



## **PUBLIC DISCLOSURE**

February 1, 2021

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

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

Office of the Comptroller of the Currency  
Northern Ohio Field Office  
200 Public Square Suite 1610  
Cleveland, OH 44144-2301

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

<b>OVERALL CRA RATING .....</b>	<b>3</b>
<b>DESCRIPTION OF INSTITUTION.....</b>	<b>4</b>
<b>SCOPE OF THE EVALUATION .....</b>	<b>5</b>
<b>DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW .....</b>	<b>6</b>
<b>STATE RATING .....</b>	<b>7</b>
STATE OF OHIO .....	7
<b>STATE RATING .....</b>	<b>32</b>
STATE OF PENNSYLVANIA .....	330
<b>APPENDIX A: SCOPE OF EXAMINATION .....</b>	<b>A-1</b>
<b>APPENDIX B: SUMMARY OF STATE RATINGS.....</b>	<b>B-1</b>
<b>APPENDIX C: DEFINITIONS AND COMMON ABBREVIATIONS .....</b>	<b>C-1</b>
<b>APPENDIX D: TABLES OF PERFORMANCE DATA .....</b>	<b>D-1</b>

## Overall CRA Rating

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

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

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

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

The major factors that support this rating include:

- The Lending Test rating is based on overall lending in the state of Ohio. The rating is based on a high level of lending in assessment areas (AAs), excellent lending activity, adequate geographic distribution of home mortgage and small loans to businesses, good distribution of home mortgage loans among borrowers of different incomes and small business loans among business of different sizes, and an adequate level of community development (CD) loans.
- The Investment Test rating is based on an overall adequate level of CD investments in the state of Ohio.
- The Service Test rating is based on the bank's retail services being reasonably accessible to geographies and individuals of different income levels and a good level of CD services in the state of Ohio.
- The bank offered several innovative and flexible loan programs that focused on making home ownership affordable and promoting small businesses, which had a positive impact on the bank's lending performance in the state of Ohio. Additionally, the bank showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 pandemic by providing loan modification opportunities such as extensions and deferrals and participating in the Small Business Administration's (SBA's) Paycheck Protection Program (PPP).

### Lending in Assessment Area

A high percentage of the bank's loans are within its AAs. During the evaluation period, the bank originated and purchased 65.5 percent by number and 62.0 percent by dollar of its total loans inside the bank's AAs. This analysis is performed at the bank level rather than the AA level. This level of lending had a positive

impact on the bank's overall geographic distribution of lending by income level of geography.

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										
2017	742	69.0	334	31.0	1,076	98,619	59.2	67,910	40.8	166,529
2018	1,159	74.2	402	25.8	1,561	145,514	70.3	61,619	29.7	207,133
2019	1,299	75.2	429	24.8	1,728	166,899	65.9	86,423	34.1	253,322
2020	1,744	70.6	727	29.4	2,471	271,377	64.1	152,158	35.9	423,535
<b>Subtotal</b>	<b>4,944</b>	<b>72.3</b>	<b>1,892</b>	<b>27.7</b>	<b>6,836</b>	<b>682,408</b>	<b>65.0</b>	<b>368,110</b>	<b>35.0</b>	<b>1,050,518</b>
Small Business										
2017	440	54.1	374	45.9	814	50,417	57.0	38,043	43.0	88,460
2018	501	55.0	410	45.0	911	62,043	53.9	53,019	46.1	115,062
2019	430	46.7	490	53.3	920	60,259	55.3	48,644	44.7	108,903
2020	1,585	61.6	988	38.4	2,573	154,372	58.0	111,824	42.0	266,196
<b>Subtotal</b>	<b>2,956</b>	<b>56.7</b>	<b>2,262</b>	<b>43.3</b>	<b>5,218</b>	<b>327,091</b>	<b>56.5</b>	<b>251,530</b>	<b>43.5</b>	<b>578,621</b>
<b>Total</b>	<b>7,900</b>	<b>65.5</b>	<b>4,154</b>	<b>34.5</b>	<b>12,054</b>	<b>1,009,499</b>	<b>62.0</b>	<b>619,640</b>	<b>38.0</b>	<b>1,629,139</b>
<i>Source: Bank data. Evaluation Period: 1/1/2017 - 12/31/2020. Due to rounding, totals may not equal 100.0%</i>										

## Description of Institution

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

According to the Report of Condition and Income, the bank's assets totaled \$3.06 billion as of December 31, 2020. As of year-end 2019 and 2018, respectively, the bank's assets totaled \$2.43 billion and \$2.31 billion. The bank offers traditional loan products, which include home mortgage, commercial, commercial real estate, small business, agricultural, home equity lines of credit (HELOCs), and consumer loans. During 2020, the bank offered PPP loans through the SBA. FNB's principal lines of business are the origination of residential home mortgage and business loans.

The bank's loan portfolio grew 45.9 percent during the evaluation period. As of December 31, 2020, the bank's loan portfolio totaled \$2.08 billion, 68.2 percent of which was secured by real estate. The loan portfolio is comprised of 29.7 percent nonfarm nonresidential properties, 25.6 percent residential mortgages, 18.6 percent commercial and industrial loans, 11.2 percent agricultural loans, 9.9 percent consumer loans, 2.5 percent multi-family loans, and 2.5 percent other loans.

FNB's consumer deposit related products and services include checking, savings, money market accounts, certificates of deposit, individual retirement accounts, online and telephone banking, mobile banking, night depository, automated teller machine (ATM) services, and safe deposit boxes. Business related products and services include checking, savings, business money market accounts, treasury management services, cash management, remote deposit capture, online banking, and night depository.

During the evaluation period, FNB had five AAs in Ohio and one AA in Pennsylvania, which are contiguous. In January 2020, the bank merged with Geauga Savings Bank, which added a new AA that included three counties in the Cleveland-Elyria, Ohio Metropolitan Statistical Area (MSA). The bank's primary AA is identified as the Mahoning, Ohio AA which includes portions of Mahoning and Trumbull counties and is part of the Youngstown-Warren-Boardman MSA. FNB's secondary AA is Wayne and includes all of Wayne County and portions of Holmes County and is not part of an MSA. The bank's other Ohio AAs include portions of Stark, Columbiana and Medina Counties. Stark County, identified as the Stark AA, is part of the Canton-Massillon, Ohio MSA. Columbiana County, which is identified as the Columbiana AA, is not part of an MSA. Medina County, which is identified as the Medina AA, is part of the Cleveland-Elyria, Ohio MSA. The Pennsylvania AA consists of portions of Beaver County, which is part of the Pittsburgh, Pennsylvania MSA. The bank exited this AA during the evaluation period.

There are no legal, financial, or other factors impeding FNB's ability to help meet the credit needs of the AAs. The bank received a "Satisfactory" rating on their previous CRA performance evaluation dated February 5, 2018.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

This performance evaluation assesses FNB's record of meeting the credit needs of its AAs. We performed a full-scope review using Large Bank CRA examination procedures, which include a lending test and a community development (CD) test. This is the first evaluation where FNB is being evaluated as a large bank. The lending test evaluates the bank's record of meeting the credit needs of the bank's AAs through the bank's home mortgage and small business lending activities. The CD test evaluates the bank's responsiveness to CD needs in the AA, through qualified lending, investments and donations, and services. The evaluation period for lending and CD activity covers January 1, 2017, through December 31, 2020.

We evaluated FNB's lending performance based on its primary loan products, which include home mortgage loans and small loans to businesses. While the bank offers multifamily, home equity, consumer installment and farm loans, these products are not a primary focus for the bank. As a result, we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful. However, we did consider any multi-family loans that qualify as CD loans, as part of our CD lending assessment.

### Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state were selected for a full-scope review. For Ohio, we selected the bank's Mahoning, Wayne, Columbiana and Stark AAs for full-scope reviews, as these areas have a majority of the bank's deposits and branch offices. In Pennsylvania, we selected the bank's only AA, Beaver County for a full-scope review, although it only has one branch and accounts for 1.2 percent of bank deposits. Refer to the "Scope" section under each State Rating section

for details regarding how full-scope AAs were selected. Refer to Appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

FNB's overall rating is based on its state of Ohio performance as it represents the bank's most significant markets in terms of deposits concentrations, branch distribution and reportable loans. Further, the bank's decision to focus the delivery of banking products in Ohio, resulted in the closure of the Beaver County, Pennsylvania office during the evaluation period and exiting of that market. The bank is also headquartered in Canfield, Ohio. The state ratings are based primarily on those areas that received full-scope reviews. However, for the state of Ohio rating, we placed more weight on the bank's performance in the Mahoning and Wayne AAs. These AAs represented the bank's largest markets with the most predominant deposit concentrations, lending activity, and branch distribution. Refer to the "Scope" section under each State for details regarding how the areas were weighted in arriving at the respective ratings.

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

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution's lending performance) 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

<b>CRA rating for the State of Ohio:</b>	Satisfactory
<b>The Lending Test is rated:</b>	High Satisfactory
<b>The Investment Test is rated:</b>	Low Satisfactory
<b>The Service Test is rated:</b>	High Satisfactory

The major factors that support this rating include:

- Lending activity reflects excellent responsiveness to meeting the credit needs of the bank's AAs.
- The bank's geographic distribution of home mortgage loans and small loans to businesses is adequate within its AAs.
- The bank distribution of home mortgage loans among individuals of different income levels and small loans to businesses of different sizes is good.
- The bank uses innovative and/or flexible lending practices in order to serve AA credit needs.
- The bank's CD investments represent an adequate responsiveness to AA needs.
- The bank's CD services represent a good responsiveness to AA needs.
- The bank's products and service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.

### Description of Institution's Operations in Ohio

During the evaluation period, FNB operated 35 branch offices throughout its five AAs. Fourteen branch offices are located in the Mahoning AA, which includes the main office and holding company location. The bank also has ten branch locations within the Wayne AA, five branches in the Columbiana AA, four branches in the Stark AA and two branches in the Medina AA. In August 2019, FNB closed one branch and opened one branch in the Wayne AA.

All branch offices are open relatively the same hours and days. Each office, except for one located in the Mahoning AA, offers deposit taking ATM services onsite, with some providing deposit imaging capabilities. An interactive teller machine is also located in the Canfield Wealth Management building. The bank had four co-branded stand-alone ATMs, which are owned and serviced through a non-affiliated agency. These ATMs are located in grocery stores in the Columbiana AA. Drive-through services are available at all branch offices with the exception of one branch in the Mahoning AA and one in the Stark AA, and all branch offices offer night depository services.

