PUBLIC DISCLOSURE

December 1, 2025

COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION

Citizens Bank of Kentucky, Inc.
RSSD #495419

620 Broadway Avenue
Paintsville, Kentucky 41240

Federal Reserve Bank of Cleveland

P.O. Box 6387
Cleveland, OH 44101-1387

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, nor should it 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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INSTITUTION'S COMMUNITY REINVESTMENT ACT (CRA) RATING

Citizens Bank of Kentucky, Inc. (Citizens) is rated: Outstanding

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Outstanding

The major factors and criteria contributing to this rating include:

- The net loan-to-deposit (NLTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs;
- A majority of loans and other lending-related activities are in the AA;
- The distribution of loans reflects a reasonable penetration among individuals of different income levels (including low- and moderate-income); and,
- The geographic distribution of loans reflects excellent dispersion throughout the AA.
- Response to substantiated complaints is appropriate.
- The bank's community development performance demonstrates excellent responsiveness to the community development needs of the AA, considering the bank's capacity and the need and availability of such opportunities in the bank's AA.

SCOPE OF EXAMINATION

The Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Examination Procedures for Intermediate Small Institutions* was utilized to evaluate Citizens' CRA Performance under Regulation BB. The evaluation considered CRA performance context, including Citizens' asset size, financial condition, business strategy and market competition, as well as the demographics, economic characteristics, and credit needs of the AAs. The following data was reviewed:

- Citizens' 13-quarter average NLTD ratio
- Home Mortgage Disclosure Act (HMDA)-reportable (home purchase, refinance, home improvement, multi-family, and other purpose closed end) loans were analyzed from January 1, 2023, through December 31, 2024. Consumer (motor vehicle, other secured, and other unsecured) loans were analyzed from January 1, 2024, through December 31, 2024.
- Based on the total loan volume by dollar amount, HMDA-reportable lending received the most weight, followed by consumer lending.
- In accordance with CRA examination procedures, the HMDA universe was reviewed. Conclusions were reached in the aggregate for each year. If lending differed between

years, more weight was given to 2023 performance, the year with the most loans by volume and dollar amount. A sample of consumer loans was chosen due to significant volume, and as such, an accurate conclusion concerning the bank's lending record could not be reached without their inclusion. Conclusions were reached in the aggregate for consumer loans. There was not enough loan volume to evaluate lending in the Lexington-Fayette AA.

- Borrower distribution received more weight than geographic distribution based on the overall percentage of low- and moderate-income (LMI) families (44.3%) compared to LMI geographies (37.5%). There are no low-income geographies in the bank's delineated AAs in this evaluation period.
- Aggregated (peer) lending data, which is comprised of lending activity for all other lenders reporting home mortgage loans under HMDA in the respective AA, was used as a comparison in evaluating the bank's lending performance in 2023 and 2024.
- Lending performance in moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they impacted the outcome of the analyses.
- The evaluation period for community development activities was November 29, 2021, through December 1, 2025. Community development activities are comprised of community development loans, qualified investments, and services.

As a full-service intrastate bank with multiple AAs, at least one AA must undergo a full-scope review. The determination of which AAs received full-scope versus limited-scope evaluations was based on the following criteria: the volume of lending by number of loans and dollar amount as a percentage of overall and statewide lending activity, deposit market share, number of branches, percentage of deposits, percentage of low- and moderate-income geographies, volume of community development activity, and other non-financial considerations.

For this evaluation, Citizens has the following three CRA delineated AAs:

- Nonmetropolitan Kentucky – Full-scope evaluation
  - Consists of the entireties of Floyd, Johnson, Magoffin, and Pike counties.
  - Since the previous evaluation, the Office of Management and Budget (OMB) removed Lawrence County from Nonmetropolitan Kentucky and added it to the Huntington-Ashland MSA in 2024.
  - Since the previous evaluation, Citizens incorporated the entirety of Pike County. Only three tracts were included in the previous evaluation.

- Huntington-Ashland WV-KY-OH MSA (Huntington-Ashland AA) – Limited-scope evaluation
  - Consists of entireties of Boyd, Carter, Greenup, and Lawrence counties in Kentucky, excluding Cabell, Lincoln, Putnam, and Wayne counties in West Virginia and Lawrence County in Ohio.
  - Since the previous evaluation, Citizens incorporated the entireties of Boyd and Greenup counties. Previously, Citizens only included eight tracts in Boyd County and four tracts in Greenup County. The OMB added Lawrence County, Kentucky to the Huntington-Ashland MSA in 2024.
- Lexington-Fayette KY MSA (Lexington-Fayette AA) – Limited-scope evaluation
  - Consists of entirety of Clark County, excluding Fayette, Bourbon, Jessamine, Scott, and Woodford counties.
  - There were no changes to this AA since the previous evaluation.

Nonmetropolitan Kentucky was given the greatest weight in the evaluation and selected to receive a full-scope review, as it contained the largest percentage of branches and originated the largest amount of loans (by number and dollar amount). A detailed description of the full-scope AA is presented in subsequent sections of this performance evaluation.

To better understand AA community development and credit needs, several sources were used, including publicly accessible data and information submitted by the bank. Three community contacts were conducted. The interviews were conducted with representatives from an economic development corporation and community and regional foundations. The contacts serve Citizens' AAs. The contacts have expertise in their respective fields and are familiar with the economic, social, and demographic characteristics and community development opportunities in the AA. Information obtained from the interviews helped establish context for the communities in which Citizens operates and gather information on its performance. More detailed information obtained from this is included in the "Description of the Institution's Operations" section for the full-scope AA.

DESCRIPTION OF INSTITUTION

Citizens is an intrastate community bank and is a banking subsidiary of Citizens National Corporation; both entities are headquartered in Paintsville, Kentucky. The bank's characteristics include:

- Citizens has total assets of $659.7 billion and total deposits of $573.9 million as of December 31, 2024. Total assets decreased by 15.0% while total deposits decreased by 13.1% since the previous evaluation.[1]
- All of Citizens' Automated Teller Machines (ATMs) are full-service and will be referred to as ATMs throughout this evaluation. In addition to the main office with an ATM, Citizens maintains 11 branches with ATMs. In Nonmetropolitan Kentucky, Citizens maintains its main office and seven branches. The main office and five branches are in moderate-income tracts, and the remaining two branches are in upper-income tracts. In the Huntington-Ashland AA, Citizens maintains two branches in moderate-income tracts and one branch in a middle-income tract. Lastly, in the Lexington-Fayette AA, Citizens maintains one branch in a middle-income tract.
- All branches offer drive-thru services. All but one branch in an upper-income tract offer extended hours of service. Six branches offer weekend hours, including four branches in moderate-income tracts.
- Since the previous evaluation, Citizens has not opened or closed any branches.
- Citizens is a full-service retail bank that offers traditional products, including consumer and business checking and savings accounts, real estate loans, home equity loans, consumer loans, credit cards, and commercial loans. Citizens' website (*www.wercitizens.bank*) offers online banking. Citizens offers mobile banking with the ability to make deposits from a smartphone. Remote deposit capture is also available to all business customers. Additionally, telephone banking, "Your Account on Call," is a free service available anytime to customers with a touch tone phone.

The loan portfolio composition as of December 31, 2024, is shown in the table below. Citizens' primary business focus is non-farm non-residential real estate loans followed by residential real estate.

[1] Financial As of Date: September 30, 2021

Composition of Loan Portfolio		
	12/31/2024	
Loan Type	$ (000s)	Percent
Construction and Development	17,611	5.5%
Secured by One- to Four- Family Dwellings	118,416	36.7%
Other Real Estate: Farmland	63	0.0%
Multifamily	13,536	4.2%
Nonfarm nonresidential	138,490	42.9%
Commercial and Industrial	23,575	7.3%
Loans to Individuals	10,794	3.3%
Agricultural Loans	0	0.0%
Total	*$ 322,485*	100.0%

**This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.*

Citizens' investment portfolio as of December 31, 2024, was $276.3 million, which represented 41.9% of total assets. U.S. Treasury and Agency securities, municipal bonds, all other securities, and interest-bearing bank balances accounted for 40.7%, 34.1%, 17.1%, and 8.1% of total investments, respectively.

There are no known legal, financial, or other factors impeding Citizens' ability to help meet the credit needs of its communities.

Citizens was rated Outstanding under the CRA at its previous evaluation conducted November 29, 2021. The lending test was rated Satisfactory, and community development test was rated Outstanding.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Citizens' overall CRA performance is rated Outstanding. Details are provided below, including facts, data, and analyses used to form conclusions regarding the lending and community development test performance ratings.

LENDING TEST

Citizens' performance relative to the lending test is rated Satisfactory based on Citizens' loan-to-deposit ratio, AA concentration, and borrower and geographic distribution.

Citizens' performance relative to the lending test is reasonable in Nonmetropolitan Kentucky and the Huntington-Ashland AA. There was insufficient loan volume to evaluate borrower and geographic distribution in the Lexington-Fayette AA.

Net Loan-to-Deposit Ratio (NLTD)

A financial institution's NLTD ratio is evaluated to determine the reasonableness of lending considering performance context, such as Citizens' capacity to lend, the availability of lending opportunities, the demographic and economic factors present in the AA since the previous evaluation in comparison to similarly situated Federal Deposit Insurance Corporation (FDIC)-insured institutions (custom peer group). To assess the bank's performance, we analyzed the NLTD ratio of comparable institutions. The custom peer group was selected based on asset size, market share, and the area where they are located.

Comparative Loan-to-Deposit (LTD) Ratio		
Institution	**Total Assets as of 12/31/2024 $(000)**	**NLTD Ratio (%)**
		13 – Quarter Average*
Citizens Bank of Kentucky, Inc	659,669	50.4
Similarly Situated Institutions	**$(000)**	**Custom Peer Ratio**
Cumberland Valley N.B. & Trust Co.	787,093	70.1
Peoples Exchange Bank	554,315	91.0
Quarterly LTD Ratio Average Since the Previous Evaluation		**80.6**
** December 31, 2021 - December 31, 2024*		

During this period, Citizens' NLTD ratio averaged 50.4%, compared to peer ratio at 80.6%. In discussions with bank management, lower NLTD ratio can be attributed to the influx of deposits from stimulus programs associated with the COVID-19 pandemic staying on the balance sheet longer than expected; resulting in the funds being housed in investment securities The NLTD ratio shows an increasing trend from 2022 to 2024 and management has implemented efforts to hire additional lending officers to increase loans; however, loan portfolio reduction through loan repayments and payoffs has muted net growth. Given these factors, Citizens' NLTD ratio is considered reasonable given the bank's size, financial condition, and AA credit needs.

Assessment Area Concentration

During the evaluation period, Citizens' lending was analyzed to determine the volume of lending inside and outside Citizens' AA. A majority of loans and other lending-related activities are in the AA.

Lending Inside and Outside the Assessment Area								
Loan Types	Inside				Outside			
	#	%	$(000s)	%	#	%	$(000s)	%
Consumer	121	87.7	$1,413	88.4	17	12.3	$185	11.6
Total Consumer related	**121**	**87.7**	**$1,413**	**88.4**	**17**	**12.3**	**$185**	**11.6**
Home Purchase - Conventional	77	74.8	$13,526	65.1	26	25.2	$7,241	34.9
Refinancing	36	87.8	$4,861	81.1	5	12.2	$1,135	18.9
Home Improvement	10	62.5	$698	39.4	6	37.5	$1,075	60.6
Multi-Family Housing	3	37.5	$3,455	47.3	5	62.5	$3,843	52.7
Other Purpose Closed-End	8	80	$711	80.2	2	20	$175	19.8
Total HMDA related	**134**	**75.3**	**$23,251**	**63.3**	**44**	**24.7**	**$13,469**	**36.7**
TOTAL LOANS	**255**	**80.7**	**$24,664**	**64.4**	**61**	**19.3**	**$13,654**	**35.6**
Note: Affiliate loans not included								

A majority of Citizens' HMDA-reportable and consumer loans were made inside the AA during the evaluation period.

Lending to Borrowers of Different Income Levels

This performance criterion evaluates the bank's penetration of lending among individuals of different income levels (including LMI).

The distribution to borrowers of different income levels is reasonable. Borrower distribution is reasonable in Nonmetropolitan Kentucky and the Huntington-Ashland AA.

Geographic Distribution of Loans

This performance criterion evaluates the bank's distribution of lending within its AAs by income level of census tracts with consideration given to the dispersion of loans throughout the AAs.

Citizens' geographic distribution of loans reflects excellent dispersion throughout the AAs. Citizens has excellent geographic distribution in Nonmetropolitan Kentucky and Huntington-Ashland AA with significant gaps in lending.

Response to Complaints

The bank has taken appropriate action in response to a substantiated CRA complaint.

COMMUNITY DEVELOPMENT TEST

Citizens' performance under the community development test is rated Outstanding.

Citizens' performance relative to the community development test is excellent in Nonmetropolitan Kentucky and adequate in the Huntington-Ashland and Lexington-Fayette AAs.

Citizens' community development performance demonstrates an excellent responsiveness to community development needs of its AA through community development loans, qualified investments and small dollar contributions and grants, and community development services, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AA. Citizens' community development activities supported revitalization/stabilization, economic development, and services to LMI individuals and families. Since the previous evaluation, Citizens increased its level of community development lending and small dollar donations and grants. Community contacts emphasized economic development, workforce development, and increased access to wraparound services, small dollar loans, and banking products and services as critical needs across the AA. The majority of community development activities support these expressed needs.

Community Development Loans

Citizens originated or renewed 58 community development loans totaling approximately $40.8 million. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	$
Revitalization / Stabilization	33	$33,698,185
Services to LMI	11	$4,934,469
Economic Development	14	$2,202,360
Total	**58**	**$40,835,014**
Totals include loans that benefit broader regional area		

The majority of community development loans by dollar amount benefited Nonmetropolitan Kentucky and the broader regional nonmetropolitan area, representing 75.9%, and 16.2% of community development lending benefited the Huntington-Ashland AA. Citizens did not originate community development loans in the Lexington-Fayette AA; however, Citizens does not have a significant presence in this competitive market and ranks eighth out of nine institutions, with only 1.9% of the market share in Clark County.

Community development loans in the Huntington-Ashland AA supported services to LMI individuals, economic development, and revitalization and stabilization. Particularly responsive loans include loans to an outpatient behavioral treatment center that primarily serves LMI adolescents and a health center that primarily services a low-income population. These loans help address health care disparities in medically underserved areas.

