

PUBLIC DISCLOSURE

June 6, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Westmoreland FS & LA Charter Number 705537

322 Main St. Latrobe, PA 15650

Office of the Comptroller of the Currency

Pittsburgh Field Office Corporate One Office Park 4075 Monroeville Boulevard Building 2, Suite 430 Monroeville, PA 15146

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The bank's loan-to-deposit (LTD) ratio is reasonable given the bank's market share in a competitive banking region.
- The bank originated a majority of loans inside its assessment area (AA).
- The bank's exhibits an excellent geographic distribution of loans in the AA.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.
- The bank has had no consumer complaints regarding its community reinvestment performance during the evaluation period.

Loan-to-Deposit Ratio

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

Westmoreland Federal Savings and Loan Association's ("Westmoreland" or "bank) LTD ratio is reasonable. The bank's average LTD ratio over the 12-quarter evaluation period was 54.2 percent. During the same period, the LTD ratio ranged from a quarterly low of 49.5 percent to a quarterly high of 59.6 percent. This is below the quarterly average net LTD ratio of 63.1 percent for six similarly situated institutions during the same time period. The average LTD for the other six banks ranged from 46.9 percent to 88.1 percent. The LTD differences are reasonable considering the bank's performance context. The bank operates in one single location in Westmoreland County, a competitively banked region. The bank faces stiff competition in loan origination, with the bank having approximately 1.4 percent market share during the assessment period in the Pittsburgh MSA AA.

Lending in Assessment Area

A majority of the bank's loans are inside its assessment area (AA).

The bank originated and purchased 75.2 percent of its total loans inside the bank's AAs during the evaluation period. The bank originated and purchased 67.9 percent of the dollar amount of loans within the AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level.

	ľ	Number o	f Loans			Dollar A	mount	of Loans \$(000s)	
Loan Category	Insi	de	Out	side	Total	Insid	le	Outsi	de	Total
	#	%	#	%	#	\$	%	\$	%	\$(000s)
Home Mortgage									•	
2019	55	75.3	18	24.7	73	7,314	68.9	3,297	31.1	10,611
2020	86	76.1	27	23.9	113	14,251	70.7	5,914	29.3	20,165
2021	74	74.0	26	26.0	100	11,390	64.3	6,337	35.7	17,726
Subtotal	215	75.2	71	24.8	286	32,955	67.9	15,548	32.1	48,503
Total	215	75.2	71	24.8	286	32,955	67.9	15,548	32.1	48,503

Description of Institution

The bank is a federally chartered mutual institution in operation since 1952, headquartered in Latrobe, Pennsylvania (PA). There are no affiliated or related organizations within Westmoreland's corporate structure.

Westmoreland is a full service, intrastate institution with one main office location. The main office is located at 322 Main Street, Latrobe, PA, which is in a moderate-income geography within the bank's AA. Westmoreland's designated AA consists of all the census tracts in Westmoreland County. Westmoreland County is located within the Pittsburgh, PA Metropolitan Statistical Area (MSA). Examiners did not identify any issues related to the legality of the bank's AA delineation. Westmoreland offers standard business hours of 9:00 AM – 4:30 PM during the weekdays and also offers Saturday hours from 9:00 AM – 12:00 PM. Westmoreland has one automated teller machine (ATM)located outside the main branch. Westmoreland is a member of the Freedom ATM Alliance, which is a joint alliance with 17 other banks in over 50 counties in PA, NY, MD, VA, and OH that offer free ATM service surcharges. During the evaluation period, the bank did not open or close any offices.

The bank's primary lending strategy is to offer fixed-rate home mortgage lending for one-to-four family residential dwellings. Savings products include checking, passbook and statement savings, certificates of deposit, money markets, individual retirement accounts, and vacation and Christmas club accounts. Additional information is available at the bank's website at www.westfedsav.com.