**Mahoning AA**

<b>Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Mahoning 2017-2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	80	6.3	23.8	46.3	23.8	0.0
Population by Geography	311,599	4.2	18.4	46.7	30.7	0.0
Housing Units by Geography	147,181	4.2	19.1	47.5	29.1	0.0
Owner-Occupied Units by Geography	91,692	2.4	14.3	49.1	34.3	0.0
Occupied Rental Units by Geography	41,278	6.7	27.3	45.6	20.4	0.0
Vacant Units by Geography	14,211	8.9	26.8	43.1	21.2	0.0
Businesses by Geography	19,323	3.6	14.2	38.0	44.2	0.0
Farms by Geography	606	1.5	9.9	45.7	42.9	0.0
Family Distribution by Income Level	82,806	19.6	18.2	20.5	41.7	0.0
Household Distribution by Income Level	132,970	23.1	15.8	17.8	43.3	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$103,044
			Median Gross Rent			\$638
			Families Below Poverty Level			12.0%
<i>Source: 2015 ACS and 2019 D&amp;B data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Mahoning AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income census tracts (CTs). Mahoning is FNB's primary AA and is comprised of contiguous portions of both Mahoning and Trumbull Counties. The AA in Mahoning County excludes the northeastern corner of the county, while the AA in Trumbull County only includes the southwest portion of the county. Based on 2015 American Community Survey (ACS) data, the AA consists of 80 CTs and includes five low-income, 19 moderate-income, 37 middle-income, and 19 upper-income CTs.

The AA is highly competitive, with a mixture of community banks and large banks serving the area. Per the June 30, 2020, Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report, 14 institutions operate in the AA, maintaining 115 offices. This does not include credit unions or other financial services providers. FNB ranked third in terms of deposit market share, with 13.8 percent, or \$1.3 billion of insured deposits. The largest competitors for deposits include Huntington National Bank, Premier Bank, JP Morgan Chase, PNC Bank and TCF National Bank, which hold a combined 69.6 percent of the deposit market. Almost 54.0 percent of the bank's total deposits are located in the Mahoning AA.

Significant competition for loans exists in the AA. Based on 2019 aggregate mortgage loan data, FNB ranked fourth out of 279 lenders originating home mortgage loans within the AA, with a 5.4 percent market share. The top five business lenders are large banks, which account for 55.7 percent of the business lending in the AA. According to 2019 aggregate small business data, FNB ranked ninth out of 86 lenders originating business loans in the AA, with a 3.8 percent market share.



A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2020 Dun & Bradstreet (D&B) data, 80.9 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 62.1 percent of businesses have fewer than five employees. Only 2.5 percent of businesses are headquartered in the AA, while 85.8 percent operate from a single location. Major employers include ValleyCare Health System, Mercy Health, Youngstown Air Reserve Station, Alorica, and Youngstown State University.

Economic conditions in the AA prior to the COVID-19 pandemic lagged behind the state of Ohio. The unemployment level at the beginning of 2017 for the AA was 7.7 percent, decreasing to 5.2 percent as of year-end 2019. In comparison, the Ohio unemployment rate ranged from 6.2 percent in the beginning of 2017 to 3.9 percent in at the end of 2019. The AA is now struggling to recover after the COVID-19 pandemic recession. At its peak, the AA’s unemployment rate was 20.2 percent, and remained over ten percent for six months in 2020. At the end of 2020 the AA’s unemployment rate of 6.6 percent still exceeded the Ohio rate of 5.3 percent. Per Moody’s Analytics, the unemployment rate would be considerably higher if not for labor force contraction. Additionally, the area experienced a 20.0 percent drop in the labor force over the last two decades, exceeding every other Ohio metropolitan area. This along with a heavy reliance on manufacturing, exposes the AA to job losses.

We conducted two community contacts, both national non-profit organizations specializing in social services for low- and moderate-income families, to determine the credit and CD needs in the AA. There is a high level of competition in the AA from larger banks, such as Huntington and First National Bank of Pennsylvania, to participate, lend, or invest in CD activities. The contact provided detailed opportunities for bank involvement. Specifically, they identified affordable housing needs and utility assistance as well as funds for food and emergency assistance, reliable transportation, living wage jobs, and funds for healthcare assistance.

**Wayne AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Canfield Wayne Holmes AA 2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	36	0.0	11.1	61.1	25.0	2.8
Population by Geography	140,819	0.0	9.0	69.5	20.7	0.7
Housing Units by Geography	53,462	0.0	9.8	67.4	22.6	0.2
Owner-Occupied Units by Geography	37,146	0.0	6.5	69.2	24.1	0.1
Occupied Rental Units by Geography	12,871	0.0	17.3	64.4	18.0	0.3
Vacant Units by Geography	3,445	0.0	17.1	59.4	22.9	0.6
Businesses by Geography	8,261	0.0	9.3	70.1	20.5	0.1
Farms by Geography	763	0.0	3.1	68.7	28.2	0.0
Family Distribution by Income Level	36,438	15.7	18.5	22.0	43.8	0.0
Household Distribution by Income Level	50,017	18.1	15.2	19.5	47.2	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$141,889
			Median Gross Rent			\$653
			Families Below Poverty Level			9.4%

*Source: 2015 ACS and 2019 D&B data. Due to rounding, totals may not equal 100.0%. (\*) The NA category consists of geographies that have not been assigned an income classification.*

The Wayne AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income CTs. The AA is comprised of all of Wayne County and contiguous portions of the northern tier of Holmes County CTs. Based on 2015 ACS data, the AA consists of 36 CTs and includes no low-income, four moderate-income, 22 middle-income, and nine upper-income CTs. One CT has no income designation.

Competition for deposits in the AA is considerable, with a mixture of community banks and large banks serving the area. Per the June 30, 2020, FDIC Deposit Market Share Report, 13 institutions operate 46 offices in the AA which does not include credit unions or other financial services providers. FNB ranked second in terms of deposit market share, with 18.3 percent, or \$441.9 million of insured deposits. The largest competitors for deposits include Huntington National Bank, Wayne Savings Bank, JP Morgan Chase, and PNC Bank, which hold a combined 60.3 percent of the deposit market. Just over 25.0 percent of the bank's total deposits are located in the Wayne AA.

Significant competition for loans exists in the AA. Based on 2019 aggregate mortgage loan data, FNB ranked third out of 216 lenders originating home mortgage loans within the AA, with a 9.6 percent market share. The top four business lenders are large banks, which account for 54.5 percent of the business lending in the AA. According to 2019 aggregate small business data, FNB ranked fifth out of 59 lenders originating business loans in the AA, with a 7.9 percent market share.

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2020 D&B data, 83.2 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 66.7 percent of businesses have fewer than five employees. Only 2.4 percent of businesses are headquartered in the AA, while 88.9 percent operate from a single location. Major employers include J.M. Smucker Company, Schaeffler, Wooster Community Hospital, the College of Wooster, and Buehler's Fresh Foods.

Economic conditions are better in the AA than the rest of the state. The unemployment level at the beginning of 2017 for the AA was 5.0 percent, decreasing to 3.1 percent as of year-end 2019. In comparison, the Ohio unemployment rate ranged from 6.2 percent in the beginning of 2017 to 3.9 percent at the end of 2019. While the effects of the COVID-19 pandemic are felt statewide, the AA's unemployment rate continued to be lower than the state level. During 2020 the highest unemployment rate in the AA was 11.7 percent, and recorded only one month over ten percent, while the state unemployment rate peaked at 16.7 percent and remained over ten percent for three months. At the end of 2020 the AA's unemployment rate was 3.8 percent compared to the state of Ohio rate of 5.3 percent.

We conducted two community contacts, both national non-profits, to determine the credit needs in the AA. One specializing in affordable housing and social services for low- and moderate-income families, and the other which addresses homelessness and affordable housing. Significant competition exists in the AA from larger banks, such as PNC Bank, Key Bank, and Huntington Bank, to participate, lend, or invest in CD activities. Based on community contact information, there are various opportunities to make CD investments and conduct CD services within the AA. They indicated the highest needs include homeownership and financial literacy, mortgages for lease-purchase homes, rehabilitation project lending for affordable housing, and general operating support. Other needs include small dollar loans for auto purchase and emergency auto repairs, funding for Head Start programs and transportation grants.

**Columbiana AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Canfield Columbiana AA 2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	22	0.0	13.6	72.7	13.6	0.0
Population by Geography	97,617	0.0	8.7	79.0	12.3	0.0
Housing Units by Geography	43,323	0.0	8.8	78.5	12.7	0.0
Owner-Occupied Units by Geography	27,494	0.0	6.2	80.4	13.4	0.0
Occupied Rental Units by Geography	11,400	0.0	12.6	76.8	10.6	0.0
Vacant Units by Geography	4,429	0.0	15.2	71.1	13.7	0.0
Businesses by Geography	5,019	0.0	5.0	78.5	16.5	0.0
Farms by Geography	297	0.0	1.0	79.1	19.9	0.0
Family Distribution by Income Level	26,306	21.0	18.7	21.6	38.7	0.0
Household Distribution by Income Level	38,894	24.0	16.3	18.8	40.9	0.0
Median Family Income Non-MSAs - OH		\$55,785	Median Housing Value			\$101,984
			Median Gross Rent			\$609
			Families Below Poverty Level			11.4%
<i>Source: 2015 ACS and 2019 D&amp;B data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Columbiana AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income CTs. The AA is comprised of all but two CTs in Columbiana County. Based on 2015 ACS data, the AA consists of 22 CTs and includes no low-income, three moderate-income, 16 middle-income, and three upper-income CTs.

Significant competition for deposits in the AA exists, with a mixture of community banks and large banks serving the area. Per the June 30, 2020, FDIC Deposit Market Share Report, 10 institutions operate 34 offices in the AA which does not include credit unions or other financial services providers. FNB ranked third in terms of deposit market share, with 15.5 percent, or \$279.7 million of insured deposits. The largest competitors for deposits include Huntington National Bank, Premier Bank, JP Morgan Chase, and PNC Bank, which hold a combined 65.3 percent of the deposit market. Just over 12.0 percent of the bank's total deposits are located in the Columbiana AA.

Loan competition in the AA is strong. Based on 2019 aggregate mortgage loan data, FNB ranked third out of 190 lenders originating home mortgage loans within the AA, with a 7.2 percent market share. The bank also ranked third out of 58 lenders originating business loans in the AA, with a 7.7 percent market share according to 2019 aggregate small business data.