Because Citizens has been responsive to community development needs and opportunities in its AAs, consideration was also given to four community development loans totaling nearly $3.2 million that benefit the broader regional area. These loans represent 7.9% of Citizens' total community development lending and supported revitalization/stabilization and economic development. These loans provided financing to three small businesses in distressed middle- or moderate-income areas and a small business that trains pilots. Proceeds from these loans helped these businesses expand services, enable hiring, and support workforce development. Community contacts emphasized the need for small dollar loans to small businesses to assist with growth and job creation. These loans are responsive to these expressed needs.

Community Development Investments

Citizens had $826,500 in qualified investments, small dollar contributions and grants during the evaluation period.

During the evaluation period, Citizens obtained two new municipal bonds worth $450,000. These bonds support school systems with at least 50.0% of the student bodies qualified for the free- or reduced-lunch program in Nonmetropolitan Kentucky.

Citizens also holds 31 prior period municipal bonds with a book value of approximately $15.6 million that support school systems with majority LMI student bodies in the broader regional nonmetropolitan area.

Qualified investments also took the form of small dollar donations and grants totaling $376,500. The following table reflects the total number of community development donations by purpose, number, and dollar amount.

Purpose of CD Donation	#	$
Services to LMI	14	$186,500
Economic Development	5	$150,000
Revitalization / Stabilization	7	$40,000
Total	**26**	**$376,500**
Totals include donations that benefit broader regional and disaster areas and grants		

Most contributions, by number and dollar amount, supported services to LMI individuals and families. These contributions include 10 Welcome Home grants totaling $175,000. Welcome Home grants assist qualified LMI homebuyers with down payments or closing costs. Eight grants ($135,000) supported homebuyers in Nonmetropolitan Kentucky, followed by one grant in the Lexington-Fayette AA ($20,000). Citizens also made five donations totaling $150,000 to an organization supporting economic development across Eastern Kentucky. These donations benefit the broader regional area, including the bank's AAs. Community contacts emphasized economic development as a critical need.

Because Citizens has been responsive to community development needs and opportunities in its AAs, consideration was given to the remaining Welcome Home grant ($20,000) that benefited a borrower in the broader regional area and three donations totaling $20,000 supporting recovery efforts caused by severe storms, flooding and tornadoes in Kentucky in 2025 which is a Federal Emergency Management Agency (FEMA) designated disaster area. Nonmetropolitan Kentucky also received consideration for donations that benefited the broader regional area.

Small dollar donations and grants primarily benefited the broader regional area (50.5%), followed by Nonmetropolitan Kentucky, Lexington-Fayette, and Huntington-Ashland at 41.5%, 5.3%, and 2.7%, respectively. Community contacts expressed the critical need for wraparound services for LMI individuals and families, affordable housing, and economic development across the bank's AAs. These donations help address these expressed needs.

Community Development Services

During the evaluation period, 22 employees assisted 23 organizations totaling 249 hours of community development service. Service hours provided equate to 0.1 annualized persons (ANP).[2] The following table provides a breakdown of qualified community development services by community development purpose.

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	45	18	18	189
Economic Development	39	3	2	41
Revitalization / Stabilization	7	2	2	19
Total	**91**	**23**	**22**	**249**
**Some employees may be double-counted if performed more than one service*				

Employees were involved with organizations and activities that promote community services targeted to LMI individuals and to lesser extents economic development and revitalization/stabilization. The majority of community development services were in Nonmetropolitan Kentucky (82.7%), followed by Huntington-Ashland (12.9%) and Lexington-Fayette (4.4%). Citizens primarily provides community development services by serving on boards and committees (152 hours) and delivering financial literacy training (97 hours).

Community development services included the following:

<u>Board and Committee Memberships</u> – Citizens' officers and managers provided financial expertise through their involvement with community development organizations throughout the AAs by serving as directors and leaders on boards and committees.

<u>Financial Education</u> – Citizens provides customized financial literacy training curriculum based on audience needs and uses the following materials to teach financial literacy primarily to elementary school children.

- **Great Minds Think – Federal Reserve Bank of Cleveland**
  - Free financial literacy fundamentals program that offers interactive online games and downloadable workbooks to teach young learners to make smart money choices and promote personal finance understanding in homes, schools, and communities.

[2] Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in a year

- **Money Monsters Learn to Save – Consumer Protection Financial Bureau (CFPB)**
  - Free financial literacy series of stories and activities that feature characters called Money Monsters designed for educators and others to work with young children to help them learn fundamental financial knowledge and skills.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Federal Reserve Bank of Cleveland conducted a fair lending analysis performed under Regulation B – Equal Credit Opportunity Act and Fair Housing Act requirements and was conducted concurrently with this CRA evaluation. No evidence of a pattern or practice of discrimination on a prohibited basis or of other illegal credit practices inconsistent with helping to meet community credit needs was identified.

NONMETROPOLITAN AREA

(Full-scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NONMETROPOLITAN KENTUCKY

Citizens' delineated AA in Nonmetropolitan Kentucky consists of the entireties of Floyd, Johnson, Magoffin, and Pike counties. Since the previous evaluation, Lawrence County moved from Nonmetropolitan Kentucky to the Huntington-Ashland MSA , and Citizens incorporated the entirety of Pike County in its AA in 2024.[3] As a result of these changes, the AA was comprised of the following tracts:

Income Tract Designations Assessment Area: Nonmetropolitan Kentucky		
Income Tract Level	Number of Tracts	
	2023	2024
Low	0	0
Moderate	24	21
Middle*	23	19
Upper	5	6
Unknown	2	2
Total	**54**	**48**
*All middle-income tracts are distressed/underserved.		

- Based on the changes to the AA, the AA lost three moderate- and four middle-income tracts and gained one upper-income tract in 2024. There were no changes to the number of low- and unknown-income tracts.
- In 2023, all middle-income tracts were designated as distressed and underserved. Middle-income tracts in Floyd and Johnson counties were distressed due to poverty and unemployment, and middle-income tracts in Lawrence and Pike counties were distressed due to poverty.
- In 2024, all middle-income tracts were designated as distressed and underserved due to poverty and unemployment.
- As of June 30, 2024, the FDIC Deposit Market Share report ranks Citizens second among nine institutions operating in the AA with 16.5% of the deposit market share, compared to the market leader, Community Trust Bank, with 46.6% of the market and U.S. Bank

[3] Previously only three tracts in Pike County were included

National Association with 11.2% of the market. Citizens operates eight branches in the AA, while Community Trust Bank and U.S. Bank National Association operate 14 and five branches, respectively.

- The 2024 HMDA Peer Market data indicate Citizens ranked 10th out of 109 HMDA reporters in the AA and originated 38 loans. By comparison, first ranked Community Trust Bank, second ranked Stockton Mortgage Corporation, and third ranked Vanderbilt Mortgage and Finance, originated 309, 98, and 95 loans, respectively.
- The 2023 HMDA Peer Market data indicate Citizens ranked sixth out of 121 HMDA reporters in the AA and originated 58 loans. By comparison, first ranked Community Trust Bank, second ranked Vanderbilt Mortgage and Finance, and third ranked Rocket Mortgage originated 363, 99, and 73 loans, respectively.
- Between 2023 and 2024, the total number of HMDA reporters in the AA declined by 9.9% and originations declined by 9.4% among these same HMDA reporters. Specifically, Citizens' originations declined by 34.5%.

Community Contacts

Three community contact interviews were conducted as part of this evaluation to provide supplemental information regarding the area's credit needs and context to demographic and economic conditions of the local community. The first interview was with a representative from an economic development organization that serves Eastern Kentucky. The contact stated the collapse of the coal industry has led to economic distress, indicating nearly 45.0% of Appalachian counties with the most severe economic distress being in Eastern Kentucky. The contact stated a major challenge in the region is a weak labor force despite a significant prime age working population. The contact indicated the current opioid epidemic prevalent throughout Appalachia plays a major role in public health and employment, and all these factors lead to the region's average life expectancy being about six years less than the average American and underemployment. Lastly, the contact stated this area has incredibly poor broadband internet availability, which directly affects community development and employment opportunities. The contact commended area banks for being involved in the community and dependable partners that assist in emergencies and provide services benefiting the community. However, the contact also indicated there are opportunities for local financial institutions to participate in task forces and advocate for improved broadband infrastructure that is desperately needed.

The second contact was with a representative from a regional foundation that works to increase charitable giving and philanthropy throughout Central Appalachia (Eastern Kentucky). The contact stated Central Appalachia continues to struggle with population loss, particularly the loss in prime working age residents, as a result of the decline in the coal industry, the opioid epidemic, and lack of safe and affordable housing. Central Appalachia tends to have the highest poverty rates within Appalachia, along with weak educational attainment and poor health outcomes which represent significant economic development challenges. The contact believes while government assistance programs are insufficient to lift low-income recipients out of poverty, these programs also help keep recipients from sinking into deep poverty. The contact expressed there is a lack of access to financial services in the community and indicated there are opportunities for financial institutions to collaborate with local officials to better address the area's issues and challenges.

The third interview was with a representative from a community foundation that funds a multitude of wraparound services to LMI individuals and families. The contact stated that lack of access to opportunities, education, healthcare, and affordable housing are key factors that contribute to generational poverty in Eastern Kentucky. Food insecurity has increased significantly due to high inflation and the end of multiple pandemic-era assistance programs. The opioid epidemic and the decline of coal mining industry are major contributors to the increase in area homelessness and unemployment. The contact stated there is a lack of opportunity and available capital for small area businesses, which prevents new businesses from opening and existing businesses from staying in business or expanding. Local financial institutions need to be more accessible; LMI and unbanked individuals tend to avoid banks due to their fear of being charged excessive fees or not being approved for a checking and/or savings account or loan. The contact stated financial literacy outreach, and education is needed for LMI consumers and small business owners.

Population Characteristics

Population Change Assessment Area: Nonmetropolitan Kentucky			
Area	**2020 Population**	**2023 Population**	**Percent Change**
Floyd County	35,942	34,027	-5.3%
Johnson County	22,680	22,344	-1.5%
Magoffin County	11,637	11,345	-2.5%
Pike County	58,669	54,397	-7.3%
Assessment Area	**128,928**	**122,113**	-5.3%
Kentucky	**4,505,836**	**4,550,595**	1.0%
Source: 2020 U.S. Census Bureau Decinnial Census *Federal Reserve Economic Data | FRED | St.Louis Fed*			

- From 2020 through 2023, the AA experienced a 5.3% decrease in population, compared to a 1.0% increase in population for Kentucky. Pike County experienced the largest decrease in population at 7.3% during this period.
- AA population is decreasing, which could increase the economic pressure on the workforce.
- According to U.S. Census data, the most populous cities in the AA reflect the same population trends:[4]
  - Pikeville (Pike County) is the most populous city in the AA with 7,366 residents, and its population decreased by 5.1% between 2020 and 2024.
  - Paintsville (Johnson County) with 4,129 residents, and its population decreased by 4.4% between 2020 and 2024.
  - Prestonsburg (Floyd County) with 3,638 residents, and its population decreased by 7.2% between 2020 and 2024.
  - Salyersville (Magoffin County) with 1,499 residents, and its population decreased by 5.7% between 2020 and 2024.
- 78.8% of the AA population was 18 years of age or older, the legal age to enter a contract.
- The majority of the AA population (52.7%) was between the ages of 25 and 64, which is the prime-working age.
- 18.2% of the population in the AA was 65 or older, compared to 16.2% in Kentucky.

[4] City and Town Population Totals: 2020-2024

- A higher elderly population may affect economic growth and the ability of government and communities providing adequate resources for older adults, including but not limited to healthcare services.
- 45.9% of the AA population reside in moderate-income tracts.

Income Characteristics

Borrower Income Levels Nonmetropolitan Kentucky							
FFIEC Estimated Median Family Income		% Change	Low	Moderate	Middle	Upper
			0 - 49.99%	50% - 79.99%	80% - 119.99%	120% - & above
2023	$64,900		0 - $32,449	$32,450 - $51,919	$51,920 - $77,879	$77,880 - & above
2024	$66,100	1.8%	0 - $33,049	$33,050 - $52,879	$52,880 - $79,319	$79,320 - & above

- During the evaluation period, median family income (MFI) in Nonmetropolitan Kentucky (includes all nonmetropolitan areas throughout Kentucky) increased by 1.8%.
- 2020 MFI in Nonmetropolitan Kentucky was $53,778, which represents a 20.7% increase from 2020 to 2023 and a 22.9% increase from 2020 to 2024.
- By comparison, 2020 MFI in the AA was $45,458, which was 15.5% lower than MFI in Nonmetropolitan Kentucky and 45.0% lower than MFI in Kentucky. These differences demonstrate that the AA has concentrated rural poverty.
- The Kentucky minimum wage and Federal minimum wage is $7.25[5] per hour and has not increased since 2009.

Poverty Rates Assessment Area: Nonmetropolitan Kentucky			
Area	**2021**	**2022**	**2023**
Floyd County	28.0%	34.8%	26.5%
Johnson County	24.2%	26.0%	25.0%
Magoffin County	33.2%	29.8%	29.2%
Pike County	30.1%	25.1%	23.4%
Kentucky	**16.3%**	**16.3%**	**16.1%**
United States	**12.8%**	**12.6%**	**12.5%**
Source: Federal Reserve Economic Data | FRED | St.Louis Fed			

[5] Federal Minimum Wage

- Poverty rates in the AA were substantially higher than poverty rates in Kentucky and the United States.
- Of the 36,983 families in the AA, 47.3% are designated as LMI and 21.0% of families are living below the poverty level, compared to 12.3% of families living below the poverty level in Kentucky.
- Of the 53,723 households in the AA, 26.8% are below the poverty level and 1.8% receive public assistance; compared to 16.5% of households across Kentucky that are below the poverty level.
- Supplemental Nutrition Assistance Program (SNAP)[6] helps LMI individuals and families, the elderly, and the working poor purchase food and reduce food insecurity and may free up resources for other necessities, such as clothing, housing, and medical expenses.

SNAP Recipients Assessment Area: Nonmetropolitan Kentucky		
Area	**2021**	**2022**
Floyd County	25.0%	25.6%
Johnson County	20.3%	21.6%
Magoffin County	29.9%	30.5%
Pike County	20.3%	20.8%
Kentucky	**21.5%**	**21.4%**
Source: Federal Reserve Economic Data | FRED | St.Louis		

- Corresponding with poverty rates, Magoffin County had the highest percentage of individuals receiving SNAP benefits and Pike County had the lowest percentage.

