



PUBLIC DISCLOSURE

August 30, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Pennsylvania
Charter Number: 249

166 Main Street
Greenville, PA 16125

Office of the Comptroller of the Currency
Midsize Bank Supervision
425 S. Financial Place, Suite 1700
Chicago, IL 60605

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 (LMI) neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Outstanding**.

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

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

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

The major factors that support this rating include:

- The Lending Test rating is based primarily on Outstanding performance in the Pittsburgh MMSA and state of Pennsylvania. CD lending had a significantly positive impact on the overall Lending Test rating in all rating areas. FNB’s overall lending was responsive to the unforeseen community needs that arose due to the Covid-19 pandemic in 2020.
- The Investment Test rating is based on excellent performance in the Pittsburgh MMSA and good performance in the state of Pennsylvania. Overall, FNB exhibited a good level of qualified CD investments and grants.
- The Service Test rating is based on good performance in the Pittsburgh MMSA and state of Pennsylvania. Overall, the bank had a good level of CD services considering the obstacles to in-person availability in 2020 due to the Covid-19 pandemic.

Lending in Assessment Area

A high percentage of the bank’s loans are in in its assessment areas (AA).

The bank originated and purchased 87.4 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	42,932	84.3	7,971	15.7	50,903	8,247,356	74.1	2,884,693	25.9	11,132,049
Small Business	29,501	92.2	2,497	7.8	31,998	3,389,763	89.8	385,844	10.2	3,775,607
Small Farm	404	93.7	27	6.3	431	24,784	92.8	1,931	7.2	26,715
Total	72,837	87.4	10,495	12.6	83,332	11,661,90	78.1	3,272,468	21.9	14,934,371

We consider performance for lending inside the bank's AAs when concluding upon geographical distribution of loans within FNB's respective rating areas.

Description of Institution

First National Bank of Pennsylvania ("FNB" or "bank") is an interstate bank headquartered in Greenville, Pennsylvania (PA), and wholly owned by FNB Corporation (FNB Corp.), a one bank holding company headquartered in Pittsburgh, PA. The bank was chartered in February 1864. FNB Corp. has two subsidiaries, First National Insurance Agency (FNIA) and F.N.B. Capital Corporation, LLC (FNBCC). Additionally, FNBCC has a funding commitment to F.N.B. Capital Partners, L.P. (FNBCP), a Small Business Investment Company (SBIC) licensed by the Small Business Administration. FNBCP is not a subsidiary or affiliate of FNB.

The bank currently operates 335 branch offices and 485 deposit-taking automated teller machines (ATMs) distributed across 30 AAs in seven states: Maryland (MD), North Carolina (NC), Ohio (OH), Pennsylvania (PA), Virginia (VA), South Carolina (SC), West Virginia (WV), and Washington, District of Columbia (DC). FNB opened six branches and closed 62 branches during the evaluation period. As of December 31, 2020, FNB had total assets of \$37.3 billion and tier 1 capital was over \$2.8 billion. Total net loans and leases outstanding were \$25.2 billion. The bank's loan portfolio consisted of 27.6 percent non-farm non-residential loans, 27.2 percent 1-4 family residential loans, 25.1 percent commercial & industrial loans, 7.4 percent loans to individuals, 7.1 percent construction and development loans, and 3.7 percent in all other loans. Total deposits were \$29.5 billion.

FNB is a full-service financial institution that offers a comprehensive array of banking, trust, investment, leasing, mortgage and cash management products and services to commercial enterprises of all sizes and consumers. FNB's primary focus is commercial and retail banking with an emphasis on small business and residential lending. FNB competes with many national banks, state banks, and credit unions for deposit market share. The bank offers a variety of deposit products to businesses and consumers. Deposit products include checking, savings, and money market deposit accounts, certificates of deposits, and other time deposits. FNB offers additional retail services including check cashing, direct deposit, online bill payment and funds transfer, mobile banking, and telephone banking. Consumer loan products include conventional mortgages, home equity loans, lines of credit, credit cards, personal loans, and automobile loans. Business loan products include term loans, lines of credit, Small Business Administration (SBA) loans, loans for equipment leases, and credit cards.

There were no legal or financial factors impeding the bank's ability during the evaluation period to help meet credit needs in its AAs. FNB's CRA performance was rated "Satisfactory" in the last public evaluation dated August 6, 2018.

Scope of the Evaluation

Evaluation Period/Products Evaluated

FNB's evaluation period is January 1, 2018 through December 31, 2020. We used this evaluation period to conduct analysis and form conclusions for all performance tests associated with this public evaluation, except as noted in the scope of the evaluation in each rating area. For the HMDA analysis and conclusions for lending activity, geographical distribution, and borrower distribution we consolidated the bank's home purchase, home refinance, home improvement, and multifamily loans. We concluded on all home mortgage, small loans to business, and small farm loan products that met the definition of a primary loan product in the bank's respective AAs. To be considered a primary loan product there must have been at least 20 loans originations for a specific loan product within a respective AA, throughout the evaluation period.

Selection of Areas for Full-Scope Review

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

Ratings

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

When determining our rating we gave the most weight to the state of Pennsylvania and the Pittsburgh MMSA. We gave the most weight to these AAs, due to the fact that these two AAs combined for the majority of bank wide deposits (62.7 percent), HMDA loan originations (51.1 percent), and small loans to business originations (55.6 percent). We also gave slightly more weight to the bank's performance in HMDA loans as compared to small loans to businesses. We gave more weight to HMDA loans due to the fact they comprised a larger percentage of bank wide HMDA and CRA small business loan originations (59.3 percent) and loan volume (70.9 percent). In AAs where meaningful small farm lending analysis could be performed, it was given much less weight compared to HMDA and CRA small business performance.

The MMSA and state ratings are based on performance in all bank AAs. Refer to the "Scope" section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Affordable Mortgage Products

See Innovative and Flexible Products section in rating areas for details on how the bank utilized these products in their rating areas.

Federal Housing Administration – FHA

An FHA fixed rate mortgage is a low-down payment option designed to help first-time and experienced homeowners. This mortgage includes a fixed monthly principal and interest payment with a set interest rate for the life of the loan. Less-than-perfect credit is considered.

FNB Home Rehabilitation Program – FHIRP

This mortgage product helps homeowners buy and renovate homes, providing the ability to finance cost of repairs, renovations, or additions. Little-to-no down payment required, no mortgage insurance required, and less-than-perfect credit is considered.

FNB Home Ownership Program – FHOP

FHOP is designed to help strengthen communities by providing an affordable, simple way to buy a home. With little-to-no down payment, no mortgage insurance required, and less-than-perfect credit considered, this product provides the necessary assistance to help first time and experienced home buyers.

U.S. Department of Agriculture – USDA

A USDA home loan is a mortgage program designed to assist homebuyers without adequate housing and with low-to-average income in qualifying rural and suburban areas. This program helps homebuyers afford housing with low-to-no down payment and reduced mortgage insurance premiums. Minimum cash required to close, up to 100 percent financing available, and eligible closing costs may be financed into the monthly payment.

U.S. Department of Veterans Affairs – VA

Designed to support those who have served become homeowners at an affordable cost, a VA home loan is available to active-duty military, veterans, reservists and members of the national guard, and certain surviving spouses of veterans. Benefits include little-to-no down payment, no mortgage insurance, payment assistance, and less-than-perfect credit is considered.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.17 in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

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

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

Multistate Metropolitan Statistical Area Rating

Charlotte MMSA

CRA rating for the Charlotte MMSA¹: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to AA credit needs.
- The bank exhibits a good geographical and borrower distribution of loans.
- The bank is a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- FNB had a good level of CD investments and grants.
- Service delivery systems are accessible to geographies and individuals of different income levels in the institution's AA.

Description of Institution's Operations in Charlotte MMSA

The Charlotte-Concord-Gastonia NC-SC MMSA (Charlotte MMSA) represents FNB's seventh largest rated area out of eight rating areas, in terms of deposits. As of December 31, 2020, the bank delineated one AA within the Charlotte-Concord-Gastonia MMSA. This includes the counties of Gaston, Iredell, Mecklenburg, Rowan, and Union in North Carolina, and York in South Carolina. The AA meets the requirements of the regulation and do not arbitrarily exclude any LMI CTs. FNB offers a full range of loan and deposit products and services through the 13 full-service branches and 13 deposit-taking ATMs located in the AA.

According to the June 30, 2020 FDIC Market Share Report, FNB held \$1.1 billion in deposits, ranking 7th out of 42 institutions in the MMSA, and representing 0.3 percent market share. The five largest competitors include Bank of America, Trust Bank, Wells Fargo, Fifth Third Bank, and First-Citizens Bank & Trust Company. These competitors have deposits totaling \$320.4 billion, representing 96.7 percent of total deposit market share. FNB's deposits within the Charlotte MMSA account for 3.8 percent of bank wide deposits.