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2020 D&B data, 81.2 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 63.8 percent of businesses have fewer than five employees. Only 2.4 percent of businesses are headquartered in the AA, while 86.4 percent operate from a single location. Major employers include American Standard Inc., East Liverpool City Hospital, Freshmark Inc., Hall China Company, and Salem Community Hospital.

Economic conditions in the AA prior to the COVID-19 pandemic lagged behind the state of Ohio. The unemployment level at the beginning of 2017 for the AA was 7.8 percent, decreasing to 4.4 percent as of year-end 2019. In comparison, the Ohio unemployment rate ranged from 6.2 percent in the beginning of 2017 to 3.9 percent in at the end of 2019. The AA is trying to recover from the aftereffects of the COVID-19 pandemic. At its peak, the AA’s unemployment rate was 20.5 percent, and remained over ten percent for five months in 2020. At the end of 2020 the AA’s unemployment rate of 6.2 percent still exceeded the state of Ohio rate of 5.3 percent.

We conducted one community contact, a national non-profit specializing in social services and home repair assistance for low- and moderate-income families, to determine the credit and CD needs in the AA. Significant competition exists in the AA from larger banks, such as Bank of America, JP Morgan Chase, and PNC Bank, to participate, lend, or invest in CD activities. Based on community contact information, there are various opportunities to make CD investments and conduct CD services within the AA. The contact indicated the highest needs include homeownership and financial counseling, investment in rehabilitation projects to spur economic growth, and grants for the organization's general operating support.

**Stark AA**

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Canfield Stark AA 2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	53	3.8	13.2	64.2	18.9	0.0
Population by Geography	235,145	1.6	10.8	65.3	22.4	0.0
Housing Units by Geography	104,998	1.9	11.4	65.8	20.9	0.0
Owner-Occupied Units by Geography	66,192	0.8	7.8	67.3	24.1	0.0
Occupied Rental Units by Geography	29,809	3.3	17.5	62.6	16.6	0.0
Vacant Units by Geography	8,997	5.4	17.8	65.5	11.3	0.0
Businesses by Geography	14,562	1.2	6.9	66.4	25.5	0.0
Farms by Geography	433	0.5	3.5	76.7	19.4	0.0
Family Distribution by Income Level	61,833	17.2	18.3	22.1	42.4	0.0
Household Distribution by Income Level	96,001	21.8	16.4	18.6	43.2	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Housing Value			\$124,337
			Median Gross Rent			\$692
			Families Below Poverty Level			8.8%
<i>Source: 2015 ACS and 2019 D&amp;B data. Due to rounding, totals may not equal 100.0%. (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

The Stark AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income CTs. The AA is comprised of two separate portions of Stark County. The largest portion of the AA includes 46 contiguous CTs that covers the western portion of the county. The second area consists of seven CTs located in the northeastern corner of the county surrounding its Alliance, Ohio branch office.

Based on 2015 ACS data, the AA consists of two low-income, seven moderate-income, 34 middle-income, and ten upper-income CTs.

Competition for deposits in the AA is considerable, with a mixture of community banks and large banks serving the area. Per the June 30, 2020, FDIC Deposit Market Share Report, 16 institutions operate 103 offices in the AA which does not include credit unions or other financial services providers. FNB ranked tenth in terms of deposit market share, with 2.0 percent, or \$160.5 million of insured deposits. The largest competitors for deposits include Huntington National Bank, JP Morgan Chase, Key Bank, Citizens Bank, and PNC Bank, which hold a combined 80.1 percent of the deposit market. Just over 6.5 percent of the bank's total deposits are located in the Stark AA.

Significant competition for loans exists in the AA. Based on 2019 aggregate mortgage loan data, FNB ranked 14th out of 282 lenders originating home mortgage loans within the AA, with a 1.8 percent market share. The top five mortgage lenders are large banks and mortgage companies who total 37.4 percent of the market. According to 2019 aggregate small business data, FNB ranked tenth out of 83 lenders originating business loans in the AA, with a 2.3 percent market share. The top five business lenders are large banks, which account for 60.5 percent of the business lending in the AA.

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2020 D&B data, 83.2 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 62.8 percent of businesses have fewer than five employees. Only 2.3 percent of businesses are headquartered in the AA, while 87.6 percent operate from a single location. Major employers include Aultman Hospital, Timken Steel, Mercy Medical Center, Freshmark, Inc., and Diebold.

Economic conditions in the AA prior to the COVID-19 pandemic lagged slightly behind the state of Ohio. The unemployment level at the beginning of 2017 for the AA was 6.7 percent, decreasing to 4.5 percent as of year-end 2019. In comparison, the Ohio unemployment rate ranged from 6.2 percent in the beginning of 2017 to 3.9 percent in at the end of 2019. Like the rest of the state, the AA is trying to recover from the aftereffects of the COVID-19 pandemic. At its peak, the AA's unemployment rate was 16.2 percent, and remained over ten percent for three months in 2020, which mirrored the state's performance. At the end of 2020, the AA's unemployment rate of 5.2 percent exceeded the state of Ohio rate of 5.3 percent.

We conducted one community contact, a national non-profit organization specializing in social services and home repair assistance for low- and moderate-income families, to determine the credit and CD needs in the AA. There is a high level of competition in the AA from larger banks, such as Citizens Bank, Key Bank, and Huntington Bank, to participate, lend, or invest in CD activities. The contact provided detailed opportunities for bank involvement. Specifically, they identified needs for housing payment assistance, food and healthcare access due to the COVID-19 pandemic, additional capitalization for their micro-financing loan pool, bankers to serve on its loan review committee, financial literacy grant support, and workforce development program support.

## **Scope of Evaluation in Ohio**

We selected the bank's Mahoning, Wayne, Columbiana, and Stark AAs for full-scope reviews as these AAs have a majority of the bank's deposits and branch offices. Refer to *Appendix A* for additional information regarding areas receiving full-scope reviews.

We evaluated FNB's performance in the state of Ohio by analyzing the bank's lending performance and

its CD lending, investment, and service performance from January 1, 2017, through December 31, 2020. We gave more consideration to the bank's performance within the Mahoning and Wayne AAs based upon the number of branch offices and total deposits serviced, when determining the overall state rating. Additionally, Mahoning is the bank's primary AA and where the bank is headquartered. We completed a limited scope review of the Medina AA, as this represents the bank's smallest market based on loans originated and includes only two branches that hold and service 1.8 percent of total deposits. We did not evaluate the bank's performance within the Cuyahoga AA resulting from the Geauga Bank merger, as this AA was new to the bank in 2020 and we did not have a full year of data to analyze.

The procedures used to assess FNB's lending performance focused on the bank's primary lending products. Based on the bank's strategic plan, reports of lending activities over the review period, Reports of Condition and Income, and discussions with senior management, we determined the bank's primary areas of lending focus are home mortgage and business loans. Aggregate home mortgage and small business data for 2020 was not available during this evaluation. Therefore, we compared the bank's lending performance to 2017 through 2019 demographic and aggregate data. The Office of Management and Budget (OMB) instituted changes to some MSA delineations that took effect January 1, 2019. The bank's AAs were not impacted by the OMB changes, allowing 2017 through 2020 data to be combined for analysis.

We also utilized other supporting information while evaluating FNB's CRA performance. Additional supporting information included 2015 ACS data, 2017 through 2020 bank loan data, internal bank records, FDIC deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AAs. We also considered information from community contacts to help assess the needs of the bank's AAs and the opportunities for financial institutions to lend and provide services within those areas.

## **CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO**

### **LENDING TEST**

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

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

Based on full-scope reviews, the bank's lending performance in their AAs is good.

#### **Lending Activity**

Lending activity reflects excellent responsiveness to AA credit needs.

<b>Number of Loans*</b>							
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>	<b>% State Loans</b>	<b>% State Deposits</b>
<b>Full-Scope</b>							
Mahoning	2,081	1,346	105	2	3,534	40.4	53.9
Wayne	1,498	718	533	3	2,752	31.4	25.1
Columbiana	707	460	125		1,292	14.8	12.1
Stark	591	381	90	1	1,063	12.1	6.6
<b>Limited-Scope</b>							
Medina	55	43	15		113	1.3	2.3
<b>TOTAL</b>	<b>4,932</b>	<b>2,948</b>	<b>868</b>	<b>6</b>	<b>8,754</b>	<b>100.0</b>	<b>100.0</b>

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

<b>Dollar Volume of Loans (000) *</b>							
<b>Assessment Area</b>	<b>Home Mortgage</b>	<b>Small Business</b>	<b>Small Farm</b>	<b>Community Development</b>	<b>Total</b>	<b>% State*</b>	<b>% State Deposits</b>
<b>Full-Scope</b>							
Mahoning	\$266,470	\$168,987	\$9,110	\$2,106	\$446,673	40.8	53.9
Wayne	\$231,099	\$56,766	\$51,571	\$6,022	\$345,458	31.6	25.1
Columbiana	\$75,812	\$44,053	\$9,962		\$129,827	11.9	12.1
Stark	\$99,296	\$52,081	\$7,294	105	\$158,776	14.5	6.6
<b>Limited-Scope</b>							
Medina	\$8,100	\$4,936	\$801		\$13,837	1.2	2.3
<b>TOTAL</b>	<b>\$680,777</b>	<b>\$326,823</b>	<b>\$78,738</b>	<b>\$8,233</b>	<b>\$1,094,571</b>	<b>100.0</b>	<b>100.0</b>

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

Refer to lending volume tables above for the facts and data used to evaluate the bank's lending activity.

FNB's volume of lending activity is excellent in Ohio. In drawing our overall conclusion as well as our conclusions for each AA, we considered the bank's operations which are focused on home mortgage and business lending. We also considered the bank's market presence and competition within each AA.

### **Mahoning AA**

Lending levels in the Mahoning AA reflects excellent responsiveness to AA credit needs. During the evaluation period, FNB originated 2,081 home loans totaling \$266.5 million and 1,346 small business loans totaling \$169.0 million. Based on the FDIC Market Share report from June 30, 2020, there were 14 deposit-taking institutions with one or more banking offices in the AA. The bank ranked third with a deposit market share of 13.8 percent.

Given the competition from other reporting lenders in the AA, FNB's lending market share is excellent compared to its deposit market share in the AA. Aggregate home mortgage data for 2019 indicates the bank's 5.4 percent market share ranked fourth among 279 lenders that reported home mortgage loans. This ranking is the equivalent to the top two percent of lenders in the AA. Aggregate business lending data for 2019 shows the bank's 3.8 percent market share ranked ninth among 86 lenders that reported business loans. This ranking is the equivalent to the top ten percent of reporting lenders in the AA.