[6] FRED – SNAP Benefits Recipients

Housing Characteristics

Housing Cost Change Assessment Area: Nonmetropolitan Kentucky						
Area	Median Housing Values			Median Gross Rent		
	2020	2023	Percent Change	2020	2023	Percent Change
Floyd County	$74,000	$93,300	26.1%	$644	$713	10.7%
Johnson County	$115,800	$125,300	8.2%	$623	$698	12.0%
Magoffin County	$71,100	$88,300	24.2%	$604	$633	4.8%
Pike County	$82,700	$104,200	26.0%	$702	$837	19.2%
Kentucky	**$147,100**	**$192,300**	30.7%	**$783**	**$933**	**19.2%**
Source: 2019-2023 U.S. Census Bureau: American Community Survey 2016-2020 U.S. Census Bureau: American Community Survey						

- The median housing values throughout the AA increased between 8.2% to 26.1%, compared to 30.7% in Kentucky. With the exception of Johnson County, MFI did not keep pace with home price growth. Overall, housing became less affordable across the AA during this period.
- Based on 2020 Census data, the affordability ratio[7] was 41.8 in the AA compared to 35.51 in Kentucky. Housing was generally more affordable across the AA than in other parts of Kentucky.
- From 2020 to 2023, median gross rent throughout the AA increased between 4.8% to 19.2%. The rise in median gross rents indicates the need for more affordable housing.
- According to 2020 Census data, 36.1% of all renters in the AA had rental costs that were greater than 30.0% of their income.
- According to the National Low Income Housing Coalition,[8] full-time workers must earn at least $21.47 an hour ($44,658 annual salary) in Kenucky to afford a two-bedroom rental apartment, which is triple the minimum wage in the state. Rents continue to increase nationwide; the national 2023 Housing Wage is $28.58 per hour ($59,446 annual salary) for a modest two-bedroom rental home.[9]
- There are 66,352 housing units in the AA, of which 58.3% are owner-occupied and 22.7% are rentals. The remaining 19.0% are vacant units, which is higher than the 12.4% in Kentucky. Housing units in the AA primarily consist of single-family dwellings, with mobile homes accounting for 33.6% of all housing units, compared to 11.5% in Kentucky.

[7] The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered.
[8] Out of Reach: Kentucky | National Low Income Housing Coalition
[9] National Low Income Housing Coalition

- The median age of housing stock in the AA is 43 years old, and 11.9% of housing units were built prior to 1950. The age of housing stock demonstrates a potential need for home improvement lending or refinance loans to make needed repairs.

Housing Cost Burden Assessment Area: Nonmetropolitan Kentucky						
	Cost Burden - Owners			Cost Burden - Renters		
Area	Low Income	Moderate Income	All Owners	Low Income	Moderate Income	All Renters
Floyd County	60.6%	18.7%	22.8%	59.7%	33.3%	35.8%
Johnson County	63.5%	23.3%	19.5%	57.1%	22.1%	33.7%
Magoffin County	44.3%	8.6%	18.8%	50.7%	9.3%	32.1%
Pike County	56.3%	19.6%	21.6%	51.8%	38.7%	35.3%
Assessment Area	**57.1%**	**18.6%**	**21.4%**	**54.8%**	**31.8%**	**34.9%**
Kentucky	**54.9%**	**24.6%**	**16.1%**	**68.2%**	**31.3%**	**36.9%**
Cost Burden is housing cost that equals 30 percent or more of household income						
Source: U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy						

- 57.1% of low-income homeowners and 54.8% of low-income renters in the AA are cost burdened, compared to 18.6% of moderate-income homeowners and 31.8% of moderate-income renters in the AA.
- 21.4% of all homeowners and 34.9% of all renters across the AA are cost burdened, compared to 16.1% of all homeowners and 36.9% of all renters across Kentucky.
- The data shows cost burden disproportionately affects renter-occupied households, particularly low-income renters as well as low-income homeowners.
- Cost-burdened renters may have a difficult time saving enough money to make a sufficient down payment to purchase a home or otherwise afford increasing rents.

Labor, Employment, and Economic Characteristics

Unemployment Rates Assessment Area: Nonmetropolitan Kentucky			
Area	2022	2023	2024
Floyd County	5.7%	5.9%	7.1%
Johnson County	5.6%	6.1%	7.3%
Magoffin County	8.8%	8.1%	9.1%
Pike County	5.2%	5.6%	6.8%
Assessment Area	**5.7%**	**6.0%**	**7.2%**
Kentucky	**4.0%**	**4.3%**	**5.1%**
Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics			

- Between 2022 to 2024 unemployment rates increased across the AA. The average unemployment rate increased from 5.7% in 2022 to 7.2% in 2024. Unemployment rates across the AA were substantially higher than unemployment rates in Kentucky throughout this period.
- According to the Appalachian Regional Commission (ARC), Floyd, Johnson, Magoffin, and Pike counties are designated as distressed based on several economic indicators, including poverty rates, per capita market income and unemployment rates. Historically, Appalachia has battled poverty, unemployment, lower educational attainment, and lower wages. Despite some recent regional improvements, the counties in this AA are still experiencing higher levels of unemployment and poverty than the national rates.[10]
- Magoffin County is the fourth poorest county out of 120 counties in Kentucky with a median household income of $29,615 as of 2021. Pike, Floyd, and Johnson counties are the 22nd, 24th, and 34th poorest counties, respectively.[11] All four counties are well below Kentucky median household income at $55,454.
- According to the Bureau of Labor Statistics, the top three employment industries in the AA are government, retail trade, and health care and social assistance.
- Utilizing benchmarks of 100 Mbps download and 20 Mbps upload:[12]
  - 95.8% of Floyd County has access to broadband internet.
  - 96.1% of Johnson County has access to broadband internet.

[10] ARC – County Economic Status and Distressed Areas in Appalachian Kentucky, Fiscal Year 2025
[11] DemographicsUS.com - Kentucky Richest Counties
[12] Kentucky Office of Broadband Development

  - 100.0% of Magoffin County has access to broadband internet.
  - 72.6% of Pike County has access to broadband internet.
- While broadband access has increased, Appalachian households still have less access to high-speed internet compared to the national average. According to ARC, improving access to high-speed internet is vital for strengthening Appalachia's economy.[13] A community contact also stated this area has incredibly poor broadband internet availability, which directly affects community development and employment opportunities.

[13] ARC – Accelerating Appalachian Broadband Access

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN KENTUCKY

LENDING TEST

Citizens' performance relative to the lending test is reasonable.

Lending to Borrowers of Different Income Levels

Borrower distribution received greater weight than geographic distribution given the overall percentage of LMI families compared to the overall percentage of LMI geographies.

The distribution to borrowers of different income levels (including LMI) is reasonable. Borrower distribution of HMDA lending is reasonable, and consumer lending is excellent.

HMDA Lending

HMDA loans are comprised of home purchase, refinance, home improvement, other purpose closed end, and multi-family, respectively. See Appendix C for explicit HMDA lending data.

Citizens' performance was compared to the percentage of families by family income (proxy) and aggregate lending data. During the evaluation period, Citizens originated 96 HMDA loans totaling $14.9 million.

In 2024, Citizens originated 38 HMDA loans totaling $5.0 million, of which 7.9% were originated to borrowers with unknown-income designations, compared to aggregate lending performance at 14.9%.

Citizens originated four (10.5%) HMDA loans to low-income borrowers, which was significantly below proxy at 29.2%, but significantly exceeded aggregate lending performance at 5.7%. Citizens originated six (15.8%) HMDA loans to moderate-income borrowers, which was slightly below proxy at 18.0%, but slightly exceeded aggregate lending performance at 14.6%.

In 2023, Citizens originated 58 HMDA loans totaling $9.9 million, of which 1.7% were originated to borrowers with unknown-income designations, compared to aggregate lending performance at 13.0%.

Citizens originated one (1.7%) HMDA loan to low-income borrowers, which was significantly below proxy at 29.6% and significantly below aggregate lending performance at 6.4%. Citizens originated eight (13.8%) HMDA loans to moderate-income borrowers, which was slightly below proxy at 18.1% and comparable to aggregate lending performance at 14.5%.

While Citizens' performance fell below proxy, performance exceeded or was comparable to aggregate lending performance. Citizens' borrower distribution of HMDA lending to LMI borrowers is reasonable, especially considering the high rates of poverty and the limited supply of housing for LMI borrowers.

Consumer Lending

Consumer loans are comprised of motor vehicle, other secured, and other unsecured loans.

Citizens' performance was compared to the percentage of households by household income (proxy). During the evaluation period, Citizens originated 82 consumer loans totaling $1.1 million, of which 1.2% were originated to borrowers with unknown income designations.

Borrower Distribution of Consumer Loans Assessment Area: Nonmetropolitan Kentucky					
Household Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households by Household Income
	#	%	$ (000s)	$ %	%
Low	23	28.0%	112	10.2%	33.0%
Moderate	27	32.9%	260	23.6%	16.3%
Middle	15	18.3%	203	18.4%	15.9%
Upper	16	19.5%	522	47.4%	34.7%
Unknown	1	1.2%	6	0.5%	
Total	82	*100.0%*	1,102	*100.0%*	100.0%
Originations & Purchases Based on 2024 FFIEC Census Data; 2016-2020 ACS data Percentages may not total 100 percent due to rounding					

Citizens originated 23 (28.0%) consumer loans to low-income borrowers, which was slightly below proxy at 33.0%. Citizens originated 27 (32.9%) consumer loans to moderate-income borrowers, which significantly exceeded proxy at 16.3%. Citizens' borrower distribution of consumer lending to low-income borrowers is reasonable and excellent to moderate-income borrowers.

Geographic Distribution of Loans

Citizens' geographic distribution of loans reflects an excellent dispersion throughout the AA. Geographic distribution of HMDA and consumer lending is excellent. There was a significant level of lending gaps.

LENDING PENETRATION								
	Nonmetropolitan Kentucky - 2023				Nonmetropolitan Kentucky - 2024			
	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration	# Tracts	Tracts w/ no loans	Tracts w/ Loans	Penetration
Low	0	0	0	No Tracts	0	0	0	No Tracts
Moderate	24	11	13	54.2%	21	5	16	76.2%
Middle	23	8	15	65.2%	19	8	11	57.9%
Upper	5	2	3	60.0%	6	1	5	83.3%
Unknown	2	2	0	0.0%	2	0	2	100.0%
Total	**54**	**23**	**31**	**57.4%**	**48**	**14**	**34**	**70.8%**

During the evaluation period, Citizens penetrated 64.1% of the AA's total tracts, which is a significant level of lending gaps. Citizens penetrated 54.2% of its moderate-income tracts in 2023, which is a significant level of lending gaps; however, in 2024 Citizens was able to penetrate 76.2% of its moderate-income tracts, which is a moderate level of lending gaps. Rental and vacant units represent 40.1% of total housing units in moderate-income tracts, which may limit the bank's lending opportunities.

HMDA Lending

Citizens' performance was compared to the percentage of owner-occupied units (proxy) and aggregate lending data.

Citizens originated 96 HMDA loans totaling $14.9 million during the evaluation period.

In 2024, Citizens originated 38 HMDA loans totaling $5.0 million. Citizens originated 19 (50.0%) HMDA loans in moderate-income tracts, which was comparable to proxy at 48.2% and slightly exceeded aggregate lending performance at 44.0%. In 2023, Citizens originated 58 HMDA loans totaling $9.9 million. Citizens originated 21 (36.2%) HMDA loans in moderate-income tracts, which was slightly below proxy at 47.6% and similar to aggregate lending performance at 38.0%. Citizens' geographic distribution of HMDA lending in moderate-income tracts is excellent.

Consumer Lending

Citizens' performance was compared to the percentage of households (proxy). During the evaluation period, Citizens originated 82 consumer loans totaling $1.1 million.

Geographic Distribution of Consumer Loans Assessment Area: Nonmetropolitan Kentucky					
Tract Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households
	#	%	$ (000s)	$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	45	54.9%	311	28.2%	47.3%
Middle	24	29.3%	234	21.2%	36.1%
Upper	12	14.6%	553	50.2%	13.8%
Unknown	1	1.2%	3	0.3%	2.7%
Total	82	*100%*	1,102	*100%*	100.0%
Originations & Purchases Based on 2024 FFIEC Census Data; 2016-2020 ACS data Percentages may not total 100 percent due to rounding					

Citizens originated 45 (54.9%) consumer loans in moderate-income tracts, which slightly exceeded proxy at 47.3%. The geographic distribution of consumer lending in moderate-income tracts is excellent.

COMMUNITY DEVELOPMENT TEST

Citizens' community development performance demonstrates excellent responsiveness to the credit and community development needs of its AA through community development loans, qualified investments and small dollar contributions and grants, and community development services, considering Citizens' capacity and the need and availability of such opportunities in the AA. Citizens' community development activities supported revitalization/stabilization, economic development, and services to LMI individuals and families. Since the previous evaluation, Citizens increased its level of community development lending and small dollar donations and grants. Community contacts emphasized economic development, workforce development, and increased access to wraparound services, small dollar loans, and banking products and services as critical needs across the AA. The majority of community development activities supported these expressed needs.

Community Development Loans

Citizens originated 30 community development loans totaling approximately $31.0 million, representing 75.9% of total community development loans. The following table reflects the total number of community development loans by purpose, number, and dollar amount.

Purpose of CD Loan	#	$
Revitalization / Stabilization	25	$29,751,433
Services to LMI	3	$628,000
Economic Development	2	$625,000
Total	**30**	**$31,004,433**
Totals include loans that benefit broader regional area		

Revitalization/Stabilization

- Two loans totaling $14.1 million provided funding to two natural gas drilling companies located in distressed middle-income tracts. These funds provide additional gas wells which help revitalize essential energy and heating infrastructure.
- Eleven loans totaling $8.6 million providing funding to nine small businesses to expand operations and create jobs in moderate- and distressed middle-income areas.
- One loan totaling $1.9 million provided funding to a small business to purchase and renovate a medical building in a moderate-income area. The two-story building currently houses a rural health clinic and a pharmacy on the first floor. Rural healthcare medical

services focus on increasing access in underserved areas. The second floor will be renovated to house additional medical offices. This loan is responsive because it helps bring improved health outcomes to a medically underserved county.

- One loan totaling $108,000 provided funding to a small business to purchase a building for sober living house for drug and alcohol rehabilitation in a moderate-income area.
- One loan totaling $29,000 provided funding to a volunteer fire department to purchase a fire truck. The fire department serves a distressed middle-income community.
- One loan totaling $7,400 provided funding to a nonprofit organization to repair its roof. Repairing the roof allowed the organization to continue offering wraparound services to LMI individuals and families in a distressed middle-income community.

