



PUBLIC DISCLOSURE

January 10, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

City National Bank of West Virginia
Charter Number: 14807

25 Gatewater Road
Cross Lanes, West Virginia 25313

Office of the Comptroller of the Currency
Roanoke Field Office
4419 Pheasant Ridge Road, Suite 300
Roanoke, Virginia 24014

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 following table indicates the performance level of City National Bank of West Virginia with respect to the Lending, Investment, and Service Tests:

Performance Levels	City National Bank of West Virginia Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
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 the rating of High Satisfactory ratings in the Charleston-Huntington-Ashland WV-OH-KY Combined Statistical Area (Charleston CSA) and the Washington CSA and the rating of High Satisfactory in the states of Kentucky, Virginia, and West Virginia.
- The Investment Test rating is based on the rating of Outstanding in the Charleston CSA and the rating of High Satisfactory in the Washington CSA, and the rating of High Satisfactory in the states of Kentucky, Virginia, and West Virginia.
- The Service Test rating is based on ratings of High Satisfactory in the Charleston CSA and the Washington CSA and the rating of High Satisfactory in the states of Kentucky, Virginia, and West Virginia.

Lending in Assessment Area

A substantial majority of the bank's loans are inside the bank's assessment areas (AAs).

The bank originated and purchased 88.6 percent of its total loans inside the bank's AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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	8,776	88.1	1,190	11.9	9,966	1,184,252	86.6	240,110	16.9	1,424,362
Small Business	2,986	90.3	321	9.7	3,307	311,195	79.9	71,044	18.6	382,239
Small Farm	96	85.7	16	14.3	112	7,752	83.4	1,287	14.2	9,039
Total	11,858	88.6	1,527	11.4	13,385	1,503,199	83.1	312,441	17.2	1,815,640

Description of Institution

City National Bank of West Virginia (CNB) is a full-service bank founded in 1957, and is headquartered in Charleston, West Virginia. CNB is wholly owned by City Holding Company, also headquartered in Charleston, WV. As of December 31, 2020, the bank reported total assets of \$5.7 billion. In December 2018, Ashland, Kentucky-based Poage Bankshares and Cynthiana, Kentucky-based Farmers Bancorp were merged into City Holding Company. Through these acquisitions, Town Square Bank, a subsidiary of Poage Bankshares and Farmers Deposit Bank, a unit of Farmers Deposit Bancorp, merged into CNB. Through these mergers, CNB acquired twelve branches.

CNB's business strategy is retail home mortgage loans and retail banking products. CNB offers a full range of deposit products to individuals and businesses. CNB's loan products include home mortgage loans, personal loans, auto loans, and commercial loans. As of December 31, 2020, the bank's loan portfolio represented 63.5 percent of total assets or \$3.6 billion. CNB is primarily a residential mortgage lender with 88.0 percent of total loans secured by residential real estate. Commercial loans represented the second largest category of loans totaling 9.8 percent. Total deposits as of December 31, 2020, were \$4.8 billion, and tier 1 capital equaled \$483 million.

CNB offers wealth management services. As of December 31, 2020, the bank had fiduciary activities with \$1.3 billion in fiduciary assets and \$70 million in customer and safekeeping.

As of December 31, 2020, CNB AAs included sixteen AAs in the states of Kentucky, Ohio, Virginia, and WV. The AAs include the Multi-State Metropolitan Statistical Areas (MMSA) of Huntington-Ashland WV-KY-OH MSA (Huntington-Ashland MSA), the Combined Statistical Area (CSA) of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA (Washington CSA), three AAs in Kentucky, one AA in Ohio, three AAs in Virginia, and seven AAs in West Virginia. The bank operates 94 branches with 92 deposit taking Automated Teller Machines. There are no free-standing ATMs. Branch distribution is as follows: 21 branches in the Huntington-Ashland KY-OH-WV MSA, five branches in the Washington CSA, ten branches in Kentucky, one branch in Ohio, ten branches in Virginia, and 47 branches in West Virginia. During the evaluation period, the bank opened a branch in Ohio and one branch in Morgantown, West Virginia. On June 28, 2019, CNB sold its two branches in Virginia Beach, Virginia. In January and February of 2019, the bank consolidated four branches in the Huntington-Ashland-KY-WV-OH MSA into other nearby CNB branches. In May of 2019, the bank closed one branch in Kentucky. On June 28, 2019, the bank sold its two full-service branches in Virginia Beach, Virginia, which represented the bank's Virginia Beach, Virginia MSA (MSA #47260). Bank deposits and other equipment and assets were sold to Select Bank and Trust, a community bank headquartered in Dunn, North Carolina. CNB retained loans maintained at these branches.

CNB's AA meets regulatory requirements and does not arbitrarily exclude any low or moderate-income census tracts. The bank does not have any legal, financial, or other factors impeding the bank's ability to meet community credit needs of its AAs during the evaluation period.

Product Innovation and Flexibility

Lending Products

CNB offered its own first-time homebuyers' program for low-income and moderate-income borrowers purchasing homes in the bank's AAs. The City Start program featured flexible credit score allowances and debt-to-income ratios, and low-down payment requirements with no private mortgage insurance requirements. During the evaluation period, the bank originated 83 City Start loans totaling \$10.9 million.

CNB also continued to participate in the West Virginia Housing Development Fund's First Time Homebuyer Program. This program featured up to 100 percent financing and down payment and closing cost assistance. Borrower incomes must be within limits of the county where the home is being purchased. During the evaluation period, the bank originated 56 loans totaling \$5.9 million through the West Virginia Housing Development Fund's First Time Homebuyer program.

CNB bank utilized specialized home lending products benefiting rural areas through the United States Department of Agriculture Administration (USDA). These loan programs target low- and moderate-income borrowers in rural areas where lending opportunities are more scarce. The USDA loan program feature loan terms up to 100 percent loan-to-value and minimum credit score of 640. In 2018 and 2019, CNB originated 10 USDA loans totaling \$1.3 million. In 2020, the bank stopped participating in the USDA loan program.

Retail Banking Products

The bank's retail products include a low-cost checking account with no maintenance fees and Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship. CNB also allows free withdrawals from the bank's ATMs for customers accessing their Electronic Benefit Transfer funds. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to these products or services.

CNB offers online banking and mobile banking. Through online banking, customers can view balances, transfer funds, and make payments online. Through the bank's mobile banking service, customers can deposit checks, transfer money to internal and external accounts, send person-to-person payments, view transactions, check balances, pay bills, and order checks. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to these services.

CNB provides customers with expanded access to branch services through video tellers, known as Interactive Teller Machines (ITMs). The ITMs are similar to an Automated Teller Machine (ATM) but with video chat capability with a live CNB teller. The video teller can perform a variety of services for customers including depositing and cashing checks. As of December 31, 2020, CNB had twenty ITMs located either inside branch lobbies or at drive through windows. The ITMs located in the drive through windows have extended weekday hours from Monday through Friday from 8:00 a.m. to 7:00 p.m. and

weekend hours from 8:00 a.m. until 1:00 p.m. on Saturdays. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to this product.

Community Development Activities in Broader Regional/Statewide Area

In addition to the qualified investments made in the AA during the current evaluation period, CNB maintained one prior period low-income housing tax credit (LIHTC) with an outstanding balance of \$3.8 million. This LIHTC benefited three affordable housing developments in Harrison and Greenbrier Counties in West Virginia and Fayette County in Kentucky.

COVID-19 Pandemic Relief

Prior to 2020, CNB did not participate in guaranteed loan programs through the Small Business Administration (SBA). In order to help its business loan customers during the COVID-19 pandemic, the bank participated in the SBA's Paycheck Protection Program (PPP). SBA implemented this program as a low-cost and forgivable loan program to help small businesses cover payroll costs, interest on mortgages, rent, and utilities during the COVID-19 pandemic. During 2020, the bank originated 653 PPP loans totaling \$23.3 million.

As part of the bank's overall COVID-19 pandemic response, CNB's collection department extended their deadline to settle charged off account customers and settle accounts at a fraction of their charged off balance. The collection department also worked with customers on Fresh Start payments. The bank's Fresh Start payment permitted customers to reset an overdrawn amount to a zero balance and allowed customers to repay the overdrawn amounts with no interest. During 2020, CNB established 2,707 Fresh Start payment to its customers. In 2020, CNB significantly reduced the number of offsets on past due loans/overdrawn checking accounts. In 2020, the bank granted 1,448 offsets, which was well below the number of 5,811 offsets granted in 2019. The bank's commercial loan department also worked with customers to defer or modify their accounts to help with COVID hardships.

With lobby closures, branch personnel worked to help meet community banking needs through drive-through facilities and digital banking services. CNB also lowered the minimum rate on cash secured loans as well as the margin on cash secured loans below \$7,500. In 2020, the bank originated 336 cash secured loans totaling \$5.3 million. CNB also donated their supply of N95 masks and gloves to local hospitals at the beginning of the pandemic. The bank received positive consideration for these activities in response to the COVID-19 pandemic.

CNB does not have any legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

CNB's prior Performance Evaluation dated October 22, 2018, resulted in a Satisfactory rating based on a Low Satisfactory Lending Test rating, and High Satisfactory Investment Test rating and a High Satisfactory Service Test rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The bank's performance was assessed based upon home mortgage, small business (SB), and small farm (SF) loans originated and purchased during the evaluation period which spanned from January 1, 2018 through December 31, 2020. Lending performance was assessed based on the bank's primary loan products. Primary loan products, for purposes of this review, were products in which the bank originated at least 20 loans within an AA during the evaluation period. CNB had a sufficient volume of home mortgage and small business loans in all AAs to conduct a meaningful analysis. Small farm loans were evaluated only in the state of Kentucky as CNB did not originate or purchase a sufficient volume of small farm loans in the other MMSAs and states.

Home Mortgage Disclosure Act (HMDA) and SB/SF aggregate lending and market share percentages consider only lenders that submit HMDA and SB/SF data. Lenders that collect, but do not submit data, are not considered in the percentages. Multi-family loans were not considered in the lending test due to the low percentage of loan originations.

Performance also included an assessment of community development (CD) activities from the date of the prior Performance Evaluation, January 1, 2018 through December 31, 2020. CD activities include CD loans, qualified investments, grants and donations, and CD services.

Management provided home mortgage information for 2018, 2019, and 2020, as required by HMDA. Management provided small business and small farm information for 2018, 2019, and 2020, as required by the Community Reinvestment Act (CRA). Management did not collect or submit any consumer loan data for consideration. Examiners determined the data submitted as required by HMDA and CRA was reliable and accurate.

On January 1, 2019, changes in MSA boundaries made by the Office of Management and Budget (OMB) became effective. The changes impacted several of CNB's AAs. To account for these changes, lending activity for the Charleston CSA and the states of Kentucky and West Virginia have a separate analysis for 2018, and a combined analysis for 2019, and 2020. Conclusions will be discussed in the appropriate sections of the PE.

With an evaluation period end date of December 31, 2020, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are addressed in this evaluation.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, MMSA, or 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 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

The bank's overall rating is a blend of the state ratings, and where applicable, multistate ratings.

CNB operates in two CSAs of Charleston-Huntington-Ashland WV-OH-KY (Charleston CSA), and the Washington-Baltimore-Arlington, DC-MD-WV-PA CSA (Washington CSA), and in the four states of Kentucky, Ohio, Virginia, and West Virginia. The Charleston CSA received the most weight in the CRA performance assessment. This AA contains a large percentage of the bank's deposits and loans. The Charleston CSA's deposits total 43 percent of the bank's total deposits, 33 percent of total branch offices, and 43 percent of loan volume (by number of home mortgage and small business loans.) The state of West Virginia carried the second heaviest weighting as it represents 34 percent of total bank deposits, 34 percent of branches, 34 percent of loan volume (by number of home mortgage, and small business). The states of Kentucky and Virginia carried the least weight. The state of Ohio received minimal weight as it represents a very small percentage of the bank's deposit, branches, and loans. The bank's Ohio deposits and loans represent 0.01 percent of total deposits and loans and only 1 percent of total branches.

In the Charleston CSA, home mortgage loans represented 79 percent of loans originated and purchased by number during the evaluation period and received the heaviest weighting. In the Charleston CSA, small business loans received the second heaviest weighting. In the state of West Virginia, home mortgage loans represented 76 percent of loans originated and purchased by number during the review period and received the heaviest weighting. Small business loans received the second heaviest rating.

In 2020 the bank originated a large number of loans through the SBA's PPP program. Under the PPP loan program, business revenue was not considered for underwriting and not collected by CNB. As a result, a large percentage of the bank's 2020 small business originations do not have revenue information. Considering that there is no business revenue information for the majority of the bank's 2020 business loans, greater weight was given to the bank's small business lending in 2018 and 2019.

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.

Multistate Metropolitan Statistical Area Rating

Charleston-Huntington-Ashland WV-OH-KY Combined Statistical Area (Charleston CSA)

CRA rating for the Charleston CSA¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding,

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the credit needs in the AA.
- The geographic distribution of loans is adequate.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes is good.
- The bank has made a relatively high level of CD loans.
- The bank has an excellent level of CD investments.
- The bank's delivery systems are readily assessable to geographies and individuals.
- The bank provides an excellent level of CD services.

Description of Institution's Operations in the Charleston CSA

The Charleston CSA combines the Charleston WV MSA (MSA #16620) and the Huntington-Ashland KY WV-MD MSA (MSA # 26580). Refer to Appendix A for a list of counties included in the AA.

CNB operates 36 branches and 41 deposit taking ATMs in the Charleston CSA AA. The bank's 36 branches in the AA account for 38.3 percent of CNB's bank-wide branch network. The distribution of branches is as follows: in West Virginia there are 11 branch offices in Kanawha County, four branches in Cabell County, four branches in Putnam County, two branches in Jackson County, two branches in Lincoln County, and one branch in Wayne County WV. In Kentucky, there are four branches in Boyd County KY, four branches in Greenup County, and one branch in Carter County KY. In the state of OH, there are three branches in Lawrence County. Of the 36 branches, two branches in Boyd County, KY are in moderate-income census tracts and one branch in Greenup County KY is in a moderate-income census tract.

The bank faces strong competition for deposits in the AA. CNB reported \$1.9 billion in deposits in the AA. According to June 30, 2020, deposit market share information, CNB ranked second out of 65 depository institutions with a 12.0 percent market share. The top banks in terms of deposit market share in the AA include Truist Bank with 18.5 percent market share, United Bank with 11.0 percent market share, JP Morgan Chase Bank N.A. with 8.1 percent market share, and The Huntington Bank N.A. with 6.2 percent market share.

CNB originated 45.7 percent of its total home mortgage loans in the AA and 35.5 percent of its total small business loans in the AA during the evaluation period.

¹This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

According to the December 2020 Moody's Analytics Inc. data, both the Charleston MSA and the Huntington-Ashland MSA were in the recovery stage of the business cycle. The region has historically been reliant on coal production, but coal mining employment decreased steadily over the past three decades. The Charleston MSA's economy has been in a weak state for the past decade. However, economic recovery from the COVID-19 pandemic was swift in the MSA, with 60 percent of pandemic-related job losses being restored by year-end 2020. With Charleston as the capital of West Virginia, the public sector is a major employer in the AA.

According to the December 2020 Moody's Analytics Inc. data, the Huntington-Ashland MSA experienced many of the same economic forces as the Charleston MSA. Energy logistics is a major economic driver, but demand for coal is weak and the pandemic decreased overall coal production in 2020. Health care is also a major driver of the economy. Two of the 10 largest hospitals in West Virginia are in the Huntington-Ashland MSA. The healthcare sector is expected to make a full recovery in the region. Moody's Analytics December 2020 data also showed that the Huntington-Ashland MSA regained two-thirds of all jobs lost in the spring of 2020.

Across the Charleston CSA, major employment sectors include retail trade, professional and business services, education and health services, and government. Top employers include the Charleston Area Medical Center, Walmart, and Toyota Motor Manufacturing. According to December 2020 U.S. Bureau of Labor Statistics, unemployment in the Charleston CSA AA reached almost 17 percent in April 2020 but recovered to under seven percent by December 2020. The Charleston CSA's unemployment rate remains elevated compared to pre-pandemic figures according to the Bureau of Labor Statistics.

According to the West Virginia Economic Outlook 2021- 2025 published by the University of West Virginia's Economic Department, over the last 10 years West Virginia's health trends have been impacted by skyrocketing use and death from opioid overdoses. According to information published by the Mountain State Spotlight, Kanawha County led the state with 207 drug overdoses in 2020. The rate of drug overdoses was up more than 33 percent from 2019.

Information from five community interviews including three economic development entities, one real estate company, and one local government official revealed that local banks have been responsive to community credit needs. Community contacts identified the following needs in the Charleston CSA AA:

- Need for more housing as housing was negatively impacted by the lumber shortage;
- Start-up capital for small businesses;
- Loans to finance rehabilitation of older homes, many of which are in substandard condition; and,
- Government guaranteed and insured loan programs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charleston CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	154	5.2	22.1	50.0	22.1	0.6
Population by Geography	582,377	3.3	15.6	56.2	24.3	0.5
Housing Units by Geography	270,822	4.1	16.5	55.5	23.7	0.2
Owner-Occupied Units by Geography	170,133	1.8	14.1	57.8	26.2	0.0
Occupied Rental Units by Geography	66,677	8.5	20.0	49.8	21.0	0.7
Vacant Units by Geography	34,012	6.6	21.9	55.1	16.1	0.2
Businesses by Geography	33,950	6.3	13.5	53.3	26.7	0.3
Farms by Geography	817	2.4	10.6	61.3	25.6	0.0
Family Distribution by Income Level	153,763	22.0	17.3	19.5	41.3	0.0
Household Distribution by Income Level	236,810	25.4	15.5	16.9	42.3	0.0
Median Family Income MSA - 16620 Charleston, WV MSA		\$54,658	Median Housing Value			\$106,807
Median Family Income MSA - 26580 Huntington-Ashland, WV-KY-OH MSA		\$54,584	Median Gross Rent			\$642
			Families Below Poverty Level			13.4%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Charleston CSA

The OCC conducted a full-scope review of the Charleston CSA. Home mortgage loans, which account for 79 percent of loans originated and purchased in the AA during the evaluation period, were given more weight than small business loans.

