



PUBLIC DISCLOSURE

August 4, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Putnam County Bank

Hurricane, West Virginia

**Federal Reserve Bank of Richmond
Richmond, Virginia**

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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P.O. Box 308

Hurricane, West Virginia 25526

Federal Reserve Bank of Richmond

P. O. Box 27622

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COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

INSTITUTION'S CRA RATING: This institution is rated: SATISFACTORY.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Satisfactory.

The major factors supporting this rating include:

- The bank's loan-to-deposit ratio is considered reasonable given the bank's capacity and the demand for credit within the assessment area.
- A majority of the institution's residential mortgage and small business loans considered in the evaluation originated within the bank's assessment area.
- The bank's borrower distribution performance (lending to low- and moderate- income borrowers and small businesses having annual revenues of \$1 million or less) is considered poor overall.
- The bank's geographic distribution performance (lending in census tracts with different income levels) is considered reasonable overall.
- The bank's responsiveness to the community development needs of its assessment area through community development loans, qualified investments, donations and services is adequate.
- There have been no complaints regarding the bank's Community Reinvestment Act (CRA) performance or activities since the previous evaluation.

SCOPE OF EXAMINATION

Putnam County Bank (PCB) was evaluated using the interagency examination procedures for intermediate small institutions developed by the Federal Financial Institutions Examination Council (FFIEC). Given its size and branch locations, PCB is required to collect and report HMDA data but is not required to collect or report data on its small business lending. Consistent with the procedures, all reported HMDA loans from 2023 and 2024 were reviewed. Additionally, small business loans were a primary product line, and all small business originations and purchases during the calendar year of 2023 were considered in the evaluation.

Qualified community development loans and services are considered since the previous evaluation (April 25, 2022). All qualified investments made during this same time period and those outstanding as of the date of this evaluation, regardless of when made, were also considered. To help determine the availability of community development opportunities in the assessment area, the CRA public evaluations of other financial institutions within PCB's assessment area were reviewed. Additionally, a member of the community was contacted to discern information about local economic conditions, local credit needs, performance of banks in the assessment area, and potential community development opportunities.

PCB serves one assessment area located in the western portion of West Virginia, and it was evaluated using the FFIEC's full-scope evaluation procedures. An overall rating and ratings under the lending and community development tests were assigned to the institution based on its performance within this assessment area.

DESCRIPTION OF INSTITUTION

PCB is headquartered in Hurricane, WV and is wholly owned by Putnam Bankshares, a single bank holding company, also located in Hurricane, WV. The bank operates four full-service branches, of which, three have automated teller machines, and one limited service branch, that also serves as a loan production office (LPO). Additionally, the bank operates another LPO located in close proximity to its assessment area, in Kanawha County, WV. PCB received a Satisfactory rating at its prior CRA evaluation dated April 25, 2022. No known legal impediments exist that would prevent the bank from meeting the credit needs of its assessment area.

As of June 30, 2025, PCB held assets totaling \$665.3 million, of which 65.4% were net loans and 23.9% were securities. As of the same date, deposits totaled \$583.8 million. Various deposit and loan products are available throughout the institution, including loans for residential mortgage, consumer, and small business purposes. The composition of the loan portfolio using gross loans thru June 30, 2025, is represented in the following table.

Composition of Loan Portfolio

Loan Type	6/30/2025	
	\$(000s)	%
Secured by 1-4 Family dwellings	241,343	54.8
Multifamily	20,957	4.8
Construction and Development	37,688	8.6
Commercial & Industrial/ NonFarm NonResidential	126,416	28.7
Consumer Loans and Credit Cards	3,189	0.7
Agricultural Loans/ Farmland	143	0.0
All Other	10,344	2.4
Total	440,080	100.0

As shown in the table above, PCB's loan portfolio is concentrated in residential real estate-secured and commercial purpose loans. The bank offers other loan products such as construction and agricultural loans; however, the volume of such lending is small in comparison to the bank's other loan products

Based on its branch locations and lending patterns, the bank has delineated one assessment area in the western portion of West Virginia. Since its previous evaluation, PCB has not opened any new branches or relocated any offices. The composition of the bank's assessment area is included in the following table.