Based on the 2015 ACS, 22.5 percent of families in the AA are low-income and 16.8 percent are moderate income. The median family income in the AA is \$64,187, meaning low-income families made \$32,094 or less and moderate-income families made \$51,350 or less per year. The median housing value is \$189,310 and the median gross rent is \$900 per month. One method to determine housing

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

affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$802 for low-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,016. Low-income borrowers would be challenged to afford a mortgage loan or rent in the AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 11.3 percent. This shows that the poverty rate in this area is much higher than many other areas around the country, making home ownership unattainable for many in the AA.

The Bureau of Labor Statistics reports that the unemployment rate has changed significantly over the review period, as was expected given the pandemic. The average annual unemployment rate in 2018 and 2019 was 3.8 and 3.5 percent, respectively. In 2020 the average annual unemployment rate grew to 7.4 percent. Based on Moody's Analytics, the leading industries in the AA are professional and business services, government, and retail trade. The top employers in the area are Atrium Health, Wells Fargo & Co., and Walmart. The May 2021 Moody's report notes that the economy has stalled in the MSA and employment has backtracked recently.

We utilized two community contacts in this AA. The first contact was a non-profit organization involved in construction, neighborhood revitalization, and financial education. The other contact was community development non-profit organization dedicated to community revitalization and affordable housing. Both organizations identified a strong need for affordable housing due to increasing housing prices. Both groups mentioned effective methods to contribute would include donations and partnerships in affordable housing programs, such as homeownership counseling, closing cost assistance, and affordable mortgage loans.

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	459	8.9	25.3	32.7	32.0	1.1
Population by Geography	1,957,020	7.6	23.8	33.8	34.5	0.4
Housing Units by Geography	805,518	7.7	24.4	34.0	33.8	0.1
Owner-Occupied Units by Geography	470,799	3.2	19.6	37.1	40.0	0.0
Occupied Rental Units by Geography	261,691	14.7	31.6	28.7	24.9	0.2
Vacant Units by Geography	73,028	11.7	29.4	33.4	25.2	0.2
Businesses by Geography	191,939	7.2	18.7	28.0	45.4	0.8
Farms by Geography	4,380	4.4	18.1	43.8	33.4	0.2
Family Distribution by Income Level	489,317	22.5	16.8	18.6	42.1	0.0
Household Distribution by Income Level	732,490	23.5	16.1	17.4	43.1	0.0

Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA	\$64,187	Median Housing Value	\$189,310
		Median Gross Rent	\$900
		Families Below Poverty Level	11.3%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Scope of Evaluation in Charlotte MMSA

The Charlotte MMSA was selected for analysis using full scope procedures because it is the only AA in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLOTTE MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Charlotte MMSA is rated Outstanding.

Based on a full-scope review, the bank’s performance in the Charlotte MMSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank’s lending capacity based on deposits, competition, and market presence. FNB only made six small loans to farms during the evaluation period. Analysis of the bank’s small farm lending was not performed as there was a very low number of loans originated and a meaningful analysis could not be performed .

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charlotte MMSA	1,891	1,622	6	61	3,580

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Charlotte MMSA	\$480,535	\$231,398	\$351	\$70,125	\$782,409

The following factors support the bank’s excellent responsiveness to community credit needs:

- FNB has the 7th highest deposit market share in the Charlotte MMSA, but that represents a very limited presence in the market relative to some of its competitors. Bank of America has 61.1 percent deposit market share and Truist Bank has 23.6 percent market share.
- Residential lending competition is significant in the Charlotte MMSA with 806 competitors in the market.
- Small business lending competition is also significant in the MMSA with 170 lenders.
- The bank's market shares for both mortgage (0.5 percent) and small business (0.4 percent) lending exceed the market share for deposits (0.3 percent).
- Although the bank's ranking for mortgage (40) and small business (23) lending are lower than the ranking for deposits (7), the rankings for lending are significantly higher than the ranking for deposits when considered in relation to the number of competitors. The bank's mortgage lending rank is in the 5th percentile and the small business lending rank is in the 14th percentile and the deposit rank is in the 17th percentile.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- FNB and other home mortgage lenders are challenged by very strong competition in the AA (806 lenders) and a very low percentage of owner-occupied housing units in low-income tracts (3.2 percent of all owner-occupied housing units are in low-income tracts).
- The bank's level of lending in low-income geographies was near to the proportion of owner-occupied housing units and exceeded the aggregate distribution of lending in those tracts. The proportion of the bank's mortgage lending in moderate-income geographies was below the proportion of owner-occupied housing units and somewhat near to the aggregate distribution of lending in those geographies.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- FNB and other small business lenders are challenged by strong competition in the AA (170 lenders) and a low percentage of small businesses in the low-income tracts within the AA (7.2 percent of the small businesses in the AA are in low-income tracts).
- FNB's level of small loans to businesses in low-income tracts exceeds both the proportion of small businesses and the aggregate distribution of lending in those tracts. The bank's lending in moderate-income tracts is near to the proportion of small businesses and exceeds the aggregate distribution of lending in those tracts.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Home prices are generally not affordable for low-income borrowers, based upon a comparison of a monthly mortgage payment calculated using the average cost of housing and monthly income for a low-income borrower in the AA. Housing is generally affordable for moderate-income borrowers based upon the same comparison of a monthly mortgage payment and monthly income for a moderate-income borrower. These analyses are based upon averages and require some assumptions. They do not take into consideration other factors that can affect housing affordability, such as the borrower's existing debt level or the lack of liquidity for down payment and closing costs.
- A significant percentage of the households in the AA are LMI with 23.5 percent classified as low-income and 16.1 percent classified as moderate-income. In addition, 13.5 percent of the population has income below the poverty line and 1.8 percent of the population receives some form of public assistance.
- Competition is very strong for mortgage loans with 806 mortgage lenders in the AA.
- Greater significance was placed on the performance compared to the aggregate distribution of residential mortgage loans. All lenders are subject to the challenges of qualifying borrowers for loans because of the high cost of housing, especially for low-income borrowers, the high percentage of LMI households, and the strong competition in the AA.

- The proportion of bank loans to low-income borrowers was significantly below the percentage of low-income families and near to the lending conducted by its competitors. The proportion of loans to moderate-income borrowers was below the percentage of moderate-income families and somewhat below the lending conducted by its competitors.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- The AA has 170 lenders originating small business loans, representing strong competition for those loans.
- The proportion of the bank's loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA, but significantly exceeded the aggregate distribution of small business loans.

Community Development Lending

The institution is a leader in making CD loans.

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

The volume of CD lending was excellent and had a significantly positive impact on the Lending Test performance in the Charlotte MMSA. During the evaluation period, FNB originated 61 CD loans totaling \$70.1 million or 64.8 percent of allocated tier 1 capital. The bank's CD loans were responsive to economic development community needs. By dollar volume, 85.8 percent funded economic development, 8.1 percent funded affordable housing, and 6.1 percent funded community services.

The following examples demonstrate the bank's use of complex and responsive CD loans:

- The bank originated a \$16.7 million loan for a revolving credit facility to a business development company for economic development purposes. The loan will help provide capital to private U.S. companies within the underserved small business market, including three businesses in the FNB footprint.
- The bank made a \$5.0 million loan to fund the redevelopment of a vacant industrial space to house a small business. The loan was made to relocate a small business into a low-income CT and provide new job opportunities within the area.

- The bank originated a \$3.5 million loan to refinance existing debt with an affordable housing facility. The refinance will help to restructure the ownership of the property that will continue to offer fair market rent in a low- income CT.
- FNB’s participation in the PPP resulted in 47 CRA qualified SBA loans totaling \$18.7 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to the Charlotte MMSA. Nine of the PPP loans totaling \$14.9 million were made to businesses located in LMI geographies.

Product Innovation and Flexibility

FNB uses innovative and/or flexible lending practices in serving it’s AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 55 innovative or flexible home mortgages totaling \$10.2 million. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of institution.

INVESTMENT TEST

The institution’s performance under the Investment Test in the Charlotte MMSA is rated High Satisfactory.

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

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

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

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Charlotte MMSA	3	\$1,620	46	\$5,140	49	100.0	\$6,760	100.0	1	\$1,494

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

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

FNB had 49 qualified CD investments and donations totaling \$6.8 million, which is equivalent to 6.2 percent of allocated tier 1 capital. The bank made 46 current period CD investments which totaled \$5.1 million. Additionally, the AA benefitted from the ongoing impact of three prior period CD investments with an outstanding balance of \$1.6 million. The bank also had one unfunded commitment totaling \$1.5 million. The bank’s CD investments were responsive to affordable housing needs in the AA.