The boundaries of Charleston MSA AA were affected by Office of Management and Budget (OMB) changes which became effective January 1, 2019. As a result of the OMB changes, Carter County Kentucky, a non-MSA county, became part of the Huntington-Ashland-WV-KY-OH MSA. Further, Jackson County, West Virginia, a non-MSA county, became part of the Charleston, WV MSA. While not a material change to the Charleston CSA, Lincoln County, Kentucky moved from the Huntington-Ashland-WV-KY-OH MSA to the Charleston, WV MSA. To account for these changes, 2018 lending data was analyzed separately from combined 2019 and 2020 lending data. Lending activity in the combined 2019-2020 period received greater weight as it represented the majority of lending activity.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLESTON CSA

LENDING TEST

The bank's performance under the Lending Test in the Charleston CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Charleston CSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charleston CSA	3,982	1,063	0	5	5,050

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charleston CSA	\$495,533	\$110,420	0	\$5,236	\$611,189

According to 2020 peer deposit market share data, CNB reported \$1.9 billion in deposits in the Charleston CSA. As of June 30, 2020, the bank ranked second out of 65 depository institutions, with 12.0 percent deposit market share in the AA. This rank placed the bank in the top 3.1 percent of depository institutions in the AA.

Based on 2020 peer mortgage data, CNB ranked first with a 9.2 market share. This rank placed the bank in the top one percent of all mortgage lenders. Competition for mortgage loans was very strong, as there were 357 other lenders in the AA. The other four top home mortgage lenders, Vanderbilt Mortgage and Finance, Quicken Loans LLC, The Huntington National Bank, and Truist Bank had a combined market share of 19.83 percent. The market share of these banks ranged from 6.85 percent to 3.27 percent.

According to 2020 peer small business data, CNB ranked third in small business lending with an 8.5 percent market share. This rank placed the bank in the top 3.4 percent of all small business lenders. Competition was strong with 113 other small business lenders in the AA. Truist Financial and American Express ranked second and third with market shares of 10.0 percent and 9.50, respectively.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

In assessing geographic distribution of loans in moderate-income census tracts, the OCC considered the distance of CNB's branch from moderate-income census tracts in the AA. Many of the bank's branches are not in close proximity to many moderate-income census tracts in Clay, Lincoln, Boone, and Wayne Counties. Of the 34 moderate-income census tracts in the AA, 13 (34 percent) are in Clay, Lincoln, Boone, and Wayne Counties. Without any CNB branches in Clay County, residents in Clay County are

25 to 30 miles away from CNB's nearest branches in Kanawha County. Two of the moderate-income census tracts in Lincoln County are more than 11 miles from the bank's two branches in Lincoln County, located in the northern portion of the county. Both Clay and Lincoln County are in very rural and mountainous areas with few roads. The bank's branch in Wayne County is in the northern portion of the county. This branch is more than 10 miles from the two southern most moderate-income census tracts in Wayne County. These two moderate-income census tracts are very rural and do not contain towns or cities. CNB does not operate any branches in Boone County. The two moderate-income census tracts in Boone County are very rural. Residents in these two moderate-income census tracts would have to travel more than 23 miles to the bank's closest branches in Kanawha and Lincoln Counties.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the Charleston CSA is adequate.

2018

The geographic distribution of home mortgage loans during 2018 is adequate. The geographic distribution of home loans in low-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts is below both the percentage of owner-occupied housing units and aggregate lending in the AA. The bank's ability to penetrate moderate-income census tracts may have been impacted by the distance of some of the bank's branches from moderate-income census tracts.

2019-2020

The geographic distribution of home mortgage loans during 2019-2020 is adequate. The geographic distribution of home mortgage loans in low-income census tracts is below the percentage of owner-occupied housing units and near aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts is below both the percentage of owner-occupied housing units and near aggregate lending in the AA.

Small Loans to Businesses

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

The distribution of small loans to businesses of different sizes is adequate in the Charleston CSA.

2018

The geographic distribution of small loans to businesses during 2018 is adequate. The geographic distribution of small loans to businesses in low-income census tracts is significantly below both the proportion of businesses in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeds both the proportion of businesses in moderate-income census tracts and aggregate lending in the AA.

2019-2020

The geographic distribution of small loans to businesses during 2019-2020 is adequate. The geographic distribution of small loans to businesses in low-income census tracts is below the proportion of businesses in low-income census tracts and well below aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeds both the proportion of businesses in moderate-income census tracts and aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the "MMSA" section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

2018

The borrower distribution of home mortgage loans during 2018 is adequate. The percentage of home mortgage loans to low-income borrowers is well below both the percentage of low-income families and aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers is below both the percentage of moderate-income families and aggregate lending in the AA.

According to 2018 Peer HMDA data, the bank ranked second with a 6.1 percent market share among 99 lenders that made mortgage loans to low-income borrowers in the AA. The bank's market share is good compared to its overall market share of 10.8 percent for home mortgage loans in the AA. Collectively, Quicken Loans, The Huntington Bank N.A., Carrington Mortgage Services, and JP Morgan Chase N.A. had a combined market share of 21.9 percent of loans to low-income borrowers. Market share for the top five lenders ranged from 8.6 percent to 4.1 percent.

2019-2020

The borrower distribution of home mortgage loans during 2019-2020 is good. The percentage of home mortgage loans to low-income borrowers is well below the percentage of low-income families but exceeds aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers is near the percentage of moderate-income families and exceeds aggregate lending in the AA.

According to 2020 Aggregate HMDA, CNB ranked first with 9.4 percent market share among 83 lenders that originated home mortgage loans to low-income borrowers in the AA. This market share is good compared to its overall home mortgage market share of 9.2 percent. Collectively, CBNA, Quicken Loans,

Movement Mortgage LLC, Prime Lending, and Vanderbilt Mortgage and Finance had a combined market share of 24.0 percent of loans to low-income borrowers. Market share for the top four lenders ranged from 6.9 percent to 5.1 percent.

Small Loans to Businesses

Refer to Table R in the “MMSA” section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution’s originations and purchases of small loans to businesses. The geographic distribution of small loans to businesses is good.

In evaluating small business lending activity in 2020, the lack of borrower revenue information for PPP loans is considered. Because SBA underwriting guidelines for PPP loans did not require analysis of borrower revenue information, CNB did not collect it for these loans. To provide a more accurate analysis, 2019 and 2020 lending data was analyzed separately. Considering that there is no business revenue information for the majority of the bank’s 2020 business loans, greater weight was given to the bank’s small business lending activity in 2018 and 2019.

2018

The borrower distribution of small loans businesses during 2018 was good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was near the percentage of those businesses and exceeded aggregate lending in the AA.

2019

The borrower distribution of small loans businesses during 2019 was good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was near the percentage of those businesses and exceeded aggregate lending in the AA.

2020

The borrower distribution of small loans to businesses during was adequate. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below both the percentage of those businesses and aggregate lending in the AA. The low percentage of loans to businesses with revenues less than \$1 million was likely impacted by PPP loans originated in 2020. As previously discussed, the bank did not collect revenue information for PPP loans originated in 2020.

Community Development Lending

The institution has made a relatively high 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.

During the evaluation period, CNB originated five CD loans totaling \$5.2million in the AA. The volume of CD loans represented 2,5 percent of allocated tier one capital. CD loans were responsive to community needs as they provided financings for small businesses and to organizations that provide services to low-

income individuals through various program including drug recovery programs. The AA has experienced a high level of deaths from drug overdoses. Other CD loans supported infrastructure benefiting moderate-income census tracts. Notable CD loans include:

- A \$4 million PPP loan for working capital to a nonprofit organization providing mental health and drug recovery programs to low-income individuals in the AA.
- One \$135,000 loan to finance the purchase of a new ambulance for a volunteer fire department serving a moderate-income census tract. The volunteer fire department provides needed community service to a moderate-income census tract.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

CNB does not offer any innovative or flexible lending practices tailored to meet credit needs in the Charleston CSA AA. The bank does participate in flexible loan programs. These programs were considered in the overall performance and are described in the Description of Institution section of the PE.

INVESTMENT TEST

The institution’s performance under the Investment Test in Charleston CSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the AA is excellent.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

CNB exhibits excellent responsiveness to affordable housing needs and community service needs for low-income persons. The institution makes significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Charleston CSA	14	8,851	216	4,194	230	100	13,046	100	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.*

During the evaluation period, CNB made investments in the three equity fund investments comprising of LIHTCs totaling \$3.5 million. These LIHTCs support affordable housing in the AA. The bank made 213 CD contributions totaling \$235 to numerous community organizations. CNB had 14 prior period investments consisting of LIHTCs and municipal securities with a balance of \$8.9 million at the end of the evaluation period. Total investments and donations represent 7.2 percent of allocated tier 1 capital.

Examples of qualified investment include:

- Investment in an equity fund totaling \$2.0 million which supports two affordable multi-family housing apartment buildings in Kanawha County. The fund allocates \$1 million to the rehabilitation of a 20-unit apartment building and \$1 million to construct 20 affordable housing units.
- Investment in one equity fund totaling \$1.2 million benefiting three multi-family developments in Putnam and Boyd Counties. Of the total investment, \$500,000 is allocated toward 20 affordable housing units in Putnam County, \$600,000 is allocated toward 447 affordable housing units in Boyd County, and \$50,000 is allocated toward 17 affordable housing units in Boyd County.
- Investment of \$300,000 in an equity fund benefiting a 20-unit affordable housing development in Putnam County.
- CD contributions of \$5,000 to a non-profit organization providing social services to at risk students in schools where the majority of the students are eligible to receive free or reduced lunch.
- CD contributions of \$2,000 and donated office space valued at \$14,400 to a non-profit organization which administers a charitable grant program. These grants provide funding to multiple community organizations which provide meals, affordable housing, and scholarships for low-income children.
- CD contributions of \$6,600 to two local affordable housing organizations.

SERVICE TEST

The institution’s performance under the Service Test in Charleston CSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the AA is good.

Retail Banking Services

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

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
Charleston CSA	100.0	36	100.0	2.8	19.4	50.0	22.2	3.0	15.0	59.0	20.6

CNB operates 36 branches in the AA with 41 deposit taking ATMs. Of the total branches, one branch is in a low-income census tract and seven branches are in moderate-income census tracts. There are 18

branches in middle-income census tracts, eight branches in upper-income census tracts, and two branches census tracts without income designation. The distribution of branches is proportionate to population distribution in the AA.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
	0	0	Low	Mod	Mid	Upp
Charleston CSA	0	4	0	-2	-2	0

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, CNB did not open any new branches in the AA. In December 2018, CNB acquired six branches through a merger with Town Square Bank. Of the six acquired branches, three branches were in moderate-income census tracts and three branches were in middle-income census tracts. In February and May of 2019, the bank consolidated two existing CNB branches in moderate-income census tracts into one of the acquired Town Square Bank branches located in a nearby moderate-income census tract. CNB also consolidated two of the acquired Town Square Bank branches in middle-income census tracts into two nearby existing CBN branches also in middle-income census tracts. Management consolidated these branches because the acquired branches were in close proximity to existing CNB branches.

Services, including where appropriate, business hours are tailored to the convenience and needs of the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The majority of CNB's branches offered extended business hours, including those branches in low-income and moderate-income census tracts. These extended business hours include until 6:00 p.m. on Friday and Saturday morning hours.

CNB provides customers with expanded access to branch services through video tellers, known as ITMs. The video teller can perform a variety of services for customers including depositing and cashing checks. As of December 31, 2020, the bank operated eleven ITMs in the Charleston CSA AA. Of the eleven ITMs, one is in a moderate-income census tract. The ITM are located inside CNB's bank branch locations or at drive through windows. The ITMs located in the drive through windows have extended weekday hours from Monday through Friday from 8:00 a.m. to 7:00 p.m. and weekend hours from 8:00 a.m. until 1:00 p.m. on Saturdays. The bank did not provide metrics for the ITMs to demonstrate the effectiveness in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to alternative delivery systems.

The bank offers several alternative delivery systems such as telephone banking, online banking, and mobile banking with mobile deposit. The bank did not provide metrics for these alternative delivery systems to demonstrate the effectiveness in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products include a low-cost checking account with no maintenance fees and a Bounceback Checking account for individuals looking to rebuild a positive checking relationship. CNB also allows free withdrawals from the bank's ATMs for customers accessing their Electronic Benefit program funds. The bank did not provide metrics to demonstrate the effectiveness of these products in

helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to these products and service.

Community Development Services

The bank is a leader in providing community development services.

During the evaluation period, 44 employees provided financial expertise to 67 different community development organizations, primarily in board and leadership positions. These organization include 54 community service, nine economic development entities, and three affordable housing organizations.

Examples of community development service include:

- Bank employees provide financial literacy training in numerous schools where the majority of students qualify for free/reduced lunches. This financial literacy training includes the Teach the Children to Save and Get Smart About Credit courses developed by the American Bankers Association.
- A bank employee serves on the board and finance committee of a non-profit organization providing food, lodging, and money management skills to low-income individuals.
- One employee serves on the board of directors of an organization that administers grants to small businesses located in low- and moderate-income areas of downtown Charleston.
- A bank employee serves on a local city government imitative working to rehabilitate sub-standard housing for low-income individuals.

Multistate Metropolitan Statistical Area Rating

Washington-Baltimore-Arlington, DC-MD-WV-PA Combined Statistical Area (Washington CSA)

CRA rating for the (Washington CSA)²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans is excellent.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes is good.
- The bank has made a low level of CD loans.
- The bank has a significant level of CD investments.
- The bank's delivery systems are readily assessable to geographies and individuals.
- The bank provides a significant level of CD services.

Description of Institution's Operations in Washington CSA

CNB operates five full-service branches and five deposit taking ATMs in the Washington CSA AA. Two branches are in Jefferson County, West Virginia. In the state of Virginia is one branch in Warren County, one branch in Fredrick County, and one branch in the independent city of Winchester. Of the five branches, the two branches in Jefferson County are in low-income census tracts. The branches in Warren County and Winchester City are in moderate-income census tracts. The bank's five branches represent 5.3 percent of CNB's bank-wide branch network.

As of June 30, 2020, CNB reported \$182 million in deposits in the AA, which represents 4.1 percent of the bank's total deposits. According to June 30, 2020, deposit market share information, CNB ranked eighth with a 4.1 percent market share. The top five banks in terms of deposit market share in the AA include Truist Bank with 28.5 percent, United Bank with 10.6 percent, Bank of Clarke County with 10.5 percent, Wells Fargo Bank National Association with 13.8 percent, and First Bank with 8.0 percent.

According to November 2020 Moody's Analytics Inc. data, the Washington CSA economy improved after the 2019 recession and the COVID-19 pandemic induced economic downturn of 2020. Despite this improvement, the AA recovered only 38 percent of job loss versus the nationwide average of 55 percent through October 2020. Population growth was negative in terms of migration inflows and out flows as there was a net excess of 23,000 people to leave the CSA.

²This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

Skilled labor is in high demand as the healthcare industry and other specialized industries attempt to provide resources for the pandemic, replace retirees, and support the existing population. Top fields for employment in the area are professional and business services, government, education and health services, and leisure and hospitality services. Top employers include Washington Navy Yard (Naval Support Activity), Andrews Naval Air Base, MedStar Health, Marriott International, and Inova Health.

Housing prices in the AA increased due to lack of supply which impacted housing affordability in the area. Based on 2015 American Community Survey, the median home value in the CSA was \$212,961. Considering that low-income families earn less than \$26,000 (50 percent of the median family income of \$54,200), low-income families may have difficulty qualifying for a home mortgage in the AA.

According to December 2020 U.S. Bureau of Labor Statistics data, annual unemployment rates (not seasonally adjusted) in Jefferson County, West Virginia ranged from a low of 3.3 percent in 2019 to a high of 5.9 percent in 2020. In Frederick County, annual unemployment rates (not seasonally adjusted) ranged from a low of 2.6 percent in 2018, to a high of 4.6 percent in 2020. In Warren County, annual unemployment rates (not seasonally adjusted) ranged from a low of 2.7 percent in 2019 to a high of 5.8 percent in 2020. In Winchester City, annual unemployment rates (not seasonally adjusted) ranged from a low of 2.7 percent in 2019 to a high of 5.8 percent in 2020.

Information from a community interview of a local government official did not identify any unmet community credit needs. The community representative indicated that more small business education programs is needed for prospective entrepreneurs and business owners. According to the community contact, the programs would help to reduce the turnover of small businesses in the area.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Washington CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	42	7.1	38.1	42.9	11.9	0.0
Population by Geography	202,203	4.8	35.4	45.4	14.4	0.0
Housing Units by Geography	82,562	5.3	35.4	45.2	14.1	0.0
Owner-Occupied Units by Geography	53,839	4.3	32.0	47.4	16.2	0.0
Occupied Rental Units by Geography	20,919	7.4	42.9	39.8	9.9	0.0
Vacant Units by Geography	7,804	6.0	38.3	44.8	10.8	0.0
Businesses by Geography	13,081	5.3	34.0	45.7	14.9	0.0
Farms by Geography	570	5.6	36.3	45.1	13.0	0.0
Family Distribution by Income Level	52,244	25.9	19.2	21.1	33.7	0.0
Household Distribution by Income Level	74,758	26.2	18.4	17.7	37.7	0.0
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC- VA-MD-WV MD		\$106,762	Median Housing Value			\$212,961
Median Family Income MSA - 49020 Winchester, VA-WV MSA		\$69,817	Median Gross Rent			\$969
			Families Below Poverty Level			6.6%
<i>Source: 2015 ACS and 2018 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Washington CSA

The OCC conducted a full-scope review of the Washington CSA. Home mortgage loans, which accounted for 77 percent of loans originated and purchased in the AA during the evaluation period, were given more weight than small business loans. The volume of small farm loans was not sufficient to conduct a meaningful analysis. The bank originated one small farm loans during the evaluation period.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON CSA

LENDING TEST

The bank's performance under the Lending Test in the Washington CSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Washington CSA is good.