Assessment Area Name	County	State	Census Tracts Included
Huntington-Ashland, WV-KY-OH	Putnam County	WV	All
	Cabell County		

DESCRIPTION OF HUNTINGTON-ASHLAND, WV ASSESSMENT AREA

As mentioned previously, the assessment area includes all of Putnam and Cabell counties, WV and the bank operates four branches (three full service and one limited service) in Putnam County and one branch in eastern Cabell County. Huntington, WV is in western Cabell County, and is the only metropolitan area within the Huntington-Ashland, WV assessment area, and it contains all of the assessment area's low- and moderate-income census tracts. Huntington is also located approximately 30 miles from the bank's headquarters in Putnam County and 25 miles from the Milton Office branch in Cabell County.

As of June 30, 2024, PCB ranked 2nd out of 16 financial institutions in local deposit market share and held 12.3% of the assessment area's deposits according to data compiled by the Federal Deposit Insurance Corporation (credit union deposits are not included.) In 2023, PCB ranked sixth out of 153 reporters with approximately 3.8% of the area's originations and purchases. In 2024, the bank ranked ninth of 161 reporters with approximately 3.1% of the area's reported activity.

Based on 2020 American Community Survey (ACS) data, the assessment area served by the bank has a total population of 151,790 and a median family housing value of \$147,771. Within the assessment area, the owner-occupancy rate equals 60%, which mirrors the West Virginia statewide owner-occupancy rate (60.5%) and the Huntington-Ashland, WV-KY-OH MSA rate (60.3%). The percentage of families living below the poverty level in the assessment area equals 11.6%, which is slightly less than the statewide level (12.3%) and the entire MSA (13.9%). The estimated median family income in 2023 and 2024 for the Huntington-Ashland, WV-KY-OH MSA equaled \$73,700 and \$74,300, respectively. The following tables include pertinent demographic data for the assessment area.

2023 Huntington-Ashland, WV AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	13.0	1,512	4.0	619	40.9	7,716	20.6
Moderate	9	19.6	4,904	13.1	1,053	21.5	5,833	15.5
Middle	15	32.6	15,367	40.9	1,542	10.0	7,038	18.8
Upper	16	34.8	15,752	42.0	1,153	7.3	16,948	45.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	46	100.0	37,535	100.0	4,367	11.6	37,535	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,177	1,109	2.6	18.0	3,349	54.2	1,719	27.8
Moderate	11,331	4,912	11.6	43.4	4,566	40.3	1,853	16.4
Middle	26,647	17,604	41.6	66.1	5,906	22.2	3,137	11.8
Upper	26,447	18,699	44.2	70.7	4,845	18.3	2,903	11.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	70,602	42,324	100.0	59.9	18,666	26.4	9,612	13.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	830	16.9	697	16.2	123	23.8	10	13.0
Moderate	668	13.6	582	13.5	77	14.9	9	11.7
Middle	1,597	32.6	1,426	33.1	143	27.7	28	36.4
Upper	1,806	36.8	1,603	37.2	173	33.5	30	39.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,901	100.0	4,308	100.0	516	100.0	77	100.0
Percentage of Total Businesses:				87.9		10.5		1.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	4	5.2	4	5.3	0	0.0	0	0.0
Middle	41	53.2	40	52.6	1	100.0	0	0.0
Upper	32	41.6	32	42.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	77	100.0	76	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.7		1.3		0.0
Source: 2023 FFIEC Census Data 2023 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