Services to LMI

- One loan totaling $380,000 provided funding to a physicians group to purchase a medical building. This loan is responsive because it helps bring improved health outcomes to medically underserved LMI individuals. The building also serves a moderate-income area.
- Two loans totaling $248,000 provided funding to two non-profits that provide wraparound services to LMI individuals and families in a moderate- and distressed middle-income communities.

Economic Development

- One loan totaling $25,000 provided funding to a small business to help them expand its inventory (children's clothing line) and retain LMI employees.

Because Citizens was responsive to community development needs across the AA, consideration was given to nine community development loans totaling $5.6 million that benefited the broader regional nonmetropolitan area in Kentucky. Eight loans ($5.0 million) helped four small businesses in LMI and distressed middle-income tracts build a convenience store that offers gas and groceries, re-open another convenience store that also offers gas and groceries, construct a rental cabin to attract visitors and enhance tourism, and pay ambulance workers to continue providing essential emergency medical services. An economic development loan ($600,000) helped a small business relocate and expand its operations.

Community Development Investments

Citizens had $606,500 in qualified investments and small dollar contributions and grants during the evaluation period.

During the evaluation period, Citizens obtained two new municipal bonds worth $450,000. These bonds support school systems with at least 50.0% of the student bodies qualified for the free- or reduced-lunch program in the AA.

Qualified investments also took the form of small dollar donations and grants, totaling $156,500. The following table shows the total number of qualified donations and grants by purpose, number, and dollar amount.

Purpose of CD Donation	#	$
Services to LMI	10	$136,500
Revitalization / Stabilization	4	$20,000
Total	**14**	**$156,500**
Totals include donations that benefit broader regional and disaster areas and grants		

Donations include:
- $135,000 - eight Welcome Home grants to LMI borrowers (six grants were also in moderate- or distressed middle-income tracts)
- $5,000 to sheriff's department that serves a distressed rural middle-income community
- $1,000 to nonprofit that provides wraparound services to LMI young women

Because Citizens has been responsive to community development needs and opportunities in its AAs, consideration was given to four donations totaling $15,500 that benefited a broader regional area. These donations provided $10,000 in recovery relief caused by severe storms, flooding and tornadoes in the AA in 2025 - a Federal Emergency Management Agency (FEMA) designated disaster area and $5,500 in student housing and scholarships for LMI college students.

Community Development Services

During the evaluation period, 19 employees assisted 18 organizations totaling 206 hours of community development service. Service hours provided in this AA equate to 0.1 ANP. The following table provides a breakdown of qualified community development services by community development purpose.

Purpose of CD Service	# Services	# Organizations	# Employees*	# Hours
Services to LMI	32	12	15	146
Economic Development	39	4	2	41
Revitalization / Stabilization	7	2	2	19
Total	**78**	**18**	**19**	**206**
**Some employees may be double-counted if performed more than one service*				

Employees were involved with organizations and activities that promote community services targeted to LMI individuals and to lesser extents economic development and revitalization/stabilization. Bank officers and employees worked with a variety of community service organizations throughout the AA during the evaluation period. Citizens primarily provides community development services by serving on boards and committees (149 hours) and delivering financial literacy training (57 hours). Service hours represent 82.7% of total community development service hours.

Serving on Boards and Committees

- Four employees serve as board members for four nonprofit organizations that provide wraparound services to LMI.
- Two employees serve as board members for four nonprofit organizations that promote economic development initiatives across the AA.
- Two employees serve as board members for two nonprofit organizations in distressed middle-income communities. One nonprofit focuses on financial aid to assist LMI college students and the other nonprofit focuses on addressing rural health disparities. Community contacts indicated the need to promote educational attainment and address healthcare disparities in a medically underserved area.

Financial Literacy

- Eleven employees partnered with eight schools and taught financial literacy to all levels of students from elementary to college.
- An employee partnered with a local library and taught financial literacy to LMI women in recovery looking to regain or retain custody of their children. Topics ranged from basic savings to building and maintaining credit.

METROPOLITAN AREAS
(Limited-scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS

- **Huntington-Ashland MSA**
    - As of December 31, 2024, Citizens operated three branches, representing 25.0% of its total branches.
    - As of June 30, 2024, Citizens had $100.5 million in deposits in this AA, representing a market share of 17.6%.
- **Lexington-Fayette MSA**
    - As of December 31, 2024, Citizens operated one branch, representing 8.3% of its total branches.
    - As of June 30, 2024, Citizens had $16.1 million in deposits in this AA, representing a market share of 2.8%.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Using available facts and data, including performance and demographic information, the AAs' performance was evaluated and compared with Citizens' overall performance. The conclusions regarding performance are provided in the tables below. Refer to the tables in Appendix C for information regarding these areas.

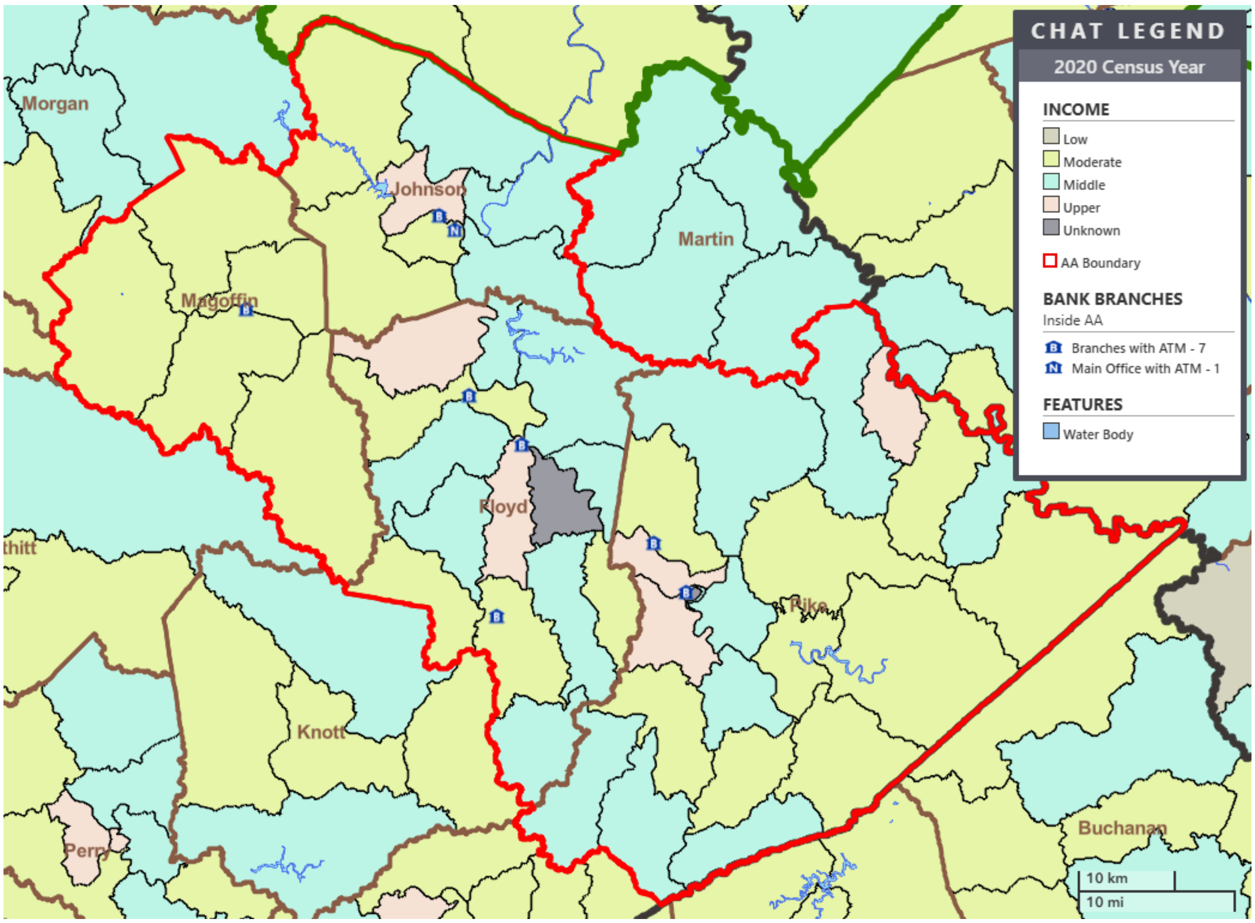
Assessment Area	Lending Test	Community Development Test
Huntington-Ashland MSA	Consistent	Below
Lexington-Fayette MSA	N/A	Below
The performance in the limited-scope AAs did not impact the overall rating		

For the lending test, Citizens received a Satisfactory rating. Performance in the Huntington-Ashland AA is consistent with Citizens' overall performance. Borrower distribution is reasonable, and geographic distribution is excellent in the Huntington-Ashland AA. There was insufficient loan volume to evaluate borrower and geographic distribution in the Lexington-Fayette AA.

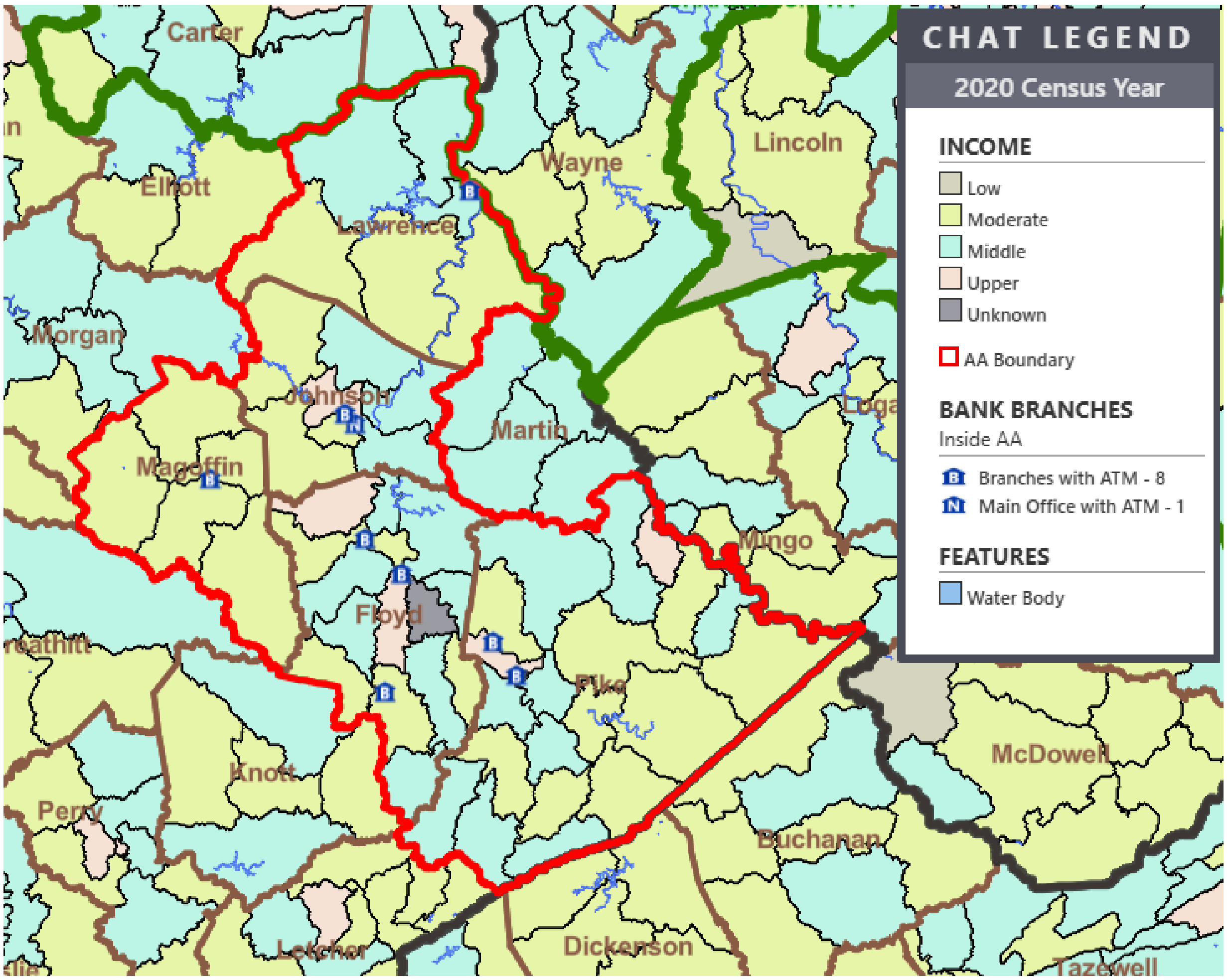
For the community development test, Citizens received an Outstanding rating. Performance in the Huntington-Ashland and Lexington-Fayette AAs is below Citizens' overall performance.