According to the Reports of Condition and Income, as of December 31, 2021, the bank reported total assets of \$170.4 million, net loans of \$75.8 million, and total deposits of \$128.1 million. Net loans represent 44.5 percent of total assets. As of December 31, 2021, tier 1 capital was \$42.1 million or 24.7 percent of total assets. Residential lending constitutes the majority of the bank's lending operations, representing more than 99 percent of the overall loan portfolio and consists primarily of one-to-four family residential real estate loans. Westmoreland is largely funded from core deposits within the bank's market area.

There are no legal or financial factors impeding the bank's ability to help meet the credit needs in its AA. The bank received a Satisfactory rating using Small Bank Community Reinvestment Act (CRA) procedures as of the last CRA performance evaluation dated June 11,2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We evaluated the bank's CRA performance under the Small Bank CRA evaluation procedures. The objective of our review was to determine the bank's record of meeting its community's credit needs, including that of low and moderate-income (LMI) borrowers. Our review included the bank's performance from January 1, 2019 through December 31, 2021. Residential mortgages are the bank's primary loan product and was the only product reviewed as part of this evaluation. This evaluation considers reportable mortgage loans pursuant to the Home Mortgage Disclosure Act of 1975 (HMDA) for calendar years 2019, 2020, and 2021 for residential mortgages.

Selection of Areas for Full-Scope Review

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

The bank's sole AA is the Pittsburgh MSA AA.

Ratings

The bank's overall rating is based entirely on the full scope review of the Pittsburgh MSA AA.

Discriminatory or Other Illegal Credit Practices Review

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

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

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

State Rating

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

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank's distribution of loans by geography is excellent.
- The bank's distribution of loans by borrower income is reasonable.
- The bank's LTD ratio is reasonable given performance context.

Description of Institution's Operations in Pennsylvania

Westmoreland's AA consists of all the census tracts in Westmoreland County. Westmoreland County is located within the Pittsburgh, PA MSA. Competition in this MSA is strong. According to the FDIC Summary of Deposit Market Share Report as of June 2, 2022, Westmorland is ranked 13 out of 49 institutions in the AA with 1.4 percent of the deposit market share. The bank's top competitors include PNC, the First National Bank of Pennsylvania, S&T, First Commonwealth Bank, and Citizens Bank. These institutions account for 70.4 percent of the deposit market share in the AA.

The analysis takes into consideration comments provided by two community organizations serving the AA. The contacts focus on economic development through business retention, technical assistance to new business ventures, subdivision and land development, and addressing poverty by providing loans. The contacts discussed the major sources of employment in the AA (Education, Business, Trade Transportation, Utilities). Employment growth is decreasing in two of the primary job sectors – Trade Transportation and Utilities. The local economy benefited from the boost by oil and gas; however, production has slowed. Another decline has been seen in Agriculture, which was once the strongest industry. One major concern of both contacts is whether or not there will be a workforce in the future as the population is aging and declining. On a positive note, there are a lot of startups buying investment properties for the first time. The contacts mentioned that the main financial need in the AA is for startup funding. There are a lot of affordable homes for LMI individuals in the AA; however, the quality of these homes is sub-par. There are a lot of opportunities to rehab older homes, which is a great way for financial institutions to get involved. Refer to the table below for more detailed demographic information of the AA.

Pittsburgh MSA AA

Table A – Der	nographic I	nformation	of the Assessm	ient Area									
Assessment Area: Pittsburgh MSA AA													
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts)	100	5.0	27.0	52.0	16.0	0.0							
Population by Geography	361,251	2.6	21.2	57.5	18.6	0.0							
Housing Units by Geography	168,250	3.3	23.4	56.5	16.8	0.0							
Owner-Occupied Units by Geography	115,868	1.4	18.8	59.6	20.2	0.0							
Occupied Rental Units by Geography	35,305	7.9	34.1	49.0	9.0	0.0							
Vacant Units by Geography	17,077	6.9	32.4	50.6	10.0	0.0							
Businesses by Geography	30,322	3.3	21.3	51.8	23.6	0.0							
Farms by Geography	1,003	1.7	19.3	57.5	21.4	0.0							
Family Distribution by Income Level	100,715	20.6	19.5	21.5	38.4	0.0							
Household Distribution by Income Level	151,173	24.0	16.3	18.0	41.7	0.0							
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housi	ing Value		\$135,442							
			Median Gross	Rent		\$652							
			Families Belo	w Poverty Lev	el	6.9%							