2024 Huntington-Ashland, WV AA Demographics								
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	6	13.0	1,512	4.0	619	40.9	7,550	20.1
Moderate	8	17.4	4,305	11.5	914	21.2	5,715	15.2
Middle	15	32.6	15,216	40.5	1,644	10.8	6,984	18.6
Upper	17	37.0	16,502	44.0	1,190	7.2	17,286	46.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	46	100.0	37,535	100.0	4,367	11.6	37,535	100.0
	Housing Units by Tract	Housing Type by Tract						
		Owner-occupied			Rental		Vacant	
		#	% by tract	% by unit	#	% by unit	#	% by unit
Low	6,177	1,109	2.6	18.0	3,349	54.2	1,719	27.8
Moderate	9,952	4,389	10.4	44.1	3,975	39.9	1,588	16.0
Middle	26,639	17,219	40.7	64.6	6,198	23.3	3,222	12.1
Upper	27,834	19,607	46.3	70.4	5,144	18.5	3,083	11.1
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	70,602	42,324	100.0	59.9	18,666	26.4	9,612	13.6
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	752	17.4	641	16.8	103	23.3	8	11.6
Moderate	515	11.9	456	12.0	51	11.5	8	11.6
Middle	1,428	33.1	1,263	33.2	141	31.8	24	34.8
Upper	1,623	37.6	1,446	38.0	148	33.4	29	42.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,318	100.0	3,806	100.0	443	100.0	69	100.0
Percentage of Total Businesses:				88.1		10.3		1.6
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	3	4.3	3	4.3	0	0.0	0	0.0
Middle	37	52.9	36	52.2	1	100.0	0	0.0
Upper	30	42.9	30	43.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	70	100.0	69	100.0	1	100.0	0	0.0
Percentage of Total Farms:				98.6		1.4		0.0
Source: 2024 FFIEC Census Data 2024 Dun & Bradstreet Data 2016-2020 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.								

Area employment opportunities exist within the government, manufacturing, and health care sectors in the assessment area. Major area employers include St. Mary's Medical Center, Cabell County Schools, Marshall University, Putnam County Board of Education, and Toyota Motor Manufacturing, WV. The following table reflects unemployment rates since the previous evaluation.

Huntington-Ashland, WV 2024 Unemployment Rates					
Area	2020	2021	2022	2023	2024
Huntington-Ashland, WV 2024	7.7%	4.5%	3.4%	3.5%	3.6%
Cabell County, WV	7.8%	4.7%	3.5%	3.6%	3.8%
Putnam County, WV	7.5%	4.3%	3.3%	3.2%	3.4%
Huntington-Ashland, WV-KY-OH MSA	8.1%	5.2%	4.4%	4.5%	5%
West Virginia	8.3%	5.1%	3.9%	3.9%	4.1%
Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics					

As indicated in the table above, unemployment rates within the assessment have risen slightly over the course of the last three years. This trend is also seen in the entire Huntington-Ashland, WV-KY-OH MSA, the state of West Virginia and both counties of Cabell and Putnam.

A community official representing an economic development organization was contacted during the evaluation to discuss local credit needs. The contact noted a declining population in the area due to the younger residents departing for larger cities. Despite this fact, the official noted that employment has remained steady and there has been growth in construction/development. As a result of the continued economic growth, the contact indicated that there is always a need for small business financing and that local financial institutions have been responsive and willing to provide services. The official was also unaware of any discriminatory practices taking place at area financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS:

Overall, the bank is rated "Satisfactory" with both the Lending Test and the Community Development Test. The Lending Test considers the bank's loan-to-deposit ratio, proportion of lending within its assessment area, and borrower and geographic distribution performance. The Community Development Test considers the level of community development lending, investments, donations, and services. The components of each test are discussed within the following sections of this report.

When evaluating a bank's HMDA and consumer lending performance, relevant area demographic data from the American Community Survey (ACS) is used as a proxy for demand. While ACS data is collected and published by the U.S. Census Bureau on an annual basis, the demographic data relied upon in this performance evaluation is based on ACS data that is periodically updated. As such, when evaluating the bank's performance, relevant area demographic data from the 2020 ACS was used. For small business lending, relevant Dun and Bradstreet (D&B) business data from 2023 was used as a proxy for demand.

Aggregate loan data is used as a proxy for demand when evaluating the bank's HMDA lending and includes all activity reported by lenders, subject to report HMDA data, within the bank's assessment areas. Similarly, the aggregate small business lending data includes all lenders subject to reporting small business data. Because the bank is not required to report small business loan data, PCB's small business loans are not included in the aggregate data.

The borrower and geographic distribution performance of HMDA lending focused on performance for Home Purchase and Refinancing loan categories. Performance for the Not Applicable, Other Closed, and Other Line of Credit loan categories were not evaluated because not all HMDA reporters are required to report each loan category. Home improvement loans were also not evaluated as this category contained relatively few loans overall.

When evaluating the borrower and geographic distribution for a specific loan category within an assessment area, primary emphasis is placed on the number (and corresponding percentage) of loans originated or purchased. To arrive at an overall assessment area level conclusion regarding the distribution of lending, performance in each loan category is then generally weighted by dollar volume of such loans made in the assessment area. During 2023 and 2024, the bank originated \$44.9 million in HMDA loans and \$4.5 million in small business loans during 2023 within the Huntington-Ashland, WV assessment area.