Appendix A – Assessment Area Maps

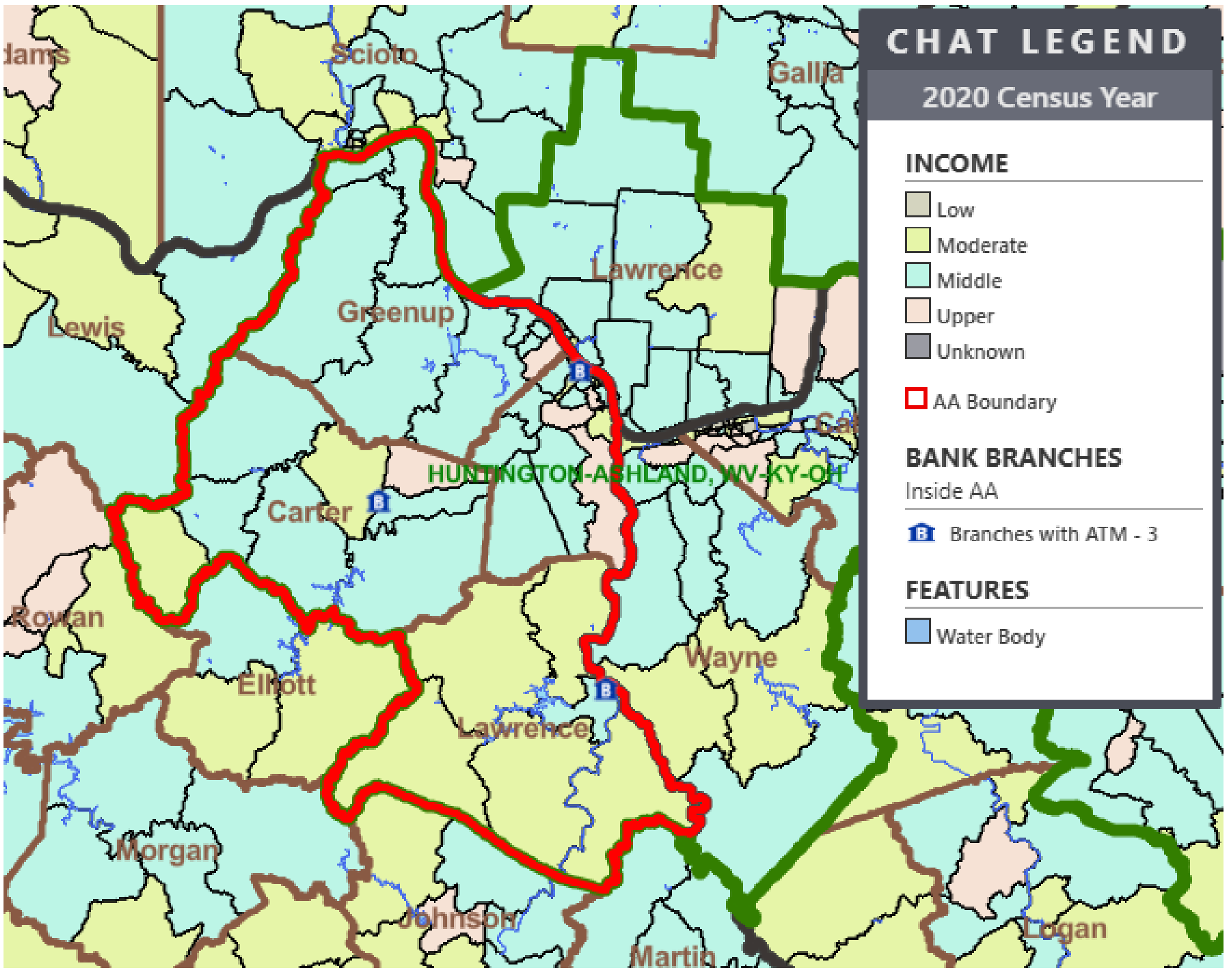
2024 Nonmetropolitan Kentucky



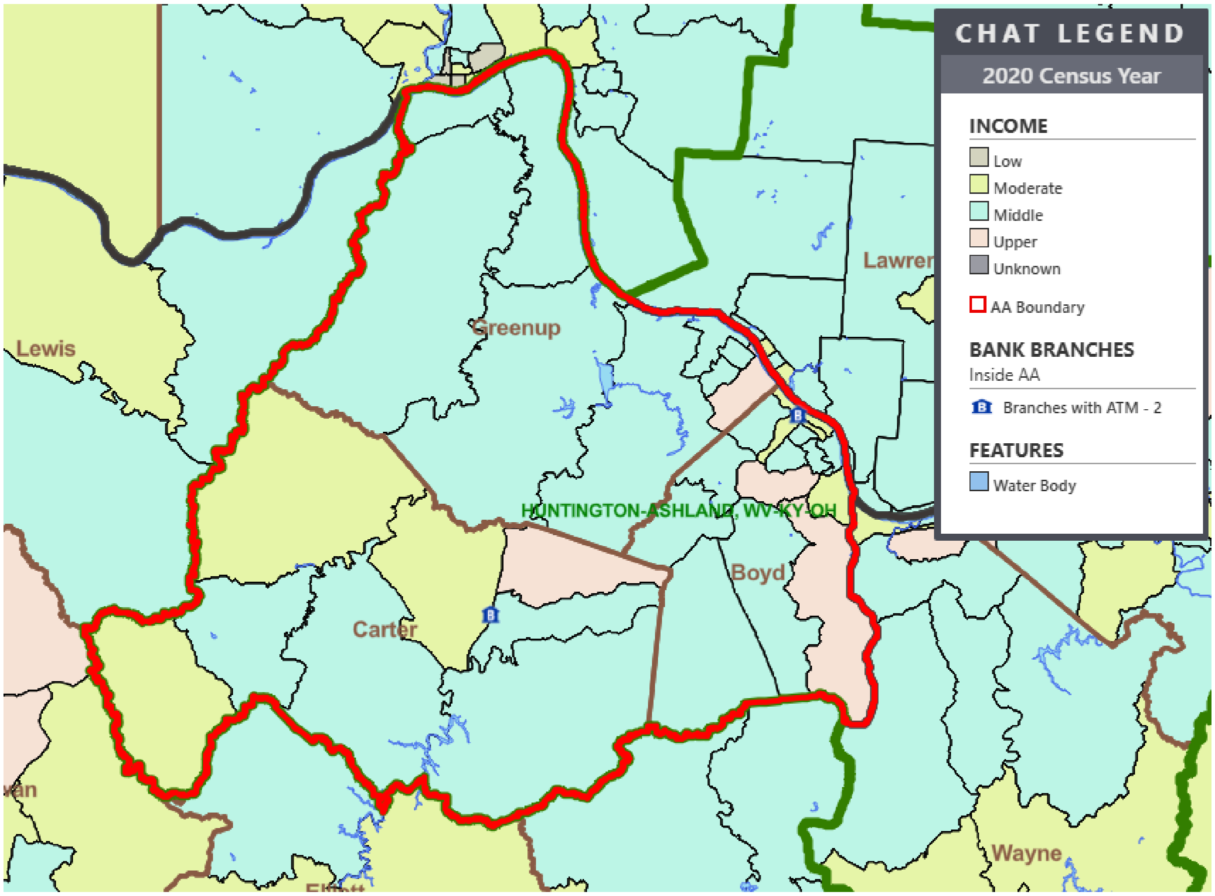
2023 Nonmetropolitan Kentucky



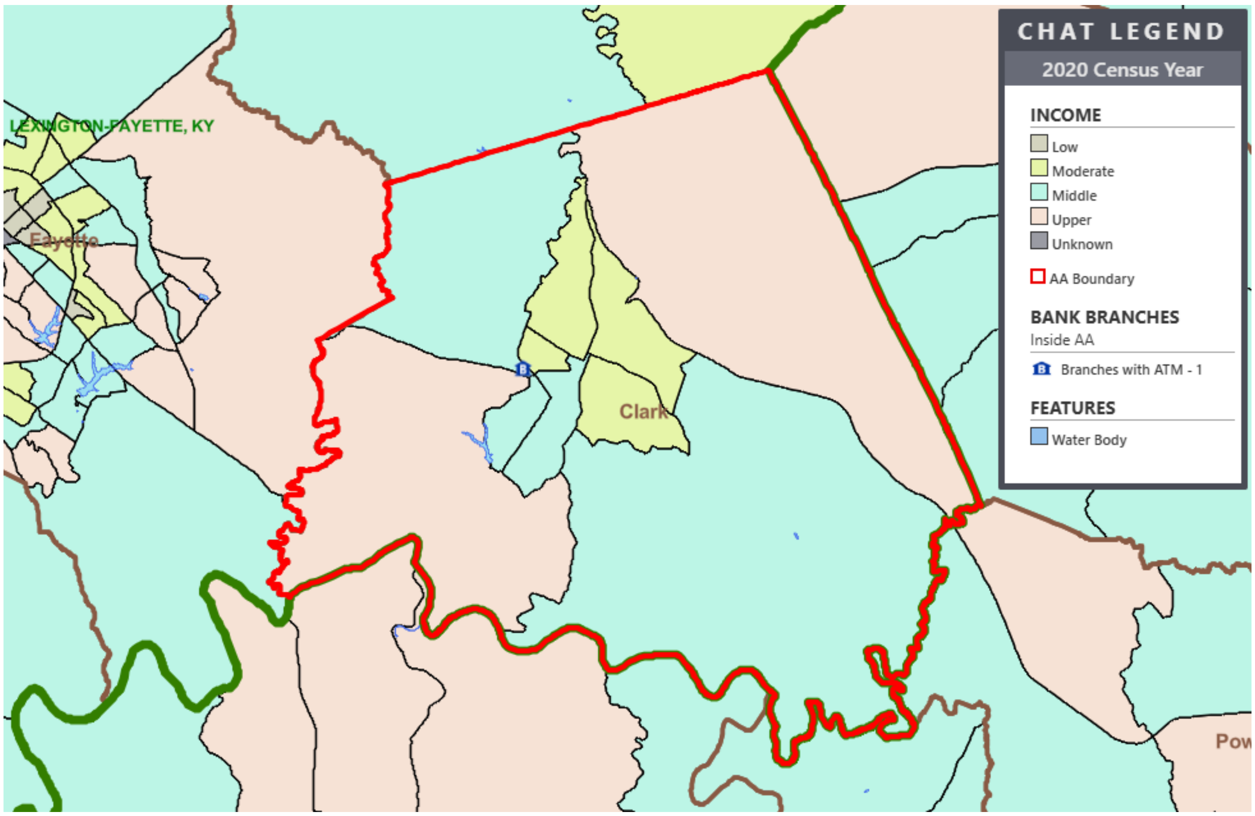
2024 Huntington-Ashland MSA



2023 Huntington-Ashland MSA



2023-2024 Lexington-Fayette MSA



Appendix B – Demographic Tables

Combined Demographics Report - 2024

Assessment Area: Nonmetropolitan Kentucky

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	10,813	29.2%
Moderate-income	21	43.8%	17,165	46.4%	4,499	26.2%	6,665	18.0%
Middle-income	19	39.6%	13,552	36.6%	2,134	15.7%	6,888	18.6%
Upper-income	6	12.5%	5,509	14.9%	837	15.2%	12,617	34.1%
Unknown-income	2	4.2%	757	2.0%	305	40.3%	0	0.0%
Total Assessment Area	**48**	**100.0%**	**36,983**	**100.0%**	**7,775**	**21.0%**	**36,983**	**100.0%**

	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	31,135	18,642	48.2%	59.9%	6,793	21.8%	5,700	18.3%
Middle-income	24,373	14,458	37.4%	59.3%	4,948	20.3%	4,967	20.4%
Upper-income	8,732	4,969	12.8%	56.9%	2,454	28.1%	1,309	15.0%
Unknown-income	2,112	626	1.6%	29.6%	833	39.4%	653	30.9%
Total Assessment Area	**66,352**	**38,695**	**100.0%**	**58.3%**	**15,028**	**22.6%**	**12,629**	**19.0%**

	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1,530	42.1%	1,405	42.6%	86	34.1%	39	45.9%
Middle-income	1,444	39.7%	1,301	39.5%	114	45.2%	29	34.1%
Upper-income	575	15.8%	520	15.8%	41	16.3%	14	16.5%
Unknown-income	84	2.3%	70	2.1%	11	4.4%	3	3.5%
Total Assessment Area	**3,633**	**100.0%**	**3,296**	**100.0%**	**252**	**100.0%**	**85**	**100.0%**
	Percentage of Total Businesses:			**90.7%**		**6.9%**		**2.3%**

	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	20	40.0%	20	40.0%	0	0.0%	0	0.0%
Middle-income	20	40.0%	20	40.0%	0	0.0%	0	0.0%
Upper-income	7	14.0%	7	14.0%	0	0.0%	0	0.0%
Unknown-income	3	6.0%	3	6.0%	0	0.0%	0	0.0%
Total Assessment Area	**50**	**100.0%**	**50**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	Percentage of Total Farms:			**100.0%**		**0.0%**		**0.0%**

Based on 2024 FFIEC Census Data and 2024 D&B information

Combined Demographics Report - 2023

Assessment Area: Nonmetropolitan Kentucky

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	12,094	29.6%
Moderate-income	24	44.4%	18,809	46.1%	4,967	26.4%	7,403	18.1%
Middle-income	23	42.6%	16,690	40.9%	2,567	15.4%	7,682	18.8%
Upper-income	5	9.3%	4,536	11.1%	741	16.3%	13,613	33.4%
Unknown-income	2	3.7%	757	1.9%	305	40.3%	0	0.0%
Total Assessment Area	**54**	**100.0%**	**40,792**	**100.0%**	**8,580**	**21.0%**	**40,792**	**100.0%**
	Housing Units by Tract	**Housing Types by Tract**						
		Owner-Occupied			**Rental**		**Vacant**	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	34,573	20,435	47.6%	59.1%	7,478	21.6%	6,660	19.3%
Middle-income	29,730	17,790	41.5%	59.8%	5,933	20.0%	6,007	20.2%
Upper-income	7,383	4,050	9.4%	54.9%	2,161	29.3%	1,172	15.9%
Unknown-income	2,112	626	1.5%	29.6%	833	39.4%	653	30.9%
Total Assessment Area	**73,798**	**42,901**	**100.0%**	**58.1%**	**16,405**	**22.2%**	**14,492**	**19.6%**
	Total Businesses by Tract		**Businesses by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1,776	40.9%	1,628	41.3%	104	34.8%	44	44.9%
Middle-income	1,924	44.4%	1,740	44.2%	146	48.8%	38	38.8%
Upper-income	546	12.6%	494	12.5%	39	13.0%	13	13.3%
Unknown-income	91	2.1%	78	2.0%	10	3.3%	3	3.1%
Total Assessment Area	**4,337**	**100.0%**	**3,940**	**100.0%**	**299**	**100.0%**	**98**	**100.0%**
	Percentage of Total Businesses:			**90.8%**		**6.9%**		**2.3%**
	Total Farms by Tract		**Farms by Tract & Revenue Size**					
			Less Than or = $1 Million		**Over $1 Million**		**Revenue Not Reported**	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	26	40.6%	26	40.6%	0	0.0%	0	0.0%
Middle-income	29	45.3%	29	45.3%	0	0.0%	0	0.0%
Upper-income	6	9.4%	6	9.4%	0	0.0%	0	0.0%
Unknown-income	3	4.7%	3	4.7%	0	0.0%	0	0.0%
Total Assessment Area	**64**	**100.0%**	**64**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	Percentage of Total Farms:			**100.0%**		**0.0%**		**0.0%**