Lending Activity

Lending levels reflects excellent responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Washington CSA	529	160	0	2	691

Dollar Volume of Loans*					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Washington CSA	\$82,628	\$17,372	\$0	\$1,231	\$101,231

The bank's market share of loans exceeds its deposit market share. According to 2020 peer deposit market share data, CNB reported \$182 million in deposits in the Washington CSA. As of June 30, 2020, the bank ranked eighth with a deposit market share of 8.0 percent. This rank placed the bank in the top 47.1 percent of 17 depository institutions in the AA.

Based on 2020 HMDA Peer data, CNB ranked ninth with a market share of 1.2 percent market share. This rank placed the bank in the top 2.3 percent of all mortgage lenders. Competition for mortgage loans was very strong as there were 386 other lenders in the AA. The top five home mortgage lenders, Quicken Loans, LLC, Wells Fargo National Bank, Truist Bank, PennyMac Loan Services LLC, and Freedom Mortgage Services LLC., had a combined market share of 28.2 percent. The market share of these banks ranged from 8.4 percent to 4.4 percent.

Based on 2020 CRA small business loan data, CNB ranked twelfth with a market share of 2.5 percent. This rank placed the bank in the top 12.4 percent of all lenders. Competition was strong for small business loans as there were 97 lenders in the AA. The top five lenders, American Express National Bank, Truist Financial, United Bank VA, Wells Fargo National Bank, and Synchrony Bank, had a combined market share of 53.0 percent. The top five banks' market shares ranged from 16.0 percent to 6.0 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an excellent geographic distribution of loans in its AA.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the Washington CSA is excellent.

The geographic distribution of loans in low-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending in the AA.

Small Loans to Businesses

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

The distribution of small loans to businesses of different sizes is excellent.

The geographic distribution of small loans to businesses in low-income census tracts exceeds both the proportion of businesses in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeds both the proportion of businesses in moderate-income census tracts and aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes.

Home Mortgage Loans

Refer to Table P in the "MMSA" section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's home mortgage loan originations and purchases.

The borrower income distribution of home mortgage loans is good.

The percentage of home mortgage loans to low-income borrowers is near the percentage of low-income families and exceeds aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers exceeds the percentage of moderate-income families and aggregate lending in the AA.

Small Loans to Businesses

Refer to Table R in the "MMSA" section of Appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to businesses.

The borrower income distribution of small loans to businesses in the Washington CSA is good.

In evaluating small business lending activity in 2020, the lack of borrower revenue information for PPP loans was considered. Because SBA's PPP loan underwriting guidelines did not require analysis of borrower revenue information, CNB did not collect it for these loans. In order to conduct a more accurate analysis, lending data for each year in the evaluation period was analyzed separately. Considering that there is no business revenue information for the majority of the bank's 2020 business loans, greater weight was given to the bank's small business lending in 2018 and 2019.

2018

The borrower distribution of small loans to businesses during 2018 is excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds both percentage of those businesses and aggregate lending in the AA.

2019

The borrower distribution of small loans to businesses during 2019 is excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less equals the percentage of those businesses and exceeds aggregate lending in the AA.

2020

The borrower distribution of small loans to businesses during 2020 is adequate. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below both the percentage of those businesses and aggregate lending in the AA. The lower percentage of loans to businesses with revenues less than \$1 million is likely impacted by the number of PPP loans originated in 2020. As previously discussed, business revenue information for PPP loans was not collected in 2020.

Community Development Lending

The institution has made a low 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.

During the evaluation period, CNB originated two CD loans totaling \$123 million in the AA. The volume of CD loans represented 6.2 percent of allocated tier 1 capital. CD Loans were responsive to identified community credit needs. These loans provided financing for community services for low-income individuals and infrastructure benefiting moderate-income census tracts.

Description of CD loans :

- A \$1.2 million loan financing improvements for a local hospital serving several moderate-income census tracts. The hospital offers financial assistance to low-income and moderate-income individuals through state and federal government programs including WV Medicaid and VA Medicaid. The hospital also offers free health care to families below 200 percent of the federal poverty guidelines
- One \$66,000 loan providing financing to a volunteer fire department serving a moderate-income census. This volunteer fire department provides needed infrastructure services to a moderate-income census tract.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

CNB does not offer any innovative or flexible lending practices tailored to meet credit needs in the Charleston CSA AA. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section.

INVESTMENT TEST

The institution’s performance under the Investment Test in Washington CSA is rated High Satisfactory.

Based on a full-scope review of the Washington CSA, the institution’s performance is good.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits adequate responsiveness to credit and community economic development needs. The institution occasionally uses use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Washington CSA	0	0	38	770	38	100	770	100	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.

During the evaluation period, the bank made three investments in municipal bonds totaling \$745,000. The municipal bonds support infrastructure in low-income and moderate-income census tracts. CNB made 35 CD contributions totaling \$29,000 to various community organizations. Total qualified investments represent 4.8 percent of allocated tier 1 capital.

Examples of qualified investments include:

- Investment in three municipal bonds totaling \$745,000. The bonds provided financing for water and sewage systems serving low-and moderate-income census tracts in the AA.
- Donations totaling \$29,000 to support numerous local organizations that provide various services to low-income and moderate-income individuals including medical care and basic living necessities.

SERVICE TEST

The institution’s performance under the Service Test in the Washington CSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Washington CSA is good.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the institution’s AA(s).

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
Washington CSA	100.0	5	100.0	40.0	40.0	0.0	20.0	4.8	35.4	45.4	14.4

Service delivery systems in the Washington CSA were readily accessible to geographies and individuals of different income levels in its AAs.

CNB has a proportional number of branches in low-income and moderate-income census compared to the population distribution. Two branches are in low-income census tracts and two branches are in moderate-income census tracts.

The bank did not open or close any branches in this CSA during the evaluation period.

Services, including where appropriate, business hours are tailored to the convenience and needs of the various portions of its AA, particularly low- and moderate-income geographies and/or individuals. The bank's branches in low-income and moderate-income census tracts offer extended business hours on Friday until 6:00 p.m. and Saturday morning business from 9:00 a.m. until 12:00 p.m.

CNB offers several alternative delivery systems including telephone banking, online banking, and mobile banking with mobile deposit. The bank did not provide metrics for these alternative delivery systems to demonstrate the effectiveness in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products include a low-cost checking account with no maintenance fee and Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship. CNB offered services that provided easy access to funds for low-income people who receive government assistance. CNB also allows free withdrawals from the bank's ATMs for customers accessing their Electronic Benefit Transfer funds. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight is given to these products and services.

Community Development Services

The institution provides a significant level of CD services.

During the evaluation period, five bank employees provided financial expertise to eleven community development organizations in the AA. Bank personnel provided services to nine organizations that serve low-income individuals and two economic development organizations.

Examples of community development services include:

- Bank employees provided financial literacy training at several schools where the majority of students qualified for free/reduced lunches. This financial literacy training included the Teach the Children to Save and Get Smart About Credit courses developed by the American Bankers Association.
- One bank employee served as the board member for an organization focused on assisting low-income individuals access resources for basic necessities such as medical care, food, and transportation.
- One bank employee served as board member of an organization that administers a drug recovery program for low-income individuals.
- A bank employee provided financial expertise to an organization involved in revitalization of low- and moderate-income census tracts.

State Rating

State of Kentucky

CRA rating for the State of Kentucky: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes is good.
- The bank has made a relatively high level of CD loans.
- The bank has a significant level of CD investments.
- The bank's delivery systems are reasonable assessable to geographies and individuals.
- The bank provides a significant level of CD services.

Description of Institution's Operations in Kentucky

CNB has two AAs in the state of Kentucky consisting of the Lexington MSA AA (MSA # 34060) and non-metropolitan counties in Kentucky (KY Non-MSA AA). The Lexington MSA AA consists of the two counties of Fayette and Jessamine Counties. The KY non-MSA consists of the five counties of Johnson, Lawrence, Harrison, Montgomery, Nicholas, and Harrison County. Johnson and Lawrence Counties are located in the central northern portion of the state. Johnson and Lawrence Counties are in the eastern part of the state bordering West Virginia.

The bank operates ten full-service branches and six deposit-taking ATMs in the state of Kentucky as of December 31, 2020. The branches represent 7.4 percent of the bank's total branch network. The bank reported \$498 million in deposits, or 11.3 percent of total bank wide deposits in the state of Kentucky according deposit market share information as of June 30, 2020.

CNB originated and purchased 4.9 percent of its total home mortgage loans, 13.6 percent of its total small business loans, and 56.7 percent of its total small farm loans in the state of Kentucky during the evaluation period.

KY-Non-MSA

CNB operates six branches and four deposit taking ATMs in the KY Non-MSA AA. The bank's six branches represent 6.4 percent of CNB's bank-wide branch network and 58.6 percent of the bank's branches in the state. The distribution of branches is as follows: two branches in Johnson County and one branch each in the counties of Lawrence, Nicholas, Harrison County, and Montgomery.

CNB reported \$292 million in deposits in the AA. According to June 30, 2020, deposit market share information, CNB ranked second with a market share of 17.7 percent. There were 13 other depository institutions in the AA. The top banks in terms of deposit market share in the AA included Traditional Bank with 23.1 percent market share, Citizens Bank of Kentucky, Inc., with 16.8 percent market share, and Community Trust Bank with 7.5 percent market share.

The majority (91.7) of the 24 total census tracts in the AA are middle-income. There are no low-income or moderate-income census tracts. Of the 22 middle-income census tracts, 19 census tracts are designated distressed or underserved due unemployment or the remote nature of the census tracts. All middle-income census tracts in Johnson and Lawrence County are designed underserved. All of the bank's branches are in distressed/underserved middle-income census tracts.

CNB originated 2.4 percent of its total home mortgage loans in the AA and 5.7 percent of its total small business loans in the AA during the evaluation period.

According to information from Data USA, the primary industries in the AA include health care, retail, education, and manufacturing. The AA experienced high unemployment rates during the evaluation period, particularly in 2020. According to December 2020 U.S. Bureau of Labor Statistics annual unemployment rates (not seasonally adjusted) ranged from a high of 21.1 percent to a low of 3.3 percent during the evaluation period. Montgomery County had the highest unemployment rate at 21.1 percent in April 2020 and Harrison County had the lowest at 3.3 percent in November 2018.

Very low-income individuals and families in the AA may experience challenges qualifying for home mortgage loans as a result of poverty. The county family poverty rates in the AA are high. Based upon 2015 American Community Survey (ASC) data, county family poverty rates in the AA ranged between 20.9 percent to 16.0 percent. In comparison, the state family poverty rate in Kentucky was 14.4 percent. Johnson County had the highest family rates at 20.9 percent and Nicholas County that the lowest family poverty rate at 16.0 percent.

Information from two community interviews of economic development entities noted that local banks are responsive to community credit needs. The community contacts identified the following needs in the Kentucky Non-MSA AA:

- Affordable housing;
- Small business financing for operations and purchasing costs; and,
- Financial education for low- and moderate-income families on topics such as money management and down payment assistance.

Table A – Demographic Information of the Assessment Area						
Assessment Area: KY Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	0.0	91.7	8.3	0.0
Population by Geography	92,061	0.0	0.0	88.0	12.0	0.0
Housing Units by Geography	41,022	0.0	0.0	88.9	11.1	0.0
Owner-Occupied Units by Geography	24,894	0.0	0.0	90.3	9.7	0.0
Occupied Rental Units by Geography	10,366	0.0	0.0	82.7	17.3	0.0
Vacant Units by Geography	5,762	0.0	0.0	93.8	6.2	0.0
Businesses by Geography	4,836	0.0	0.0	86.6	13.4	0.0
Farms by Geography	292	0.0	0.0	89.0	11.0	0.0
Family Distribution by Income Level	24,208	24.3	16.1	17.9	41.6	0.0
Household Distribution by Income Level	35,260	26.7	14.7	15.7	42.8	0.0
Median Family Income Non-MSAs - KY		\$45,986	Median Housing Value			\$98,638
			Median Gross Rent			\$585
			Families Below Poverty Level			19.0%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Kentucky

The OCC conducted a full-scope review of the KY Non-MSA and a limited-scope review of the Lexington MSA AA.

The full-scope AA received the highest weighting as it represents 58.6 percent of the state’s total deposits, 49.1 percent of the state’s loans, and 66.7 percent of the state’s branches. Home mortgage loans, which accounted for 47.7 percent of loans, made in the state’s AAs during the evaluation period, were given equal weight as small business loans which represented 45.8 percent of total lending in the state. Lesser weight was assigned to small farm loans as small farm loans represented 6.4 percent of the bank’s lending in the state.

The KY Non-MSA AA was impacted by MSA boundary changes that became effective January 1, 2019. As a result of the OMB changes, Carter County KY, a non-MSA county, became part of the Huntington-Ashland-WV-KY-OH MSA. To account for this change, 2018 lending data was analyzed separately from combined 2019 and 2020 lending data. Greater weight was placed on the bank’s lending activity during 2019 and 2020 as it represented the majority of loans by total number.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Lexington MSA	214	232	15	1	462	51.2	41.4
Non-MSA	210	175	51	5	441	48.8	58.6

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Lexington MSA	\$36,954	\$36,504	\$720	\$2,622	\$76,800	67.3	41.4
Non-MSA	\$19,885	\$13,654	\$2,988	\$799	\$37,326	32.7	58.6

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

The bank's market share of loans exceeded its deposit market share. According to June 30, 2020, deposit market share data, CNB reported \$292 million in deposits in the AA. As of June 30, 2020, the bank ranked second with a 17.7 percent market share. This rank placed the bank in the top 11.8 percent of 17 other depository institutions in the AA. Based on 2020 HMDA peer data, CNB ranked fourth with a 4.0 market share. This rank placed the bank in the top 2.3 percent of mortgage lenders. Competition is strong as there are 176 other lenders in the AA. The top three home mortgage lenders, Community Trust Bank Inc., Quicken Loans LLC, and Kentucky Bank, had a combined market share of 17.9 percent. The market share of these banks ranged from 7.4 percent to 4.2 percent.

Based upon 2020 Peer small business loan data, the bank ranked fourth out of 63 small business lenders, with a 7.9 percent market share. This rank placed the bank in the top 6.3 percent of small business lenders. The top three lenders, Traditional Bank, Community Trust Bank, Inc., and American Express, National Bank had a combined market share of 38.9 percent. The top five banks' market shares ranged from 14.43 percent to 11.48 percent.

Based on 2020 Peer small farm data, CNB ranked fifth out of 11 lenders with a market share of 11.3 percent. This rank placed the bank in the top 45.5 percent of all small farm lenders. The top four lenders, John Deer FSB, Traditional Bank, Community Trust Bank Inc., and Whitaker Bank Inc. had a combined market share of 73.0 percent. The market shares of these top lenders ranged from 24.1 percent to 15.0 percent.

Distribution of Loans by Income Level of the Geography

A geographic distribution analysis of home mortgage loans was not completed. There were no low-income or moderate-income census tracts in the Kentucky Non-MSA AA.

Lending Gap Analysis

A geographic distribution analysis of home mortgage and consumer loans was not completed for this evaluation period. There are no low-income or moderate-income census tracts in the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits adequate distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

The borrower income distribution of home mortgage loans in the state of Kentucky is adequate.

2018

The shortage of affordable housing as stated by a community contact, the high family poverty rates, and competition impacted the bank's ability to originate home mortgage loans to low-income and moderate-income borrowers. The borrower distribution of home mortgage loans during 2018 was good considering the shortage of affordable housing, the high family poverty rates, and competition. The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families but exceeds aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but is near aggregate lending in the AA.

According to 2018 Peer HMDA data, the bank ranked sixth with a 4.4 percent market share among 48 lenders that made mortgage loans to low-income borrowers in the AA. The bank's market share is good compared to its overall market share of 4.5 percent for home mortgage loans in the AA. Collectively, the top five lenders, Century Mortgage, Quicken Loans, Traditional Bank Inc., Carrington Mortgage Services, and Whitaker Bank had a combined market share of 38.6 percent of loans to low-income borrowers.

2019-2020

The shortage of affordable housing as stated by a community contact, high family poverty rates and competition impacted the bank's ability to originate home mortgage loans to low-income and moderate-income borrowers.

The borrower distribution of home mortgage loans during 2019-2020 is adequate considering the shortage of affordable housing, the high family poverty rates, and competition. The percentage of home mortgage loans to low-income borrowers was significantly below the percentage of low-income families

and well below aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and near aggregate lending in the AA. According to 2020 Peer HMDA data, the bank ranked 19th with a 1.4 percent market share among 43 lenders that made mortgage loans to low-income borrowers in the AA. The bank's market share was below its overall market share of 4.0 percent for home mortgage loans in the AA. Collectively, Quicken Loans, Vanderbilt Mortgage and Finance, Peoples Exchange Bank, Peoples Bank, and Stockton Mortgage Corporation had a combined market share of 34.3 percent of loans to low-income borrowers.

Small Loans to Businesses

Refer to Table R in the state of Kentucky section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower income distribution of small loans to businesses in the State of Kentucky is excellent.

In evaluating the bank's small business lending activity in 2020, consideration was given to the lack of borrower revenue information for PPP loans. Because SBA's PPP underwriting guidelines did not require analysis of borrower revenue information, CNB did not collect for PPP loan. To conduct a more accurate analysis, 2018, 2019, and 2020 lending data was analyzed separately.

2018

The borrower distribution of small loans to businesses during 2018 is excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds both the percentage of those businesses and aggregate lending in the AA.