### **Wayne AA**

Lending levels in the Wayne AA reflect excellent responsiveness to AA credit needs. During the evaluation period, FNB originated 1,498 home mortgage loans totaling \$231.1 million and 718 small business loans totaling \$56.8 million. Based on the FDIC Market Share report from June 30, 2020, there were 13 deposit-taking institutions with one or more banking offices in the AA. The bank ranked second with a deposit market share of 18.3 percent.

Given the competition from other reporting lenders in the AA, FNB's lending market share is excellent compared to its deposit market share in the AA. Aggregate home mortgage data for 2019 indicates the bank's 9.6 percent market share ranked third among 216 lenders that reported home mortgage loans. This ranking is the equivalent to the top two percent of lenders in the AA. Aggregate business lending data for 2019 shows the bank's 7.9 percent market share ranked fifth among 59 lenders that reported business loans. This ranking is the equivalent to the top eight percent of reporting lenders in the AA.

### **Columbiana AA**

Lending levels in the Columbiana AA reflect excellent responsiveness to AA credit needs. During the evaluation period, FNB originated 707 home mortgage loans totaling \$75.8 million and 460 small business loans totaling \$44.1 million. Based on the FDIC Market Share report from June 30, 2020, there were 10 deposit-taking institutions with one or more banking offices in the AA. The bank ranked third with a deposit market share of 15.5 percent.

Given the competition from other reporting lenders in the AA, FNB's lending market share is excellent compared to its deposit market share in the AA. Aggregate home mortgage data for 2019 indicates the bank's 7.2 market share ranked third among 190 lenders that reported home mortgage loans. This ranking is the equivalent to the top two percent of lenders in the AA. Aggregate business lending data for 2019 shows the bank's 7.7 percent market share ranked third among 58 lenders that reported business loans. This ranking is the equivalent to the top five percent of reporting lenders in the AA.

### **Stark AA**

Lending levels in the Stark AA reflect excellent responsiveness to AA credit needs. During the evaluation period, FNB originated 591 home mortgage loans totaling \$99.3 million and 381 small business loans totaling \$52.1 million. Based on the FDIC Market Share report from June 30, 2020, there were 16 deposit-taking institutions with one or more banking offices in the AA. The bank ranked tenth with a deposit market share of 2.0 percent.

Given the competition from other reporting lenders in the AA, FNB's lending market share is excellent compared to its deposit market share in the AA. Aggregate home mortgage data for 2019 indicates the bank's 1.8 percent market share ranked 14<sup>th</sup> among 282 lenders that reported home mortgage loans. This ranking is the equivalent to the top five percent of lenders in the AA. Aggregate business lending data for 2019 shows the bank's 2.3 percent market share ranked tenth among 83 lenders that reported business loans. This ranking is the equivalent to the top twelve percent of reporting lenders in the AA.



## Distribution of Loans by Income Level of the Geography

FNB exhibits an adequate geographic distribution of loans in its AAs.

### *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.

In determining our ratings, we weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from larger institutions, the number of low- and moderate-income CTs, branch presence, area demographics, and the location of the majority of owner-occupied housing. We also considered the bank's rank in market share within low- and moderate-income CTs.

### **Mahoning AA**

The overall geographic distribution of home mortgage loans in the Mahoning AA is adequate.

In our analysis, we considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to the 2015 ACS, those CTs contained 83.4 percent of owner-occupied housing units in the AA. Additionally, the percentage of renter occupied housing units in low- and moderate-income CTs is 44.8 percent and 40.0 percent, respectively. Vacant housing units account for 20.3 percent of units in low-income CTs and 13.5 percent of units in moderate-income CTs. And while single family homes comprise 79.9 percent and 82.0 percent of housing units in low- and moderate-income CTs, respectively, only 34.9 percent in low-income CTs and 46.5 percent in moderate-income CTs are owner occupied. In low-income CTs, this represents only 2,165 housing units.

During the assessment period, the proportion of FNB's home mortgage loans in low-income CTs at 0.1 percent is below the percentage of owner-occupied housing units of 2.4 percent, but very near the aggregate home mortgage lending percentage of 0.3 percent. Likewise, the proportion of the bank's home mortgage lending in moderate-income CTs at 5.9 percent is below the owner-occupied housing unit percentage of 14.3 percent but near the aggregate home mortgage lending percentage of 8.8 percent.

FNB's rank and market share for lending in low-income CTs was good in 2018 and 2019. Based on 2018 aggregate data, the bank ranked 12th out of 29 lenders with 3.2 percent market share in low-income CTs. The bank improved in 2019, ranking fifth out of 29 lenders with a 5.0 percent market share. FNB's rank and market share for lending in moderate-income CTs was good in 2018 and 2019. In 2018, the bank ranked 11th out of 119 lenders with 2.8 percent market share in moderate-income CTs. FNB increased its market share in 2019, ranking third out of 114 lenders at 4.6 percent of the market. This corresponds to the top three percent of reporting lenders in the AA. Overall, the rankings show the bank is actively lending within low- and moderate-income CTs.

### **Wayne AA**

The overall geographic distribution of home mortgage loans in the Wayne AA is adequate.

In our analysis, we considered that the AA has no low-income CTs and that better lending opportunities exist in upper- and middle-income CTs within the AA. According to the 2015 ACS, those CTs contained 93.4 percent of owner-occupied housing units in the AA. In addition, the percentage of renter occupied

housing units in moderate-income CTs is 42.5 percent, and vacant housing units account for 11.2 percent of units. We also considered that while 87.2 percent of the housing units located in moderate-income CTs are single family homes, this corresponds to only 2,118 owner-occupied units.

The percentage of FNB's home mortgage lending in moderate-income CTs at 3.1 percent is below, but near, the owner-occupied housing unit percentage of 6.5 percent and the aggregate home mortgage lending percentage of 7.7 percent. The bank's rank and market share for lending in moderate-income CTs was good in 2018 and 2019. Based on 2018 aggregate data, the bank ranked second out of 69 lenders with 6.6 percent market share in moderate-income CTs. In 2019, the bank ranked seventh out of 77 lenders with a 3.8 percent market share. This demonstrates the bank is actively lending within moderate-income CTs.

### **Columbiana AA**

The overall geographic distribution of home mortgage loans in the Columbiana AA is adequate.

In our analysis, we considered that the AA has no low-income CTs and that better lending opportunities exist in upper- and middle-income CTs within the AA. According to the 2015 ACS, those CTs contained 93.8 percent of owner-occupied housing units in the AA. In addition, the percentage of renter occupied housing units in moderate-income CTs is 37.7 percent, and vacant housing units account for 17.7 percent of units. We also considered that while 91.5 percent of the housing units located in moderate-income CTs are single family homes, this corresponds to only 1,551 owner-occupied units.

The percentage of FNB's home mortgage lending in moderate-income CTs at 2.3 percent is below the owner-occupied housing unit percentage of 6.2 percent but very near the aggregate home mortgage lending percentage of 2.8 percent. The bank's rank and market share for lending in moderate-income CTs was good in 2018 and 2019. Based on 2018 aggregate data, the bank ranked sixth out of 38 lenders with 4.7 percent market share in moderate-income CTs. In 2019, the bank's rank improved to fourth out of 128 lenders with a 7.8 percent market share.

### **Stark AA**

The overall geographic distribution of home mortgage loans in the Stark AA is good.

In our analysis, we considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to the 2015 ACS, those CTs contained 91.4 percent of owner-occupied housing units in the AA. Additionally, the percentage of renter occupied housing units in low- and moderate-income CTs is 49.5 percent and 43.6 percent, respectively. Vacant housing units account for 25.0 percent of units in low-income CTs and 13.4 percent of units in moderate-income CTs. And while single family homes comprise 80.8 percent and 91.1 percent of housing units in low- and moderate-income CTs, respectively, only 25.5 percent in low-income CTs and 43.0 percent in moderate-income CTs are owner occupied housing units. In low-income CTs, this represents only 499 homes.

During the evaluation period, the proportion of the bank's home mortgage loans in low-income CTs at 0.3 percent is slightly below the percentage of owner-occupied housing units of 0.8 percent, and equal to the aggregate home mortgage lending percentage. The proportion of the bank's home mortgage lending in moderate-income CTs at 5.4 percent is below the owner-occupied housing unit percentage of 7.8 percent but exceeds the aggregate home mortgage lending percentage of 4.9 percent.

FNB ranked last in market share for lending in low-income CTs in 2018 and did not make any loans in moderate-income CTs in 2019. Based on 2018 aggregate data, the bank originated one loan in low-income CTs. However, reporting banks made only 41 total loans during 2018, while 16 other banks originated only one loan as well. FNB's rank and market share for lending in moderate-income CTs was good in 2018 and 2019. In 2018, the bank ranked ninth out of 92 lenders with 2.4 percent market share in moderate-income CTs. FNB increased its market share in 2019, ranking eighth out of 100 lenders at 2.5 percent of the market.

### ***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.

Overall, the bank's geographic distribution of small loans to businesses is adequate. In determining our conclusions, we gave consideration for opportunities to lend based on the number of CTs in each income level, the level of competition, and the number of non-farm businesses located in low- and moderate-income CTs within each AA.

### **Mahoning AA**

FNB's distribution of small loans to businesses in low- and moderate-income geographies is adequate. In our analysis, we considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to 2020 D&B data, those CTs contained 82.2 percent of businesses in the AA.

The bank's proportion of small business loans at 2.7 percent in low-income CTs is below, but near, both the percentage of businesses and percentage of aggregate small business lending at 3.6 percent and 3.5 percent, respectively. The proportion of bank's small loans to businesses in moderate-income CTs at 10.6 percent is also below, but near, both the percentage of businesses at 14.4 percent and aggregate's percentage of small loans to businesses at 12.4 percent.

### **Wayne AA**

The geographic distribution of FNB's small loans to businesses in the Wayne AA is adequate. In our evaluation, we considered that the AA has no low-income CTs and that better lending opportunities exist in upper- and middle-income CTs within the AA. According to 2020 D&B data, those CTs contained 90.6 percent of businesses in the AA. The bank originated 6.5 percent of its small loans to businesses in moderate-income CTs, which is below but near both the percentage of businesses at 9.2 percent and the aggregate's small loans to business lending percentage of 9.0 percent.