Based on 2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report - 2024

Assessment Area: Huntington-Ashland WV-KY-OH MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	7,701	23.9%
Moderate-income	11	28.9%	6,713	20.8%	1,632	24.3%	5,396	16.7%
Middle-income	22	57.9%	21,156	65.6%	3,085	14.6%	7,039	21.8%
Upper-income	5	13.2%	4,402	13.6%	256	5.8%	12,135	37.6%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**38**	**100.0%**	**32,271**	**100.0%**	**4,973**	**15.4%**	**32,271**	**100.0%**
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	13,804	6,742	19.1%	48.8%	3,870	28.0%	3,192	23.1%
Middle-income	36,949	23,333	66.1%	63.1%	7,497	20.3%	6,119	16.6%
Upper-income	7,174	5,199	14.7%	72.5%	1,093	15.2%	882	12.3%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**57,927**	**35,274**	**100.0%**	**60.9%**	**12,460**	**21.5%**	**10,193**	**17.6%**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1,208	31.9%	1,083	31.5%	110	39.7%	15	19.5%
Middle-income	2,081	54.9%	1,893	55.1%	132	47.7%	56	72.7%
Upper-income	501	13.2%	460	13.4%	35	12.6%	6	7.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**3,790**	**100.0%**	**3,436**	**100.0%**	**277**	**100.0%**	**77**	**100.0%**
	Percentage of Total Businesses:			**90.7%**		**7.3%**		**2.0%**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	24	27.9%	24	27.9%	0	0.0%	0	0.0%
Middle-income	57	66.3%	57	66.3%	0	0.0%	0	0.0%
Upper-income	5	5.8%	5	5.8%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**86**	**100.0%**	**86**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	Percentage of Total Farms:			**100.0%**		**0.0%**		**0.0%**

Based on 2024 FFIEC Census Data and 2024 D&B information

Combined Demographics Report - 2023

Assessment Area: Huntington-Ashland WV-KY-OH MSA

Income Categories	Tract Distribution #	Tract Distribution %	Families by Tract Income #	Families by Tract Income %	Families < Poverty Level as % of Families by Tract #	Families < Poverty Level as % of Families by Tract %	Families by Family Income #	Families by Family Income %
Low-income	0	0.0%	0	0.0%	0	0.0%	6,620	23.3%
Moderate-income	7	21.9%	4,552	16.0%	1,179	25.9%	4,647	16.3%
Middle-income	21	65.6%	20,654	72.6%	2,871	13.9%	6,376	22.4%
Upper-income	4	12.5%	3,256	11.4%	118	3.6%	10,819	38.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**32**	**100.0%**	**28,462**	**100.0%**	**4,168**	**14.6%**	**28,462**	**100.0%**

	Housing Units by Tract	Housing Types by Tract: Owner-Occupied #	Owner-Occupied %	Owner-Occupied %	Rental #	Rental %	Vacant #	Vacant %
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	9,256	4,306	13.9%	46.5%	3,032	32.8%	1,918	20.7%
Middle-income	36,048	22,870	73.6%	63.4%	7,385	20.5%	5,793	16.1%
Upper-income	5,177	3,892	12.5%	75.2%	666	12.9%	619	12.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**50,481**	**31,068**	**100.0%**	**61.5%**	**11,083**	**22.0%**	**8,330**	**16.5%**

	Total Businesses by Tract #	Total Businesses by Tract %	Businesses by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	1,071	30.7%	950	30.1%	110	40.9%	11	17.2%
Middle-income	1,990	57.1%	1,814	57.5%	128	47.6%	48	75.0%
Upper-income	425	12.2%	389	12.3%	31	11.5%	5	7.8%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**3,486**	**100.0%**	**3,153**	**100.0%**	**269**	**100.0%**	**64**	**100.0%**
	Percentage of Total Businesses:			**90.4%**		**7.7%**		**1.8%**

	Total Farms by Tract #	Total Farms by Tract %	Farms by Tract & Revenue Size: Less Than or = $1 Million #	Less Than or = $1 Million %	Over $1 Million #	Over $1 Million %	Revenue Not Reported #	Revenue Not Reported %
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	17	22.7%	17	22.7%	0	0.0%	0	0.0%
Middle-income	53	70.7%	53	70.7%	0	0.0%	0	0.0%
Upper-income	5	6.7%	5	6.7%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**75**	**100.0%**	**75**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	Percentage of Total Farms:			**100.0%**		**0.0%**		**0.0%**

Based on 2023 FFIEC Census Data and 2023 D&B Information

Combined Demographics Report

Assessment Area: Lexington-Fayette KY MSA

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,581	25.8%
Moderate-income	4	40.0%	4,041	40.4%	706	17.5%	1,974	19.7%
Middle-income	4	40.0%	4,360	43.6%	284	6.5%	2,423	24.2%
Upper-income	2	20.0%	1,607	16.1%	70	4.4%	3,030	30.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**10**	**100.0%**	**10,008**	**100.0%**	**1,060**	**10.6%**	**10,008**	**100.0%**
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	7,503	3,787	37.7%	50.5%	3,075	41.0%	641	8.5%
Middle-income	6,231	4,582	45.6%	73.5%	1,164	18.7%	485	7.8%
Upper-income	2,180	1,688	16.8%	77.4%	280	12.8%	212	9.7%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**15,914**	**10,057**	**100.0%**	**63.2%**	**4,519**	**28.4%**	**1,338**	**8.4%**
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	537	44.1%	496	43.9%	37	46.3%	4	44.4%
Middle-income	487	40.0%	445	39.4%	38	47.5%	4	44.4%
Upper-income	195	16.0%	189	16.7%	5	6.3%	1	11.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**1,219**	**100.0%**	**1,130**	**100.0%**	**80**	**100.0%**	**9**	**100.0%**
	Percentage of Total Businesses:			**92.7%**		**6.6%**		**0.7%**
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = $1 Million		Over $1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	5	8.9%	5	8.9%	0	0.0%	0	0.0%
Middle-income	17	30.4%	17	30.4%	0	0.0%	0	0.0%
Upper-income	34	60.7%	34	60.7%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	**56**	**100.0%**	**56**	**100.0%**	**0**	**0.0%**	**0**	**0.0%**
	Percentage of Total Farms:			**100.0%**		**0.0%**		**0.0%**

Based on 2024 FFIEC Census Data and 2024 D&B Information

Appendix C –Lending Tables

HMDA Lending Tables

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Nonmetropolitan Kentucky

Product Type	Borrower Income Levels	2023 Count Bank #	2023 Count Bank %	2023 Count Agg %	2023 Dollar Bank $ (000s)	2023 Dollar Bank $ %	2023 Dollar Agg $ %	2023 Families by Family Income %	2024 Count Bank #	2024 Count Bank %	2024 Count Agg %	2024 Dollar Bank $ (000s)	2024 Dollar Bank $ %	2024 Dollar Agg $ %	2024 Families by Family Income %
HOME PURCHASE	Low	0	0.0%	5.4%	0	0.0%	2.5%	29.6%	1	4.5%	3.7%	19	0.5%	1.6%	29.2%
	Moderate	3	9.1%	15.2%	155	2.4%	9.4%	18.1%	5	22.7%	15.8%	235	6.6%	9.3%	18.0%
	Middle	6	18.2%	25.6%	762	11.7%	20.6%	18.8%	1	4.5%	27.1%	84	2.4%	22.4%	18.6%
	Upper	24	72.7%	38.8%	5,579	85.9%	52.4%	33.4%	13	59.1%	37.8%	2,992	84.4%	50.6%	34.1%
	Unknown	0	0.0%	15.0%	0	0.0%	15.1%	0.0%	2	9.1%	15.7%	214	6.0%	16.1%	0.0%
	Total	*33*	*100%*	*100%*	*6,496*	*100%*	*100%*	*100%*	*22*	*100%*	*100%*	*3,544*	*100%*	*100%*	*100%*
REFINANCE	Low	1	6.7%	9.9%	50	2.0%	5.3%	29.6%	2	20.0%	10.8%	78	7.5%	4.9%	29.2%
	Moderate	2	13.3%	15.1%	195	7.8%	11.2%	18.1%	0	0.0%	12.6%	0	0.0%	7.8%	18.0%
	Middle	3	20.0%	21.8%	377	15.0%	18.6%	18.8%	2	20.0%	17.6%	185	17.8%	14.5%	18.6%
	Upper	9	60.0%	45.2%	1,885	75.2%	54.8%	33.4%	5	50.0%	41.7%	712	68.6%	50.8%	34.1%
	Unknown	0	0.0%	7.9%	0	0.0%	10.2%	0.0%	1	10.0%	17.3%	63	6.1%	22.0%	0.0%
	Total	*15*	*100%*	*100%*	*2,507*	*100%*	*100%*	*100%*	*10*	*100%*	*100%*	*1,038*	*100%*	*100%*	*100%*
HOME IMPROVEMENT	Low	0	0.0%	6.8%	0	0.0%	5.7%	29.6%	1	33.3%	4.5%	50	18.9%	3.1%	29.2%
	Moderate	2	33.3%	12.4%	70	20.2%	10.1%	18.1%	0	0.0%	14.4%	0	0.0%	9.3%	18.0%
	Middle	1	16.7%	26.7%	80	23.1%	22.4%	18.8%	1	33.3%	24.2%	48	18.1%	23.8%	18.6%
	Upper	3	50.0%	50.3%	197	56.8%	59.9%	33.4%	1	33.3%	52.3%	167	63.0%	59.3%	34.1%
	Unknown	0	0.0%	3.7%	0	0.0%	1.9%	0.0%	0	0.0%	4.5%	0	0.0%	4.5%	0.0%
	Total	*6*	*100%*	*100%*	*347*	*100%*	*100%*	*100%*	*3*	*100%*	*100%*	*265*	*100%*	*100%*	*100%*
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	29.6%	0	0.0%	0.0%	0	0.0%	0.0%	29.2%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.1%	0	0.0%	0.0%	0	0.0%	0.0%	18.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.8%	0	0.0%	0.0%	0	0.0%	0.0%	18.6%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	33.4%	0	0.0%	0.0%	0	0.0%	0.0%	34.1%
	Unknown	1	100.0%	100.0%	245	100.0%	100.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	Total	*1*	*100%*	*100%*	*245*	*100%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
OTHER PURPOSE LOC	Low	0	0.0%	6.3%	0	0.0%	2.1%	29.6%	0	0.0%	8.9%	0	0.0%	5.2%	29.2%
	Moderate	0	0.0%	10.9%	0	0.0%	9.6%	18.1%	0	0.0%	13.3%	0	0.0%	9.0%	18.0%
	Middle	0	0.0%	17.2%	0	0.0%	12.6%	18.8%	0	0.0%	20.0%	0	0.0%	13.6%	18.6%
	Upper	0	0.0%	57.8%	0	0.0%	71.4%	33.4%	0	0.0%	53.3%	0	0.0%	68.9%	34.1%
	Unknown	0	0.0%	7.8%	0	0.0%	4.3%	0.0%	0	0.0%	4.4%	0	0.0%	3.4%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Nonmetropolitan Kentucky

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count			Dollar			Families by Family Income	Count			Dollar			Families by Family Income
		Bank		Agg	Bank		Agg		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	%	#	%	%	$ (000s)	$ %	$ %	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	2.9%	0	0.0%	2.8%	29.6%	0	0.0%	12.8%	0	0.0%	10.5%	29.2%
	Moderate	1	33.3%	17.1%	19	6.4%	10.2%	18.1%	1	33.3%	10.3%	70	35.7%	6.2%	18.0%
	Middle	0	0.0%	20.0%	0	0.0%	20.5%	18.8%	0	0.0%	23.1%	0	0.0%	16.6%	18.6%
	Upper	2	66.7%	57.1%	278	93.6%	65.4%	33.4%	2	66.7%	48.7%	126	64.3%	47.3%	34.1%
	Unknown	0	0.0%	2.9%	0	0.0%	1.1%	0.0%	0	0.0%	5.1%	0	0.0%	19.4%	0.0%
	Total	*3*	*100%*	*100%*	*297*	*100%*	*100%*	*100%*	*3*	*100%*	*100%*	*196*	*100%*	*100%*	*100%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	7.7%	0	0.0%	4.4%	29.6%	0	0.0%	0.0%	0	0.0%	0.0%	29.2%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	18.1%	0	0.0%	12.5%	0	0.0%	14.0%	18.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.8%	0	0.0%	0.0%	0	0.0%	0.0%	18.6%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	33.4%	0	0.0%	0.0%	0	0.0%	0.0%	34.1%
	Unknown	0	0.0%	92.3%	0	0.0%	95.6%	0.0%	0	0.0%	87.5%	0	0.0%	86.0%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
HMDA TOTALS	Low	1	1.7%	6.4%	50	0.5%	3.1%	29.6%	4	10.5%	5.7%	147	2.9%	2.5%	29.2%
	Moderate	8	13.8%	14.5%	439	4.4%	9.5%	18.1%	6	15.8%	14.6%	305	6.0%	8.8%	18.0%
	Middle	10	17.2%	24.2%	1,219	12.3%	19.8%	18.8%	4	10.5%	24.1%	317	6.3%	20.2%	18.6%
	Upper	38	65.5%	42.0%	7,939	80.3%	52.8%	33.4%	21	55.3%	40.6%	3,997	79.3%	50.4%	34.1%
	Unknown	1	1.7%	13.0%	245	2.5%	14.8%	0.0%	3	7.9%	14.9%	277	5.5%	18.1%	0.0%
	Total	*58*	*100%*	*100%*	*9,892*	*100%*	*100%*	*100%*	*38*	*100%*	*100%*	*5,043*	*100%*	*100%*	*100%*