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

Scope of Evaluation in Pennsylvania

The bank's only AA is the Pittsburgh MSA AA, which includes all census tracts from Westmoreland County. The bank's sole branch is located in Westmoreland County. This assessment area is evaluated through a full-scope review.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

The bank exhibits excellent geographic distribution of loans in the State.

^(*) The NA category consists of geographies that have not been assigned an income classification.

Home Mortgage Loans

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

The bank exhibits excellent geographical distribution of loans in the Pittsburgh MSA AA. While the bank did not have any loans in low-income tracts, this is reasonable given that only 5 of 100 census tracts are designated as low-income. Aggregate lending to low-income tracts is low. In moderate-income tracts, the bank exceeded both the aggregate, and the percent of owner-occupied housing units. Moderate-income tracts are weighted more heavily given the low percentage of low-income census tracts.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels, given the product lines offered by the bank.

Home Mortgage Loans

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

The bank exhibits reasonable distribution of loans by borrower income. Westmoreland's lending to moderate-income borrowers was excellent as it exceeded both the aggregate lending percentage and distribution of moderate-income borrowers percentages. Westmoreland's lending to low-income borrowers was well below the aggregate and the distribution of low-income families. The bank's low-income and moderate-income lending performance are weighted equally given the similar numbers of low and moderate-income families.

Responses to Complaints

There were no CRA complaints received by the bank or the agency since the prior examination regarding performance in meeting the credit needs of Westmoreland's established 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".

Time Period Reviewed:	1/1/2019 to 12/31/2021										
Bank Products Reviewed:	Home mortgage										
List of Assessment Areas and Type of Examination											
Rating and Assessment Areas	Type of Exam	Other Information									
Pennsylvania											
Pittsburgh MSA AA	Full-scope	Westmoreland County Only									

Appendix B: Summary of MMSA and State Ratings

RATINGS Westmorelar	nd Federal Savings and Loan Association
Overall Bank:	Lending Test Rating
Westmoreland Federal Savings and Loan Association	Satisfactory
State:	
Pittsburgh MSA AA	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

Aggregate Lending (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 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2019-21

Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-	Income	Tracts	Not Available-Income Tracts			
Assessment Area:	#	\$		Overall Market	Occupied			% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		Aggregate	% of Owner- Occupied Housing Units		00 0	% of Owner- Occupied Housing Units		00 0
Pittsburgh MSA AA	215	32,955	100.0	14,454	1.4	0.0	0.8	18.8	20.9	14.4	59.6	64.2	57.0	20.2	14.9	27.8	0.0	0.0	0.0
Total	215	32,955	100.0	14,454	1.4	0.0	0.8	18.8	20.9	14.4	59.6	64.2	57.0	20.2	14.9	27.8	0.0	0.0	0.0

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Table P: Assessment Area	Distribution of H	Iome Mortgage L	oans by Income (Category of the Borrower

2019-21

	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-I	ncome]	Borrowers	Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Pittsburgh MSA AA	215	32,955	100.0	14,454	20.6	7.9	10.1	19.5	20.9	18.8	21.5	26.0	22.7	38.4	41.9	34.6	0.0	3.3	13.8
Total	215	32,955	100.0	14,454	20.6	7.9	10.1	19.5	20.9	18.8	21.5	26.0	22.7	38.4	41.9	34.6	0.0	3.3	13.8

Source: 2015 ACS Census; 01/01/2019 - 12/31/2021 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%