### **Columbiana AA**

The geographic distribution of FNB's small loans to businesses in the Wayne AA is good. In our assessment, we considered that the AA has no low-income CTs and that better lending opportunities exist in upper- and middle-income CTs within the AA. According to 2020 D&B data, those CTs contained 95.0 percent of businesses in the AA. The bank originated 2.6 percent of its small loans to businesses in moderate-income CTs, which is below the percentage of businesses at 5.0 percent but exceeds the aggregate's small loans to businesses lending percentage of 2.2 percent.

### **Stark AA**

FNB's distribution of small loans to businesses in low- and moderate-income CTs is excellent. In our analysis, we considered that better lending opportunities exist in upper- and middle-income CTs within the AA. According to 2020 D&B data, those CTs contained 92.1 percent of businesses in the AA.

The bank's proportion of small business loans at 2.9 percent in low-income CTs exceeded both the percentage of businesses and percentage of aggregate small loans to business lending at 1.2 percent and 0.7 percent, respectively. The proportion of bank's small loans to businesses in moderate-income CTs at 8.7 percent also exceeded the percentage of businesses at 6.8 percent and aggregate's percentage of small loans to businesses at 6.4 percent.

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

We reviewed summary reports and maps, and analyzed FNB's home mortgage lending over the evaluation period to identify any gaps in the geographic distribution of loan activity. We did not identify any unexplained, conspicuous gaps.

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

FNB exhibits good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

### ***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.

In evaluating the borrower distribution of home mortgage loans, we considered the level of competition and its effect on limiting the bank's ability to lend to borrowers of different incomes, as well as the economic conditions in the AA. We also considered the percentage of families that live below the poverty level, and barriers this creates for these families to qualify for home mortgage financing.

### **Mahoning AA**

FNB's overall distribution of home mortgage loans among borrowers of different income levels throughout the Mahoning AA is good.

The proportion of home mortgage loans to low-income borrowers at 7.1 percent is near the aggregate level of lending at 8.9 percent. Though the bank's percentage of home mortgage loans is below the 19.6 percent of low-income families in the AA, the bank's level of lending in comparison to the demographic comparator is reasonable given that 12.0 percent of the families in the AA are living below the poverty level. The proportion of the bank's home mortgage loans to moderate-income borrowers at 17.9 percent was near both the percentage of moderate-income families in the AA at 18.2 percent and aggregate lending at 21.6 percent.

Additionally, FNB's overall rank and market share for lending to low- and moderate-income borrowers is good. Based on 2018 aggregate data, the bank ranked seventh out of 108 lenders with 3.9 percent market share to low-income borrowers and eighth out of 156 lenders with 3.9 percent market share to moderate-income borrowers. The bank's results were better in 2019, ranking fourth out of 110 lenders with 4.2

percent market share to low-income borrowers and sixth out of 152 lenders with 5.3 percent market share to moderate-income borrowers.

### **Wayne AA**

Overall, the distribution of FNB's home mortgage loans to borrowers of different incomes within the Wayne AA is good.

The proportion of home mortgage loans to low-income borrowers at 4.1 percent is near the aggregate level of lending at 5.5 percent. Though the bank's percentage of home mortgage loans to low-income borrowers is below the 15.7 percent of low-income families in the AA, the bank's level of lending in comparison to the demographic comparator is reasonable given that 9.4 percent of the families in the AA are living below the poverty level. The proportion of the bank's home mortgage loans to moderate-income borrowers at 27.4 percent is significantly higher than both the percentage of moderate-income families in the AA at 18.5 percent and the aggregate lending percentage at 19.3 percent.

Additionally, the bank's overall rank and market share for lending to low- and moderate-income borrowers is excellent, ranking in the top five percent of reporting lenders in the AA. Based on 2018 aggregate data, the bank ranked third out of 69 lenders with 8.2 percent market share to low-income borrowers and third out of 115 lenders with 11.7 percent market share to moderate-income borrowers. During 2019, the bank ranked fourth out of 69 lenders with 6.0 percent market share to low-income borrowers and first out of 110 lenders with 15.2 percent market share to moderate-income borrowers.

### **Columbiana AA**

The distribution of FNB's home mortgage loans to borrowers of different incomes within the Columbian AA is good.

The proportion of the bank's home mortgage loans to low-income borrowers at 9.5 percent is significantly below the percentage of low-income families in the AA at 21.0 percent. Though the bank's percentage of home mortgage loans to low-income borrowers is below the percentage of low-income families in the AA, the bank's level of lending in comparison to the demographic comparator is reasonable given that 11.4 percent of the families in the AA are living below the poverty level. The bank exceeded the aggregate level of lending percentage to low-income borrowers of 9.4 percent. Additionally, the bank's percentage of home mortgage lending to moderate-income borrowers at 21.9 percent exceeded both the percentage of moderate-income families and aggregate level of home mortgage lending percentages of 18.7 and 20.7 percent, respectively.

The bank's overall rank and market share for lending to low- and moderate-income borrowers is excellent, ranking in the top five percent of reporting lenders in the AA. Based on 2018 aggregate data, the bank ranked third out of 70 lenders with 6.6 percent market share to low-income borrowers and fourth out of 93 lenders with 6.8 percent market share to moderate-income borrowers. During 2019, the bank ranked third out of 74 lenders with 7.5 percent market share to low-income borrowers and fourth out of 95 lenders with 7.5 percent market share to moderate-income borrowers.

### **Stark AA**

The distribution of FNB's home mortgage loans to borrowers of different incomes within the Stark AA is good.

The proportion of the bank's home mortgage loans to low-income borrowers at 8.3 percent is near the aggregate level of lending at 9.1 percent. Though the bank's percentage of home mortgage loans to low-income borrowers is below the 17.2 percent of low-income families in the AA, the bank's level of lending in comparison to the demographic comparator is reasonable given that 8.8 percent of the families in the AA are living below the poverty level. The bank's percentage of home mortgage lending to moderate-income borrowers at 18.1 percent is very near both the percentage of moderate-income families and aggregate level of home mortgage lending percentages of 18.3 and 19.4 percent, respectively.

Additionally, the bank's overall rank and market share for lending to low- and moderate-income borrowers is adequate. Based on 2018 aggregate data, the bank ranked 14th out of 121 lenders with 1.6 percent market share to low-income borrowers and eighteenth out of 150 lenders with 1.1 percent market share to moderate-income borrowers. During 2019, the bank ranked 17th out of 117 lenders with 1.3 percent market share to low-income borrowers and 16th out of 148 lenders with 1.4 percent market share to moderate-income borrowers.

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

FNB's borrower distribution of small loans to businesses of different sizes is good.

Refer to Table R in *Appendix D* for the facts and data used to evaluate the bank's distribution of small loans to businesses. In evaluating the borrower distribution of loans to businesses of different sizes, we 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.

### **Mahoning AA**

The borrower distribution of FNB's small loans to small businesses in the Mahoning AA is adequate. The bank originated 31.9 percent of its small loans to businesses with revenues of \$1 million or less. In comparison, the bank's small percentage is significantly below the percentage of businesses with revenues of \$1 million or less at 80.6 percent and is slightly below the aggregate lending percentage of small loans to small businesses of 44.9 percent.

### **Wayne AA**

The borrower distribution of FNB's small loans to small businesses in the Wayne AA is good. The bank's percentage of small loans to small businesses at 52.8 percent is significantly below the percentage of small businesses in the AA that report revenues of \$1 million or less at 82.2 percent. However, the bank's percentage of small loans to small businesses exceeded the aggregate percentage of small loans to small businesses of 45.0 percent.

### **Columbiana AA**

The borrower distribution of FNB's small loans to small businesses in the Columbiana AA is good. The bank's percentage of small loans to small businesses at 43.5 percent is significantly below the percentage of small businesses in the AA that report revenues of \$1 million or less at 80.4 percent. However, the bank's percentage of small loans to small businesses is very near the aggregate percentage of small loans to small businesses of 46.9 percent.

## **Stark AA**

The borrower distribution of FNB's small loans to small businesses in the Stark AA is good. The bank's percentage of small loans to small businesses at 46.2 percent is significantly below the percentage of small businesses in the AA that report revenues of \$1 million or less at 83.0 percent. However, the bank's percentage of small loans to small businesses slightly exceeded the aggregate percentage of small loans to small businesses of 45.0 percent.

## **Community Development Lending**

During the evaluation period, FNB made an adequate level of CD loans.

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

FNB originated six qualifying CD loans totaling \$9.3 million. Below are the details regarding each loan and the AAs that benefitted. When drawing our conclusions for each AA, we considered the level of competition for CD loans within the bank's AAs from larger financial institutions and the overall economic conditions impacting the bank's ability to generate CD loans.

## **Mahoning AA**

FNB originated an adequate level of CD loans within the Mahoning AA. The bank originated two CD loans totaling approximately \$2.1 million during the evaluation period:

- A \$2.0 million construction loan to a rescue mission to build a shelter in a moderate-income CT to serve low- and moderate- income individuals who are homeless, need meals or need educational or professional services.
- A \$105,875 loan to a non-profit organization, located in a moderate-income CT, that provides affordable housing to low- and moderate-income families.

## **Wayne AA**

FNB's CD lending within the Wayne AA is good. The bank originated three CD loans totaling approximately \$6.0 million during the evaluation period:

- A \$4.6 million PPP loan to a non-profit organization that provides emotional and physical treatments to children, foster care programs, healthcare support services, and juvenile court programs for low- to moderate-income individuals.
- A \$1.3 million loan to a non-profit organization to complete construction on a community center in a moderate-income CT used to provide meals and educational services to low- and moderate-income individuals.
- A \$200,000 loan to a non-profit organization to build a multi-family housing unit for low- and moderate-income individuals.

## **Columbiana AA**

FNB's CD lending within the Columbiana County AA had a neutral impact on the bank's overall CD lending performance rating. During the evaluation period, the bank did not originate any CD loans in the AA. The lack of CD lending was a result of limited opportunities to originate CD loans within the AA and competition from other financial institutions for CD loans.

## **Stark AA**

FNB originated an adequate level of CD loans within the Stark AA. The bank originated two CD loans totaling approximately \$1.1 million during the evaluation period:

- A \$1.0 million refinance of a loan for the purchase and renovation of single-family homes to rent to low- and moderate-income individuals.
- A \$104,700 PPP loan to a non-profit organization providing services to low- and moderate-income individuals for ongoing operating support.

## **Product Innovation and Flexibility**

FNB uses innovative and/or flexible lending practices in order to serve AA credit needs. The bank offered several innovative or flexible loan programs that focused on making home ownership affordable and promoting small businesses which had a positive impact on the bank's lending performance in the state of Ohio.