Loan-To-Deposit Ratio

The bank's loan-to-deposit ratio as of June 30, 2025, equaled 74.5% and averaged 70.7% for the 13-quarter period ending June 30, 2025. In comparison, the quarterly average loan-to-deposit ratios for three similarly situated institutions that operate in similar areas to PCB's assessment area ranged from 71.2% to 83.1% during the same 13-quarter period. Since June 30, 2022, PCB's assets and deposits have decreased by 1.6% and .02% respectively. For the same period, net loans increased by 26.3%. The bank's level of lending activity as measured by its loan-to-deposit ratio is considered reasonable given the institution's size, financial condition, and local credit needs.

Lending In Assessment Area

To determine the institution's volume of lending within its assessment areas, the geographic location of the bank's 2023 and 2024 HMDA and 2023 small business loans were considered. The lending distribution inside and outside of the bank's assessment areas is represented in the following table.

Comparison of Credit Extended Inside and Outside of Assessment Area(s)

Loan Type	Inside				Outside			
	#	%	\$(000)	%	#	%	\$(000)	%
Home Purchase	115	61.5	29,904	66.8	72	38.5	14,867	33.2
Home Improvement	8	88.9	768	89.9	1	11.1	86	10.1
Refinancing	39	59.1	6,510	65.7	27	40.9	3,398	34.3
Multi-Family Housing	4	40.0	6,966	43.0	6	60.0	9,240	57.0
Loan Purpose Not Applicable	0	0.0	0	0.0	0	0.0	0	0.0
Other Purpose Closed/Exempt	13	76.5	786	61.4	4	23.5	494	38.6
Other Purpose LOC	0	0.0	0	0.0	0	0.0	0	0.0
Total HMDA related	179	61.9	44,934	61.5	110	38.1	28,085	38.5
Small Business	29	70.7	4,499	65.5	12	29.3	2,371	34.5
TOTAL LOANS	208	63.0	49,433	61.9	122	37.0	30,456	38.1

As indicated in the above table, a majority of the total number (63%) and dollar amount (61.9%) of HMDA and small business loans were extended within the bank's assessment area. Overall, the institution's level of lending within its assessment area is considered responsive to community credit needs.

Lending to Borrowers of Different Incomes and To Businesses of Different Sizes

PCB's borrower distribution performance of HMDA lending is considered poor while performance of small business lending is considered reasonable. Given the relative loan volume and strength of performance for each product, the bank's overall performance is considered poor. In reaching the overall conclusion, greater weight was given to HMDA lending as there was a significantly larger dollar volume of such lending during the review period.