Examples of CD investments in the AA include:

- FNB provided a \$2.0 million investment in a low-income housing tax credit (LIHTC) that assisted the construction of 68 units in an apartment complex and a community center building in a low-income geography.
- FNB made a \$2.1 million investment in a LIHTC to support construction of a handicap accessible community offering 60 units in a low-income census tract. All of the units will qualify for rental subsidy.

SERVICE TEST

The institution’s performance under the Service Test in the Charlotte MMSA is rated High Satisfactory

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charlotte MMSA	100.0	13	100.0	8.1	23.2	31.7	36.6	7.6	23.8	33.8	34.5

The bank has 13 branches within the AA, with one branch in a low-income CT, and three branches in moderate-income CTs. The percentage of the bank’s branches in LMI geographies approximates the percentage of population living in the LMI geographies. The bank's branches include deposit-taking ATMs. The bank has 13 deposit-taking ATMs located in the AA, with one in a low-income CT, and three in moderate-income CTs. The percentage of ATMs in LMI CTs approximates the level of population in the LMI areas. ATM distribution is consistent with the bank’s branch distribution.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Charlotte MMSA	0	-3	0	0	-1	-2

The bank did not open branches within the AA during the evaluation period. The institution's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank closed three branches including a branch located in a middle-income CT and two branches located in upper-income CTs due to branch consolidation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The institution provides few if any CD services.

FNB associates provided 51 hours of service to eight organizations that meet the definition of CD, including four hours of board or committee service.

Multistate Metropolitan Statistical Area Rating

Pittsburgh MMSA

CRA rating for the Pittsburgh MMSA²: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs.
- FNB exhibits good geographical and borrower distribution of loans.
- FNB is a leader in providing CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- FNB exhibits an excellent level of qualified CD investments and grants.
- FNB's service delivery systems are accessible to geographies and individuals of different income levels in its AA. Branch closures in moderate-income geographies had a negative impact on the overall Service Test rating in the Pittsburgh MMSA.
- The institution is a leader in providing community development services.

Description of Institution's Operations in Pittsburgh MMSA

The Pittsburgh-Newcastle-Weirton PA-OH MMSA (Pittsburgh MMSA) represents FNB's second largest rated area out of eight rating areas, in terms of deposits. As of December 31, 2020, the bank delineated one AA within the Pittsburgh-Newcastle-Weirton MMSA. This includes the counties of Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland in Pennsylvania, Jefferson in Ohio, and Brooke in West Virginia. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. FNB offers a full range of loan and deposit products and services through the 76 full-service branches and 74 deposit-taking ATMs located in the AA.

According to the June 30, 2020 FDIC Market Share Report, FNB held \$8.2 billion in deposits, ranking 5th out of 55 institutions in the MMSA, with a 4.4 percent market share. The four competitors ranking higher than FNB are PNC Bank, BNY Mellon, The Bank of New York Mellon, and Citizens Bank. These competitors have deposits totaling \$138.7 billion, representing 73.6 percent of total deposit market share.

The bank's lending focus in the AA is on home mortgage and small business loans. Based on HMDA reported loans, the bank originated or purchased 10,637 home mortgage loans, totaling \$1.7 billion in the AA during the review period. This represented 24.8 percent of home mortgage loans bank wide by number and 21.1 percent by dollar volume. Based on CRA reported loans, the bank also originated or

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

purchased 7,002 small business loans, totaling \$747.5 million in the AA during the review period. This represented 523.7 percent of small business loans bank wide by number and 22.1 percent by dollar volume.

Based on 2020 peer mortgage data, FNB ranks 6 out of 665 lenders in the AA, with 3.6 percent of the market share. The top five lenders in the AA are PNC Bank, Wells Fargo Bank, Citizens Bank, Quicken Loans, and Dollar Bank. These five lenders account for 29.6 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 10 out of 146 lenders in the AA. FNB holds a market share of 2.3 percent. The top five lenders in the AA are PNC Bank, American Express National Bank, JPMorgan Chase Bank, Citibank, and Capital One Bank. These lenders account for 60.7 percent of the market share.

According to the 2015 ACS, 2.6 percent of owner-occupied housing units are located in low-income CTs in the AA and 17.4 percent are located in moderate-income CTs. Rental occupied housing units account for 10.5 percent of housing units in low-income CTs and 29.4 percent of housing units in moderate-income CTs. Based on 2020 D&B data, 4.8 percent of businesses are located in low-income CTs and 16.1 percent are located in moderate-income CTs. The bank's AA is made up of 740 CTs, with 62 CTs designated as low-income and 179 designated as moderate-income. There are 15 CTs in the AA that do not have an income designation. This information is shown in Table A below.

Based on the 2015 ACS, 21.1 percent of families in the AA are low-income and 17.5 percent are moderate income. The median family income of the Pittsburgh, PA MSA is \$69,624, meaning low-income families made \$34,812 or less and moderate-income families made \$55,699 or less per year. The median family income of the Weirton-Steubenville, WV-OH MSA is \$52,770, meaning low-income families made \$26,385 or less and moderate-income families made \$42,216 or less per year. The median housing value is \$134,952 and the median gross rent is \$746 per month. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment is \$870 for low-income borrowers in the Pittsburgh, PA MSA and \$660 in the Weirton-Steubenville, WV-OH MSA. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$724. While low-income borrowers in the Pittsburgh MSA would be able to afford a mortgage loan, low-income borrowers in the Weirton-Steubenville MSA would be challenged to afford a mortgage loan or rent in the AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 8.6 percent. This shows that while the AA is faring better than many other areas, it is still high in the area.

The Bureau of Labor Statistics reports that the unemployment rate has changed significantly over the review period, as was expected given the pandemic. The average annual unemployment rate in 2018 and 2019 was 4.5 percent for each year. In 2020 the average annual unemployment rate grew to 9.3 percent. Based on Moody's Analytics, the leading industries in the Pittsburgh MSA are education and health services, professional and business services, with both retail services and government tying for third. The top employers in the area are UPMC Health Systems, Highmark Inc., and University of Pittsburgh.

The May 2021 Moody's report notes that less than two-thirds of the lost jobs have been recouped, which is below the national average. Based on Moody's Analytics, the leading industries in the Weirton-Steubenville MSA are education and health services, government, and manufacturing. The top employers in the area are Trinity Medical Center, Mountaineer Park Inc., and Weirton Medical Center. The April 2021 Moody's report notes that approximately two-thirds of the jobs lost in the pandemic have been recovered, and the unemployment rate has nearly returned to the pre-pandemic level.

We utilized four community contacts in this AA. Three contacts were non-profit organizations with the mission to provide affordable housing and renovations to low-income families. The other contact was a community-based organization that works with banks and public agencies to eradicate predatory lending to low-income borrowers and revitalize the community. The organizations indicated a need for general banking products for low-income customers, such as low balance checking accounts, affordable home rehabilitation mortgages, financial literacy, and homeownership counseling.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Pittsburgh MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	740	8.4	24.2	44.7	20.7	2.0
Population by Geography	2,450,644	4.9	20.3	48.6	25.8	0.5
Housing Units by Geography	1,148,206	5.7	22.1	48.6	23.4	0.1
Owner-Occupied Units by Geography	718,251	2.6	17.4	51.9	28.0	0.0
Occupied Rental Units by Geography	311,259	10.5	29.4	43.2	16.6	0.3
Vacant Units by Geography	118,696	11.8	31.7	42.9	13.3	0.2
Businesses by Geography	217,654	4.8	16.1	42.1	36.3	0.8
Farms by Geography	5,070	1.9	13.8	57.9	26.3	0.1
Family Distribution by Income Level	636,496	21.1	17.5	20.6	40.8	0.0
Household Distribution by Income Level	1,029,510	25.2	15.5	17.1	42.3	0.0
Median Family Income MSA - 38300 Pittsburgh, PA MSA		\$69,624	Median Housing Value			\$134,952
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$52,770	Median Gross Rent			\$746
			Families Below Poverty Level			8.6%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Pittsburgh MMSA

The Pittsburgh MMSA was selected for analysis using full scope procedures because it is the only AA in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PITTSBURGH MMSA

LENDING TEST

The bank's performance under the Lending Test in the Pittsburgh MMSA is rated Outstanding.