The bank offers Freddie Mac's Home Possible program loan product. Additionally, the bank developed an in-house Neighborhood Affordable Home Mortgage loan program, which provides opportunities for low- and moderate-income individuals to purchase a home through use of a grant of up to \$3,000 to be used for down payment or closing costs. Underwriting fees are reduced, and borrowers are able to finance up to 97.0 percent of the purchase price of the home but must commit to living in the home for five years to avoid repayment of any portion of the grant. Between 2017 and 2020, 66 borrowers received \$98,964 in home loan assistance grants in the bank's AAs. Based on bank reports, FNB originated the following in the bank's AAs during the evaluation period:

- 98 Home Possible loans totaling \$9.2 million
- 66 FNB Affordable Housing loans totaling \$4.0 million

The bank also offers small business loans in partnership with the SBA and with the GrowNow Ohio Participant program which enables small business owners to receive a reduced interest rate when they link the loan to job growth or retention in the state of Ohio.

## COVID-19 pandemic relief

FNB showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 pandemic by providing loan modification opportunities such as extensions and deferrals and participating in the SBA's PPP program. According to bank records, the bank approved over 20,000 loan modifications during 2020. FNB also originated 1,718 PPP loans totaling \$200.4 million.



## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Medina AA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O, P, Q, and R in the state of Ohio section of *Appendix D* for the facts and data that support these conclusions.

## INVESTMENT TEST

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

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's overall performance in the Mahoning, Wayne, Columbiana and Stark AAs is adequate.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
<b>Full Review</b>										
Mahoning	0	0	24	31	24	35.3	31	.2	0	0
Wayne	0	0	0	0	0	0	0	0	0	0
Columbiana	0	0	7	10	7	10.3	10	.1	0	0
Stark	0	0	29	2,044	29	42.6	2,044	16.3	0	0
Statewide/Regional with Direct Benefit to AAs	2	4,283	6	4,168	8	11.8	8,451	83.4	3	926
<b>Limited Review</b>										
Medina	0	0	0	0	0	0	0	0	0	0

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

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

The Qualified Investment Table, shown above, set forth the information and data used to evaluate the bank's level of qualified CD investments. This table includes all CD investment, including prior period investments that remain outstanding as of our performance evaluation.

FNB made a total of 68 qualifying investments and donations, including two prior period investments, totaling \$10.5 million. This equates to 3.9 percent of total tier 1 capital as of December 31, 2020. The bank also has \$926,000 in unfunded investment commitments.

### Statewide/Regional

FNB committed \$8.5 million of investments into statewide securities. This includes a prior period investment in a Small Business Investment Company Fund (SBIC) with an outstanding value of \$2.7 million along with an additional unfunded commitment amount of \$512,000 that benefitted the bank's Wayne AA.

The bank funded four investments in Low-Income Housing Tax Credits (LIHTC), totaling \$2.7 million that benefitted their AAs. FNB previously funded another LIHTC holding a current balance of \$1.6 million

and has two unfunded commitments totaling \$414,000. The investments in the LIHTCs helped create and preserve approximately 5,800 affordable housing units benefiting low- and moderate-income geographies or individuals in the state of Ohio.

Additionally, the bank made two qualified investments in Ohio Housing Authority bonds, totaling \$1.5 million that benefitted their AAs by providing home mortgage loans to low- and moderate-income families.

### **Mahoning AA**

FNB displayed adequate responsiveness to the CD needs of the AA when giving consideration for statewide or regional CD investments. The bank made 24 Affordable Housing Grants totaling \$31,000 for down payment assistance to low- and moderate-income individuals. Specific investments targeted to this AA are low considering this is the bank's primary AA and holds 53.9 percent of bank deposits. However, as noted above, FNB funded four qualified LIHTC investments totaling \$2.7 million in a broader, statewide region, which resulted in the creation or rehabilitation of 447 affordable housing units in the bank's AAs. Of these, 213 units were within the Mahoning AA. Additionally, FNB's investments in the Ohio Housing Authority bonds also benefitted low- to moderate-income individuals within the AA.

### **Wayne AA**

FNB's responsiveness to the CD needs of the AA is adequate when giving consideration for statewide or regional investments. While FNB did not make any CD investments or donations that directly benefitted this AA, as noted above, the bank did make one prior period qualified SBIC investment with a current balance of \$2.7 million in a broader, statewide region, which benefitted the Wayne AA. Additionally, FNB's investments in the Ohio Housing Authority bonds also benefitted low- to moderate-income individuals within the AA.

### **Columbiana AA**

FNB exhibited adequate responsiveness to the AA's CD needs when giving consideration for statewide or regional investments. During the evaluation period, the bank made seven Affordable Housing Grants totaling \$10,000 for down payment assistance to low- and moderate-income individuals. As noted above, FNB made two qualified investments to the Ohio Housing Authority totaling \$1.5 million in a broader, statewide region, which benefitted low- to moderate-income individuals within the Columbiana AA.

### **Stark AA**

FNB displayed good responsiveness to the CD needs of the AA when giving consideration for statewide or regional investments. During the evaluation period, the bank made 24 Affordable Housing Grants totaling \$44,000 for down payment assistance to low- and moderate-income individuals. The bank also purchased a \$2.0 million Multi-family Structured Pass-Through Bond which is backed by 226 Freddie Mac multi-family loans, with one located in the AA. This multi-family apartment provided affordable housing for low- and moderate-income individuals. As noted above, FNB funded four qualified LIHTC investments totaling \$2.7 million in a broader, statewide region, which resulted in the creation or rehabilitation of 447 affordable housing units in the bank's AAs. Of these, 132 units were within the Stark AA. Additionally, FNB's investments in the Ohio Housing Authority bonds also benefitted low- to moderate-income individuals within the AA.

## Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, FNB's performance under the Investment Test in the Medina AA is similar to the bank's overall performance under the Investment Test in full-scope areas, when giving consideration to regional and statewide investments. As noted above, FNB funded four qualified LIHTC investments totaling \$2.7 million in a broader, statewide region, which resulted in the creation or rehabilitation of 447 affordable housing units in the bank's AAs. Of these, 102 units were within the Medina AA. Additionally, FNB's investments in the Ohio Housing Authority bonds also benefited low-to moderate-income individuals within the AA.

## SERVICE TEST

FNB's performance under the Service Test in Ohio is rated High Satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, FNB's performance in the Mahoning, Wayne, Columbiana, and Stark AAs is good.

## Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches Location of Branches by Income of Geographies (%)				Population % of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
	<b>Full-Scope</b>										
Mahoning	53.9	14	40.0	0.00	14.3	28.6	57.1	4.2	18.5	46.7	30.7
Columbiana	25.1	5	14.3	0.00	0.0	80.0	20.0	0.0	8.7	79.0	12.3
Wayne	12.1	10	28.6	0.00	10.0	70.0	20.0	0.0	9.0	69.5	20.7
Stark	6.6	4	11.4	0.00	0.0	100.0	0.0	1.3	6.0	68.0	24.7
<b>Limited Scope</b>											
Medina	2.3	2	5.7	0.00	50.0	50.0	0.0	0.0	19.6	51.3	29.3

Branch closure(s) during the review period. See Distribution of Branch Openings/Closings table for details. Data within table is based on the FDIC's Deposit Market Share Report as of June 30, 2020.

## Mahoning AA

FNB's branches are reasonably accessible to geographies and individuals of different income levels in the Mahoning AA. Overall, systems for delivering retail banking services are adequate. As shown in the table above, the bank operates 14 branch offices in the AA. Although the bank did not have any offices located within the five low-income CTs of the AA, the bank did have two offices located in moderate-income CTs and two other branches near to moderate-income CTs. Additionally, the percentage of offices located in moderate-income CTs is almost equal to the percentage of the AA's population that lives in those CTs. The bank did not open or close any branches in the Mahoning AA during the evaluation period. Branch

hours, and the level of services available, do not vary in ways that inconvenience any portion of the AA, including low- and moderate-income individuals. In addition, excluding one branch office located in Trumbull County, each office offers access to a full-service ATM. Four branches include ATMs with expanded services such as deposit imaging, while one branch has an interactive ATM. Other alternative delivery systems include online, mobile, and internet banking.

**Wayne AA**

FNB’s branches are reasonably accessible to geographies and individuals of different income levels within the Wayne AA. The AA has no low-income CTs, and only four moderate-income CTs. The majority of CTs within the AA are middle-income. The distribution of the bank’s branches is consistent with the percentage of population within each geography. Out of the 10 branches operated within the AA, one is located within a moderate-income CT and two other branches are located near moderate-income CTs. Branch hours, and the level of services available, do not vary in ways that inconvenience any portion of the bank’s AA including low- and moderate-income individuals. Each office offers access to a full-service ATM, with one branch ATM including deposit imaging. Other alternative delivery systems include online, mobile, and internet banking.

**Columbiana AA**

FNB’s branches are reasonably accessible to geographies and individuals of different income levels in the Columbiana AA. The AA has no low-income CTs, and only three moderate-income CTs. The majority of CTs are middle-income. The bank operates five offices along with two stand-alone deposit taking ATMs in the area, and has not opened or closed any branches during the evaluation period. Out of the five branch offices, one is located on the border of one moderate-income CT and near to a second moderate-income CT. Branch hours, and the level of services available, do not vary in ways that inconvenience any portion of the bank’s AA including low- and moderate-income individuals. Each office offers access to a full-service ATM, and three branches include ATMs with expanded services such as deposit imaging. In addition to the branch offices, one of the stand-alone deposit-taking ATMs is located within one of the moderate-income CTs. Other alternative delivery systems include online, mobile, and internet banking.

**Stark AA**

FNB’s branches are reasonably accessible to the geographies and individuals of different income levels within the Stark AA. The AA has two low-income CTs, and seven moderate-income CTs. The majority of CTs within the AA are middle-income. All four branches in the AA are located within middle-income CTs. Of the four branches, one is located on the border of a moderate-income CT and near to one low-income and two moderate-income CTs. Two other branches are near to a low- and moderate-income CT. The bank closed one branch and opened one branch, both in upper-income CTs during the evaluation period. Branch hours, and the level of services available, do not vary in ways that inconvenience any portion of the bank’s AA including low- and moderate-income individuals. Each office offers access to a full-service ATM, with one branch ATM including deposit imaging. Other alternative delivery systems include online, mobile, and internet banking.

<b>Distribution of Branch Openings/Closings</b>			
<b>Branch Openings/Closings</b>			
<b>Assessment Area</b>	<b># of Branch Openings</b>	<b># of Branch Closings</b>	<b>Net change in Location of Branches (+ or -)</b>

			Low	Moderate	Middle	Upper
Wayne	1	1	0	0	-1	+1

FNB’s opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA(s), particularly low- and moderate-income geographies and/or individuals.