Distribution of 2023 and 2024 Home Mortgage Lending By Borrower Income Level													
Assessment Area: Huntington-Ashland, WV													
Borrower Income Level	Bank And Aggregate Loans By Year												Families by Family Income %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	# %	# %	\$ (000)	\$ %	\$ %	#	# %	# %	\$ (000)	\$ %	\$ %	
Home Purchase Loans													
Low	3	5.3	5.7	226	1.7	2.5	0	0.0	5.6	0	0.0	2.3	20.1
Moderate	4	7.0	21.0	683	5.0	13.7	1	1.7	18.5	160	1.0	10.9	15.2
Middle	5	8.8	21.3	1,397	10.2	18.7	12	20.7	21.2	2,558	15.7	17.3	18.6
Upper	35	61.4	36.9	10,371	76.1	50.8	32	55.2	38.3	10,708	65.8	52.4	46.1
Unknown	10	17.5	15.0	954	7.0	14.3	13	22.4	16.4	2,847	17.5	17.2	0.0
Total	57	100.0	100.0	13,631	100.0	100.0	58	100.0	100.0	16,273	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	10.1	0	0.0	6.9	0	0.0	7.3	0	0.0	3.0	20.1
Moderate	6	25.0	16.8	409	11.7	10.5	2	13.3	13.2	185	6.2	7.7	15.2
Middle	5	20.8	24.4	648	18.5	21.6	3	20.0	19.4	392	13.1	14.1	18.6
Upper	8	33.3	37.7	1,851	52.8	46.9	5	33.3	37.7	1,712	57.0	38.3	46.1
Unknown	5	20.8	10.9	601	17.1	14.1	5	33.3	22.4	712	23.7	36.9	0.0
Total	24	100.0	100.0	3,509	100.0	100.0	15	100.0	100.0	3,001	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	8.1	0	0.0	6.4	1	16.7	6.6	40	6.2	4.4	20.1
Moderate	0	0.0	15.7	0	0.0	9.3	1	16.7	14.0	70	10.9	9.1	15.2
Middle	0	0.0	21.0	0	0.0	17.9	0	0.0	22.8	0	0.0	18.9	18.6
Upper	2	100.0	54.3	127	100.0	65.9	2	33.3	53.9	141	22.0	63.5	46.1
Unknown	0	0.0	1.0	0	0.0	0.4	2	33.3	2.6	390	60.8	4.1	0.0
Total	2	100.0	100.0	127	100.0	100.0	6	100.0	100.0	641	100.0	100.0	100.0
Total Home Mortgage Loans													
Low	5	5.4	6.8	421	2.4	3.4	1	1.2	6.1	40	0.2	2.6	20.1
Moderate	12	13.0	19.4	1,197	6.7	13.0	4	4.8	16.9	415	2.1	10.3	15.2
Middle	13	14.1	22.4	2,228	12.5	19.4	15	18.1	21.2	2,950	14.7	16.8	18.6
Upper	47	51.1	38.6	12,459	69.8	50.3	42	50.6	40.0	12,745	63.4	49.8	46.1
Unknown	15	16.3	12.9	1,555	8.7	14.0	21	25.3	15.8	3,958	19.7	20.5	0.0
Total	92	100.0	100.0	17,860	100.0	100.0	83	100.0	100.0	20,108	100.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													
Multifamily loans are not included in the borrower distribution analysis.													

HMDA Lending

PCB's borrower distribution performance of HMDA lending is considered poor overall. From a product category perspective, performance for home purchase lending was considered very poor and refinance lending was considered reasonable. Home purchase performance was weighted more heavily because of the substantially larger dollar volume of such lending within the assessment area. As mentioned previously, performance for the home improvement loan category was not evaluated based on the relatively limited volume of such lending in this assessment area.

Home Purchase Lending

During 2023, home purchase lending to low-income borrowers (5.3%) substantially lagged the percentage of area low-income families (20.6%) and was comparable to the aggregate level of lending (5.7%) in the assessment area. Bank lending to moderate-income borrowers (7%) significantly lagged both the percentage of area moderate-income families (15.5%) and the aggregate level of lending (21%). The bank's overall home purchase lending performance during 2023 is considered poor.

During 2024, the bank made no (0%) home purchase loans to low-income borrowers which significantly lagged the demographic (20.1%) and aggregate (5.6%) proxies for credit demand. The bank's lending to moderate-income borrowers during 2024 (1.7%) also significantly lagged both the percentage of area moderate-income families (15.2%) and the aggregate level of lending (18.5%). PCB's overall home purchase lending performance during 2024 is considered very poor.

Overall, the bank's home purchase performance is considered very poor. In arriving at the overall performance conclusion, more weight was placed on the bank's performance during 2024 because of the larger dollar volume during that year.

Refinance Lending

During 2023, PCB made no (0%) refinance loans to low-income borrowers which significantly lags the percentage of low-income families in the area (20.6%) and the aggregate lending level (10.1%). The bank's lending to moderate-income borrowers (25%) outpaced both the percentage of moderate-income families in the assessment area (15.5%) as well as the aggregate level of lending (16.8%). The bank's performance during 2023 is considered reasonable, and this conclusion is driven by the performance in moderate-income tracts. While performance in 2024 was not quite as strong, it is also considered reasonable and driven by performance in moderate-income census tracts.

Small Business Lending

PCB's small business loan performance is considered reasonable.