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Nonmetropolitan Kentucky

Product Type	Tract Income Levels	2023 Count Bank #	2023 Count Bank %	2023 Count Agg %	2023 Dollar Bank $ (000s)	2023 Dollar Bank $ %	2023 Dollar Agg $ %	2023 Owner Occupied Units %	2024 Count Bank #	2024 Count Bank %	2024 Count Agg %	2024 Dollar Bank $ (000s)	2024 Dollar Bank $ %	2024 Dollar Agg $ %	2024 Owner Occupied Units %
HOME PURCHASE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	14	42.4%	38.4%	2,275	35.0%	33.9%	47.6%	9	40.9%	46.9%	905	25.5%	42.9%	48.2%
	Middle	16	48.5%	45.9%	3,423	52.7%	48.4%	41.5%	7	31.8%	33.2%	1,411	39.8%	31.8%	37.4%
	Upper	3	9.1%	12.6%	798	12.3%	14.3%	9.4%	5	22.7%	16.7%	1,068	30.1%	21.8%	12.8%
	Unknown	0	0.0%	3.1%	0	0.0%	3.3%	1.5%	1	4.5%	3.2%	160	4.5%	3.4%	1.6%
	Total	*33*	*100%*	*100%*	*6,436*	*100%*	*100%*	*100%*	*22*	*100%*	*100%*	*3,544*	*100%*	*100%*	*100%*
REFINANCE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	5	33.3%	40.9%	661	26.4%	36.6%	47.6%	6	60.0%	37.8%	784	75.5%	32.8%	48.2%
	Middle	10	66.7%	44.0%	1,846	73.6%	49.0%	41.5%	2	20.0%	42.4%	151	14.5%	44.5%	37.4%
	Upper	0	0.0%	13.5%	0	0.0%	12.9%	9.4%	1	10.0%	17.6%	63	6.1%	21.7%	12.8%
	Unknown	0	0.0%	1.6%	0	0.0%	1.5%	1.5%	1	10.0%	2.2%	40	3.9%	1.0%	1.6%
	Total	*15*	*100%*	*100%*	*2,507*	*100%*	*100%*	*100%*	*10*	*100%*	*100%*	*1,038*	*100%*	*100%*	*100%*
HOME IMPROVEMENT	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	33.3%	32.9%	62	17.9%	26.6%	47.6%	2	66.7%	41.7%	215	81.1%	38.8%	48.2%
	Middle	3	50.0%	46.6%	245	70.6%	51.3%	41.5%	1	33.3%	42.4%	50	18.9%	47.1%	37.4%
	Upper	1	16.7%	16.1%	40	11.5%	17.5%	9.4%	0	0.0%	12.9%	0	0.0%	11.6%	12.8%
	Unknown	0	0.0%	4.3%	0	0.0%	4.7%	1.5%	0	0.0%	3.0%	0	0.0%	2.6%	1.6%
	Total	*6*	*100%*	*100%*	*347*	*100%*	*100%*	*100%*	*3*	*100%*	*100%*	*265*	*100%*	*100%*	*100%*
MULTI FAMILY								Multi-Family Units							Multi-Family Units
	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	28.6%	0	0.0%	45.4%	37.5%	0	0.0%	20.0%	0	0.0%	17.5%	37.7%
	Middle	1	100.0%	57.1%	245	100.0%	40.6%	31.8%	0	0.0%	80.0%	0	0.0%	82.5%	26.7%
	Upper	0	0.0%	14.3%	0	0.0%	14.0%	19.1%	0	0.0%	0.0%	0	0.0%	0.0%	23.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	11.5%	0	0.0%	0.0%	0	0.0%	0.0%	12.3%
	Total	*1*	*100%*	*100%*	*245*	*100%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
OTHER PURPOSE LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	31.3%	0	0.0%	29.0%	47.6%	0	0.0%	37.8%	0	0.0%	34.1%	48.2%
	Middle	0	0.0%	46.9%	0	0.0%	46.6%	41.5%	0	0.0%	42.2%	0	0.0%	43.2%	37.4%
	Upper	0	0.0%	18.8%	0	0.0%	22.9%	9.4%	0	0.0%	20.0%	0	0.0%	22.7%	12.8%
	Unknown	0	0.0%	3.1%	0	0.0%	1.4%	1.5%	0	0.0%	0.0%	0	0.0%	0.0%	1.6%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Nonmetropolitan Kentucky

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count			Dollar			Owner Occupied Units	Count			Dollar			Owner Occupied Units
		Bank		Agg	Bank		Agg		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	%	#	%	%	$ (000s)	$ %	$ %	%
OTHER PURPOSE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	40.0%	0	0.0%	37.7%	47.6%	2	66.7%	38.5%	148	75.5%	54.1%	48.2%
	Middle	3	100.0%	45.7%	297	100.0%	46.3%	41.5%	1	33.3%	38.5%	48	24.5%	32.5%	37.4%
	Upper	0	0.0%	11.4%	0	0.0%	12.7%	9.4%	0	0.0%	23.1%	0	0.0%	13.4%	12.8%
	Unknown	0	0.0%	2.9%	0	0.0%	3.2%	1.5%	0	0.0%	0.0%	0	0.0%	0.0%	1.6%
	Total	*3*	*100%*	*100%*	*297*	*100%*	*100%*	*100%*	*3*	*100%*	*100%*	*196*	*100%*	*100%*	*100%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	46.2%	0	0.0%	54.9%	47.6%	0	0.0%	87.5%	0	0.0%	96.2%	48.2%
	Middle	0	0.0%	30.8%	0	0.0%	30.1%	41.5%	0	0.0%	12.5%	0	0.0%	3.8%	37.4%
	Upper	0	0.0%	23.1%	0	0.0%	15.0%	9.4%	0	0.0%	0.0%	0	0.0%	0.0%	12.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	1.5%	0	0.0%	0.0%	0	0.0%	0.0%	1.6%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	21	36.2%	38.0%	2,998	30.3%	34.2%	47.6%	19	50.0%	44.0%	2,052	40.7%	40.4%	48.2%
	Middle	33	56.9%	45.6%	6,056	61.2%	48.4%	41.5%	11	28.9%	36.7%	1,660	32.9%	36.0%	37.4%
	Upper	4	6.9%	13.5%	838	8.5%	14.4%	9.4%	6	15.8%	16.6%	1,131	22.4%	20.9%	12.8%
	Unknown	0	0.0%	2.9%	0	0.0%	3.0%	1.5%	2	5.3%	2.7%	200	4.0%	2.7%	1.6%
	Total	*58*	*100%*	*100%*	*9,892*	*100%*	*100%*	*100%*	*38*	*100%*	*100%*	*5,043*	*100%*	*100%*	*100%*

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Huntington-Ashland WV-KY-OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count			Dollar			Families by Family Income	Count			Dollar			Families by Family Income
		Bank		Agg	Bank		Agg		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	%	#	%	%	$ (000s)	$ %	$ %	%
HOME PURCHASE	Low	0	0.0%	7.6%	0	0.0%	3.9%	23.3%	1	7.7%	6.2%	55	2.2%	3.0%	23.9%
	Moderate	2	25.0%	21.5%	129	18.3%	15.6%	16.3%	1	7.7%	19.5%	153	6.1%	14.0%	16.7%
	Middle	2	25.0%	24.8%	209	29.6%	24.0%	22.4%	1	7.7%	25.6%	119	4.7%	23.2%	21.8%
	Upper	1	12.5%	30.1%	153	21.7%	41.5%	38.0%	8	61.5%	33.1%	1,988	78.7%	45.5%	37.6%
	Unknown	3	37.5%	16.0%	215	30.5%	15.0%	0.0%	2	15.4%	15.5%	210	8.3%	14.3%	0.0%
	Total	*8*	*100%*	*100%*	*706*	*100%*	*100%*	*100%*	*13*	*100%*	*100%*	*2,525*	*100%*	*100%*	*100%*
REFINANCE	Low	0	0.0%	9.3%	0	0.0%	4.7%	23.3%	0	0.0%	8.5%	0	0.0%	4.8%	23.9%
	Moderate	2	22.2%	21.1%	75	6.6%	15.8%	16.3%	0	0.0%	15.9%	0	0.0%	11.9%	16.7%
	Middle	2	22.2%	27.1%	128	11.3%	24.6%	22.4%	0	0.0%	17.3%	0	0.0%	15.1%	21.8%
	Upper	1	11.1%	31.2%	25	2.2%	39.0%	38.0%	0	0.0%	35.6%	0	0.0%	38.6%	37.6%
	Unknown	4	44.4%	11.4%	906	79.9%	15.9%	0.0%	2	100.0%	22.7%	182	100.0%	29.6%	0.0%
	Total	*9*	*100%*	*100%*	*1,134*	*100%*	*100%*	*100%*	*2*	*100%*	*100%*	*182*	*100%*	*100%*	*100%*
HOME IMPROVEMENT	Low	0	0.0%	10.8%	0	0.0%	6.3%	23.3%	0	0.0%	10.1%	0	0.0%	6.3%	23.9%
	Moderate	0	0.0%	19.6%	0	0.0%	14.0%	16.3%	0	0.0%	16.9%	0	0.0%	10.4%	16.7%
	Middle	1	100.0%	23.5%	86	100.0%	19.9%	22.4%	0	0.0%	23.6%	0	0.0%	20.3%	21.8%
	Upper	0	0.0%	42.6%	0	0.0%	55.3%	38.0%	0	0.0%	45.5%	0	0.0%	59.6%	37.6%
	Unknown	0	0.0%	3.4%	0	0.0%	4.5%	0.0%	0	0.0%	3.9%	0	0.0%	3.4%	0.0%
	Total	*1*	*100%*	*100%*	*86*	*100%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.3%	0	0.0%	0.0%	0	0.0%	0.0%	23.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.3%	0	0.0%	0.0%	0	0.0%	0.0%	16.7%
	Middle	0	0.0%	5.3%	0	0.0%	2.1%	22.4%	0	0.0%	0.0%	0	0.0%	0.0%	21.8%
	Upper	0	0.0%	10.5%	0	0.0%	3.4%	38.0%	0	0.0%	28.6%	0	0.0%	24.6%	37.6%
	Unknown	0	0.0%	84.2%	0	0.0%	94.5%	0.0%	1	100.0%	71.4%	600	100.0%	75.4%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*1*	*100%*	*100%*	*600*	*100%*	*100%*	*100%*
OTHER PURPOSE LOC	Low	0	0.0%	15.6%	0	0.0%	14.0%	23.3%	0	0.0%	8.6%	0	0.0%	4.1%	23.9%
	Moderate	0	0.0%	28.1%	0	0.0%	20.5%	16.3%	0	0.0%	15.7%	0	0.0%	12.4%	16.7%
	Middle	0	0.0%	25.0%	0	0.0%	37.0%	22.4%	0	0.0%	17.1%	0	0.0%	12.4%	21.8%
	Upper	0	0.0%	31.3%	0	0.0%	28.5%	38.0%	0	0.0%	55.7%	0	0.0%	70.1%	37.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	2.9%	0	0.0%	1.1%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*

Originations & Purchases

Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Huntington-Ashland WV-KY-OH MSA

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count			Dollar			Families by Family Income	Count			Dollar			Families by Family Income
		Bank		Agg	Bank		Agg		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	%	#	%	%	$ (000s)	$ %	$ %	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	14.3%	0	0.0%	9.2%	23.3%	0	0.0%	12.2%	0	0.0%	11.7%	23.9%
	Moderate	0	0.0%	25.0%	0	0.0%	17.7%	16.3%	1	100.0%	20.0%	65	100.0%	19.6%	16.7%
	Middle	0	0.0%	21.4%	0	0.0%	24.1%	22.4%	0	0.0%	16.7%	0	0.0%	13.4%	21.8%
	Upper	1	100.0%	27.4%	153	100.0%	28.2%	38.0%	0	0.0%	43.3%	0	0.0%	40.3%	37.6%
	Unknown	0	0.0%	11.9%	0	0.0%	20.9%	0.0%	0	0.0%	7.8%	0	0.0%	14.9%	0.0%
	Total	*1*	*100%*	*100%*	*153*	*100%*	*100%*	*100%*	*1*	*100%*	*100%*	*65*	*100%*	*100%*	*100%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.3%	0	0.0%	0.0%	0	0.0%	0.0%	23.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.3%	0	0.0%	0.0%	0	0.0%	0.0%	16.7%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	22.4%	0	0.0%	0.0%	0	0.0%	0.0%	21.8%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	38.0%	0	0.0%	0.0%	0	0.0%	0.0%	37.6%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
HMDA TOTALS	Low	0	0.0%	8.7%	0	0.0%	4.2%	23.3%	1	5.9%	7.3%	55	1.6%	3.5%	23.9%
	Moderate	4	21.1%	21.2%	204	9.8%	15.0%	16.3%	2	11.8%	17.9%	218	6.5%	12.8%	16.7%
	Middle	5	26.3%	24.7%	423	20.3%	23.1%	22.4%	1	5.9%	22.2%	119	3.5%	19.7%	21.8%
	Upper	3	15.8%	31.2%	331	15.9%	39.5%	38.0%	8	47.1%	35.6%	1,988	59.0%	43.2%	37.6%
	Unknown	7	36.8%	14.2%	1,121	53.9%	18.1%	0.0%	5	29.4%	16.9%	992	29.4%	20.7%	0.0%
	Total	*19*	*100%*	*100%*	*2,079*	*100%*	*100%*	*100%*	*17*	*100%*	*100%*	*3,372*	*100%*	*100%*	*100%*

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Huntington-Ashland WV-KY-OH MSA

PRODUCT TYPE	Tract Income Levels	2023 Count Bank #	2023 Count Bank %	2023 Count Agg %	2023 Dollar Bank $ (000s)	2023 Dollar Bank $ %	2023 Dollar Agg $ %	2023 Owner Occupied Units %	2024 Count Bank #	2024 Count Bank %	2024 Count Agg %	2024 Dollar Bank $ (000s)	2024 Dollar Bank $ %	2024 Dollar Agg $ %	2024 Owner Occupied Units %
HOME PURCHASE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	37.5%	13.2%	215	30.5%	11.3%	13.9%	4	30.8%	15.8%	423	16.8%	14.1%	19.1%
	Middle	5	62.5%	75.2%	491	69.5%	74.7%	73.6%	9	69.2%	68.1%	2,102	83.2%	66.8%	66.1%
	Upper	0	0.0%	11.4%	0	0.0%	13.8%	12.5%	0	0.0%	16.2%	0	0.0%	19.1%	14.7%
	Unknown	0	0.0%	0.2%	0	0.0%	0.2%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	*8*	*100%*	*100%*	*706*	*100%*	*100%*	*100%*	*13*	*100%*	*100%*	*2,525*	*100%*	*100%*	*100%*
REFINANCE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	33.3%	15.1%	125	11.0%	14.9%	13.9%	1	50.0%	15.3%	102	56.0%	15.4%	19.1%
	Middle	6	66.7%	74.8%	1,009	89.0%	71.4%	73.6%	1	50.0%	67.1%	80	44.0%	65.5%	66.1%
	Upper	0	0.0%	9.9%	0	0.0%	13.6%	12.5%	0	0.0%	17.3%	0	0.0%	19.0%	14.7%
	Unknown	0	0.0%	0.2%	0	0.0%	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.1%	0.0%
	Total	*9*	*100%*	*100%*	*1,134*	*100%*	*100%*	*100%*	*2*	*100%*	*100%*	*182*	*100%*	*100%*	*100%*
HOME IMPROVEMENT	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.8%	0	0.0%	11.8%	13.9%	0	0.0%	14.0%	0	0.0%	13.7%	19.1%
	Middle	1	100.0%	75.0%	86	100.0%	70.4%	73.6%	0	0.0%	60.7%	0	0.0%	57.2%	66.1%
	Upper	0	0.0%	14.2%	0	0.0%	17.8%	12.5%	0	0.0%	25.3%	0	0.0%	29.0%	14.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	*1*	*100%*	*100%*	*86*	*100%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
MULTI FAMILY							Multi-Family Units							Multi-Family Units	
	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	57.9%	0	0.0%	83.3%	58.2%	0	0.0%	33.3%	0	0.0%	9.3%	56.6%
	Middle	0	0.0%	42.1%	0	0.0%	16.7%	35.7%	1	100.0%	52.4%	600	100.0%	61.5%	33.8%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	6.1%	0	0.0%	9.5%	0	0.0%	27.5%	9.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	4.8%	0	0.0%	1.6%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*1*	*100%*	*100%*	*600*	*100%*	*100%*	*100%*
OTHER PURPOSE LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	6.3%	0	0.0%	6.6%	13.9%	0	0.0%	18.6%	0	0.0%	30.5%	19.1%
	Middle	0	0.0%	79.7%	0	0.0%	71.3%	73.6%	0	0.0%	70.0%	0	0.0%	60.6%	66.1%
	Upper	0	0.0%	14.1%	0	0.0%	22.1%	12.5%	0	0.0%	11.4%	0	0.0%	8.9%	14.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Huntington-Ashland WV-KY-OH MSA