**Community Development Services**

FNB provides a good level of CD services.

**Mahoning AA**

FNB demonstrated a good level of responsiveness to community needs by providing a variety of CD services through financial and technical expertise to non-profit groups involved in affordable housing, social services for low- or moderate-income individuals, financial literacy, and economic development. Primary examples of bank’s officer and staff participation include:

- Four employees serve on the Board of Directors for organizations that provide educational and social services for low- to moderate-income individuals.
- One employee serves on the Board of Directors and Finance Committee of an organization that helps to support low- and moderate-income individuals who require assisted living arrangements and health care services.
- One employee serves on the Board of Directors of two organizations that supports economic development opportunities for small businesses and low- and moderate-income individuals.
- One employee serves on the Board of Directors for an organization that provides workforce development training for low- to moderate-income individuals.

**Wayne AA**

FNB demonstrated a good level of responsiveness to community needs by providing a variety of CD services through financial and technical expertise to non-profit groups involved in affordable housing, social services for low- or moderate-income individuals, financial literacy, and economic development. Primary examples of bank’s officer and staff participation include:

- Five employees serve on the Board of Directors for organizations that provide educational and social services for low- to moderate-income individuals.
- One employee serves on the Board of Directors for organizations that provides community philanthropic opportunities for low- to moderate-income individuals.
- One employee serves on the Board of Directors for an organization that provides economic development opportunities for small businesses and low- to moderate- income individuals.

- One employee serves on the Board of Directors for an organization that builds homes and provides community services for low- to moderate-income individuals.

### **Columbiana AA**

FNB demonstrated an adequate level of responsiveness to community needs by providing a variety of CD services through financial and technical expertise to non-profit groups involved in social services for low- or moderate-income individuals, financial literacy, and economic development. Primary examples of bank's officer and staff participation include:

- Two employees serve on the Board of Directors for organizations that provide educational and social services for low- to moderate-income individuals.
- One employee serves on the Board of Directors for an organization that provides economic, commercial, and civic development for small business and low- to moderate- income individuals.

### **Stark AA**

FNB demonstrated a good level of responsiveness to community needs by providing a variety of CD services through financial and technical expertise to non-profit groups involved in social services for low- or moderate-income individuals, financial literacy, and economic development. Primary examples of bank's officer and staff participation include:

- One employee serves on the executive and finance committees of a non-profit organization which promotes services such as community-based childcare, education, healthcare and social services targeted to low- and moderate-income families.
- One employee is a member of the executive committee of an economic development organization which provides technical assistance on financial matters to small businesses.
- One employee provided a financial education seminar for low- and moderate-income individuals.
- One employee served as board secretary of a non-profit organization and was part of a fund-raising program to purchase medicine for under insured and uninsured low- and moderate-income individuals.

Additionally, employees participated in other non-qualifying volunteer, outreach, and fundraising service activities that benefitted low- and moderate-income individuals and non-profit organizations located within the bank's AAs.

## **State Rating**

### **State of Pennsylvania**

**CRA rating for the State of Pennsylvania:** Needs to Improve

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

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

The major factors that support this rating include:

- The bank did not originate a sufficient volume of home mortgage or small business loans to allow for a meaningful quantitative distribution analysis of loans by income geography, the income level of the borrower, or small business revenue.
- The bank made no CD loans or investments within the AA.
- The bank's CD services represent a poor responsiveness to AA needs.

## **Description of Institution's Operations in Pennsylvania**

FNB's state of Pennsylvania operations account for only 1.2 percent of the bank's total deposit base and less than 1.0 percent of the loans that the bank reported within its AAs during the evaluation period. The bank delineated one AA within the state. Refer to Appendix A: Scope of Examination for further details. The AA contains one branch in Midland, Pennsylvania which was acquired as part of the Tri-State Bank merger in October 2015 and required the creation of a new state AA. The Beaver AA consists of several CTs within Beaver County, Pennsylvania and is part of the Pittsburgh, Pennsylvania MSA. The bank closed this branch in October 2020 and exited the AA by the end of the evaluation period.

### **Beaver AA**

The Beaver AA meets the requirements of the CRA and does not arbitrarily exclude any low- or moderate-income CTs. The AA is comprised of three contiguous CTs in Beaver County. Based on 2015 ACS data, the AA contains no low-income, one moderate-income, two middle-income, and no upper-income CTs.

The AA's competition is a mixture of community banks and large banks. Per the June 30, 2020, FDIC Deposit Market Share Report, 11 institutions operate in Beaver County and maintain 41 offices. This does not include credit unions or other financial services providers. FNB ranked seventh in terms of deposit market share, with 1.1 percent, or \$28.1 million of insured deposits. The largest competitors for deposits include Huntington National Bank, Citizens Bank, First National Bank of Pennsylvania, Westbanco Bank, and PNC Bank, which hold a combined 93.0 percent of the deposit market.

Significant competition for loans exists in the AA. Based on 2019 aggregate mortgage loan data, FNB ranked 17th out of 80 lenders originating home mortgage loans within the AA, with a 1.4 percent market share. According to 2019 aggregate small business data, the bank ranked 29th out of 62 lenders originating business loans in the AA, with a 0.28 percent market share.

A majority of non-farm businesses in the AA are small as measured by the number of employees and gross revenues. According to 2020 D&B data, 84.9 percent of businesses located in the AA have less than \$1 million in gross annual revenues and 62.7 percent of businesses have fewer than five employees. Only 1.2 percent of businesses are headquartered in the AA, while 90.9 percent operate from a single location. Major employers include Great Arrow Builders, Valley Medical Facilities, Wal-Mart stores, Beaver County government, and the Beaver Valley Nuclear Plant.

Economic conditions in the AA prior to the COVID-19 pandemic lagged behind the state of Pennsylvania. The unemployment level at the beginning of 2017 for the AA was 6.6 percent, decreasing to 4.8 percent as of year-end 2019. In comparison, the state of Pennsylvania unemployment rate ranged from 5.6 percent in the beginning of 2017 to 4.4 percent in at the end of 2019. The AA struggled to recover after the COVID-19 pandemic recession. At its peak, the AA's unemployment rate was 18.2 percent, and remained over 12.0 percent for five months in 2020. At the end of 2020 the AA's unemployment rate of 7.4 percent still exceeded the Pennsylvania rate of 6.9 percent. The economic conditions in the AA are also evident in the poverty rate of 12.3 percent.

Demographic information for the full-scope assessment area is contained in the tables below.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Beaver PA AA 2017-2020</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	3	0.0	33.3	66.7	0.0	0.0
Population by Geography	8,851	0.0	29.3	70.7	0.0	0.0
Housing Units by Geography	3,924	0.0	30.6	69.4	0.0	0.0
Owner-Occupied Units by Geography	2,622	0.0	17.3	82.7	0.0	0.0
Occupied Rental Units by Geography	831	0.0	67.3	32.7	0.0	0.0
Vacant Units by Geography	471	0.0	39.5	60.5	0.0	0.0
Businesses by Geography	409	0.0	34.5	65.5	0.0	0.0
Farms by Geography	16	0.0	6.3	93.8	0.0	0.0
Family Distribution by Income Level	2,426	24.6	24.5	22.2	28.7	0.0
Household Distribution by Income Level	3,453	29.2	19.1	16.9	34.9	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$106,580
			Median Gross Rent			\$529
			Families Below Poverty Level			12.3%

*Source: 2015 ACS and 2019 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.*

## Scope of Evaluation in Pennsylvania

We selected the bank's Beaver AA for a full-scope review as this is the bank's only AA in the state. Refer to *Appendix A* for additional information regarding areas receiving full-scope reviews.

We evaluated FNB's performance in the state of Pennsylvania by analyzing the bank's lending performance and its CD lending, investment, and service performance from January 1, 2017, through December 31, 2020. As this AA was not a focus of the bank, with a single branch and small deposit base that was closed by the end of the evaluation period, we gave very little weight to the bank's performance in the state in determining our overall ratings.

The procedures used to assess FNB's lending performance focused on the bank's primary lending products. Based on the bank's strategic plan, reports of lending activities over the evaluation period, Reports of Condition and Income, and discussions with senior management, we determined the bank's



primary areas of lending focus are home mortgage and business loans. Aggregate home mortgage and small business data for 2020 was not available during this evaluation. Therefore, we compared the bank's lending performance to 2017 through 2019 demographic and aggregate data. The Office of Management and Budget (OMB) instituted changes to some MSA delineations that took effect January 1, 2019. The bank's AAs were not impacted by the OMB changes, allowing 2017 through 2020 data to be combined for analysis.

We also utilized other supporting information while evaluating FNB's CRA performance. Additional supporting information included 2015 ACS data, 2017 through 2020 bank loan data, internal bank records, FDIC deposit market share data, and information from governmental websites regarding the characteristics and economy of the bank's AAs.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Beaver AA is poor.

### Lending Activity

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
<b>Full-Scope</b>							
Beaver	12	8	1	0	21	100.0	100.0

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

Dollar Volume of Loans (000) *							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
<b>Full-Scope</b>							
Beaver	\$1,631	268	64	0	\$1,963	100.0	100.0

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

Refer to lending volume tables above for the facts and data used to evaluate the bank's lending activity.

The bank did not originate the necessary volume of loans to allow for meaningful analysis of lending within the AA.

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

Refer to Tables O and Q in the state of Pennsylvania section of *Appendix D* for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loans and small loans to businesses.

The number and income distribution of CTs in the AA are not sufficient for a meaningful analysis of the geographic distribution of the bank's home mortgage loans or small loans to businesses. The AA only contains one moderate-income CT and two middle-income CTs. Additionally, the bank did not originate the needed volume of loans to allow for a reliable analysis of geographic lending.

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

We did not perform a gap analysis for the Beaver AA due to its size and the bank's lack of lending in the AA.

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

Refer to Tables P and R in the state of Pennsylvania section of *Appendix D* for the facts and data used to evaluate the borrower distribution by income and business revenue of the bank's home mortgage loans and small loans to businesses.

The bank's volume of home mortgage loans and small loans to businesses was not significant enough to allow for meaningful quantitative distribution analysis of loans by income or revenue level of the borrower or business.

### **Community Development Lending**

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

The bank's level of CD lending during the evaluation period is poor, as no CD loans were made in the Beaver AA.

### **Product Innovation and Flexibility**

The institution did not make use of any innovative or flexible lending practices within the AA during the review period.