2019

The borrower distribution of small loans to businesses during 2019 is excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is near the percentage of those businesses but exceeded aggregate lending in the AA.

2020

The borrower distribution of small loans to businesses is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses but exceeded aggregate lending in the AA. The low percentage of loans to businesses with revenues less than \$1 million was likely impacted by the number of PPP loans originated in 2020. As previously discussed, the bank did not collect revenue information for PPP loans originated in 2020.

Small Loans to Farms

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

The borrower income distribution of small farm loans in the State of Kentucky is excellent.

2018

The borrower distribution of small loans to farms during 2018 is excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds both the percentage of those businesses and aggregate lending in the AA.

2019-2020

The borrower distribution of small loans to farms during 2018 is excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is near the percentage of those businesses and exceeds aggregate lending in the AA.

Community Development Lending

The institution has made a significantly high 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.

CNB originated five CD loans totaling \$799 thousand in the AA. The CD loans were responsive to community credit needs. The CD loans are responsive to community needs of supported affordable housing and stabilization of distressed middle-income census tracts. Notable CD loans include:

- A \$495,000 loan provided financing of infrastructure in a designed Opportunity Zone in Nicholas County. This loan will help encourage economic development in the AA.
- Two loans totaling \$120,000 to a local fire district serving distressed middle-income census tracts in Nicholas County. One loan financed the purchase a pumper truck and the other loan financed the construction a fire station. These loans help to provide needed community services to promote economic development in these distressed middle-income census tracts.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

CNB does not offer any innovative or flexible lending practices tailored to meet credit needs in the Charleston CSA AA. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Lexington KY MSA AA is stronger than the bank's overall performance under the Lending Test in the full-scope AA. The bank's geographic distribution loans home mortgage loans in Lexington MSA is good. The bank's percentage of lending in low-income and moderate-income census tracts is near the percentage of owner-occupied housing units in these census tracts and exceeds aggregate lending in these census tracts.

Refer to Tables O through V in the state of Kentucky section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Kentucky is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lexington MSA	0	0	23	329	23	43.4	329	18.2	0	0
Kentucky Non-MSA	0	0	29	842	29	54.7	842	32.7	0	0
Statewide/ Regional with P/M/F	0	0	1	905	1	1.9	905	49.1	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.

Kentucky Statewide Area

CNB invested in one bond totaling \$905,000 which benefited affordable housing in the statewide area during the evaluation period. This affordable housing bond was acquired through the merger of Town Square Bank in December 2018. Total statewide qualified investments represented 1.9 percent of the bank's tier 1 allocated capital during the evaluation period.

KY Non-MSA AA

During the evaluation period, the bank made 39 qualified investments and CD contributions totaling \$842,000 in the AA. The majority the qualified investments consisted of general revenue bonds supporting local schools in distressed middle-income census tracts. These bonds were acquired through the merger with Town Square Bank in December 2018. CNB made 27 CD contributions totaling \$35,000 to various community organizations providing community services targeting low-income persons. Total qualified investments represent 3.4 percent of allocated tier 1 capital.

Qualified investments include:

- One municipal bond totaling \$500,000 to finance the construction of an elementary school in located in a designated distressed middle-income census tract in Montgomery County. The majority of students at this school are eligible to receive free or reduced lunch.
- One municipal bond totaling \$60,000 to fund the construction of a new elementary school in a distressed and underserved census tract in Nicholas County. The majority of students at this school are eligible to receive free or reduced lunch.
- The bank made contributions totaling \$4,000 to an organization that provide services to low-income individuals including food and clothing. This organization also administers a snack program to children in local schools where the majority of students are eligible to receive free and reduced lunch.
- The bank made CD contributions totaling \$2,000 to a local food pantry serving low-income individuals in the AA

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Lexington MSA AA is consistent with the bank’s overall performance under the Investment Test.

SERVICE TEST

The bank’s performance under the Service Test in Kentucky is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Kentucky Non-MSA AA is good.

Retail Banking Services

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

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
Lexington MSA	41.4	4	44.4	0.0	50.0	25.0	25.0	10.0	26.3	33.8	29.9
Non-MSA	58.6	6	55.6	0.0	0.0	100.0	0.0	0.0	0.0	88.0	12.0

Service delivery systems in the AA are reasonably accessible to individuals of different income levels in its AAs.

In assessing branch services, the OCC considered that all bank’s branch offices in the AA are in distressed middle-income census tracts.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of the AA, particularly low- and moderate-income geographies and/or individuals. Most of the bank’s branches have extended weekday hours until 6:00 p.m. on Friday and Saturday morning hours until 12:00 p.m.

Alternative delivery systems include services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank did not provide metrics for these alternative delivery systems to demonstrate the effectiveness in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to alternative delivery systems.

The bank’s retail products include a low-cost checking account with no maintenance fee and Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship. CNB offered services that provided easy access to funds for low-income people who receive government assistance. CNB also allows free withdrawals from the bank’s ATMs for customers accessing their Electronic Benefit Transfer funds. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight is given to these products and services.

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

To the extent changes have been made, the institution’s opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period, CNB did not open any new branch offices. Through the bank’s December 2018 mergers with Town Square Bank and Farmers Deposit Bank, CNB acquired five branches in the AA. Four of the acquired branches were in middle-income census tracts and one branch was in an upper-income census tract. On May 15, 2020, the bank closed the acquired branch in the upper income census tract in Harrison County. Management chose to close this branch due to its close proximity to another CNB branch.

Community Development Services

The institution provides a significant level of CD services.

During the evaluation period, three bank employees provided financial expertise to six community development organizations in the AA. Bank personnel provided services to two organizations that serve LMI individuals and two economic development organizations.

Examples of CD services include:

- Bank employees provide financial literacy training in a number of schools where the majority of students qualified for free/reduced lunches. This financial literacy training consists of the Teach the Children to Save and Get Smart About Credit courses developed by the American Bankers Association.
- Two employees serve as board members in two organizations that promote tourism to stimulate growth in distressed and underserved middle-income census tracts in the AA.
- A bank employee serves as a board member of a local medical center serving a distressed middle-income census tract in the AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Lexington KY MSA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of Ohio

CRA rating for the State of Ohio: 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:

- Lending levels reflect poor responsiveness to the credit needs in the AA.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes is poor.
- The bank made no CD loans.
- The bank qualified investments consist of a minimal amount of financial contributions.
- The bank's delivery systems are reasonably assessable to geographies and individuals.
- The bank provides no CD services.

Description of Institution's Operations in Columbus, OH

CNB has one AA in the state of Ohio consisting of a portion of the Columbus, OH MSA (MSA #18140) AA. The AA includes the eight census tracts comprising the City of Worthington in Franklin County. The city of Worthington consists of a 5.5 square mile area located in the northern portion of Franklin County. All eight of the census tracts in the city of Worthington are upper-income tracts. CNB operates one branch and two deposit taking ATMs in the AA. The bank's branch office represented 1.1 percent of the bank's total branch network.

CNB faces strong competition for deposits and loans in the AA. As of June 30, 2020, CNB reported \$7 million in deposits in the AA, which represents 0.2 percent of the bank's total deposits. According to June 30, 2020, deposit market share information, CNB ranked 13th out of 13 depository institutions in the AA, with a 0.4 percent market share. The top banks in terms of deposit market share in the AA include CF Bank National Bank with an 18.2 percent market share, JP Morgan Chase with a 13.5 percent market share, The Huntington Bank National Association with a 13.1 percent market share, and First Financial Bank with a 9.9 percent market share. According to 2020 HMDA peer data, 179 lenders originated 2,221 home mortgage loans in the AA. According to 2020 peer small business data, 190 lenders originated 28,482 small business loans in the AA.

In December of 2018, the bank opened a branch in the Columbus area in order to support two commercial lenders that had been working in Columbus market for the past couple of years. The branch was opened to accommodate the bank's commercial lending customers. Management acknowledged that with opening this remote branch would pose challenges in terms of staffing, marketing, business development as well as originating retail loans. Considering the bank's limited presence in the Columbus market, management focused on generating deposits and loans through outreach efforts of the bank's two commercial lenders and two retail personnel. During the evaluation period, advertising was limited to checking accounts and home equity loans. Management also asserted that that mandatory COVID-19 pandemic shutdowns in

2020 made it difficult for the bank’s branch manager and commercial lenders to establish relationships to generate loans.

According to October 2020 Moody’s Analytical data, major employment sectors in the Columbus MSA included professional and business services, education, health services, and government. Some top employers include JP Morgan Chase & Co., Nationwide, and Honda, according to Department of Development for the City of Columbus 2020 Factbook.

According to the Bureau of Labor Statistics, unemployment in the Columbus MSA AA was 7.4 percent as of December 2020. This is a strong recovery from a high of 13.4 percent, unemployment in April 2020. Unemployment remained elevated relative to year-end unemployment for 2018 and 2019 at 4 percent.

Information from a community interview with a community development organization identified the following needs:

- Shortage of affordable housing
- Financial literacy training

A recent interagency regulatory meeting with local community development entities revealed that as a result of the limited supply of affordable housing, there are 26,000 families on the waiting list for federally subsidized housing and HUD Section 8 housing assistance in the Columbus OH MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Columbus OH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	8	0.0	0.0	12.5	87.5	0.0
Population by Geography	26,617	0.0	0.0	24.2	75.8	0.0
Housing Units by Geography	11,110	0.0	0.0	23.1	76.9	0.0
Owner-Occupied Units by Geography	8,909	0.0	0.0	20.3	79.7	0.0
Occupied Rental Units by Geography	2,032	0.0	0.0	35.2	64.8	0.0
Vacant Units by Geography	169	0.0	0.0	26.0	74.0	0.0
Businesses by Geography	3,423	0.0	0.0	14.3	85.7	0.0
Farms by Geography	41	0.0	0.0	14.6	85.4	0.0
Family Distribution by Income Level	7,340	7.9	12.9	14.6	64.6	0.0
Household Distribution by Income Level	10,941	8.9	13.1	15.0	63.1	0.0
Median Family Income MSA - 18140 Columbus, OH MSA		\$70,454	Median Housing Value			\$230,756
			Median Gross Rent			\$987
			Families Below Poverty Level			2.2%

*Source: 2015 ACS and 2020 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 AA had a relatively high cost of housing that may have impeded homeownership for low-income individuals and families. The affordability table below illustrates housing affordability calculations for the city of Worthington. The monthly mortgage payment calculations assumed a 30-year mortgage with a five percent interest rate, not accounting for down payment, homeowner’s insurance real estate taxes, or any additional expenses. The maximum low-income calculation is based upon 50 percent of the 2020 FFIEC adjusted median family income in the Columbus OH MSA. As the table illustrates, low-income borrowers would be challenged to afford the median home price.

MSA Name	2020 MFI for MSA	Maximum Low Income	Maximum Affordable Mortgage Amount	Maximum Mortgage Payment	2020 Median Home Sales Price	Mortgage Payment based upon Sale Price
Columbus OH MSA	\$84,600	\$42,300	\$196,992	\$1,057	\$278,100*	\$1,492

*Home sales data from Realtor.com for the city of Worthington.

Scope of Evaluation in Ohio

The OCC conducted a full scope review of the Columbus, OH MSA AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO LENDING TEST

The bank’s performance under the Lending Test in Ohio is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank’s performance in the Columbus OH MSA AA is poor.

Lending Activity

Lending levels reflect poor responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Columbus OH MSA	1	0	0	0	1	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*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Columbus OH MSA	\$200	\$0	0	0	\$200	100.0	100.0

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

Overall lending levels reflect poor responsiveness to credit needs. During the evaluation period, CNB made one home mortgage loan in the AA. The bank did not originate any small business loans in the AA.

According to June 30, 2020, deposit market share data, CNB reported \$7 million in deposits in the AA. As of June 30, 2020, the bank ranked 13th out of 13 depository institutions with a 0.4 percent market share. According to 2020 Peer HMDA data, the bank ranked 138th out of 179 lenders with a market share of .05 percent. The top five lenders, The Huntington Bank N.A., Union Savings Bank, J.P. Morgan Chase Bank N.A., Wells Fargo Bank N.A., and Fifth Third Bank N.A., had a combined market share of 30.6 percent.

CNB had no small business market share during the evaluation period. According to 2020 Small Business peer data, 190 lenders originated small business loans in the AA. The top five lenders, JP Morgan Chase, The Huntington Bank, PNC Bank N.A., American Express Bank N.A., and US Bank, had a combined market share of 59.3 percent.

Distribution of Loans by Income Level of the Geography

A geographic distribution analysis of home mortgage loans was not conducted. There are no low-income or moderate-income census tracts in the Columbus OH MSA AA.

Distribution of Loans by Income Level of the Borrower

A borrower income distribution analysis was not conducted. CNB did not originate a sufficient number of home mortgage loans for a meaningful analysis.

Community Development Lending

The institution has made few if any CD loans.

The bank's small presence and challenges in establishing relationships in the AA, may have impacted the bank's opportunities to originate CD loans in the AA.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve the AA credit needs.

CNB does not offer any innovative or flexible lending practices tailored to meet credit needs in the Columbus OH MSA AA. As previously discussed, the bank's City Start Program, West Virginia Housing Development Fund's First Time Homebuyer Program, the WV Housing Fund First Time Homebuyer Program, USDA housing program, and the SBA's PPP loans were available bank wide.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Columbus OH MSA is poor.

The institution has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits poor responsiveness to credit and community economic development needs. The institution does not make significant use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Columbus OH MSA	0	0	2	3	2	100.0	3	100.0	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.

CNB made two CD contributions totaling \$3,000 to a local food pantry serving low-income individuals. Total qualified investments were the equivalent of 0.4 percent of allocated tier 1 capital.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

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
Columbus OH MSA	100.0	1	100.0	0.0	0.0	0.0	100.0	0.0	0.0	0.0	100.0

The bank operates one-full-service branch office with two deposit taking ATMs in the AA. The branch distribution is in proportion the distribution of the population.

During the evaluation period, CNB did not open any new branch offices in the AA.

Services, including where appropriate, business hours are tailored to convenience particularly low- and moderate-income geographies and/or individuals.

The bank's lobby hours are 9:00 a.m. to 4:00 p.m., Monday through Friday. While there are no Saturday business hours, there are extended weekday and weekend hours at the bank's walk-up video teller terminals from 8:00 a.m. until 7:00 p.m. Monday through Friday and from 8:00 a.m. until 1:00 p.m. on Saturday.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank did not provide metrics for these alternative delivery systems to demonstrate the effectiveness in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products include a low-cost checking account with no maintenance fee and Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship. CNB offered services that provided easy access to funds for low-income people who receive government assistance. CNB also allows free withdrawals from the bank's ATMs for customers accessing their Electronic Benefit Transfer funds. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight is given to these products and services.

CNB provides customers with expanded access to its branch services through ITMs. The ITMs are similar to ATMs, but with video chat capability with a live CNB teller. The video teller can perform a variety of services for customers including depositing and cashing checks. As of December 31, 2020, there was one ITM inside the branch lobby and one ITM at the drive through window at the bank's Worthington OH branch. The bank did not provide any metrics to support how the ITM is helping meet banking needs of low-income and moderate-income individuals or geographies. Consequently, no significant weight was assigned to this service.

Community Development Services

The institution provides few if any CD services.

Management asserted that several factors adversely impacted CNB branch personnel's ability to participate in community service events and organizations during the evaluation period. Since opening the branch office in December 2018, the bank maintained a small staff at the branch which tended to affect the bank's ability to establish new relationships with local community organizations. Management further explained that after hiring a new branch manager in April of 2019, the new branch manager spent the remainder of 2019 training. In addition, the 2020 COVID-19 pandemic mandated shutdowns and restrictions, further compounded the branch manager's efforts to establish contacts and relationships in the community.

State Rating

State of Virginia

CRA rating for the State of Virginia ³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans is good.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes is good.
- The bank has made a low adequate level of CD loans.
- The bank has a significant level of CD investments.
- The bank's delivery systems are readily assessable to geographies and individuals.
- The bank provides a significant level of CD services.

Description of Institution's Operations in Virginia

CNB has two assessment areas in the state of Virginia consisting of the Staunton MSA (MSA # 44420) and the non-metropolitan counties in Virginia (VA Non-MSA AA). The Staunton WV MSA consists of Augusta County and the independent cities of Staunton and Waynesboro. The VA Non-MSA AA includes Shenandoah County, Rockbridge County and the independent cities of Buena Vista and Lexington City.

The bank operates ten full-service branches and three deposit taking ATM in the state of Virginia as of December 31, 2020. These branches represent 10.6 percent of the bank's total branch network. The bank reported \$378 million in deposits or 8.6 percent of total deposits in the state of Virginia based upon deposit market share information as of June 30, 2020.

CNB originated and purchased 5.2 percent of its total home mortgage loans and 14.3 percent of its total small business loans in the state of Virginia during the evaluation period.

Staunton VA MSA

The bank operates five branches and one deposit taking ATM in the AA. Two branches are in Augusta County, two branches are in Staunton City, and one branch is in Waynesboro City. The bank's branches represent 5.3 percent of the bank's network of branches and 50.0 percent of total branches in Virginia.

The bank faces strong competition for deposits in the AA. CNB reported \$239 million in deposits in the AA, which represented 5.4 percent of the CNB's bank-wide total deposits and 63.2 percent of the bank's

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

total deposits in the state of Virginia. According to June 30, 2020, deposit market share information, CNB ranked fifth out of 17 depository institutions in the AA, with a 7.5 percent market share. The top banks in terms of deposit market share in the AA include Dupont Credit Union with 40.0 percent market share, Atlantic Union Bank with 14.5 percent market share, Truist Bank with 11.3 market share, and The First Bank with 10.1 percent market share.

CNB originated 70.3 percent of its total home mortgage loans in the AA and 79.2 percent of its total small business loans in the AA during the evaluation period.