Distribution of 2023 Small Business Lending By Revenue Size of Businesses							
Assessment Area: Huntington-Ashland, WV							
	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	%	%	\$(000)	%	%	
By Revenue							
\$1 Million or Less	12	41.4	50.6	1,737	38.6	34.8	87.9
Over \$1 Million	17	58.6		2,762	61.4		10.5
Revenue Unknown	0	0.0		0	0.0		1.6
Total	29	100.0		4,499	100.0		100.0
By Loan Size							
\$100,000 or Less	19	65.5	92.8	929	20.6	36.6	
\$100,001 - \$250,000	7	24.1	4.1	1,185	26.3	18.4	
\$250,001 - \$1 Million	3	10.3	3.2	2,385	53.0	45.0	
Total	29	100.0	100.0	4,499	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less							
\$100,000 or Less	9	75.0		337	19.4		
\$100,001 - \$250,000	2	16.7		450	25.9		
\$250,001 - \$1 Million	1	8.3		950	54.7		
Total	12	100.0		1,737	100.0		
Source: 2023 FFIEC Census Data							
2023 Dun & Bradstreet Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

PCB's level of lending to businesses with annual revenues of \$1 million or less (41.4%) lagged the percentage of area businesses having revenues of \$1 million or less (87.9%) but was comparable to the aggregate level of lending (50.6%). The remaining percentage of small business loans reported by the aggregate lenders either had revenue exceeding \$1 million per year or revenues were unknown. With respect to the distribution by loan size, 65.5% of the bank's small business loans were in loan amounts of \$100,000 or less while 92.8% of aggregate loans were in amounts of \$100,000 or less. Overall, the bank's performance is reasonable and is primarily driven by its level of small business lending by revenue compared to the aggregate reporters' level of lending.

Geographic Distribution of Loans

PCB's geographic distribution performance of HMDA lending is considered reasonable, while small business lending is considered poor. Given the relative loan volumes and strength of performance for each product, the bank's overall performance is considered reasonable. In reaching the overall conclusion, greater weight was given to HMDA lending as there was a significantly larger dollar volume of such lending during the review period. Additionally, an analysis of the dispersion of loans was conducted and revealed no notable gaps or lapses that impacted the overall conclusion.

Distribution of 2023 and 2024 Home Mortgage Lending By Income Level of Geography													
Assessment Area: Huntington-Ashland, WV													
Geographic Income Level	Bank And Aggregate Loans By Year												Owner Occupied Units %
	2023						2024						
	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	
	#	# %	# %	\$(000)	\$ %	\$ %	#	# %	# %	\$(000)	\$ %	\$ %	
Home Purchase Loans													
Low	2	3.5	2.3	94	0.7	1.1	0	0.0	2.3	0	0.0	1.1	2.6
Moderate	3	5.3	11.0	605	4.4	7.4	6	10.3	10.9	1,218	7.5	6.8	10.4
Middle	23	40.4	40.6	5,378	39.5	40.2	28	48.3	40.1	7,662	47.1	37.4	40.7
Upper	29	50.9	46.0	7,554	55.4	51.3	24	41.4	46.7	7,393	45.4	54.7	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	57	100.0	100.0	13,631	100.0	100.0	58	100.0	100.0	16,273	100.0	100.0	100.0
Refinance Loans													
Low	2	8.3	3.4	190	5.4	1.9	0	0.0	2.1	0	0.0	1.3	2.6
Moderate	2	8.3	8.6	207	5.9	7.3	0	0.0	6.6	0	0.0	4.0	10.4
Middle	11	45.8	36.6	1,519	43.3	33.6	9	60.0	41.1	1,184	39.5	46.0	40.7
Upper	9	37.5	51.4	1,593	45.4	57.2	6	40.0	50.2	1,817	60.5	48.8	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	3,509	100.0	100.0	15	100.0	100.0	3,001	100.0	100.0	100.0
Home Improvement Loans													
Low	0	0.0	2.4	0	0.0	1.1	1	16.7	1.8	70	10.9	1.3	2.6
Moderate	0	0.0	8.1	0	0.0	7.5	0	0.0	5.3	0	0.0	5.2	10.4
Middle	0	0.0	41.9	0	0.0	40.0	4	66.7	40.4	381	59.4	39.2	40.7
Upper	2	100.0	47.6	127	100.0	51.4	1	16.7	52.6	190	29.6	54.2	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	127	100.0	100.0	6	100.0	100.0	641	100.0	100.0	100.0
Multifamily Loans													Multi-family Units %
Low	0	0.0	13.8	0	0.0	5.1	0	0.0	25.0	0	0.0	9.0	27.2
Moderate	0	0.0	27.6	0	0.0	17.1	1	50.0	21.9	188	5.0	28.1	18.1
Middle	1	50.0	31.0	270	8.4	18.5	0	0.0	28.1	0	0.0	7.2	27.6
Upper	1	50.0	27.6	2,960	91.6	59.3	1	50.0	25.0	3,548	95.0	55.7	27.1
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	3,230	100.0	100.0	2	100.0	100.0	3,736	100.0	100.0	100.0
Total Home Mortgage Loans													Owner Occupied Units %
Low	4	4.3	2.7	284	1.3	1.7	1	1.2	2.4	70	0.3	1.9	2.6
Moderate	6	6.4	10.1	872	4.1	8.4	7	8.2	9.4	1,406	5.9	8.2	10.4
Middle	39	41.5	39.8	7,420	35.2	37.2	44	51.8	40.2	9,345	39.2	36.4	40.7
Upper	45	47.9	47.4	12,514	59.3	52.8	33	38.8	47.9	13,023	54.6	53.5	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	94	100.0	100.0	21,090	100.0	100.0	85	100.0	100.0	23,844	100.0	100.0	100.0
Source: 2024 FFIEC Census Data													
2016-2020 U.S. Census Bureau: American Community Survey													
Note: Percentages may not total 100.0 percent due to rounding.													