### **INVESTMENT TEST**

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

FNB exhibits a poor responsiveness to credit and community economic development needs of the area as the bank made no investments to support CD initiatives in the Beaver AA.

### **SERVICE TEST**

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

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

Based on full-scope reviews, the bank’s performance in the Beaver AA is poor.

### Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AAs.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Beaver PA	100.0	1	100.0	0.0	100.0	0.0	0.0	0.0	29.3	70.7	0.0

FNB’s branch in the Beaver AA is reasonably accessible to the geographies and individuals of different income levels. The AA has no low-income CTs, and only one moderate-income CT among its three CTs. The branch is located within the AA’s moderate-income CT. Branch hours, and the level of services available, do not vary in ways that inconvenience any portion of the bank’s AA including low- and moderate-income individuals. The office offers access to a full-service ATM and drive-through capability. Other alternative delivery systems include online, mobile, and internet banking.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upp
			Low	Mod	Mid	Upp
Beaver PA	0	1	0	-1	0	0

During the evaluation period, FNB closed its one branch in the Beaver AA and exited the retail banking business in the state. The office was located in a moderate-income CT.

### Community Development Services

FNB’s level of CD services is poor as the bank did not offer any community development services during the evaluation period in the Beaver AA.

## 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”.

<b>Time Period Reviewed:</b>	Lending Test: 1/1/2017 to 12/31/2020 Investment Test and Service Test: 1/1/2017 to 12/31/2020	
<b>Bank Products Reviewed:</b>	Home mortgage loans, business loans, community development loans, qualified investments, and community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>State(s)</b>		
<b><u>State of Ohio</u></b>		
Mahoning AA	Full-scope	Youngstown-Warren-Boardman OH-PA MSA (Portions of Mahoning and Trumbull Counties)
Wayne AA	Full-scope	All of Wayne County and portions of Holmes County
Columbiana AA	Full-scope	Portions of Columbiana County
Stark AA	Full-scope	Canton-Massillon, OH MSA (Portions of Stark County)
Medina AA	Limited-scope	Cleveland-Elyria MSA (Portion of Medina County)
<b><u>State of Pennsylvania</u></b>		
Beaver AA	Full-scope	Pittsburgh, PA MSA (Portion of Beaver County)

## Appendix B: Summary of State Ratings

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<b>RATINGS: First National Bank of Canfield</b>				
<b>Overall Bank:</b>	<b>Lending Test Rating*</b>	<b>Investment Test Rating</b>	<b>Service Test Rating</b>	<b>Overall Bank Rating</b>
	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
<b>State:</b>				
Ohio	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Pennsylvania	Needs to Improve	Needs to Improve	Needs to Improve	Needs to Improve

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals

the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

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

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

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

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

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

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

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

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

**Market Share:** The number of loans originated and purchased by the 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.

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

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

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

**Rating Area:** A rated area is a state or multi-state metropolitan statistical area. For an 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

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### Content of Standardized Tables

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

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

**Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.

**Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.

**Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

**Ohio Lending**

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2017-2020	
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	
<b>Full-Scope</b>																				
Mahoning	2,081	266,470	42.2	9,030	2.4	0.1	0.3	14.3	5.9	8.8	49.1	42.5	49.7	34.3	51.5	41.1	0.0	0.0	0.0	
Wayne	1,498	231,099	30.4	3,454	0.0	0.0	0.0	6.5	3.1	7.7	69.2	80.0	64.6	24.1	16.8	27.6	0.1	0.0	0.1	
Columbiana	707	75,812	14.3	2,426	0.0	0.0	0.0	6.2	2.3	2.8	80.4	83.7	83.6	13.4	14.0	13.7	0.0	0.0	0.0	
Stark	591	99,296	12.0	8,612	0.8	0.3	0.3	7.8	5.4	4.9	67.3	70.7	65.9	24.1	23.5	28.9	0.0	0.0	0.0	
<b>Limited Scope</b>																				
Medina	55	8,100	1.1	670	0.0	0.0	0.0	15.7	21.8	11.6	53.2	60.0	49.6	31.1	18.2	38.8	0.0	0.0	0.0	
<b>Total</b>	<b>4,932</b>	<b>680,777</b>	<b>100</b>	<b>24,192</b>	<b>1.2</b>	<b>0.1</b>	<b>0.2</b>	<b>10.2</b>	<b>4.6</b>	<b>6.7</b>	<b>61.6</b>	<b>63.4</b>	<b>61.0</b>	<b>27.1</b>	<b>31.9</b>	<b>32.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	
Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 bank data, 2019 HMDA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%																				

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																			<b>2017-2020</b>		
	<b>Total Home Mortgage Loans</b>				<b>Low-Income Borrowers</b>			<b>Moderate-Income Borrowers</b>			<b>Middle-Income Borrowers</b>			<b>Upper-Income Borrowers</b>			<b>Not Available-Income Borrowers</b>				
<b>Assessment Area:</b>	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Families</b>	<b>% Bank Loans</b>	<b>Aggregate</b>		
<b>Full-Scope</b>																					
Mahoning	2,081	266,470	42.2	9,030	19.6	7.1	8.9	18.2	17.9	21.6	20.5	21.8	22.7	41.7	47.6	33.7	0.0	5.6	13.1		
Wayne	1,498	231,099	30.4	3,454	15.7	4.1	5.5	18.5	27.4	19.3	22.0	24.0	25.6	43.8	41.5	37.6	0.0	2.9	12.0		
Columbiana	707	75,812	14.3	2,426	21.0	9.5	9.4	18.7	21.9	20.7	21.6	23.3	26.3	38.7	40.2	34.0	0.0	5.1	9.7		
Stark	591	99,296	12.0	8,612	17.2	8.3	9.1	18.3	18.1	19.4	22.1	24.0	23.1	42.4	43.7	36.2	0.0	5.9	12.2		
<b>Limited Scope</b>																					
Medina	55	8,100	3.2	670	15.1	5.5	7.5	16.1	25.5	22.1	25.7	34.5	24.9	43.1	32.7	31.8	0.0	1.8	13.7		
<b>Total</b>	<b>4,932</b>	<b>680,777</b>	<b>100</b>	<b>24,192</b>	<b>18.3</b>	<b>6.6</b>	<b>8.5</b>	<b>18.3</b>	<b>21.5</b>	<b>20.4</b>	<b>21.5</b>	<b>23.1</b>	<b>23.7</b>	<b>42.0</b>	<b>44.1</b>	<b>35.1</b>	<b>0.0</b>	<b>4.7</b>	<b>12.3</b>		
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 bank data, 2019 HMDA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																					

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-2020</b>		
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		
<b>Full-Scope</b>																					
Mahoning	1,346	168,987	45.7	5,135	3.6	2.7	3.5	14.4	10.6	12.4	37.7	35.5	34.7	44.2	51.3	49.4	0.0	0.0	0.0		
Wayne	718	56,766	24.4	2,465	0.0	0.0	0.0	9.2	6.5	9.0	70.5	72.7	72.8	20.2	20.8	18.2	0.1	0.0	0.0		
Columbiana	460	44,053	15.6	1,296	0.0	0.0	0.0	5.0	2.6	2.2	78.6	81.5	81.3	16.4	15.9	16.5	0.0	0.0	0.0		
Stark	381	52,081	12.9	3,808	1.2	2.9	0.7	6.8	8.7	6.4	66.0	71.4	61.5	26.0	17.1	31.4	0.0	0.0	0.0		
<b>Limited Scope</b>																					
Medina	43	4,936	1.5	279	0.0	0.0	0.0	18.5	20.9	11.5	56.5	65.1	59.1	25.0	14.0	29.4	0.0	0.0	0.0		
<b>Total</b>	<b>2,948</b>	<b>326,823</b>	<b>100.0</b>	<b>12,983</b>	<b>1.8</b>	<b>1.6</b>	<b>1.6</b>	<b>10.3</b>	<b>8.2</b>	<b>9.0</b>	<b>56.5</b>	<b>56.8</b>	<b>54.9</b>	<b>31.3</b>	<b>33.3</b>	<b>34.5</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>		
Source: 2020 D&B Data; 01/01/2017 - 12/31/2020 bank data; 2019 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%																					

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2017-2020</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
<b>Full-Scope</b>												
Mahoning	1,346	168,987	45.7	5,135	80.6	31.9	44.9	6.4	20.7	13.0	47.4	
Wayne	718	56,766	24.4	2,465	82.2	52.8	45.0	6.9	13.2	11.0	34.0	
Columbiana	460	44,053	15.6	1,296	80.4	43.5	46.9	6.6	16.5	13.0	40.0	
Stark	381	52,081	12.9	3,808	83.0	46.2	45.0	5.7	13.9	11.3	39.9	
<b>Limited Scope</b>												
Medina	43	4,936	1.5	279	82.0	51.2	52.0	4.6	18.6	13.4	30.2	
<b>Total</b>	<b>2,948</b>	<b>326,823</b>	<b>100.0</b>	<b>12,983</b>	<b>81.6</b>	<b>40.9</b>	<b>45.3</b>	<b>6.3</b>	<b>17.3</b>	<b>12.1</b>	<b>41.8</b>	
<i>Source: 2020 D&amp;B Data; 01/01/2017 - 12/31/2020 bank data; 2019 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

**Pennsylvania Lending**

<b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b>																				<b>2017-20</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Beaver PA	12	1,631	100.0	227	0.0	0.0	0.0	17.3	16.7	13.7	82.7	83.3	86.3	0.0	0.0	0.0	0.0	0.0	0.0	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 bank data, 2019 HMDA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

<b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b>																				<b>2017-20</b>
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Beaver PA	12	1,631	150.0	227	24.6	0.0	8.8	24.5	16.7	23.8	22.2	33.3	28.2	28.7	50.0	30.4	0.0	0.0	8.8	
<i>Source: 2015 ACS Census; 01/01/2017 - 12/31/2020 bank data, 2019 HMDA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2017-20</b>	
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	
Beaver PA	8	268	100.0	83	0.0	0.0	0.0	33.5	25.0	24.1	66.5	75.0	75.9	0.0	0.0	0.0	0.0	0.0	0.0	
<i>Source: 2020 D&amp;B Data; 01/01/2017 - 12/31/2020 bank data; 2019 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>												<b>2017-20</b>	
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		
Beaver PA	8	268	100.0	83	84.8	50.0	44.6	4.3	0.0	10.9	50.0		
<i>Source: 2020 D&amp;B Data; 01/01/2017 - 12/31/2020 bank data; 2019 CRA aggregate data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>													