December 2020 Moody's Analytics Inc. data placed Staunton MSA in the recovery stage of the business cycle as of December 2020. Gains in nonfarm employment at year-end 2020, were above pre-pandemic figures. Home sales increased year-over-year during the evaluation period, but the supply of homes has not kept up with the low but stable population growth.

Major employment sectors in the Staunton MSA include manufacturing, retail trade, education and health services, and government. Top employers include the Augusta Medical Center, Hershey Chocolate of Virginia, and McKee Foods Corp. According to December 2020 U.S. Bureau of Labor Statistics, the unemployment rate (not seasonally adjusted) ranged from a low of 2.0 percent in December 2019, to a high of 9.9 percent in April 2020. By December 2020, the unemployment rate was 4.7 percent.

Information from four community interviews including one affordable housing organization, one economic development entity, and two community service organizations revealed that local banks have been responsive to community credit needs. The community representatives identified the following needs in the Staunton AA:

- Limited supply of affordable housing
- Financial literacy training
- Small dollar loans (between \$500 and \$50,00) for new start-up businesses

Table A – Demographic Information of the Assessment Area						
Assessment Area: Staunton VA MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	4.2	12.5	75.0	8.3	0.0
Population by Geography	119,396	1.1	12.0	79.6	7.4	0.0
Housing Units by Geography	53,374	1.2	11.0	81.0	6.8	0.0
Owner-Occupied Units by Geography	33,456	0.2	9.2	83.1	7.4	0.0
Occupied Rental Units by Geography	14,112	3.4	13.6	77.7	5.4	0.0
Vacant Units by Geography	5,806	1.1	15.2	77.1	6.6	0.0
Businesses by Geography	8,990	4.0	5.9	82.5	7.7	0.0
Farms by Geography	603	0.7	4.1	90.9	4.3	0.0
Family Distribution by Income Level	32,221	19.7	18.4	22.7	39.2	0.0
Household Distribution by Income Level	47,568	22.9	17.4	18.9	40.8	0.0
Median Family Income MSA - 44420 Staunton, VA MSA		\$60,603	Median Housing Value			\$184,989
			Median Gross Rent			\$800
			Families Below Poverty Level			8.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Virginia

The OCC conducted a full-scope review of the Staunton MSA AA and a limited-scope review of the VA Non-MSA AA.

The Staunton MSA AA received the highest weighting as it represents 50.0 the state's total deposits, 73.7 percent of state's total loans, and 50 percent of the state's branches. Home mortgage loans, which accounted for 61.5 percent of the loans made in the state's AAs during the evaluation period, were given greater weight than small business loans which represented 36.9 percent of total loans originated in the AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	% State Deposits
Staunton MSA	500	338	14	1	853	73.7	63.2
Non-MSA	211	89	5	0	305	26.3	36.8

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Staunton MSA	\$83,331	\$36,519	\$434	\$1,195	\$121,479	80.1	64.2
Non-MSA	\$22,589	\$7,235	\$447	\$0	\$30,271	19.9	36.8

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

The bank's lending market share exceeds its deposit market share. CNB reported \$292 million in deposits in the AA based upon June 30, 2020, deposit share information. According to June 30, 2020, deposit market share information, CNB ranked fifth with 7.5 percent market share. This rank placed the bank in the top 29.4 percent of the total 17 depository institutions in the AA. Based on 2020 HMDA peer data, CNB ranked ninth with a 3.0 percent market share. This rank placed the bank in the top 3.7 percent of all the mortgage lenders in the AA. Competition for home mortgage loans is strong in the AA. There are 245 other home mortgage lenders in the AA. The top three home mortgage lenders, Dupont Credit Union, Alcove Mortgage LLC., Quicken Loans, C&F Mortgage Corp, and Truist Bank, had a combined market share of 40.0 percent. The market share of these banks ranged from 14.8 percent to 5.6 percent.

Based on 2020 Peer small business data, CNB ranked sixth with 8.4 market share. This rank placed the bank in the top 9.1 percent of all small business lenders. There were 65 other small business lenders in the AA. The top three lenders, First Bank and Trust, Atlantic Union Bank, American Express National Association, Truist Bank, and Synchrony had a combined market share of 57.6 percent. The top three banks' market shares ranged from 14.43 percent to 11.48 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

The geographic distribution of home mortgages is excellent.

The geographic distribution of loans in low-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending in the AA. The geographic distribution of home mortgage loans in moderate-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending in the AA.

Small Loans to Businesses

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

The geographic distribution of small loans to businesses of different sizes in the state of Virginia is good.

The geographic distribution of small loans to businesses in low-income census tracts is below both the proportion of businesses in low-income census tracts and aggregate lending in the AA. The geographic distribution of small loans to businesses in moderate-income census tracts exceeds both the proportion of businesses in moderate-income census tracts and aggregate lending in the AA.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

The borrower income distribution of home mortgage loans in the state of Virginia is good.

The percentage of home mortgage loans to low-income borrowers is well below the percentage of low-income families but exceeds aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers exceeds both the percentage of moderate-income families and aggregate lending in the AA.

According to 2020 HMDA peer data, CNB ranked seventh with a 4.3 percent market share among 67 lenders who made home mortgage loans to low-income borrowers in the AA. This market share was good compared to its overall market share of 3.0 percent. Collectively, Dupont Community Credit Union,

C&F Mortgage Corporation, Alcovia Mortgage LLC, Quicken Loans, and Truist Bank, had a combined market share of 53.4 percent of loans to low-income borrowers. Market share for the top five lenders ranged from 17.8 percent to 6.6 percent.

Small Loans to Businesses

Refer to Table R in the state of Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower income distribution of small loans to businesses in the state of Virginia is good.

In evaluating the bank's small business lending activity in 2020, the lack of borrower revenue information for the PPP loans was considered. Because SBA underwriting guidelines for PPP loans did not require analysis of borrower revenue information, CNB did not collect revenue information. To provide a more accurate analysis of the bank's record of lending to business according to revenue size 2018, 2019, and 2020 lending data was analyzed separately.

2018

The borrower distribution of small loans to businesses during 2018 was good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is near the percentage of those businesses and exceeds aggregate lending in the AA.

2019

The borrower distribution of small loans to businesses during 2018 was good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was below the percentage of those businesses but exceeds aggregate lending in the AA.

2020

The borrower distribution of small loans to businesses during 2020 was good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is well below the percentage of those businesses and is near aggregate lending in the AA. The low percentage of loans to businesses with revenues less than \$1 million was likely impacted by the number of PPP loans originated in 2020. As previously discussed, the bank did not collect revenue information for PPP loans originated in 2020.

Community Development Lending

The institution has made a low 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.

CNB originated one CD loan totaling \$1.2 million in the AA. CD volume was equivalent to 4.6 percent of allocated tier 1 capital. The bank's CD loan demonstrates responsiveness to community needs. This loan financed improvements for four schools of which a majority of students are eligible to receive free or reduced lunch.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

CNB does not offer any innovative or flexible lending practices tailored to meet credit needs in the Charleston CSA AA. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section of the PE.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the VA Non-MSA is consistent the bank’s overall performance under the Lending Test in the full-scope area.

Refer to Tables O through V in the state of Virginia section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in Virginia is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

The institution has a significant level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution makes limited use of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Staunton VA MSA	0	0	21	3,386	21	45.7	3,386	57.1	0	0
VA Non-MSA	0	0	24	1,014	24	52.2	1,014	17.3	0	0
Statewide	0		1	1,464	1	2.2	1,464	25.0	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 bank made twenty-one community development investments and CD donations totaling \$3.4 million during the evaluation period. The majority of the bank’s qualified investment consisted of a \$3.0 million LIHTC benefiting affordable housing in the AA. Total investments represented 13.0 percent of allocated tier 1 capital.

The bank’s qualified investments include the following:

- A \$3.0 million LIHTC benefiting an 80-unit senior affordable housing development in Augusta County.

- CD contributions totaling \$21 thousand made to multiple organizations which provide food, clothing, and medical care to low-income individuals.
- A purchase of a mortgage-backed security totaling \$1.5 million secured by loans to low-income and moderate-income borrowers throughout the state of Virginia.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Virginia Non-MSA AA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank’s performance under the Service Test in Virginia is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Staunton VA AA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution’s AA particularly low- and moderate-income geographies and/or low- and moderate-income individuals.

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
Staunton	63.2	5	50.0	0.0	20.0	80.0	0.0	1.1	12.0	79.6	7.4
Non-MSA	36.8	5	50.0	0.0	20.0	60.0	20.0	0.0	8.4	58.6	32.9

The bank operated five full-service branches with one deposit taking ATM in the AA. Of the five branches, one branch was located in a moderate-income census tract. Branch locations were in proportion to AA population.

The bank did not close or open any branch offices during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of the AA, particularly low- and moderate-income geographies and/or individuals.

Most of the bank’s branches, including the branch in the moderate-income census tract had extended Friday hours from 9:00 a.m. until 6:00 p.m. Only one branch in a middle-income census tract had Saturday hours from 9:00 a.m. to 12:00 p.m.

Alternative delivery systems included services such as telephone banking, online banking, and mobile banking with mobile deposit. The bank did not provide metrics for these alternative delivery systems to demonstrate the effectiveness in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to alternative delivery systems.

The bank's retail products include a low-cost checking account with no maintenance fees and Bounceback Checking accounts for individuals looking to rebuild a positive checking relationship. CNB offered services that provided easy access to funds for low-income people who receive government assistance. Recipients (customer or non-customer) of Electronic Benefits Transfer Programs (EBT) could withdraw funds from any CNB ATM free of charge. The bank did not provide metrics to demonstrate the effectiveness of these products in helping meet the needs of low-income and moderate-income individuals or communities, so no significant weight was given to this product.

Community Development Services

The institution provides a significant level of CD services.

During the evaluation period, six bank employees provided financial expertise to five community development organizations in the AA. Bank personnel provided services to three organizations that serve low-and moderate-income individuals, one affordable housing organization, and one economic development organization. Bank employee service was primarily in board and leadership positions.

Examples of CD services include:

- Bank employees provided financial literacy training in several schools where the majority of students qualified for free/reduced lunches. This financial literacy training included the Teach the Children to Save and Get Smart About Credit courses developed by the American Bankers Association.
- One bank employee served on the board of directors of a medical foundation that provides free medical care to individuals who are 200 percent below federal poverty limits.
- One employee served on the board of directors of an organization that provides home repairs and renovations to low-income people who are unable to make repairs themselves.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the VA Non-MSA AA is consistent with the bank's overall performance under the Service Test in the full-scope area.

State Rating

State of West Virginia

CRA rating for the State of West Virginia⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to the credit needs in the AA.
- The geographic distribution of loans is adequate.
- The distribution of home mortgage loans to individuals of different income levels and small businesses of different sizes is good.
- The bank has made a relatively high level of CD loans.
- The bank has a significant level of CD investments.
- The bank's delivery systems are readily assessable to geographies and individuals.
- The bank provides a significant level of CD services.

Description of Institution's Operations in West Virginia

CNB has four AAs in the state of West Virginia including the Beckley, WV MSA (MSA #13200), the Hagerstown-Martinsburg, MD-WV MSA (MSA# 25180), the Morgantown, WV MSA (MSA # 34060), and non-metropolitan counties in West Virginia (WV Non-MSA AA). The Beckley MSA AA includes the two counties of Fayette and Jessamine Raleigh. The Hagerstown-Martinsburg, MD-WV MSA consists of Berkeley and Morgan Counties. The Morgantown MSA consists of Monongalia County. The WV Non-MSA AA includes the eight counties of Harrison, Mason, Braxton, Greenbrier, Nicholas, Pocahontas, Summers, and Mercer.

CNB operates 32 full-service branches and 36 deposit taking ATMs in the state of West Virginia. The branches represented 34.0 percent of the bank's total branch network. The bank reported \$1.4 billion in deposits, or 34.5 percent of total deposits in the state of West Virginia based upon deposit market share information as of June 30, 2020.

CNB originated and purchased 35.2 percent of its total home mortgage loans and 31.3 percent of its total small business loans in the state of West Virginia during the evaluation period.

Hagerstown-Martinsburg MSA AA

CNB operates five branches and four deposit taking ATMs in the AA. CNB's five branches represent 5.3 percent of CNB bank-wide branch network, and 15.6 percent of the branches in West Virginia AAs as of December 31, 2020. Four branches are in Berkeley County and one branch is in Morgan County. Of the five branches, three branches are in moderate-income census tracts.

⁴ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The CNB faces strong competition for deposits in the AA. The bank reported \$234.6 million in deposits representing 4.8 percent of the bank's total deposits, and 16.4 percent of the bank's total state deposits. According to June 30, 2020, deposit market data, CNB ranked fourth out of 14 depository institutions with a deposit share of 11.8 percent. Top banks in the AA include Truist Bank with 22.7 percent market share, United Bank with 19.6 percent market share, CNB Bank Inc. with 14.7 percent market share, and Summit Community Bank with 8.2 percent market share.

CNB originated 23.9 percent of its total home mortgage loans in the AA and 14.7 percent of its total small business loans in the AA during the evaluation period.

Economic Data

According to September 2020 Moody's Analytics Inc. data, the Hagerstown-Martinsburg MSA had recovered following the COVID-19 pandemic induced economic downturn of 2020. Job recovery for the area fared better compared by the northeastern United States with payrolls 18 percent below pre-crisis levels compared to 10 percent for the northeastern United States. Unemployment was around 6 percent which was half of its peak during the pandemic but twice its pre-crisis level.

Top employers include Meritus Healthcare, Citicorp Credit Services, First Data Corp, and Volvo Powertrain of North America. Manufacturing had once been a source of strength for the MSA but during the last several years became a drag on the recovery efforts. While manufacturing employment increased at from 2018 to the start of the pandemic, but layoffs at Volvo and other manufacturers decreased employment.

According to December 2020 U.S. Bureau of Labor Statistics, Berkeley County unemployment rates (not seasonally adjusted) ranged from a low of 3.1 percent in September 2019 to a high of 11.8 percent in April 2020. In December 2020, the Berkeley County unemployment rate (not seasonally adjusted) was 5.0. Morgan County unemployment rates (not seasonally adjusted) ranged from a low of 3.6 percent in April 2019 to a high of 12.9 percent in April 2020. In December 2020, the unemployment rate was 4.9 percent.

Information from an interview with an affordable housing organization identified a shortage of affordable housing in the AA. The community contact noted that there was a long waiting list for federal subsidized housing in the AA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hagerstown-Martinsburg MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	18	0.0	27.8	66.7	5.6	0.0
Population by Geography	126,199	0.0	16.7	75.5	7.8	0.0
Housing Units by Geography	55,692	0.0	19.5	73.4	7.0	0.0
Owner-Occupied Units by Geography	35,186	0.0	12.7	78.6	8.7	0.0
Occupied Rental Units by Geography	13,153	0.0	30.0	65.8	4.2	0.0
Vacant Units by Geography	7,353	0.0	33.6	62.3	4.1	0.0
Businesses by Geography	6,803	0.0	24.7	67.5	7.9	0.0
Farms by Geography	314	0.0	6.7	83.4	9.9	0.0
Family Distribution by Income Level	32,788	20.8	18.2	21.9	39.1	0.0
Household Distribution by Income Level	48,339	22.6	16.1	20.4	40.9	0.0
Median Family Income MSA - 25180 Hagerstown-Martinsburg, MD-WV MSA		\$64,343	Median Housing Value			\$162,389
			Median Gross Rent			\$897
			Families Below Poverty Level			10.2%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

WV Non-MSA AA

CNB operates 17 branches and 26 deposit taking ATMs in the AA. The AA consisted of the eight counties of Harrison, Mason, Braxton, Greenbrier, Nicholas, Pocahontas, Summers, and Mercer. Branch distribution is as follows: two branches in Harrison County, three branches in Mason County, one branch in Mercer County, three branches in Braxton County, six branches in Greenbrier County, one branch in Pocahontas County, and one branch in Summers County. The counties of Braxton, Greenbrier, Nicholas, Pocahontas, Summers, and Mercer Counties are in Greenbrier Valley Region. Harrison County is the North Central Region of the state. Mason County borders Putnam County, West Virginia to the east and the state of Ohio to the west. The bank's 17 branches account for 18.1 percent of CNB's bank-wide branch network and 53.1 percent of the bank's branches in West Virginia AAs as of December 31, 2020.

Of the total 69 census tracts in the AA, there are no low-income census tracts and nine moderate-income census tracts. There are 45 middle-income census tracts. Of the 45 middle-income census tracts, 29 census tracts are classified distressed or underserved due to poverty, unemployment, or the remote and rural nature of the census tracts. During the evaluation period, Braxton and Pocahontas Counties were designated underserved. None of CNB's branches are in moderate-income census tracts in the AA. Of the nine moderate-income census tracts in the AA, five of the moderate-income census tracts are in Mercer County. Two moderate-income census tracts are in Harrison County, one moderate-income census tract is in Nicholas County, and one moderate-income census tract is in Summers County. CNB's branches in Braxton, Mason, Mercer, and Pocahontas Counties are in designated distressed or underserved middle-income census tracts.

The bank faces strong competition for deposits in the AA. CNB reported \$681 million in deposits in the AA, which represent 15.5 percent of the CNB's bank-wide total deposits and 47.6 percent of the bank's total deposits in the state of West Virginia. According to June 30, 2020, deposit market share information, CNB ranked second out of 37 depository institutions in the AA, with 13.0 percent market share. The top banks in terms of deposit market share in the AA include Truist Bank with 18.0 percent market share, First Community Bank with 7.0 percent market share, and Summit Community Bank with 6.9 percent market share.

CNB originated 8.4 percent of its total home mortgage loans in the AA and 4.6 percent of its total small business loans in the AA during the evaluation period.