Based on a full-scope review, the bank's performance in the Pittsburgh MMSA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs considering the number and dollar amount of home mortgage, small business, and small farm loans relative to the bank's lending capacity based on deposits, competition, and market presence.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Pittsburgh MMSA	10,637	7,002	45	329	18,013

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Pittsburgh MMSA	\$1,737,955	\$747,540	\$2,377	\$248,527	\$2,736,399

The following factors support the bank's adequate responsiveness to community credit needs:

- FNB is the 5th largest bank in the market with a deposit market share of 4.37 percent. However, competition is very strong with PNC Bank, NA holding a dominant position with a deposit market share of 43.7 percent. The next three larger banks have a combined market share of 29.9 percent.
- Residential lending competition is significant in in the Pittsburgh MMSA with 665 competitors in the market.
- Small business lending competition is also significant in the MMSA with 146 lenders.
- The bank's market share for mortgage (3.6 percent) lending is somewhat below the bank's deposit market share (4.4 percent). The market shares for small business (2.3 percent) and small farm (3.2 percent) lending are well below and below the market share for deposits (4.4 percent), respectively.
- Although the bank's rankings for mortgage (6), small business (10), and small farm (10) lending are lower than the ranking for deposits (5), the ranking for home mortgage lending is significantly higher and the ranking for small business lending is higher than the ranking for deposits, respectively, when considered in relation to the number of competitors. The bank's mortgage lending rank is in the 1st percentile and the small business lending rank is in the 7th percentile and the deposit rank is in the 9th percentile.

- The percentile ranking for small farm lending of 48th is significantly lower than the percentile ranking for deposits. Small farm lending has minimal impact on the conclusion on the bank's lending responsiveness because it is not a business focus for the bank with most loans being originated on an accommodation basis.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- FNB and other lenders in the Pittsburgh MMSA are challenged by very strong competition for mortgage loans (665 lenders) and a very low percentage of owner-occupied housing units in low-income tracts (2.7 percent of all owner-occupied housing units are in low-income tracts) in the AA.
- The bank's level of lending in low-income geographies was well below the proportion of owner-occupied housing units but exceeded the aggregate distribution of lending in those tracts. The proportion of the bank's mortgage lending in moderate-income geographies was below the proportion of owner-occupied housing units but exceeded the aggregate distribution of lending in those geographies.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

- Lenders in the AA, including FNB, are challenged by strong competition in the AA (146 lenders) and a low percentage of small businesses in the low-income tracts within the AA (4.8 percent of the small businesses in the AA are in low-income tracts).
- FNB's level of small loans to businesses in low-income tracts was below the proportion of small businesses and near to the aggregate distribution of lending in those tracts. The bank's lending in moderate-income tracts exceeded both the proportion of small businesses and the aggregate distribution of lending in those tracts.

Small Loans to Farms

Refer to Table S in the Pittsburgh MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- FNB did not originate any small farm loans in low-income geographies. The bank's lack of lending is not significantly different from other lenders as the percentage of aggregate lending in low-income tracts was only 1.8 percent of all small farm lending in the AA. Lending within low-income tracts is significantly impacted by the very low percentage of farms within those tracts (1.9 percent of all farms within the AA). The bank's level of small loans to farms was significantly below both the proportion of small farms and the aggregate distribution in moderate-income geographies.
- Small farm lending is not a business focus for the bank with most loans being originated on an accommodation basis. The bank's lending performance is considered within the context of its business focus and has minimal impact on the overall lending performance conclusion.

Lending Gap Analysis

Examiners reviewed summary reports and maps, and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained, conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Home prices are generally affordable for LMI borrowers, although they represent more of a stretch for low-income borrowers. The analysis of housing affordability is based upon a comparison of a monthly mortgage payment calculated using the average cost of housing and monthly income for a low-income borrower in the AA. The analysis to assess housing affordability is based upon averages and requires some assumptions. It does not take into consideration other factors that can affect housing affordability for a borrower, such as the borrower's existing debt level or the lack of liquidity for down payment and closing costs.

- A significant percentage of the households in the AA are LMI with 25.2 percent classified as low-income and 15.5 percent classified as moderate-income. In addition, 12.6 percent of the population has income below the poverty line and 3.1 percent of the population receives some form of public assistance.
- Competition for mortgage loans is very strong with 665 mortgage lenders in the AA.
- Greater significance was placed on the performance compared to the aggregate distribution of residential mortgage loans. All lenders are subject to the challenges of qualifying borrowers for loans because of the high percentage of LMI households and the strong competition in the AA.
- The proportion of bank loans was significantly below the proportion of low-income families and near to the aggregate distribution of mortgage loans to low-income families. The proportion of loans to moderate-income families was near to both the proportion of moderate-income families and the lending conducted by bank's competitors, represented by the aggregate distribution of loans to moderate-income families.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- The AA has strong competition for small business lending with a total of 146 lenders.
- The proportion of the bank's loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA, but significantly exceeded the aggregate distribution of small business loans.

Small Loans to Farms

Refer to Table T in the Pittsburgh MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms for this evaluation is good. The following information was taken into consideration when determining this rating.

- FNB's proportion of loans to small farms is near to the proportion of small farms and significantly exceeded the aggregate distribution of lending to small farms in the AA.
- Small farm lending is not a business focus for the bank with most loans being originated on an accommodation basis. The bank's lending performance is considered within the context of its business focus and has minimal impact on the overall lending performance conclusion.

Community Development Lending

The institution is a leader in making CD loans.

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

The volume of CD lending was excellent and had a significantly positive impact on the Lending Test performance in the Pittsburgh MMSA. During the evaluation period, FNB originated 329 CD loans totaling \$248.5 million or 30.1 percent of allocated tier 1 capital. CD loans were responsive to identified revitalization and stabilization community needs. By dollar volume, 46.5 percent funded revitalization and stabilization efforts, 31.8 percent funded economic development, 17.3 percent funded affordable housing, and 4.4 percent funded community services.

The following examples demonstrate the bank's use of complex and responsive CD loans:

- The bank made a \$105.5 million loan to revitalize an office and retail project in a low-income CT in the Pittsburgh MMSA. The loan funded the revitalization of an apartment complex and provided relocation benefits to former residents.
- The bank originated a \$10.0 million loan to fund construction on a property to be converted into an affordable housing apartment complex in the Pittsburgh MMSA.
- The bank made a \$10.0 million loan to revitalize and stabilize low-income CTs in the Pittsburgh MMSA. The loan was originated to revitalize the communities and affordable housing units within the East Liberty Transit Revitalization Investment District.
- FNB's participation in the PPP resulted in 290 CRA qualified SBA loans totaling \$39.7 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to the Pittsburgh MMSA. 11 of the PPP loans totaling \$17.5 million were made to businesses located in LMI geographies.

Product Innovation and Flexibility

FNB uses innovative and/or flexible lending practices in serving its AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 311 innovative or flexible home mortgages totaling \$41.0 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

INVESTMENT TEST

The institution's performance under the Investment Test in the Pittsburgh MMSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Pittsburgh MMSA is excellent.

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

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

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Pittsburgh MMSA	8	\$9,164	223	\$57,592	231	100.0	\$66,755	100.0	0	\$0

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

FNB had 231 qualified CD investments and grants totaling \$66.8 million. CD investments and grants were equivalent to 8.1 percent of allocated tier 1 capital. Throughout the evaluation period, the bank made 223 CD investments and grants totaling \$57.6 million. Additionally, the AA benefited from the ongoing impact of eight prior period CD investments totaling \$9.2 million. Bank CD investments were responsive to affordable housing needs within the AA.

Examples of CD investments include:

- FNB provided a \$12.7 million LIHTC investment in a low-income CT that allows for the reuse and substantial renovation of a blighted property. The investment will provide 37 affordable apartment units with income restrictions on occupancy and some that will provide rental assistance.
- FNB invested \$12.2 million in a LIHTC project that assists in the construction of a 36-unit affordable housing project.

SERVICE TEST

The institution’s performance under the Service Test in Pittsburgh MMSA is rated High Satisfactory.

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

Retail Banking Services

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

Distribution of Branch Delivery System					
	Deposits	Branches			Population
	% of Rated Area	% of Rated	Location of Branches by Income of Geographies (%)		% of Population within Each Geography

Assessment Area	Deposits in AA	# of BANK Branches	Area Branches in AA	Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Pittsburgh MMSA	100.0	80	100.0	7.5	16.3	42.5	32.5	4.9	20.3	48.6	25.8

The bank has 80 branches within the AA, with six branches in low-income CTs, and 13 branches in moderate-income CTs. The percentage of the bank's branches in low-income geographies exceeded the percentage of population living in those geographies. The percentage of branches in moderate-income geographies was below the percentage of the population in those geographies. The bank's branches include deposit-taking ATMs. The bank has 80 deposit-taking ATMs located in the AA, with six in a low-income CT, and 13 in moderate-income CTs. The percentage of ATMs in low-income CTs exceeded the level of population in the LMI areas. The percentage of ATMs in moderate-income geographies was below the percentage of the population in those geographies.