HMDA Lending

PCB's geographic distribution performance of HMDA lending is considered reasonable overall, as home purchase and refinance lending are both considered reasonable. Given the relatively small number of home improvement and multifamily loans originated and reported by the bank during 2023 and 2024, performance of the bank's home improvement and multifamily loans was not evaluated further.

Home Purchase Lending

During 2023, PCB's home purchase lending in low-income tracts (3.5%) outpaced both the percentage of area owner-occupied housing units (2.6%) and the aggregate level of lending (2.3%) in the assessment area. The bank's lending in moderate-income tracts (5.3%) lagged the percentage of area owner-occupied housing units (11.6%) and the aggregate level of lending (11%) in the assessment area. On a combined basis, the bank's performance is considered reasonable, and performance in 2024 was substantially similar.

Refinance Lending

During 2023, refinance lending in low-income tracts (8.3%) exceeded both the percentage of area owner-occupied housing units (2.6%) and the aggregate level of lending (3.4%) in the assessment area. Bank lending in moderate-income tracts (8.3%) lagged the percentage of area owner-occupied housing units (11.6%) in the assessment area but was similar to the aggregate level of lending (8.6%). The bank's refinance lending performance during 2023 is considered excellent and is driven by its lending in low-income tracts.

During 2024, the bank made no (0%) refinance loans in low-income tracts; however, the demographic and aggregate data indicate that there is opportunity to make such loans with 2.6% of owner-occupied housing units and 2.1% of the aggregate level of lending. Similarly, PCB made no (0%) refinance loans in moderate-income tracts in 2024; however, the demographic and aggregate data indicate that there is opportunity to make such loans with 10.4% of owner-occupied housing units and 6.6% of the aggregate level of lending. PCB's refinance lending performance is considered very poor during 2024.

Overall, the bank's refinance lending performance is considered reasonable. In arriving at the overall performance conclusion, more weight was placed on the bank's performance during 2023 because of the slightly larger dollar volume of refinance lending during the year.

Small Business Lending

The bank's small business lending performance is considered poor.

Distribution of 2023 Small Business Lending By Income Level of Geography							
Assessment Area: Huntington-Ashland, WV							
Geographic Income Level	Bank And Aggregate Loans						Total Businesses %
	Bank		Agg	Bank		Agg	
	#	#%	#%	\$(000)	\$%	\$%	
Low	1	3.4	12.3	124	2.8	13.5	16.9
Moderate	1	3.4	9.6	935	20.8	10.6	13.6
Middle	14	48.3	37.8	2,684	59.7	36.2	32.6
Upper	13	44.8	39.2	756	16.8	39.5	36.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.1	0	0.0	0.2	
Total	29	100.0	100.0	4,499	100.0	100.0	100.0
Source: 2023 FFIEC Census Data							
2023 Dun & Bradstreet Data							
2016-2020 U.S. Census Bureau: American Community Survey							
Note: Percentages may not total 100.0 percent due to rounding.							