The counties in the AA are primarily rural with small towns throughout. According to the Census Bureau's 2015 ASC data, Harrison, Mercer, and Greenbrier Counties are the most heavily populated with populations of 68,998, 61,891, and 35,666, respectively. Collectively these counties represent 60.0 percent to the total population in the AA. In contrast, Pocahontas, Summers, and Braxton Counties are the least populated with populations of 8,697, 13,544, and 14,446, respectively.

According to 2015 American Community Survey Census Data, major employment sectors in the AA include health care and social assistance, retail trade, and accommodation and food services. Greenbrier county has a large and diverse economy.

According to information from the University of West Virginia's Greenbrier Valley Region Economic Outlook 2019-2019, economic drivers of Greenbrier County include timber, wood products, manufacturing, coal mining, and tourism. The Greenbrier Resort and Snowshoe, WV are key tourist areas. Greenbrier County is still recovering from a major flood in 2016. In March of 2020, Greenbrier County received a Federal Emergency Management Agency grant to help with removal of flood debris from the 2016 flood.

Based upon information the University of West Virginia's North Central Economic Outlook 2022-2026, Harrison County economy benefited from natural gas production. Over the last several years, Harrison County experienced growth from construction and engineering. However, with the completion and delays in other projects, these jobs waned. Harrison County has also experienced an increase in aerospace manufacturing and support operations.

According to the December 2020 U.S. Bureau of Labor Statistics, annual unemployment (not seasonally adjusted) in the AA ranged from a high of 10.4 to a low of 7.8 percent. Braxton County had the highest unemployment rate (not seasonally adjusted) at 10.4 percent, and Summers County had the lowest at 7.8 percent.

Very low-income individuals and families in the AA may experience challenges qualifying for home mortgage loans as a result of poverty. The family poverty rates in the AA are high compared to the state of West Virginia family poverty rates. Based upon 2015 ASC data, family poverty rates in the AA ranged between 16.4 percent to 10.2 percent. In comparison, the state family poverty rate was 14.4 percent. Mercer, Braxton, and Mason Counties had the highest family poverty rates of 16.4 percent, 16.1 percent, and 15.8 percent, respectively.

Information from community interviews with three economic development entities, identified the following needs in the AA:

- Shortage of affordable housing
- Limited housing supply and many available homes being purchased for use as short-term vacation rentals
- Micro loans (under \$20,000) for small businesses

Community contacts also noted that local banks have been responsive to community credit needs.

Table A – Demographic Information of the Assessment Area						
Assessment Area: WV Non MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	0.0	13.0	65.2	21.7	0.0
Population by Geography	256,369	0.0	9.9	67.1	23.0	0.0
Housing Units by Geography	130,403	0.0	9.9	69.1	21.0	0.0
Owner-Occupied Units by Geography	78,553	0.0	8.8	68.4	22.8	0.0
Occupied Rental Units by Geography	26,292	0.0	13.5	63.2	23.3	0.0
Vacant Units by Geography	25,558	0.0	9.7	77.3	13.0	0.0
Businesses by Geography	14,251	0.0	10.8	59.0	30.2	0.0
Farms by Geography	579	0.0	5.7	74.8	19.5	0.0
Family Distribution by Income Level	69,051	20.8	17.0	20.7	41.5	0.0
Household Distribution by Income Level	104,845	24.1	16.1	17.1	42.7	0.0
Median Family Income Non-MSAs - WV		\$48,107	Median Housing Value			\$95,033
			Median Gross Rent			\$608
			Families Below Poverty Level			14.4%

*Source: 2015 ACS and 2020 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 West Virginia

The OCC conducted full-scope reviews of the Hagerstown-Martinsburg MSA AA and the WV Non-MSA AA and limited-scope reviews of the Beckley MSA AA and the Morgantown MSA AA.

The two full-scope AAs accounted for 64.0 percent of the state’s total deposits, 75.5 percent of the state’s total loans, and 81.3 percent of state’s total branches. The WV Non-MSA AA received the greatest weighting as it represents 47.6 percent of the state’s deposits, 41.7 percent of state’s total loans, and 53.1 percent of the state’s total branches. Home mortgage loans, which account for 76.2 percent of the state’s total loans, was given more weight than small business loans which represent percent 23.2 of the bank’s lending in the state.

The Hagerstown-Martinsburg MSA AA was impacted by MSA boundary changes that became effective January 1, 2019. As a result of the OMB changes, Morgan County, West Virginia, a non-MSA county, became part of the Hagerstown-Martinsburg MD-WV MSA. To account for this change in the evaluation, 2018 lending data was analyzed separately from combined 2019 and 2020 lending data.

The West Virginia Non-MSA AA was impacted by MSA boundary changes that became effective January 1, 2019. With these changes, the two non-MSA counties of Jackson and Carter Counties moved into the Charleston WV MSA and the Huntington-Ashland WV-KY-OH MSA, respectively. To account for these changes, 2018 lending data was analyzed separately from combined 2019 and 2020 lending data.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

LENDING TEST

The bank’s performance under the Lending Test in West Virginia is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Hagerstown-Martinsburg MSA AA and the WV Non-MSA AA is good.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Beckley MSA	873	412	0	8	1,293	32.0	35.8
Hagerstown-Martinsburg MSA	735	138	0	4	877	21.7	16.4
Morgantown MSA	173	19	0	1	193	4.8	.2
Non-MSA	1,292	368	19	4	1,683	41.5	47.6

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Beckley MSA	\$91,427	\$46,890	\$0	\$30,007	\$168,324	31.9	35.8
Hagerstown-Martinsburg MSA	\$101,880	\$9,780	\$0	\$19,201	\$130,861	24.8	16.4
Morganton MSA	\$39,726	\$2,658	\$0	\$2,000	\$44,384	8.4	.2
Non-MSA	\$147,728	\$32,316	\$2,914	\$346	\$183,304	34.8	47.6

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

Hagerstown-Martinsburg MSA AA

The Hagerstown-Martinsburg MSA AA lending levels reflects excellent responsiveness to AA credit needs.

The bank's loan market share exceeds the bank's deposit market share. According to 2020 peer deposit market share data, CNB reported \$235 million in deposits in the AA. CNB bank ranked fourth with a 11.8 percent market share. This rank placed the bank in the top 28.6 percent among the other 13 depository institutions in the AA. Based on 2020 HMDA peer data, CNB ranked tenth with a market share of 2.7 percent. This rank placed the bank in top 3.9 percent of all mortgage lenders. Competition for home mortgage loans is strong as there are 256 other lenders in the AA. The top five home mortgage lenders, Quicken Loans LLC, Penny Mac Loan Services LLC, Freedom Mortgage Corporation, Wells Fargo Bank N.A., and Sierra Pacific Mortgage Corporation Inc. had a combined market share of 29.6 percent. The market share of these banks ranged from 8.5 percent to 3.4 percent.

Based on 2020 CRA small business loan data, the bank ranked sixth out of 72 small business lenders, with a 5.0 percent market share. This rank placed the bank in the top 8.9 percent of small business lenders. The top five lenders, CNB, American Express Bank N.A, United Bank VA, Truist Financial, and First United Bank and Trust, had a combined market share of 57.0 percent. The top five banks' market shares ranged from 16.8 percent to 6.7 percent.

WV Non-MSA AA

The WV-Non MSA AA lending levels reflects excellent responsiveness to AA credit needs.

The bank's loan market share exceeds the bank's deposit market share. According to 2020 peer deposit market share data, CNB reported \$682 million in deposits in the AA. As of June 30, 2020, the bank ranked second out of 37 depository institutions, with 13.0 percent deposit market share in the AA. This rank placed the bank in the top 5.4 percent of depository institutions in the AA. Based on 2020 HMDA peer data, CNB ranked third with a 6.9 percent market share. This rank placed the bank in the top 1.5 percent of all mortgage lenders. Competition is strong as there were 204 other lenders in the AA. The other top mortgage lenders, Quicken Loans, First Community Bank, Truist Bank, and Wes Banco Inc. had a combined market share of 26.0 percent. The market share of these banks ranged from 8.2 percent to 4.7 percent.

Based on 2020 CRA small business loan data, the bank ranked fourth with a market share of 6.2 percent. This rank placed the bank in the top 4.8 percent of all small business lenders. Competition for business loans is strong as there are 84 other small business lenders. Other top four lenders, First Community Bank, Truist Financial, American Express National Bank, and Lake Forest Bank and Trust, had a combined market share of 34.6 percent. The top five banks' market shares ranged from 11.5 percent to 5.3 percent.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AAs.

Home Mortgage Loans

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

The geographic distribution of home mortgage loans in the state of West Virginia is adequate.

Hagerstown-Martinsburg MSA AA

2018

The geographic distribution of home mortgage loans during 2018 is excellent. The geographic distribution of home mortgage loans in moderate-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending in the AA.

2019-2020

The geographic distribution of home mortgage loans during 2019-2020 is excellent. The geographic distribution of home mortgage loans in moderate-income census tracts exceeds both the percentage of owner-occupied housing units and aggregate lending in the AA.

WV Non MSA AA

In assessing geographic distribution of loans in moderate-income census tracts, the OCC considered CNB's branch distances from moderate-income census tracts and competition. The bank's single branch in Mercer County is between six to 13 miles from five moderate-income census tracts in Mercer County. With the mountainous terrain in Mercer County, there are few major roads connecting the bank's branch office to these moderate-income census tracts. The bank's single branch in Summers County is between eight and 15 miles away from the only moderate-income census tract in the county. The bank does not have a branch in Nicholas County. CNB's closest branches to the moderate-income census tract in Nicholas County is more than 20 miles away in Braxton County and Greenbrier Counties.

There are fifteen moderate-income census tracts and no low-income census tracts in the AAs. Consideration is also given to the 29 designated distressed or underserved middle income tracts in the West Virginia Non-MSA AA. This designation is given to these tracts due to the remote rural location, poverty and/or unemployment levels. During the evaluation period, CNB originated 363 home mortgage loans in middle-income distressed and/or underserved census tracts.

2018

The geographic distribution of home mortgage loans during 2018 is adequate. The geographic distribution of home mortgage loans in moderate-income census tracts is significantly below both the percentage of owner-occupied housing units and below aggregate lending in the AA.

While the bank's percentage of lending in moderate-income census tracts was well below area demographics and aggregate lending, the geographic distribution is adequate considering the distance of the bank's branches from moderate-income census tracts and competition.

As previously discussed, the bank's branches were not in close proximity to moderate-income census tracts. In addition, competition from other home mortgage lenders may have impacted the bank's lending opportunities in moderate-income census tracts. According to 2018 HMDA peer data, 60 other lenders including a large commercial bank and an online lender originated home mortgage loans in moderate-income census tracts in the AA. The top five home mortgage lenders in moderate-income census tracts, First Community Bank, Branch Bank and Trust Company, Quicken Loans, and Summit Community Bank, had a combined market share of 40.0 percent of moderate-income census tracts.

2019-2020

The geographic distribution of home mortgage loans during 2019-2020 is adequate. The geographic distribution of home mortgage loans in moderate-income census tracts was significantly below the percentage of owner-occupied housing units and below aggregate lending in the AA. While the bank's percentage of lending in moderate-income census tracts was well below area demographics and aggregate lending, the geographic distribution is adequate considering the distance of the bank's branches from moderate-income census tracts and competition.

As previously discussed, many of the bank's branches are not in close proximity to moderate-income census tracts in the AA. Competition from other lenders may have also impacted the bank's lending opportunities within moderate-income census tracts. Based upon 2020 HMDA peer data, 56 other lenders originated loans in moderate-income census tracts. In 2020, the top home mortgage lenders in moderate-income census tracts, First Community Bank, Truist Bank, Atlantic Union, Summit Community Bank, and Quicken Loans, had a combined market share of 42.3 percent in moderate-income census tracts.

Small Loans to Businesses

Refer to Table Q in the state of West Virginia 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.

In assessing geographic distribution of loans in moderate-income census tracts, consideration is given to the distance of CNB's branches to moderate-income census tracts and competition. The bank's single branch in Mercer County was between six to 13 miles from five moderate income census tracts in Mercer County. With the mountainous terrain in Mercer County, there are few major roads connecting the bank's branch offices to moderate-income census tracts. The bank's single branch in Summers County is between eight and 15 miles away from the only moderate-income census tract in the county. The bank does not have any branch offices in Nicholas County. CNB's closest branches to the moderate-income census tract in Nicholas County are more than 20 miles away in Braxton County and Greenbrier Counties.

The OCC also considered the bank's record of small business lending within distressed/underserved middle-income census tracts. During the evaluation period, the bank originated 59 loans in distressed/underserved middle-income census tracts in the AA.

Hagerstown-Martinsburg MSA AA***2018***

The geographic distribution of small business loans during 2018 is excellent. The geographic distribution of small business loans in moderate-income census tracts exceeds both the percentage of small business in moderate-income census tracts and aggregate lending in the AA.

2019-2020

The geographic distribution of small business loans during 2019-2020 is excellent. The geographic distribution of small business loans in moderate-income census tracts exceeds both the percentage of small business in moderate-income census tracts and aggregate lending in the AA.

WV Non-MSA AA***2018***

The geographic distribution of small business loans during 2018 is adequate. The geographic distribution of small business loans in moderate-income census tracts was significantly below the percentage of small business in moderate-income census tracts and well below aggregate lending in the AA. While the bank's lending in moderate-income census tract is well below area demographic characteristics and aggregate lending, it is considered adequate given distance of the many of bank's branches from moderate-income census tracts. As previously discussed, many of the bank's branches were not close to moderate-income census tracts.

2019-2020

The geographic distribution of small business loans during 2019-2020 is adequate. The geographic distribution of small business loans in moderate-income census tract was significantly below the percentage of small business in moderate-income census tracts and well below aggregate lending in the AA. While the bank's lending in moderate-income census is well below demographic characteristics and aggregate lending, it is considered adequate given the distance of many of the bank's branches from moderate-income census tracts. As previously discussed, many of the bank's branches were not close to moderate-income census tracts.

Lending Gap Analysis

The OCC reviewed summary reports and maps to identify any gaps in the geographic distribution of CNB's home mortgage loans and small loans to businesses during the evaluation period. The analysis did not identify any unexplained, conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and business and farms of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

The borrower income distribution of home mortgage loans in the state of West Virginia is good.

Hagerstown-Martinsburg AA

2018

The borrower distribution of home mortgage loans during 2018 is good. The percentage of home mortgage loans to low-income borrowers is well below the percentage of low-income families and below aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers exceeds the percentage of moderate-income families and is near aggregate lending in the AA.

According to 2018 HMDA peer data, CNB ranked seventh with a 4.0 percent market share among 77 lenders that made home mortgage loans to low-income borrowers in the AA. This market share was reasonable compared to the bank's overall market share of 4.9 percent. Collectively, Integrity Home Mortgage Corporation, Carrington Mortgage Services, Well Fargo Bank N.A., Quicken Loans, and Prime Lending, had a combined market share of 34.5 percent of loans to low-income borrowers. Market share for the top five lenders ranged from 11.8 percent to 4.3 percent.

2019-2020

The borrower distribution of home mortgage loans during 2019-2020 is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeds aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was near the percentage of moderate-income families and exceeds aggregate lending in the AA.

According to 2020 HMDA peer data, CNB ranked sixth with a 4.8 market share among 97 lenders that made home mortgage loans to low-income borrowers in the AA. This market share was good compared to the bank's overall market share of 2.7 percent. Collectively, CBNA, Quicken Loans, Truist Bank, Sierra Pacific Mortgage, Prime Lending, and CNB (a different bank) had a combined market share of 33.9 percent of loans to low-income borrowers. Market share for the top five lenders ranged from 11.1 percent to 5.0 percent.

WV Non-MSA AA

2018

The borrower distribution of home mortgage loans during 2018 is good. The percentage of home mortgage loans to low-income borrowers is well below the percentage of low-income families but is near to aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families but exceeds aggregate lending in the AA.

For lending to low-income borrowers, consideration is given to CNB's performance compared to regional and local competition. According to 2018 HMDA peer data, the bank ranked third with a 7.6 market share

among 67 lenders who made home mortgage loans to low-income borrowers in the AA. This market share is reasonable compared to the bank's overall market share of 9.1 percent. Collectively, Quicken Loans, Branch Bank and Trust, First Community Bank, and Alcova Mortgage, had a combined market share of 32.5 percent of loans to low-income borrowers. Market share for the top four lenders ranged from 11.6 percent to 5.0 percent.

2019-2020

The borrower distribution of home mortgage loans during 2019-2020 is good. The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but exceeds aggregate lending in the AA. The percentage of home mortgage loans to moderate-income borrowers is below the percentage of moderate-income families but exceeds aggregate lending in the AA.

According to 2020 HMDA peer data, CNB ranked fifth with a market share of 6.6 percent among 58 lenders who made home mortgage loans to low-income borrowers in the AA. This market share is reasonable compared to the bank's overall market share of 6.9 percent. Collectively, Truist Bank, Quicken Loans, Alcova Mortgage LLC, and Premier Bank, had a combined market share of 35.4 of loans to low-income borrowers. The market share for top five lenders ranged from 11.9 percent to 6.6 percent.

Small Loans to Businesses

Refer to Table R in the state of West Virginia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

The borrower income distribution of small loans to businesses in the state of West Virginia is good.

In evaluating small business lending activity in 2020, the lack of borrower revenue information for the PPP loans was considered. Because SBA underwriting guidelines for PPP loans did not require analysis of borrower revenue information, CNB did not collect business revenue data. To provide a more accurate analysis, 2019 and 2020 lending data were analyzed separately.

Hagerstown-Martinsburg MSA AA

2018

The borrower distribution of small loans to businesses during 2018 is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is near the percentage of those businesses and exceeded aggregate lending in the AA.

2019

The borrower distribution of small loans to businesses during 2019 is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is near the percentage of those businesses and exceeded aggregate lending in the AA.