Distribution of Branch Openings/Closings						
Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Pittsburgh MMSA	0	-11	0	-5	-6	0

The bank did not open branches during the evaluation period. The institution's closing of branches has adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and/or to LMI individuals. During the assessment period, the bank closed 11 branches including five branches located in moderate-income CTs and six located in middle-income CTs. Branches were closed due to branch consolidation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The institution is a leader in providing CD services.

FNB associates provided 1,724 hours of service to 96 organizations that meet the definition of CD, including 943 hours of board or committee service. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

The following are examples of CD services provided in this AA:

- A bank employee provided 375 hours of board service to a nonprofit Community Development Corporations (CDC) organization. The organization works to strengthen the community through business development, housing revitalization grants and individual aid.
- A bank employee provided 32 hours of board and committee service to a Community Development Financial Institution (CDFI). The CDFI's mission is to make western PA a thriving region for all by promoting economic opportunity and community revitalization. It assists underserved populations by providing capital and education to ignite business and job growth.
- Bank employees supported the Federal Home Loan Bank's Affordable Housing Program (AHP) which provides grants and subsidized loans for the acquisition, construction, or rehabilitation of affordable housing for LMI households. During the evaluation period, FNB partnered with seven different housing developers to apply for AHP funding.
- A bank employee served 46 hours on a loan committee to a nonprofit organization which offers flexible low interest financing for businesses within the City of Pittsburgh. The organization provides an array of financing, technical products, and services to promote community development. It provides funds to facilitate business start-up and expansion, commercial and real estate development, and residential real estate development.
- A bank employee provided 118 hours of board service to a nonprofit social service organization. The services include food, shelter, clothing, rent and utility payment assistance, medication payment assistance, substance abuse rehabilitation, education and job training, youth services, and emergency disaster assistance. They serve the homeless by providing food and overnight lodging; provide educational, counseling, and vocational services.

Multistate Metropolitan Statistical Area Rating

Youngstown MMSA

CRA rating for the Youngstown MMSA³: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs
- The bank exhibits good geographical and borrower distribution of loans.
- The bank is a leader in providing CD loans. CD lending had a significant positive impact on the Lending Test rating.
- The institution has a significant level of qualified CD investments and grants.
- Its service delivery systems are accessible to geographies and individuals of different income levels AA, particularly to LMI geographies or to LMI individuals.
- The institution provides a relatively high level of community development services.

Description of Institution's Operations in Youngstown MMSA

The Youngstown-Warren-Boardman OH-PA MMSA (Youngstown MMSA) represents FNB's fifth largest rated area out of eight rating areas, in terms of deposits. As of December 31, 2020, the bank delineated one AA within the Youngstown MMSA. This includes the counties of Mahoning and Trumbull in Ohio, and Mercer in Pennsylvania. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. FNB offers a full range of loan and deposit products and services through the 15 full-service branches and 16 deposit-taking ATMs located in the AA.

According to the June 30, 2020 FDIC Market Share Report, FNB held \$1.6 billion in deposits, ranking second out of 26 institutions in the MMSA, with 12.0 percent market share. The bank with the largest market share in the AA is The Huntington National Bank, with 19.1 percent of deposits or \$2.6 billion. Premier Bank, PNC Bank, and The Farmers National Bank of Canfield fall right below FNB, with 1.1, 10.2, and 9.8 percent of the deposit market share, respectively.

The bank's lending focus in the AA is on home mortgage and small business loans. Based on HMDA reported loans, the bank originated or purchased 2,416 home mortgage loans, totaling \$244.2 million in the AA during the review period. This represented 5.6 percent of home mortgage loans bank wide by number and 3.0 percent by dollar volume. Based on CRA reported loans, the bank also originated or

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

purchased 1,545 small business loans, totaling \$161.3 million in the AA during the review period. This represented 5.2 percent of small business loans bank wide by number and 4.8 percent by dollar volume.

Based on 2020 peer mortgage data, FNB ranks seventh out of 325 lenders in the AA, with 0.5 percent of the market share. The top five lenders in the AA are The Huntington National Bank, Seven Seventeen Credit Union, Quicken Loans, The Farmers National Bank of Canfield, and Waterstone Mortgage Corporation. These five lenders account for 37.1 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 10 out of 89 lenders in the AA. FNB holds a market share of 2.4 percent. The top five lenders in the AA are JPMorgan Chase Bank, American Express National Bank, PNC Bank, Synchrony Bank, and Citibank. These lenders account for 56.2 percent of the market share.

According to the 2015 ACS, 5.1 percent of owner-occupied housing units are located in low-income CTs in the AA and 12.5 percent are located in moderate-income CTs. Rental occupied housing units account for 14.5 percent of housing units in low-income CTs and 23.7 percent of housing units in moderate-income CTs. Based on 2020 D&B data, 7.8 percent of businesses are located in low-income CTs and 12.5 percent are located in moderate-income CTs. The bank's AA is made up of 155 CTs, with 22 CTs designated as low-income and 31 designated as moderate-income. This information is shown in Table A below.

Based on the 2015 ACS, 20.5 percent of families in the AA are low-income and 18.4 percent are moderate income. The median family income in the AA is \$55,174, meaning low-income families made \$27,587 or less and moderate-income families made \$44,139 or less per year. The median housing value is \$98,762 and the median gross rent is \$630 per month. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment was \$690 for low-income borrowers. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$530. This shows that housing is affordable in the AA.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 12.7 percent. While housing in the AA is generally affordable for all income levels, the high poverty rate does impact affordability in the area for this population.

The Bureau of Labor Statistics reports that the unemployment rate has changed significantly over the review period, as was expected given the pandemic. The average annual unemployment rate in 2018 and 2019 was 5.8 percent for each year. In 2020 the average annual unemployment rate grew to 10.2 percent. Based on Moody's Analytics, the leading industries in the AA are educational and health services, government, and retail trade. The top employers in the area are ValleyCare Health System, Mercy Health, and Youngstown Air Reserve Station. The February 2021 Moody's report notes that the economy in the area is struggling to recover. Employment has continued to decrease into 2021, which has kept the unemployment rate above the national average.

We utilized one community contact in the AA. The contact was a local housing authority dedicated to creating and managing healthy and enriching housing environments for residents. The organization

indicated there is an abundance of homes in the area due to a declining population; however, the conditions of the homes are deteriorating. There is opportunity for institutions to provide financing for home improvement. Furthermore, the contact noted a need for shorter-term financing to make borrowers into homeowners and using programs such as rent-to-own, specifically for individuals with low credit scores.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Youngstown MMSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	155	14.2	20.0	45.8	20.0	0.0
Population by Geography	556,243	8.7	15.4	50.3	25.7	0.0
Housing Units by Geography	258,796	9.3	16.6	49.6	24.5	0.0
Owner-Occupied Units by Geography	161,805	5.1	12.5	53.0	29.3	0.0
Occupied Rental Units by Geography	68,359	14.5	23.7	44.7	17.0	0.0
Vacant Units by Geography	28,632	20.5	22.6	42.0	14.9	0.0
Businesses by Geography	33,636	7.8	12.5	44.8	34.9	0.0
Farms by Geography	1,279	2.3	5.9	57.4	34.4	0.0
Family Distribution by Income Level	146,502	20.5	18.4	20.6	40.5	0.0
Household Distribution by Income Level	230,164	23.9	16.1	18.0	42.0	0.0
Median Family Income MSA - 49660 Youngstown-Warren-Boardman, OH-PA MSA		\$55,174	Median Housing Value			\$98,762
			Median Gross Rent			\$630
			Families Below Poverty Level			12.7%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(* The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Youngstown MMSA

The Youngstown MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN YOUNGSTOWN MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Youngstown MMSA is rated Outstanding

Based on a full-scope review, the bank’s performance in the Youngstown MMSA is excellent.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Youngstown MMSA	2,416	1,545	52	67	4,080

Dollar Volume of Loans					
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total
Youngstown MMSA	\$244,199	\$161,313	\$1,613	\$42,844	\$449,969

The following factors support the bank's adequate responsiveness to community credit needs:

- FNB has a significant presence in the market, based upon a deposit market share of 13.5 percent (2nd highest in the MMSA). However, competition is very strong with Huntington National Bank being the largest bank, based upon deposit market share of 21.5 percent and the five banks below FNB having deposit market shares of 12.5 percent to 6.7 percent.
- Competition for residential mortgage lending in the Youngstown MMSA is significant with 325 mortgage lenders in the market.
- Small business lending competition is also significant in the MMSA with 146 lenders.
- The bank's market shares for residential mortgage (4.2 percent) and small business (2.4 percent) lending are significantly below the bank's deposit market share (13.5 percent).
- The bank's market share ranking for mortgage (7) and small business (10) lending are significantly below the ranking for deposits (2). However, the ranking for mortgage lending exceeds and the ranking for small business equals the ranking for deposits, respectively, when they are considered in relation to the number of competitors for those products. The bank's mortgage lending rank is in the 2nd percentile and small business lending rank is in the 11th percentile compared to the deposit rank in the 11th percentile.
- Small farm lending is considered in concluding on the bank's responsiveness, but it has minimal impact on the conclusion. It is not a business focus for FNB with most loans being originated on an accommodation basis. The bank's low volume of small farm loans originated during the evaluation period resulted in a market share of 2.5 percent and a ranking of nine with a total of 13 lenders originating small farm loans in the market. The percentile ranking for small farm lending of 69th is significantly lower than the percentile ranking for deposits.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AA.