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count			Dollar			Owner Occupied Units	Count			Dollar			Owner Occupied Units
		Bank		Agg	Bank		Agg		Bank		Agg	Bank		Agg	
		#	%	%	$ (000s)	$ %	$ %	%	#	%	%	$ (000s)	$ %	$ %	%
OTHER PURPOSE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	100.0%	15.5%	153	100.0%	18.3%	13.9%	1	100.0%	23.3%	65	100.0%	18.3%	19.1%
	Middle	0	0.0%	73.8%	0	0.0%	70.4%	73.6%	0	0.0%	61.1%	0	0.0%	65.5%	66.1%
	Upper	0	0.0%	10.7%	0	0.0%	11.3%	12.5%	0	0.0%	15.6%	0	0.0%	16.2%	14.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	*1*	*100%*	*100%*	*153*	*100%*	*100%*	*100%*	*1*	*100%*	*100%*	*65*	*100%*	*100%*	*100%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	14.3%	0	0.0%	14.2%	13.9%	0	0.0%	5.6%	0	0.0%	1.8%	19.1%
	Middle	0	0.0%	85.7%	0	0.0%	85.8%	73.6%	0	0.0%	83.3%	0	0.0%	85.8%	66.1%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	12.5%	0	0.0%	11.1%	0	0.0%	12.4%	14.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Total	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*100%*
HMDA TOTALS	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	7	36.8%	13.7%	493	23.7%	15.0%	13.9%	6	35.3%	16.0%	590	17.5%	14.4%	19.1%
	Middle	12	63.2%	75.0%	1,586	76.3%	71.4%	73.6%	11	64.7%	67.0%	2,782	82.5%	66.1%	66.1%
	Upper	0	0.0%	11.2%	0	0.0%	13.4%	12.5%	0	0.0%	16.9%	0	0.0%	19.4%	14.7%
	Unknown	0	0.0%	0.1%	0	0.0%	0.2%	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0.0%
	Total	*19*	*100%*	*100%*	*2,079*	*100%*	*100%*	*100%*	*17*	*100%*	*100%*	*3,372*	*100%*	*100%*	*100%*

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Lexington-Fayette KY MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2023, 2024					Bank & Aggregate Lending											
		Bank				Families by Family Income	2023						2024					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	10.9%	0	0.0%	6.1%	0	0.0%	7.8%	0	0.0%	4.2%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	26.4%	0	0.0%	21.5%	0	0.0%	26.2%	0	0.0%	20.2%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	22.6%	0	0.0%	22.5%	0	0.0%	22.9%	0	0.0%	21.8%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	19.3%	0	0.0%	29.1%	0	0.0%	19.6%	0	0.0%	28.0%
	Unknown	1	100.0%	255	100.0%	0.0%	1	100.0%	20.8%	255	100.0%	20.8%	0	0.0%	23.6%	0	0.0%	25.7%
	Total	*1*	*100%*	*255*	*100%*	*100.0%*	*1*	*100%*	*100%*	*255*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
REFINANCE	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	17.1%	0	0.0%	9.9%	0	0.0%	10.8%	0	0.0%	6.2%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	23.2%	0	0.0%	17.6%	0	0.0%	17.1%	0	0.0%	13.4%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	18.2%	0	0.0%	18.3%	0	0.0%	19.6%	0	0.0%	17.3%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	23.8%	0	0.0%	34.3%	0	0.0%	25.0%	0	0.0%	28.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	17.7%	0	0.0%	19.9%	0	0.0%	27.5%	0	0.0%	34.5%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	12.1%	0	0.0%	7.7%	0	0.0%	7.3%	0	0.0%	3.5%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	24.2%	0	0.0%	18.8%	0	0.0%	19.5%	0	0.0%	12.6%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	26.4%	0	0.0%	20.9%	0	0.0%	29.3%	0	0.0%	22.1%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	34.1%	0	0.0%	49.5%	0	0.0%	39.0%	0	0.0%	53.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.3%	0	0.0%	3.1%	0	0.0%	4.9%	0	0.0%	8.8%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
MULTI FAMILY	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	13.3%	0	0.0%	6.7%
	Unknown	1	100.0%	2,610	100.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	1	100.0%	86.7%	2,610	100.0%	93.3%
	Total	*1*	*100%*	*2,610*	*100%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*1*	*100%*	*100%*	*2,610*	*100%*	*100%*
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	17.2%	0	0.0%	11.0%	0	0.0%	15.5%	0	0.0%	10.3%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	15.6%	0	0.0%	13.4%	0	0.0%	22.5%	0	0.0%	14.9%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	29.7%	0	0.0%	27.2%	0	0.0%	26.8%	0	0.0%	24.2%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	37.5%	0	0.0%	48.3%	0	0.0%	31.0%	0	0.0%	47.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.2%	0	0.0%	2.7%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: Lexington-Fayette KY MSA

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2023, 2024					Bank & Aggregate Lending											
		Bank				Families by Family Income	2023						2024					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	21.9%	0	0.0%	13.3%	0	0.0%	20.5%	0	0.0%	17.8%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	28.1%	0	0.0%	25.0%	0	0.0%	20.5%	0	0.0%	20.2%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	12.5%	0	0.0%	14.4%	0	0.0%	23.1%	0	0.0%	17.7%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	34.4%	0	0.0%	40.4%	0	0.0%	30.8%	0	0.0%	35.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.1%	0	0.0%	7.0%	0	0.0%	5.1%	0	0.0%	8.4%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
HMDA TOTALS	Low	0	0.0%	0	0.0%	25.8%	0	0.0%	12.9%	0	0.0%	6.5%	0	0.0%	9.4%	0	0.0%	4.7%
	Moderate	0	0.0%	0	0.0%	19.7%	0	0.0%	24.4%	0	0.0%	19.1%	0	0.0%	22.6%	0	0.0%	17.1%
	Middle	0	0.0%	0	0.0%	24.2%	0	0.0%	21.9%	0	0.0%	20.1%	0	0.0%	22.5%	0	0.0%	19.5%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	23.2%	0	0.0%	29.2%	0	0.0%	23.5%	0	0.0%	28.5%
	Unknown	2	100.0%	2,865	100.0%	0.0%	1	100.0%	17.7%	255	100.0%	25.1%	1	100.0%	22.0%	2,610	100.0%	30.2%
	Total	*2*	*100%*	*2,865*	*100%*	*100.0%*	*1*	*100%*	*100%*	*255*	*100%*	*100%*	*1*	*100%*	*100%*	*2,610*	*100%*	*100%*

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Lexington-Fayette KY MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2023, 2024					Bank & Aggregate Lending											
							2023						2024					
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	37.7%	0	0.0%	43.8%	0	0.0%	33.9%	0	0.0%	44.2%	0	0.0%	36.6%
	Middle	1	100.0%	255	100.0%	45.6%	1	100.0%	45.7%	255	100.0%	49.2%	0	0.0%	43.8%	0	0.0%	44.3%
	Upper	0	0.0%	0	0.0%	16.8%	0	0.0%	10.5%	0	0.0%	16.9%	0	0.0%	12.0%	0	0.0%	19.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*1*	*100%*	*255*	*100%*	*100.0%*	*1*	*100%*	*100%*	*255*	*100%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	37.7%	0	0.0%	34.8%	0	0.0%	27.0%	0	0.0%	40.0%	0	0.0%	35.8%
	Middle	0	0.0%	0	0.0%	45.6%	0	0.0%	45.9%	0	0.0%	47.8%	0	0.0%	40.8%	0	0.0%	38.9%
	Upper	0	0.0%	0	0.0%	16.8%	0	0.0%	19.3%	0	0.0%	25.2%	0	0.0%	19.2%	0	0.0%	25.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	37.7%	0	0.0%	30.8%	0	0.0%	21.8%	0	0.0%	31.7%	0	0.0%	23.3%
	Middle	0	0.0%	0	0.0%	45.6%	0	0.0%	42.9%	0	0.0%	39.6%	0	0.0%	47.6%	0	0.0%	44.6%
	Upper	0	0.0%	0	0.0%	16.8%	0	0.0%	26.4%	0	0.0%	38.6%	0	0.0%	20.7%	0	0.0%	32.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
MULTI FAMILY						Multi-Family Units												
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	73.3%	0	0.0%	90.0%	0	0.0%	21.2%	0	0.0%	60.0%	0	0.0%	40.2%
	Middle	1	100.0%	2,610	100.0%	26.3%	0	0.0%	10.0%	0	0.0%	78.8%	1	100.0%	40.0%	2,610	100.0%	59.8%
	Upper	0	0.0%	0	0.0%	0.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*1*	*100%*	*2,610*	*100%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*1*	*100%*	*100%*	*2,610*	*100%*	*100%*
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	37.7%	0	0.0%	35.9%	0	0.0%	28.9%	0	0.0%	36.6%	0	0.0%	26.3%
	Middle	0	0.0%	0	0.0%	45.6%	0	0.0%	39.1%	0	0.0%	37.6%	0	0.0%	40.8%	0	0.0%	41.4%
	Upper	0	0.0%	0	0.0%	16.8%	0	0.0%	25.0%	0	0.0%	33.5%	0	0.0%	22.5%	0	0.0%	32.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Lexington-Fayette KY MSA

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data 2023, 2024					Bank & Aggregate Lending											
		Bank				Owner Occupied Units	2023						2024					
		Count		Dollar			Count			Dollar			Count			Dollar		
							Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg
		#	%	$ (000s)	$ %	%	#	%	%	$ (000s)	$ %	$ %	#	%	%	$ (000s)	$ %	$ %
OTHER PURPOSE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	37.7%	0	0.0%	46.9%	0	0.0%	40.6%	0	0.0%	28.2%	0	0.0%	31.3%
	Middle	0	0.0%	0	0.0%	45.6%	0	0.0%	43.8%	0	0.0%	38.9%	0	0.0%	51.3%	0	0.0%	44.5%
	Upper	0	0.0%	0	0.0%	16.8%	0	0.0%	9.4%	0	0.0%	20.5%	0	0.0%	20.5%	0	0.0%	24.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	37.7%	0	0.0%	80.0%	0	0.0%	63.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	45.6%	0	0.0%	20.0%	0	0.0%	36.8%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	16.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*0*	*0.0%*	*0*	*0.0%*	*100.0%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*	*0*	*0.0%*	*100%*
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	37.7%	0	0.0%	40.9%	0	0.0%	31.5%	0	0.0%	41.3%	0	0.0%	35.7%
	Middle	2	100.0%	2,865	100.0%	45.6%	1	100.0%	44.4%	255	100.0%	50.3%	1	100.0%	43.5%	2,610	100.0%	44.1%
	Upper	0	0.0%	0	0.0%	16.8%	0	0.0%	14.7%	0	0.0%	18.3%	0	0.0%	15.2%	0	0.0%	20.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	*2*	*100%*	*2,865*	*100%*	*100.0%*	*1*	*100%*	*100%*	*255*	*100%*	*100%*	*1*	*100%*	*100%*	*2,610*	*100%*	*100%*

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Consumer Lending Tables

Borrower Distribution of Consumer Loans

Assessment Area: Huntington-Ashland WV-KY-OH MSA

Household Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households by Household Income
	#	%	$ (000s)	$ %	%
Low	8	21.6%	34	11.2%	26.6%
Moderate	10	27.0%	66	21.8%	15.2%
Middle	11	29.7%	74	24.4%	16.6%
Upper	7	18.9%	125	41.3%	41.6%
Unknown	1	2.7%	5	1.7%	
Total	37	*100.0%*	303	*100.0%*	100.0%

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data
Percentages may not total 100 percent due to rounding

Geographic Distribution of Consumer Loans

Assessment Area: Huntington-Ashland WV-KY-OH MSA

Tract Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households
	#	%	$ (000s)	$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	14	37.8%	106	35.0%	22.2%
Middle	21	56.8%	142	46.9%	64.6%
Upper	2	5.4%	55	18.2%	13.2%
Unknown	0	0.0%	0	0.0%	0.0%
Total	37	*100%*	303	*100%*	100.0%

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data
Percentages may not total 100 percent due to rounding

Borrower Distribution of Consumer Loans

Assessment Area: Lexington-Fayette KY MSA

Household Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households by Household Income
	#	%	$ (000s)	$ %	%
Low	2	100.0%	8	100.0%	28.3%
Moderate	0	0.0%	0	0.0%	16.2%
Middle	0	0.0%	0	0.0%	18.2%
Upper	0	0.0%	0	0.0%	37.3%
Unknown	0	0.0%	0	0.0%	
Total	2	*100.0%*	8	*100.0%*	100.0%

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data
Percentages may not total 100 percent due to rounding

Geographic Distribution of Consumer Loans

Assessment Area: Lexington-Fayette KY MSA

Tract Income Levels	Bank Lending & Demographic Data 2024				
	Count		Dollar		Households
	#	%	$ (000s)	$ %	%
Low	0	0.0%	0	0.0%	0.0%
Moderate	1	50.0%	8	100.0%	47.1%
Middle	1	50.0%	1	12.5%	39.4%
Upper	0	0.0%	0	0.0%	13.5%
Unknown	0	0.0%	0	0.0%	0.0%
Total	2	*100%*	8	*100%*	100.0%

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data
Percentages may not total 100 percent due to rounding

Appendix D – Glossary of Terms

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas; or designated distressed or underserved nonmetropolitan middle-income geographies.

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, home equity lines of credit, 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 is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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 applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

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 metropolitan area/assessment area.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. A MD is a division of an MSA based on specific criteria including commuting patterns. Only a MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

Rated area: A rated area is a state or multistate metropolitan 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 multistate metropolitan area, the institution will receive a rating for the multistate metropolitan 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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 Reports 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.

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