2020

The borrower distribution of small loans to businesses during 2020 is adequate. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below both the percentage of those businesses and aggregate lending in the AA. The bank's low percentage of loans to businesses with revenues less than \$1 million may have been impacted by the number of PPP loans originated in 2020. As previously discussed, the bank did not collect revenue information for PPP loans originated in 2020.

WV Non MSA AA**2018**

The borrower distribution of small loans to businesses during 2018 is good. The percentage of small loans to businesses with gross annual revenues of \$1 million or less is near the percentage of those businesses and but exceeds aggregate lending in the AA.

2019

The borrower distribution of small loans to businesses during 2019 is excellent. The percentage of small loans to businesses with gross annual revenues of \$1 million or less exceeds both the percentage of those businesses and aggregate lending in the AA.

2020

The borrower distribution of small loans to businesses during 2020 is adequate. The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below both the percentage of those businesses and aggregate lending in the AA. The low percentage of loans to businesses with revenues less than \$1 million may have impacted by the number of PPP loans originated in 2020. As previously discussed, the bank did not collect revenue information for PPP loans originated in 2020.

Community Development Lending

The institution has made a significant level of CD loans in the state of West Virginia

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.

Hagerstown-Martinsburg MSA AA

The bank made a significant level of CD loans.

CNB originated four CD loans totaling \$19.2 million in the AA. All four loans financed the redevelopment of a large shopping mall located in a designated Opportunity Zone in city of Martinsburg. The state of West Virginia created this tax incentive program to support recovery and growth in distressed areas.

WV Non MSA AA

The bank made a significant level of CD loans.

During the evaluation period, CNB originated four CD loans totaling \$346,000. CD loans were responsive to community credit needs. The bank's loans provided community development services benefiting low-income and moderate-income individuals and economic development in distressed middle-income census tracts.

Notable CD loans include:

-
- A \$20,000 loan which financed the purchase of a police vehicle for a municipality serving distressed and underserved middle-income census tracts in Braxton County. This loan helps to provide needed community services to support and attract economic development.
- A \$90,000 loan to refinance a purchase of ambulance by a charitable organization serving distressed and underserved middle-income census tracts in Pocahontas County.
- A \$185,000 loan to volunteer fire department serving a designated Opportunity Zone in Greenbrier County. Opportunity Zones are designated areas by the state of West Virginia to help stimulate growth in distressed areas through tax incentives. The bank's loan proceeds financed improvements to a fire department building. The fire department provides essential community services for economic development.

Product Innovation and Flexibility

The institution makes no use of innovative and/or flexible lending practices in order to serve AA credit needs.

CNB does not offer any innovative or flexible lending practices tailored to meet credit needs in the Charleston CSA AA. The bank does participate in flexible loan programs. The flexible programs were considered in the overall performance and are described in the Description of Institution section.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Beckley MSA and the Morganton MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through V in the state of West Virginia section of Appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in West Virginia is High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based upon full scope reviews, the bank's performance in the Hagerstown-Martinsburg MSA AA and WV Non-MSA AA is good.

The institution has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and economic development needs. CNB occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Beckley MSA	16	6,313	34	259	50	18.7	6,572	24.2	0	0
Hagerstown-Martinsburg MSA	26	9,573	55	3,503	81	30.3	13,076	48.2	0	0
Morgantown MSA	2	3,281	8	1,386	10	3.7	4,667	17.2	0	0
WV Non-MSA	5	910	120	393	125	46.8	1,302	4.8	0	0
WV Statewide with P/M/F	1	1,500	0	0	1	0.4	1,500	5.5	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.

West Virginia Statewide

CNB had one prior period investment totaling \$1.5 million outstanding at the end of the evaluation period. This investment consisted of a CRA mutual fund benefiting the state of West Virginia.

Hagerstown-Martinsburg MSA AA

The institution has an excellent level of qualified CD investments and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The institution occasionally innovative and/or complex investments to support CD initiatives.

The bank made 55 community development investments and CD donations totaling \$3.5 million during the evaluation period. The majority of the bank's qualified investment consisted of the purchase of three municipal securities that refinanced prior bonds benefiting improvements in a judicial building located in

a moderate-income census tract. CNB made 52 CD contributions totaling \$53,000, to various community development organizations that provide food, educational assistance, and health care to low-income individuals. CNB had 26 prior period investments totaling \$9.6 million at the end of the evaluation period. Total investments equaled \$13 million, and represent 51.0 percent of allocated tier 1 capital.

WV Non-MSA AA

The institution has a significant level of qualified CD investment and donations, often in a leadership position, particularly those that are not routinely provided by private investors.

The institution exhibits good responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

The bank made 125 investments and CD donations in the AA totaling \$392,000 during the current evaluation period. Current period investments primarily consist of one LIHTC supporting affordable housing. The bank made 119 CD contributions totaling \$142,000, to numerous organizations providing services to low-income individuals. The bank had five prior period investments totaling \$919,000, outstanding at the end of the evaluation period. Total qualified investments equaled \$1.3 million, and represent 1.7 percent of allocated tier 1 capital.

Examples of current period investments include:

- Investment in a LIHTC totaling \$250,000 allocated toward 38 affordable housing units in Harrison County.
- CD contributions of \$1,500 and in-kind donation of rented office space totaling \$7,000 to a non-profit organization that makes endowments to help support critical programs serving individuals that are below poverty in Mason County.
- CD contribution totaling \$3,000 to a homeless shelter serving a small rural area in Mason County.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Beckley MSA and Morgantown MSA AAs is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in West Virginia is rated High Satisfactory

Conclusions for Areas Receiving Full-Scope Reviews

Based on full scope reviews, the bank's performance in the Hagerstown-Martinsburg MSA AA and the WV-Non MSA AA is good.

Retail Banking Services

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

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
Beckley	35.8	9	28.1	0.0	0.0	100.0	0.0	0.0	8.4	81.8	9.8
Hagerstown-Martinsburg	16.4	5	15.6	0.0	60.0	40.0	0.0	0.0	16.7	75.5	7.8
Morgantown	0.2	1	3.1	0.0	0.0	0.0	100.0	1.5	20.3	41.1	37.2
Non-MSA	47.6	17	53.1	0.0	0.0	82.4	17.6	0.0	9.9	67.1	23.0

Hagerstown-Martinsburg MSA AA

The institution's delivery systems are readily accessible to geographies and individuals of different income levels.

CNB operates five full-service branches with four deposit taking ATMs. Three branches of the five branches are in moderate-income census tracts. The distribution of branches in moderate-income census tracts is in proportion to the population in moderate-income census tracts. There are no low-income census tracts in the AA. One of the branches in a moderate-income census tract does not have a deposit taking ATM.

CNB bank did not open or close any branch offices during the review period.

WV Non-MSA AA

The institution's delivery systems are readily accessible to geographies and individuals of different income levels.

CNB operates 17 full-service branches all branches with deposit taking ATMs. All five branches are in designated distressed and or underserved middle-income census tracts in Braxton, Mercer, Pocahontas, and Summers Counties.

CNB bank did not open or close any branch offices during the review period.

Hagerstown-Martinsburg MSA AA

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AAs, particularly low- and moderate-income geographies and/or individuals. Most branches, including moderate-income have extended Friday hours from 8:00 a.m. to 6:00 p.m. and Saturday morning hours from 8:00 a.m. to 12:00 p.m.

WV MSA-Non MSA AA

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AAs, particularly low- and moderate-income geographies and/or individuals. Most branches, including those located in distressed middle-income census tracts have extended Friday hours from 8:00 a.m. to 6:00 p.m., and Saturday morning hours from 8:00 a.m. to 12:00 p.m.

Community Development Services

The institution provides a significant level of CD services.

Hagerstown-Martinsburg MSA AA

CNB provides a significant level of CD services. Seven employees provided financial expertise to 12 different community development organizations in the AA. Bank personnel provided services to eight organizations that serve low-and moderate-income individuals, three affordable housing organizations, and one economic development organization. Bank employees primarily served in board and leadership positions. Examples of community development service include:

- Bank employees provide financial literacy training in several schools where the majority of students qualified for free/reduced lunches. This financial literacy training included the Teach the Children to Save and Get Smart About Credit courses developed by the American Bankers Association.
- Two employees serve as board members of two affordable housing organizations in Berkley County.
- A bank employee served as president and board member of a local economic development organization. This organization promotes new business and maintaining existing businesses in areas containing distressed middle-income tracts.
- A bank employee serves as a board member and treasurer for an organization providing after-school enrichment program for families below poverty.

WV Non-MSA AA

CNB provides a significant level of CD services. During the evaluation period, 12 employees provided financial expertise to 19 different community development organizations in the AA. Bank personnel provided services to 15 organizations that serve very low-income individuals, two affordable housing organizations, and two economic development organizations.

- Bank employees provide financial literacy training in several schools where the majority of students qualified for free/reduced lunches. This financial literacy training included the Teach the Children to Save and Get Smart About Credit courses developed by the American Bankers Association.
- A bank employee served as executive director of a county economic development authority.
- A bank employee provided banking expertise for an initiative to build a new homeless shelter in Mason County.
- A bank employee served on the board of a nonprofit organization that is working to build affordable housing for low-income seniors.
- A bank employee served as a board member of a nonprofit that focuses on servicing very low-income individuals with basic living necessities.

Conclusions for Areas Receiving Limited-Scope Reviews

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

The bank's performance in the Morgantown MSA AA is weaker than the bank's overall Service Test performance in the full scope area. CNB's retail branch services to moderate-income census in the Morgantown MSA AA is limited and bank employees provided a low level of community development services. Considering the bank's limited presence and volume of deposits in the Morgantown AA, the lower level of performance did not negatively impact the bank's overall performance under the Service Test.

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:	1/1/2018 to 12/31/2020	
Bank Products Reviewed:	Home mortgage, small business, small farm loans. Community development loans, qualified investments, and community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	NA	NA
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
Charleston-Huntington-Ashland, WV-OH-KY Combined Statistical Area	Full-scope	Kanawha, County, Clay County, Boone County, Lincoln County. Jackson County, Cabell County, Wayne County, Putnam County, Lincoln County Lawrence, Boyd County, Greenup County, and Carter County
Washington-Baltimore-Arlington, DC-MD-WV Kentucky	Full-scope	Jefferson County, Warren County, Fredrick County Winchester City
Lexington MSA	Limited-scope	Fayette County and Jessamine County
KY Non-MSA	Full-scope	Johnson County, Lawrence County, Montgomery County, Harrison County, Nicholas County
Ohio		
Columbus OH MSA	Full-scope	City of Worthington Ohio in Franklin County
Virginia		
Staunton MSA	Full-scope	Augusta County, Staunton City, Waynesboro City, Shenandoah County, Rockbridge County, Buena Vista City, and Lexington City
West Virginia		
Beckley WV MSA	Limited-scope	Fayette County, Raleigh County
Hagerstown-Martinsburg MSA	Full-scope	Berkley and Morgan Counties
Morgantown	Limited-scope	Monongalia County

Appendix B: Summary of MMSA and State Ratings

RATINGS City National Bank of West Virginia				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
Charleston CSA	High Satisfactory	Outstanding	Outstanding	Satisfactory
Washington CSA	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Kentucky	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Ohio	Needs to Improve	Needs to Improve	Needs to Improve	Needs to Improve
Virginia	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
West Virginia	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory

(*) 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

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 30th of each year. Tables without data are not included in this PE.

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018
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	
Charleston CSA 2018	1,319	149,859	100.0	11,655	1.8	2.0	1.8	14.7	8.9	11.2	59.7	56.0	55.8	23.7	33.1	31.1	0.0	0.0	0.2	
Total	1,319	149,859	100.0	11,655	1.8	2.0	1.8	14.7	8.9	11.2	59.7	56.0	55.8	23.7	33.1	31.1	0.0	0.0	0.2	

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2019-2020
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	
Charleston CSA	2,663	345,674	100.0	15,060	1.8	1.4	1.4	14.1	7.1	8.4	57.8	54.8	52.2	26.2	36.6	37.9	0.0	0.0	0.0	
Total	2,663	345,674	100.0	15,060	1.8	1.4	1.4	14.1	7.1	8.4	57.8	54.8	52.2	26.2	36.6	37.9	0.0	0.0	0.0	

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
Charleston CSA 2018	1,319	149,859	100.0	11,655	22.3	3.9	7.3	16.9	14.0	16.8	19.7	24.4	22.7	41.0	55.4	41.1	0.0	2.2	12.1
Total	1,319	149,859	100.0	11,655	22.3	3.9	7.3	16.9	14.0	16.8	19.7	24.4	22.7	41.0	55.4	41.1	0.0	2.2	12.1

Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2020
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Charleston CSA	2,663	345,674	100.0	15,060	22.0	5.6	5.1	17.3	16.9	15.8	19.5	21.9	20.4	41.3	52.7	42.7	0.0	2.9	16.0
Total	2,663	345,674	100.0	15,060	22.0	5.6	5.1	17.3	16.9	15.8	19.5	21.9	20.4	41.3	52.7	42.7	0.0	2.9	16.0

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2018
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	
Charleston CSA 2018	150	25,714	100.0	6,848	6.4	2.7	6.8	15.4	15.3	12.6	54.6	44.0	53.3	23.3	36.7	27.1	0.3	1.3	0.1	
Total	150	25,714	100.0	6,848	6.4	2.7	6.8	15.4	15.3	12.6	54.6	44.0	53.3	23.3	36.7	27.1	0.3	1.3	0.1	

*Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-2020
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charleston CSA	913	84,706	100.0	8,636	6.3	4.5	7.8	13.5	13.8	13.0	53.3	50.5	49.9	26.7	31.1	29.2	0.3	0.1	0.0	
Total	913	84,706	100.0	8,636	6.3	4.5	7.8	13.5	13.8	13.0	53.3	50.5	49.9	26.7	31.1	29.2	0.3	0.1	0.0	

*Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
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
Charleston CSA 2018	150	25,714	100.0	6,848	75.5	73.3	45.3	6.9	25.3	17.7	1.3
Total	150	25,714	100.0	6,848	75.5	73.3	45.3	6.9	25.3	17.7	1.3

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019
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
Charleston CSA	173	34,519	100.0	7,043	77.2	71.7	42.8	6.2	21.4	16.6	6.9
Total	173	34,519	100.0	7,043	77.2	71.7	42.8	6.2	21.4	16.6	6.9

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston CSA	740	50,187	100.0	8,636	78.6	19.1	32.2	5.7	4.1	15.7	76.9	
Total	740	50,187	100.0	8,636	78.6	19.1	32.2	5.7	4.1	15.7	76.9	

Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data. "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-2020		
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		
Washington CSA	529	82,628	100.0	15,430	4.3	10.0	4.1	32.0	40.6	27.4	47.4	41.4	51.9	16.2	7.9	16.6	0.0	0.0	0.0		
Total	529	82,628	100.0	15,430	4.3	10.0	4.1	32.0	40.6	27.4	47.4	41.4	51.9	16.2	7.9	16.6	0.0	0.0	0.0		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-2020		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Washington CSA	529	82,628	100.0	15,430	25.9	14.4	10.1	19.2	21.9	19.3	21.1	28.9	20.0	33.7	28.0	24.8	0.0	6.8	25.9		
Total	529	82,628	100.0	15,430	25.9	14.4	10.1	19.2	21.9	19.3	21.1	28.9	20.0	33.7	28.0	24.8	0.0	6.8	25.9		

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-2020		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Washington CSA	160	17,372	100.0	3,761	5.2	14.4	6.0	32.6	40.6	31.3	46.3	35.6	46.7	15.9	9.4	16.0	0.0	0.0	0.0		
Total	160	17,372	100.0	3,761	5.2	14.4	6.0	32.6	40.6	31.3	46.3	35.6	46.7	15.9	9.4	16.0	0.0	0.0	0.0		

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018	
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	
Washington CSA	31	4,196	100.0	3,439	83.9	87.1	52.1	4.6	12.9	11.5	0.0	
Total	31	4,196	100.0	3,439	83.9	87.1	52.1	4.6	12.9	11.5	0.0	

*Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019	
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	
Washington CSA	31	5,045	100.0	3,994	86.1	71.0	46.6	3.9	29.0	10.0	0.0	
Total	31	5,045	100.0	3,994	86.1	71.0	46.6	3.9	29.0	10.0	0.0	

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Washington CSA	98	8,131	100.0	3,761	87.3	22.4	37.2	3.5	3.1	9.2	74.5
Total	98	8,131	100.0	3,761	87.3	22.4	37.2	3.5	3.1	9.2	74.5

*Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KY Non MSA 2018	95	9,323	52.2	2,123	0.0	0.0	0.0	0.0	0.0	0.0	92.7	100.0	87.0	7.3	0.0	13.0	0.0	0.0	0.0
Lexington KY MSA AA	87	30,105	47.8	12,025	5.4	3.4	4.2	20.8	21.8	20.5	35.3	33.3	33.8	38.5	41.4	41.4	0.0	0.0	0.0
Total	182	39,427	100.0	14,148	3.8	1.6	3.6	14.7	10.4	17.5	52.1	68.1	41.8	29.4	19.8	37.1	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
KY Non-MSA AA	115	10,562	47.5	2,614	0.0	0.0	0.0	0.0	0.0	0.0	90.3	91.3	86.1	9.7	8.7	13.9	0.0	0.0	0.0
Lexington KY MSA AA	127	24,929	52.5	20,273	5.4	3.2	3.1	20.8	31.5	18.3	35.3	34.6	32.5	38.5	30.7	46.1	0.0	0.0	0.0
Total	242	35,492	100.0	22,887	4.1	1.7	2.8	15.9	16.5	16.2	48.4	61.6	38.6	31.7	20.2	42.4	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
KY Non MSA 2018	95	9,323	52.2	2,123	23.0	5.3	5.4	17.2	12.6	14.2	18.7	11.6	22.2	41.1	68.4	40.6	0.0	2.1	17.7
Lexington KY MSA AA	87	30,105	47.8	12,025	24.1	9.2	9.6	16.0	19.5	16.6	18.5	19.5	18.3	41.4	41.4	36.8	0.0	10.3	18.6
Total	182	39,427	100.0	14,148	23.8	7.1	9.0	16.3	15.9	16.3	18.5	15.4	18.9	41.3	55.5	37.4	0.0	6.0	18.5