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- The small proportion of owner-occupied housing units in low-income tracts makes it challenging for FNB and other lenders to make mortgage loans in those tracts. The low-income tracts contain 8,318 units, representing only 5.1 percent of total owner-occupied housing units in the AA. The housing supply in moderate-income tracts is significantly larger at 12.5 percent and does not present the challenges to lenders as the supply in low-income tracts.
- The large percentage of low-income households in LMI tracts also creates challenges for making mortgage loans in those tracts. Low-income households represent 54.7 percent of total households in low-income tracts and 37.4 percent of total households in moderate-income tracts.
- Competition for home mortgage lending is very strong with 325 lenders in the AA
- The proportion of loans in LMI geographies was significantly below the proportion of owner-occupied housing units in those geographies. The proportions of bank loans in LMI tracts exceeded the aggregate distribution of lending in low-income tracts and was near to the aggregate distribution of lending in moderate-income tracts.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- The competition for small business lending in the AA is strong with a total of 89 lenders.
- FNB's level of small loans to businesses in low-income tracts approximates the percentage of businesses in those tracts. The bank's lending in moderate-income tracts is near to the proportion of small businesses in the tracts. The bank's small business lending exceeds the aggregate distribution of lending in LMI tracts.

Small Loans to Farms

Refer to Table S in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- There were no small farm loans originated in the LMI geographies in the Youngstown MMSA during the evaluation period. The small number of farms in the LMI tracts makes it challenging for banks to make loans in those tracts. The AA has a total of 1,279 farms with only 2.3 percent of those farms in low-income geographies and 5.9 percent in moderate-income geographies. The lack of small farm lending by FNB is also consistent with the bank's business strategy. Small farm lending is not a business focus for the bank with the limited number of loans being originated on an accommodation basis. The bank's lending performance is considered within the context of its business focus and the number of farms within the AA and has minimal impact on the overall lending performance conclusion.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained, conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- Home prices are considered affordable for LMI borrowers, based upon the average cost of housing and the LMI levels for the AA. This analysis does not consider factors that can affect housing affordability for borrowers, such as existing debt level or the lack of liquidity for down payment and closing costs.
- A significant percentage of the households in the AA are LMI with 23.9 percent classified as low-income and 16.1 percent classified as moderate-income. In addition, 15.8 percent of the population has income below the poverty line and 3.5 percent of the population receives some form of public assistance.
- Competition is strong with 325 home mortgage lenders in the AA.
- Greater significance was placed on the performance compared to the aggregate distribution of residential mortgage loans because all lenders would be subject to the same challenges in qualifying borrowers for loans.

- The proportion of loans to low-income borrowers was significantly below the proportion of low-income families in the AA. The proportion of loans to low-income borrowers is near to the aggregate distribution of home mortgage loans to low-income families in the AA. The proportion of loans to moderate-income borrowers was near to the proportion of moderate-income families and approximated the aggregate distribution of loans to moderate-income families in the AA.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- There is strong competition for small business lending with 89 lenders in the AA.
- The proportion of loans to businesses with revenues of \$1 million or less was below the proportion of those businesses in the AA, but significantly exceeded the aggregate distribution of loans.

Small Loans to Farms

Refer to Table T in the Youngstown MMSA section of appendix D for the facts and data used to evaluate the borrower distribution of the institution's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- FNB's proportion of loans to small farms was below the proportion of small farms and exceeded the aggregate distribution of lending to small farms in the AA.
- Small farm lending is not a business focus for the bank with most loans being originated on an accommodation basis. The bank's lending performance is considered within the context of its business focus and has a minimal impact on the overall lending performance conclusion.

Community Development Lending

The institution is a leader in making CD loans. CD lending had a significantly positive impact on the Lending Test rating.

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

The level of CD lending in the AA is excellent and had a significantly positive impact on the Lending Test. During the evaluation period, the bank originated 67 loans totaling \$42.8 million, which represents

26.0 percent of allocated tier 1 capital. The bank's CD loans were responsive to economic development community needs. By dollar volume, 90.8 percent funded economic development and 9.2 percent funded affordable housing.

Examples of CD loans in the AA include:

- The bank made an \$8.3 million loan to a business development company that provides capital to private companies for economic development. The proceeds of this loan will be used to provide capital to a business located in the AA.
- The bank made a \$4.0 million loan to a nonprofit organization to rebuild a retirement community facility to support affordable housing. The loan serves the housing units for the portion of the community receiving Medicare and Medicaid.
- The bank made a \$1.8 million to a local nonprofit organization that provides employment and other services for blind and disabled individuals. The funds will be used to renovate the operating facility of the organization.
- FNB's participation in the PPP resulted in 61 CD loans totaling \$25.2 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to LMI people in the Youngstown MMSA. Seven of the PPP loans totaling \$14.7 million were made to businesses located in LMI geographies.

Product Innovation and Flexibility

FNB uses innovative and/or flexible lending practices in serving its AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 137 innovative or flexible home mortgages totaling \$14.0 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

INVESTMENT TEST

The institution's performance under the Investment Test in the Youngstown MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Youngstown MMSA is good.

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

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

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Youngstown MMSA	3	\$2,731	48	\$7,962	51	100	\$10,693	100	0	\$0

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

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

FNB had a total of 51 CD investments and grants totaling \$10.7 million. CD investments and grants were equivalent to 6.4 percent of allocated tier 1 capital. Throughout the evaluation period the bank made 48 CD investments and grants totaling \$8.0 million. Additionally, the AA benefitted from the ongoing impact of three prior period CD investments totaling \$2.7 million. Bank CD investments were responsive to affordable housing and economic development needs in the AA.

Examples of CD investments include:

- FNB invested \$5.0 million in a LIHTC project to renovate a 200-unit apartment complex in a low-income CT that targets seniors and contains income restrictions.
- FNB provided a \$2.0 million investment to a small business investment company which seeks to increase the flow of capital to emerging and middle-market companies.

SERVICE TEST

The institution's performance under the Service Test in Youngstown MMSA is rated High Satisfactory.

Based on a full-scope review, the institution's performance in the Youngstown MMSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
		# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
	Low			Mod	Mid	Upp	Low	Mod	Mid	Upp	
Youngstown MMSA	100.0	15	100.0	13.3	6.7	40.0	40.0	8.7	15.4	50.3	25.7

The bank has 15 branches within the AA, with two branches in low-income CTs, and one branch in moderate-income CT. The percentage of the bank's branches in low-income geographies exceeded the

percentage of population living in those geographies. The percentage of bank branches in moderate-income geographies was well below the percentage of the population in those geographies. The bank's branches include deposit-taking ATMs. The bank had 16 deposit-taking ATMs located in the AA, with two in a low-income CT, and two in moderate-income CTs. The percentage of ATMs in low-income CTs exceeds the percentage of the population in those geographies. The percentage of ATMs in moderate-income geographies was near to the percentage of the population in those geographies.

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

The bank did not open any branches and closed two branches in middle-income CTs in the AA during the evaluation period. The institution's closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank closed two branches in middle-income CTs due to branch consolidation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences the various portions of its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The institution provides a significant level of CD services.

FNB associates provided 408 hours of service to 34 organizations that meet the definition of CD, including 73 hours of board or committee service. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

The following are examples of CD services provided in this AA:

- FNB's associates provided 13 hours to Junior Achievement (JA) during the evaluation period. JA reaches students in classrooms and after-school locations, which is taught by volunteers that are essential for the success of their programs. The bank's associates participated as financial literacy instructors of JA's programs and served on the JA board. The majority of students in these programs are from LMI communities.

- Three employees provided 94 hours of board and committee support to three different local Community Development Corporations (CDC). The CDC serve to promote the economic well-being within the AA. The purpose of the CDC is to assist in the development of new business start-ups and retention of existing businesses. The primary mission is the creation of job opportunities for residents.
- Two team members provided 18 hours of financial education for clients of a nonprofit organization whose mission is to ensure equal access and opportunity for those in need. The service the employees provided is responsive to the community's needs, particularly financial education.