During 2023, PCB's geographic distribution of small business lending is considered poor. The bank's small business lending in low-income census tracts (3.4%) substantially lagged both the aggregate level of lending (12.3%) and the percentage of businesses (16.9%) in the area. Similarly, the banks lending to businesses in moderate-income census tracts (3.4%) lagged both the aggregate lenders (9.6%) and the percentage of area businesses in moderate-income census tracts (13.6%).

Community Development Loans, Investments, and Services

PCB supports community development initiatives that benefit its assessment area by making qualified loans and investments as well as providing qualified services to local organizations. Discussions with an individual knowledgeable of the local community and reviews of the performance evaluations of other local financial institutions indicated that community development opportunities are reasonably available within the assessment area. The bank faces no constraints in providing community development loans, investments, or services.

During the review period, PCB extended no qualified loans within the Huntington-Ashland, WV assessment area or statewide.

As of the date of this evaluation, PCB holds 12 qualified investments totaling approximately \$6.8 million, and made 39 charitable donations, totaling \$14,902, that supported community services within the assessment area and the boarder statewide, including but not limited to the following:

- The bank donated a total of \$1,625 to Facing Hunger Foodbank, fighting hunger with food banks across the assessment area.
- The bank donated a total of \$8,262 to the local Ronald McDonald House to help provide meals to local citizens experiencing food insecurity.
- The bank holds three qualified investments through the CRA Qualified Investment Fund totaling, \$1.5 million that benefits the state of West Virginia, including the Huntington-Ashland, WV assessment area. The fund allows participating institutions to direct their capital to support specific geographies and areas in addition to helping statewide.
- The bank holds nine qualified investment bonds totaling \$5.3 million issued by the West Virginia Housing Development Fund. The fund is dedicated to improving housing opportunities for West Virginia residents through various assistance programs and initiatives.

Since the previous evaluation, PCB and its employees have volunteered time and financial expertise to multiple organizations or programs that promote economic development or provide financial literacy training within the Huntington-Ashland, WV AA, including but not limited to the following:

- Hurricane Development Authority – A PCB loan officer holds the position of chairman for this organization. The organization specializes in planning community development projects for the Hurricane area, striving to enhance the City of Hurricane.
- Milton Business Development Committee – Two employees hold positions with the committee. The committee plans and discusses recruiting and retention of community businesses. In addition, the committee seeks to brainstorm and execute plans to invite new community members to work, live, and visit the Milton area.
- “Get A Life” Program - Partnering with local financial institutions, the organization provides financial literacy education in Putnam County public schools, specifically middle schools in the county. Various employees served as financial education instructors for this program.

When considering community development opportunities, PCB has demonstrated adequate responsiveness to local community needs through its investments facilitating community development, and community development services.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified. Adequate policies, procedures, and training programs have been developed to support nondiscrimination in lending activities.

CRA APPENDIX A

Branch Information

Assessment Area	Address	City	State	Zip	Tract Income Level	Opened/Closed/Existing	Branch Type
Huntington-Ashland, WV AA	2761 Main St	Hurricane	WV	25526	Middle	Existing	Full Service
Huntington-Ashland, WV AA	101 Hurricane Creek Rd	Hurricane	WV	25526	Middle	Existing	Full Service
Huntington-Ashland, WV AA	300 Hurricane Creek Rd	Hurricane	WV	25526	Upper	Existing	Limited Service
Huntington-Ashland, WV AA	3058 Mt. Vernon Rd	Hurricane	WV	25526	Upper	Existing	Full Service
Huntington-Ashland, WV AA	500 Main St	Milton	WV	25541	Upper	Existing	Full Service
Charleston, WV MSA	405 Capital St	Kanawha	WV	25301	Upper	Existing	LPO - Commercial

GLOSSARY

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: All Agencies have adopted the following language. 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.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- (i) Low-or moderate-income geographies.
- (ii) Designated disaster areas; or
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on-
 - (A) Rates of poverty, unemployment, and population loss; or
 - (B) Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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 loans, other secured consumer loans, and other unsecured consumer loans.

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

Full-scope review: Performance under the Lending and Community Development Tests 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, and 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 under the Lending and Community Development Tests 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 a 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) and the Thrift Financial Reporting (TFR) 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 Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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.