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2020	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
KY Non-MSA AA	115	10,562	47.5	2,614	24.3	1.7	2.8	16.1	11.3	13.0	17.9	26.1	20.6	41.6	57.4	44.1	0.0	3.5	19.5	
Lexington KY MSA AA	127	24,929	52.5	20,273	24.1	5.5	7.0	16.0	18.1	18.9	18.5	19.7	20.0	41.4	37.8	39.6	0.0	18.9	14.6	
Total	242	35,492	100.0	22,887	24.1	3.7	6.5	16.1	14.9	18.2	18.4	22.7	20.0	41.4	47.1	40.1	0.0	11.6	15.1	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "-
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018	
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	
KY Non MSA 2018	28	2,227	47.5	1,211	0.0	0.0	0.0	0.0	0.0	0.0	89.7	100.0	88.4	10.3	0.0	11.6	0.0	0.0	0.0	
Lexington KY MSA AA	31	7,516	52.5	8,316	6.8	6.5	6.0	19.7	9.7	21.1	40.0	54.8	38.7	33.5	29.0	34.2	0.0	0.0	0.0	
Total	59	9,743	100.0	9,527	5.6	3.4	5.2	16.3	5.1	18.4	48.5	76.3	45.1	29.5	15.3	31.3	0.0	0.0	0.0	

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-2020		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
KY Non-MSA AA	147	11,427	42.2	1,176	0.0	0.0	0.0	0.0	0.0	0.0	86.6	87.8	83.8	13.4	12.2	16.2	0.0	0.0	0.0		
Lexington KY MSA AA	201	28,988	57.8	9,823	6.7	6.5	7.0	19.3	24.9	19.0	39.5	46.8	39.1	34.6	21.9	34.9	0.0	0.0	0.0		
Total	348	40,415	100.0	10,999	5.8	3.7	6.2	16.9	14.4	17.0	45.4	64.1	43.9	31.9	17.8	32.9	0.0	0.0	0.0		

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018	
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		
KY Non MSA 2018	28	2,227	47.5	1,211	80.8	89.3	45.7	4.4	7.1	14.8	3.6		
Lexington KY MSA AA	31	7,516	52.5	8,316	82.4	38.7	42.7	6.1	61.3	11.5	0.0		
Total	59	9,743	100.0	9,527	82.1	62.7	43.1	5.8	35.6	12.1	1.7		

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019
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	
KY Non-MSA AA	54	4,992	42.9	1,093	81.4	75.9	43.6	4.5	20.4	14.1	3.7	
Lexington KY MSA AA	72	15,780	57.1	8,531	83.9	66.7	46.3	5.3	31.9	10.8	1.4	
Total	126	20,772	100.0	9,624	83.6	70.6	46.0	5.2	27.0	11.2	2.4	

*Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
KY Non-MSA AA	93	6,435	41.9	1,176	82.2	34.4	31.5	4.1	8.6	13.7	57.0	
Lexington KY MSA AA	129	13,208	58.1	9,823	85.2	18.6	40.0	4.7	16.3	10.1	65.1	
Total	222	19,643	100.0	10,999	84.8	25.2	39.1	4.6	13.1	10.6	61.7	

*Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KY Non MSA 2018	2	77	100.0	180	0.0	0.0	0.0	0.0	0.0	0.0	91.9	100.0	93.9	8.1	0.0	6.1	0.0	0.0	0.0
Lexington KY MSA AA	0	0	0.0	152	4.9	0.0	3.3	15.1	0.0	8.6	41.6	0.0	49.3	38.4	0.0	38.8	0.0	0.0	0.0
Total	2	77	100.0	332	3.7	0.0	1.5	11.4	0.0	3.9	53.9	100.0	73.5	31.0	0.0	21.1	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2019-2020
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
KY Non-MSA AA	49	2,911	93.8	133	0.0	0.0	0.0	0.0	0.0	0.0	89.0	98.0	94.7	11.0	2.0	5.3	0.0	0.0	0.0
Lexington KY MSA AA	6	720	12.8	99	5.3	0.0	4.0	15.5	20.0	8.1	41.3	13.3	47.5	37.9	6.7	40.4	0.0	0.0	0.0
Total	55	3,631	100.0	232	4.3	0.0	1.7	12.5	2.6	3.4	50.5	42.7	74.6	32.7	1.7	20.3	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non MSA 2018	2	77	100.0	180	99.7	100.0	61.1	0.0	0.0	0.3	0.0
Lexington KY MSA AA	--	--	--	152	95.1	--	52.6	3.1	--	1.8	--
Total	2	77	100.0	332	96.2	100.0	57.2	2.4	0.0	1.4	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2019-2020
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
KY Non-MSA AA	49	2,911	89.1	133	99.3	100.0	59.4	0.0	0.0	0.7	0.0
Lexington KY MSA AA	6	720	10.9	99	95.5	50.0	54.5	2.7	16.7	1.8	33.3
Total	55	3,631	100.0	232	96.2	94.5	57.3	2.2	1.8	1.6	3.6

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-2020	
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	
Columbus OH MSA AA	1	200	100.0	2,221	0.0	0.0	0.0	0.0	0.0	0.0	20.3	0.0	18.5	79.7	100.0	81.5	0.0	0.0	0.0	
Total	1	200	100.0	2,221	0.0	0.0	0.0	0.0	0.0	0.0	20.3	0.0	18.5	79.7	100.0	81.5	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-2020	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Columbus OH MSA AA	1	200	100.0	2,221	7.9	--	2.3	12.9	100.0	11.5	14.6	--	21.2	64.6	--	54.6	0.0	--	10.4	
Total	1	200	100.0	2,221	7.9	--	2.3	12.9	100.0	11.5	14.6	--	21.2	64.6	--	54.6	0.0	--	10.4	

Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Staunton VA MSA AA	500	83,331	70.3	6,180	0.2	0.4	0.2	9.2	9.4	9.4	83.1	80.2	81.6	7.4	10.0	8.7	0.0	0.0	0.0
VA Non MSA AA	211	22,589	29.7	3,671	0.0	0.0	0.0	7.3	14.7	4.8	57.3	44.1	55.6	35.4	41.2	39.6	0.0	0.0	0.0
Total	711	105,920	100.0	9,851	0.1	0.3	0.2	8.5	11.0	7.7	72.9	69.5	71.9	18.5	19.3	20.2	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Staunton VA MSA AA	500	83,331	70.3	6,180	19.7	7.6	7.2	18.4	24.2	22.1	22.7	18.4	21.2	39.2	38.0	28.7	0.0	11.8	20.8
VA Non MSA AA	211	22,589	29.7	3,671	16.3	7.6	2.7	18.5	13.7	12.5	19.6	19.9	17.4	45.6	50.7	44.8	0.0	8.1	22.7
Total	711	105,920	100.0	9,851	18.4	7.6	5.5	18.4	21.1	18.5	21.5	18.8	19.8	41.7	41.8	34.7	0.0	10.7	21.5

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-2020		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Staunton VA MSA AA	338	36,519	79.2	2,024	4.0	2.1	3.4	5.9	6.2	6.8	82.5	80.2	81.5	7.7	11.5	8.4	0.0	0.0	0.0		
VA Non MSA AA	89	7,235	20.8	978	0.0	0.0	0.0	5.7	7.9	5.0	59.5	62.9	58.6	34.8	29.2	36.4	0.0	0.0	0.0		
Total	427	43,754	100.0	3,002	2.3	1.6	2.3	5.8	6.6	6.2	73.1	76.6	74.0	18.8	15.2	17.5	0.0	0.0	0.0		

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2018	
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		
Staunton VA MSA AA	88	11,276	84.6	1,772	82.0	76.1	55.3	5.6	23.9	12.4	0.0		
VA Non MSA AA	16	1,979	15.4	1,060	84.7	87.5	58.0	4.0	12.5	11.3	0.0		
Total	104	13,255	100.0	2,832	83.2	77.9	56.3	4.9	22.1	11.9	0.0		

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2019
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	
Staunton VA MSA AA	79	10,625	81.4	1,823	84.1	63.3	49.7	4.8	35.4	11.2	1.3	
VA Non MSA AA	18	1,815	18.6	1,137	86.1	94.4	49.9	3.5	5.6	10.3	0.0	
Total	97	12,440	100.0	2,960	84.9	69.1	49.8	4.3	29.9	10.8	1.0	
<i>Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2020
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Staunton VA MSA AA	171	14,618	75.7	2,024	85.9	38.0	40.1	4.1	15.8	10.0	46.2	
VA Non MSA AA	55	3,441	24.3	978	87.3	25.5	36.0	3.1	5.5	9.6	69.1	
Total	226	18,059	100.0	3,002	86.5	35.0	38.7	3.7	13.3	9.9	51.8	
<i>Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018
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	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.	% of Owner-Occupied Housing Units	% Bank Loans	Aggt.
Beckley WV MSA AA	278	34,152	26.6	1,931	0.0	0.0	0.0	7.9	3.6	5.4	81.3	73.7	77.5	10.7	22.7	17.0	0.0	0.0	0.0
Hagerstown-Martinsburg MSA 2018	246	34,658	23.5	5,031	0.0	0.0	0.0	9.0	12.2	7.6	80.9	70.7	79.8	10.2	17.1	12.5	0.0	0.0	0.0
Morgantown MSA AA	48	10,568	4.6	2,550	0.0	0.0	0.2	15.3	4.2	12.4	43.2	41.7	40.1	41.4	54.2	47.4	0.0	0.0	0.0
WV Non MSA 2018	474	51,200	45.3	5,224	0.0	0.0	0.0	9.0	3.4	6.2	63.4	63.5	57.5	27.6	33.1	36.3	0.0	0.0	0.0
Total	1,046	130,577	100.0	14,736	0.0	0.0	0.0	9.5	5.5	7.7	67.6	66.9	64.7	22.9	27.5	27.6	0.0	0.0	0.0

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2019-2020	
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	
Beckley WV MSA AA	595	57,275	29.4	2,358	0.0	0.0	0.0	7.9	3.9	4.5	81.3	74.3	76.1	10.7	21.8	19.4	0.0	0.0	0.0	
Hagerstown-Martinsburg MSA AA	489	67,222	24.1	8,935	0.0	0.0	0.0	12.7	17.4	8.2	78.6	72.2	78.9	8.7	10.4	12.9	0.0	0.0	0.0	
Morgantown MSA AA	125	29,158	6.2	3,964	0.0	0.0	0.1	15.3	13.6	9.8	43.2	38.4	35.9	41.4	48.0	54.2	0.0	0.0	0.0	
WV Non MSA AA	818	96,528	40.4	5,724	0.0	0.0	0.0	8.8	3.7	5.0	68.4	68.1	61.9	22.8	28.2	33.1	0.0	0.0	0.0	
Total	2,027	250,183	100.0	20,981	0.0	0.0	0.0	10.2	7.6	7.2	70.1	69.1	65.8	19.7	23.3	26.9	0.0	0.0	0.0	

Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018
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
Beckley WV MSA AA	278	34,152	26.6	1,931	20.7	4.0	5.9	18.2	11.9	14.6	20.7	21.2	21.1	40.5	55.0	45.5	0.0	7.9	12.9
Hagerstown - Martinsburg MSA 2018	246	34,658	23.5	5,031	21.6	5.7	6.9	18.5	18.3	21.2	21.9	19.1	22.1	38.1	50.0	26.7	0.0	6.9	23.1
Morgantown MSA AA	48	10,568	4.6	2,550	20.9	2.1	5.5	14.4	10.4	16.9	20.4	10.4	20.1	44.2	75.0	48.7	0.0	2.1	8.7
WV Non MSA 2018	474	51,200	45.3	5,224	20.4	4.9	5.8	17.0	11.6	13.6	20.2	22.6	22.4	42.4	57.8	45.3	0.0	3.2	12.9
Total	1,046	130,577	100.0	14,736	20.7	4.7	6.1	17.2	13.2	16.9	20.6	20.8	21.7	41.5	56.0	39.6	0.0	5.3	15.7

*Source: 2015 ACS Census; 01/01/2018 - 12/31/2018 Bank Data, 2018 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2019-2020		
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers				
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate		
Beckley WV MSA AA	595	57,275	29.4	2,358	20.7	8.2	4.7	18.2	17.6	14.9	20.7	25.0	20.7	40.5	45.9	43.9	0.0	3.2	15.8		
Hagerstown-Martinsburg MSA AA	489	67,222	24.1	8,935	20.8	7.0	5.1	18.2	14.1	17.8	21.9	27.2	19.8	39.1	44.8	29.4	0.0	7.0	27.8		
Morgantown MSA AA	125	29,158	6.3	3,964	20.9	4.6	3.1	14.4	22.4	13.3	20.4	16.0	17.4	44.2	52.8	54.2	0.0	6.4	12.0		
WV Non MSA AA	818	96,528	40.4	5,724	20.8	5.6	4.3	17.0	14.1	13.1	20.7	23.8	19.9	41.5	52.4	47.9	0.0	4.0	14.8		
Total	2,027	250,183	100.0	20,981	20.8	6.5	4.5	17.2	15.6	15.3	20.9	24.5	19.5	41.1	48.7	40.8	0.0	4.6	19.9		

*Source: 2015 ACS Census; 01/01/2019 - 12/31/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018
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	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
Beckley WV MSA AA	77	12,580	47.2	1,623	0.0	0.0	0.0	4.4	5.2	4.6	86.1	68.8	83.2	9.5	26.0	12.3	0.0	0.0	0.0
Hagerstown - Martinsburg MSA 2018	17	2,529	10.4	1,182	0.0	0.0	0.0	22.8	29.4	17.9	68.6	64.7	70.1	8.6	5.9	12.0	0.0	0.0	0.0
Morganton MSA AA	5	524	3.1	1,753	0.3	0.0	0.2	22.3	0.0	19.7	37.6	80.0	37.9	39.8	20.0	42.2	0.0	0.0	0.0
WV Non MSA 2018	64	8,793	39.3	3,945	0.0	0.0	0.0	10.6	3.1	11.7	55.4	57.8	51.3	34.0	39.1	37.0	0.0	0.0	0.0
Total	163	24,426	100.0	8,503	0.1	0.0	0.0	13.7	6.7	12.9	59.4	64.4	57.2	26.7	28.8	29.9	0.0	0.0	0.0

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-2020		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Beckley WV MSA AA	335	34,310	43.3	1,846	0.0	0.0	0.0	4.2	3.3	4.5	85.3	77.9	80.3	10.6	18.8	15.2	0.0	0.0	0.0		
Hagerstown-Martinsburg MSA AA	121	7,251	15.6	1,836	0.0	0.0	0.0	24.7	32.2	22.9	67.5	57.0	69.2	7.9	10.7	8.0	0.0	0.0	0.0		
Morgantown MSA AA	14	2,134	1.8	1,960	0.3	0.0	0.1	20.9	21.4	20.9	36.9	50.0	37.0	41.9	28.6	42.0	0.0	0.0	0.0		
WV Non MSA AA	304	23,523	39.3	3,762	0.0	0.0	0.0	10.8	4.3	11.7	59.0	64.8	58.1	30.2	30.9	30.2	0.0	0.0	0.0		
Total	774	67,218	100.0	9,404	0.1	0.0	0.0	14.6	8.5	14.4	60.4	69.0	60.2	25.0	22.5	25.4	0.0	0.0	0.0		

Source: 2020 D&B Data; 01/01/2019 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
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
Beckley WV MSA AA	77	12,580	47.2	1,623	74.3	74.0	46.8	6.9	24.7	18.9	1.3
Hagerstown -Martinsburg MSA 2018	17	2,529	10.4	1,182	84.2	82.4	50.9	4.1	17.6	11.7	0.0
Morganton MSA AA	5	524	3.1	1,753	79.2	100.0	44.7	6.1	0.0	14.8	0.0
WV Non MSA 2018	64	8,793	39.3	3,945	76.7	75.0	46.1	6.3	21.9	17.0	3.1
Total	163	24,426	100.0	8,503	77.9	76.1	46.6	6.0	22.1	16.0	1.8

Source: 2018 D&B Data; 01/01/2018 - 12/31/2018 Bank Data; 2018 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019
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
Beckley WV MSA AA	84	11,993	45.4	1,708	76.4	71.4	40.2	6.1	28.6	17.5	0.0
Hagerstown-Martinsburg MSA AA	28	2,693	15.1	1,674	86.1	78.6	43.7	3.4	21.4	10.5	0.0
Morganton MSA AA	5	696	2.7	1,845	81.8	100.0	41.1	4.9	0.0	13.3	0.0
WV Non MSA AA	68	8,483	36.8	3,226	77.9	82.4	40.4	5.8	16.2	16.3	1.5
Total	185	23,865	100.0	8,453	80.1	77.3	41.1	5.2	22.2	14.8	0.5

Source: 2019 D&B Data; 01/01/2019 - 12/31/2019 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Beckley WV MSA AA	251	22,317	42.6	1,846	78.3	25.9	30.8	5.5	6.0	16.2	68.1
Hagerstown-Martinsburg MSA AA	93	4,558	15.8	1,836	87.2	14.0	30.5	3.0	0.0	9.9	86.0
Morgantown MSA AA	9	1,438	1.5	1,960	83.6	44.4	28.9	4.3	11.1	12.2	44.4
WV Non MSA AA	236	15,040	40.1	3,762	79.6	21.6	38.0	5.1	3.0	15.3	75.4
Total	589	43,353	100.0	9,404	81.7	22.6	33.2	4.6	3.9	13.7	73.5
<i>Source: 2020 D&B Data; 01/01/2020 - 12/31/2020 Bank Data; 2020 CRA Aggregate Data. "--" data not available. Due to rounding, totals may not equal 100.0%</i>											