State Rating

State of Maryland

CRA rating for the State of Maryland⁴: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- FNB exhibits a good geographical distribution and an adequate borrower distribution of loans.
- The bank is a leader in making CD loans. CD lending had a significantly positive impact on the overall Lending Test rating.
- The bank has an excellent level of CD investments.
- Its service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.
- The institution provides an adequate level of community development services.

Description of Institution's Operations in Maryland

The State of Maryland represents FNB's fourth largest rated area out of eight rating areas, with 7.4 percent of deposits. As of December 31, 2020, the bank delineated one AA within the State of Maryland, the Washington-Baltimore-Arlington CSA (Baltimore CSA). This includes the counties of Ann-Arundel, Baltimore, Harford, Howard, Queen Anne's, Baltimore City, and Montgomery. The AA meets the requirements of the regulation and do not arbitrarily exclude any LMI CTs. FNB offers a full range of loan and deposit products and services through the 25 full-service branches and 21 deposit-taking ATMs located in the AA.

According to the June 30, 2020 FDIC Market Share Report, FNB held \$2.1 billion in deposits, ranking ninth out of 57 institutions in the AA, representing 1.5 percent market share. The five largest competitors in the AA include Bank of America, Manufacturers and Traders Trust Company, Truist Bank, Capital One, and Wells Fargo Bank. These competitors have deposits totaling \$95.6 billion, representing 68.3 percent of total deposit market share.

The bank's lending focus in the AA is on home mortgage and small business loans. Based on HMDA reported loans, the bank originated or purchased 4,640 home mortgage loans, totaling \$1.6 billion in the AA during the review period. This represented 10.8 percent of home mortgage loans bank wide by

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

number and 20.0 percent by dollar volume. Based on CRA reported loans, the bank also originated or purchased 2,663 small business loans, totaling \$299.6 million in the AA during the review period. This represented 9.0 percent of small business loans bank wide by number and 8.8 percent by dollar volume.

Based on 2020 peer mortgage data, FNB ranks 32 out of 715 lenders in the AA, with 0.7 percent of the market share. The top five lenders in the AA are Quicken Loans, Wells Fargo Bank, Truist Bank, Freedom Mortgage Corporation, and PennyMac Loan Services. These five lenders account for 22.8 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 21 out of 192 lenders in the AA. FNB holds a market share of 0.38 percent. The top five lenders in the AA are American Express National Bank, JP Morgan Chase Bank, Bank of America, Capital One Bank, and Citibank. These lenders account for 63.4 percent of the market share.

Based on the 2015 ACS, 22.4 percent of families in the AA are low-income and 16.9 percent are moderate income. The median family income of the Baltimore-Columbia-Towson, MD MSA is \$87,788, meaning low-income families made \$43,894 or less and moderate-income families made \$70,230 or less per year. The median family income of the Frederick-Gaithersburg-Rockville MD is \$112,655, meaning low-income families made \$56,328 or less and moderate-income families made \$90,124 or less per year. The median housing value is \$324,250 and the median gross rent is \$1,313 per month. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment is \$1,097 for low-income borrowers in the Baltimore, MD MSA and \$1,408 in the Frederick MD. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$1,741. Low-income borrowers in this AA would be challenged to afford a mortgage loan or rent in the AA, given the high cost of housing.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 6.9 percent.

The Bureau of Labor Statistics reports that the unemployment rate has changed significantly over the review period, as was expected given the pandemic. The average annual unemployment rate in 2018 and 2019 was 3.5 and 3.2 percent, respectively. In 2020 the average annual unemployment rate grew to 6.5 percent. Based on Moody's Analytics, the leading industries in the area are education and health services, professional and business services, and government. The top employers in the area are Fort George G. Meade, Johns Hopkins University, and Johns Hopkins Health System. The May 2021 Moody's report notes that the area is just starting to recover. Job growth just resumed after backtracking at the beginning of the year.

We utilized three community contacts in this AA. The first contact was a development corporation that leads, plans, and executes neighborhood revitalization activities that benefit LMI individuals. The second contact was an organization that provides comprehensive housing counseling, training, advocacy, technical assistance, and housing opportunities for LMI individuals. The third contact was a minority business development agency that provides established minority businesses with access to capital, procurement, contracts, global business development, and strategic business consulting. The contacts shared there is a strong need for financial institutions to engage in outreach programs in the

community to educate and to improve the financial literacy of LMI individuals. Additionally, there is a need for affordable housing projects and for small businesses to have access to capital.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Baltimore CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	860	12.1	23.3	31.7	30.9	2.0
Population by Geography	3,620,233	9.0	22.7	33.7	33.8	0.7
Housing Units by Geography	1,465,506	10.2	23.4	34.4	31.8	0.3
Owner-Occupied Units by Geography	880,001	4.7	17.9	36.2	41.2	0.1
Occupied Rental Units by Geography	461,542	16.3	32.9	32.9	17.3	0.6
Vacant Units by Geography	123,963	25.9	27.1	26.9	19.3	0.8
Businesses by Geography	365,371	5.7	18.1	35.2	40.6	0.5
Farms by Geography	6,461	2.7	15.1	35.6	46.5	0.1
Family Distribution by Income Level	884,383	22.4	16.9	19.6	41.1	0.0
Household Distribution by Income Level	1,341,543	24.6	15.8	17.6	42.1	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Housing Value			\$324,250
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$112,655	Median Gross Rent			\$1,313
			Families Below Poverty Level			6.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Maryland

The Baltimore CSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. We combined the Baltimore-Towson MD and the Silver Spring–Frederick MD for analysis and conclusions on performance.

The rating is based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage, small business, and small farm loans relative to the bank's lending capacity based on deposits, competition, and market presence.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Baltimore CSA	4,640	2,663	24	76	7,403	100	100

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

Dollar Volume of Loans (in thousands)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Baltimore CSA	\$1,647,576	\$299,586	\$810	\$110,951	\$2,058,923	100	100

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

The following factors support the bank's good responsiveness to community credit needs:

- Residential mortgage lending competition in the Baltimore CSA is significant with 715 mortgage lenders in the market.
- Competition in small business lending is also significant in the CSA with 146 lenders.
- The bank's market share for small business (2.3 percent) lending significantly exceeds the bank's deposit market share (1.5 percent), but the market share for residential mortgage (0.7 percent) lending is well below the market share for deposits (0.3 percent).
- The bank's ranking for mortgage (32) and small business lending (10) are well below and approximate the ranking for deposits (9), respectively. However, the rankings for mortgage and small business lending exceed the ranking for deposits when considered in relation to the number of competitors for those products. The bank's mortgage lending rank is in the 5th percentile and small business lending rank is in the 14th percentile compared to the deposit rank in the 17th percentile.
- Small farm lending has minimal impact on the conclusion on the bank's responsiveness. It is not a business focus for FNB with most loans being originated on an accommodation basis. The bank's low volume of small farm loans originated during the evaluation period resulted in a market share of 0.3 percent and a ranking of 20 with a total of 21 lenders originating small farm loans in the market. The percentile ranking for small farm lending of 95th is significantly lower than the percentile ranking for deposits.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Home mortgage lending in the Baltimore CSA is challenging for FNB and its competitors. The opportunity to make residential real estate loans is limited because the supplies of owner-occupied homes in LMI tracts is relatively limited. The low-income tracts contain 2.8 percent and the moderate-income tracts contain 10.7 percent, respectively, of the total owner-occupied housing units in the AA. Additionally, there are 715 lenders in the AA. The very strong level of competition makes it very challenging to originate residential mortgage loans in the AA.
- Greater significance was placed on performance compared to the aggregate distribution of residential mortgage loans. All lenders are subject to the same challenges of originating mortgage loans because of the limited supply of owner-occupied housing units in LMI tracts and the strong competition in the AA.
- The proportions of loans in LMI geographies were significantly below the proportion of owner-occupied housing units in those geographies. The proportions of bank loans in low-income tracts was significantly below the aggregate distribution of lending in low-income tracts and was well below the aggregate distribution of lending in moderate-income tracts.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Small business lending is challenging in the Baltimore CSA. The competition for small business lending is strong with a total of 146 lenders. Additionally, the opportunities to make small business loans in low-income tracts is very limited with only 5.7 percent of all businesses in the CSA located in those tracts.
- More significance was placed on performance compared to the aggregate distribution of small business loans than compared to the AA demographics. All lenders are subject to the same challenges of originating small business loans because of the limited supply of businesses in low-income tracts and the strong competition for loans in the AA.

- FNB's level of small loans to businesses in low-income tracts was below the percentage of businesses in those tracts. The bank's lending in moderate-income tracts approximated the proportion of small businesses in the tracts. The bank's small business lending exceeded the aggregate distribution of lending in LMI tracts.

Small Loans to Farms

Refer to Table S in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to farms.

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- FNB did not originate any small farm loans in the LMI geographies in the Baltimore CSA during the evaluation period.
- Other lenders also did not originate any small farm loans in low-income geographies. The opportunity to make small farm loans in the low-income tracts is very limited because a very small percentage of farms in the AA (2.7 percent) is in those tracts. Although 15.0 percent of farms are in moderate-income tracts, most of farms (over 80.0 percent) are in middle- and upper-income tracts. The lack of small farm lending by FNB is consistent with the bank's business strategy. Small farm lending is not a business focus for the bank with most loans originated on an accommodation basis. The bank's performance is considered within the context of its business focus and the number of farms within the AA and has minimal impact on the overall lending performance conclusion.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Housing prices are high and generally not affordable for low-income borrowers, based upon the average cost of housing and the low-income levels for the AA. Housing prices are generally more affordable for moderate-income borrowers. This analysis does not consider factors that can affect

housing affordability for borrowers, such as existing debt level or the lack of liquidity for down payment and closing costs.

- A significant percentage of the households in the AA are LMI with 24.6 percent classified as low-income and 15.8 percent classified as moderate-income. In addition, 9.6 percent of the population has income below the poverty line and 2.8 percent of the population receives some form of public assistance.
- The competition for lending is strong with 715 home mortgage lenders in the AA.
- Greater significance was placed on the performance compared to the aggregate distribution of residential mortgage loans because all lenders are subject to those same challenges in qualifying borrowers for loans.
- The proportions of loans to low-income borrowers was significantly below the proportion and the aggregate distribution of loans to low-income families in the AA. The proportion of the bank's mortgage loans are well below the proportion of moderate-income families and the aggregate distribution of mortgage loans to those families.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- There was strong competition for small business lending with 146 lenders in the AA.
- The proportion of the bank's loans to businesses with revenues of \$1 million or less was below the proportion of those businesses in the AA, but exceeded the aggregate distribution of loans.

Small Loans to Farms

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to farms for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- FNB's proportion of loans to small farms was significantly below the proportion of small farms and well below the aggregate distribution of lending to small farms in the AA.
- Small farm lending is not a business focus for the bank with most loans being originated on an accommodation basis. The bank's lending performance is considered within the context of its business focus and has minimal impact on the overall lending performance conclusion.

Community Development Lending

The institution is a leader in making CD loans.

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

The level of CD lending in the AA is excellent and had a significantly positive impact on the Lending Test. During the evaluation period, the bank originated 72 CD loans totaling \$111.0 million, which represents 51.9 percent of allocated tier 1 capital. The bank's CD loans were responsive to economic development community needs. By dollar volume, 87.3 percent funded economic development, 7.0 percent funded revitalization, and 5.6 percent funded affordable housing.

Examples of CD loans in the AA include:

- The bank made a \$20.0 million loan to redevelop an industrial site into a retail shopping center located in a low-income CT. The loan will help revitalize the community and support new jobs.
- The bank made a \$14.0 million loan for the acquisition of a retail center in a moderate-income CT. The retail center provides underserved neighborhoods with pharmacy, health/medical, and grocery options.
- FNB's participation in the PPP resulted in 62 loans totaling \$14.0 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to LMI people in the Baltimore CSA. Three of the PPP loans totaling \$6.0 million were made to businesses located in LMI geographies.

Product Innovation and Flexibility

FNB makes limited use of innovative and/or flexible lending practices in serving its AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 102 innovative or flexible home mortgages totaling \$26.5 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

INVESTMENT TEST

The bank's performance under the Investment Test in Maryland is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Baltimore CSA	5	\$2,077	61	\$26,260	66	100	\$28,337	100	0	\$0

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

FNB had a total of 66 CD investments and grants totaling \$28.3 million. CD investments and grants were equivalent to 13.3 percent of allocated tier 1 capital. Throughout the evaluation period the bank made 61 CD investments and grants totaling \$26.3 million. In addition, the AA benefitted from the ongoing impact of five prior period CD investments totaling \$2.1 million. Bank CD investments were responsive to affordable housing needs in the AA.

Examples of CD investments include:

- FNB invested \$4.0 million in a LIHTC project to construct a 140-unit senior living facility in a moderate-income CT to be used for LMI individuals.
- FNB provided a \$5.0 million LIHTC investment that supported the acquisition and rehabilitation of a 211-unit apartment building for LMI seniors in a low-income CT.
- FNB invested \$5.5 million in a mortgage-backed security which is backed by 165 multifamily loans, some of which are low or very low-income housing.

SERVICE TEST

The bank’s performance under the Service Test in Maryland is rated Low Satisfactory.

Conclusions for Area receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Baltimore MSA is adequate.

Retail Banking Services

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

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

Baltimore CSA	100.0	25	100.0	8.0	8.0	32.0	52.0	9.0	22.7	33.7	33.8
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The bank has 25 branches within the AA, with two branches in low-income CTs, and two branches in moderate-income CTs. The percentage of the bank's branches in low-income geographies is near to the percentage of population living in those geographies. The percentage of the bank's branches in moderate-income geographies is well below the percentage of population living in those geographies. The bank's branches include deposit-taking ATMs. The bank has two deposit-taking ATMs located in a low-income CT, and two in moderate-income CTs. The percentage of ATMs in low-income geographies is near to the percentage of population living in those geographies. The percentage of the ATMs in moderate-income geographies is well below the percentage of population living in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Baltimore CSA	1	-5	0	0	-3	-1

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank closed five branches including three branches located in a middle-income CTs and two branches located in upper-income CTs, due to branch consolidation. In 2020, the bank opened a branch located in an upper-income CT.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The institution provides a relatively high level of CD services.

FNB associates provided 371 hours of service to 41 organizations that meet the definition of CD, including 211 hours of board or committee service. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

The following are examples of CD services provided in this AA:

- A bank employee provided 87 hours of board service to a nonprofit organization whose mission is to transform lives through affordable homeownership. Their programs build and sell homes to low-income families enabling them to grow and thrive in safe, affordable, and stable housing. The services the employee provided demonstrate leadership and responsive to the community's needs, particularly affordable housing.
- FNB's associates provided 30 hours to JA during the evaluation period. JA reaches students in classrooms and after-school locations, which is taught by volunteers that are essential for the success of their programs. The bank's associates participated as financial literacy instructors of JA's programs and served on the JA board. The majority of students in these programs are from LMI communities.
- A bank employee provided 40 hours of board service to a nonprofit small business association whose mission is to enhance the business environment within a neighborhood in the AA.

State Rating

State of North Carolina

CRA rating for the State of North Carolina⁵: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to community credit needs.
- The bank exhibits good geographical distribution and adequate borrower distribution of loans.
- The bank is a leader in providing CD loans. CD lending had a significantly positive impact on the Lending test rating.
- The bank had a good level of CD investments. Performance in the limited-scope areas had a negative impact on the overall Investment Test rating.
- FNB's service delivery systems are accessible to geographies and individuals or different income levels in its AAs.
- The institution provides a good level of community development services.

Description of Institution's Operations in North Carolina

The State of North Carolina represents FNB's third largest rated area out of eight rating areas, in terms of deposits. As of December 31, 2020, the bank had 10 AAs within the State of North Carolina. These AAs include the counties of Alamance in the Burlington MSA, Cumberland in the Fayetteville MSA, Guilford and Rockingham in the Greensboro MSA, Pitt in the Greenville MSA, Onslow in the Jacksonville MSA, Brunswick in the Myrtle Beach MSA, Raleigh in the North Carolina Non-MSA, Durham, Johnston, Orange, and Wake in the Raleigh-Durham CSA, New Hanover and Pender in the Wilmington MSA, and Davidson Forsyth, Stokes, and Yadkin in the Winston-Salem MSA. The AAs meet the requirements of the regulation and do not arbitrarily exclude any LMI CTs. FNB offers a full range of loan and deposit products and services through the 70 full-service branches and 56 deposit-taking ATMs located in North Carolina.

Raleigh-Durham CSA

The Raleigh-Durham CSA is comprised of the counties of Durham, Johnston, Orange, and Wake. FNB maintains 14 full-service branches and 14 deposit taking ATMs in the AA. The AA meets the requirements of the regulation and does not arbitrarily exclude any LMI CTs. According to the June 30, 2020 FDIC Market Share Report, FNB ranked 9th out of 35 institutions in the AA, representing 1.8

⁵ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

percent market share. The five largest competitors include Wells Fargo Bank, National Association, Truist Bank, Pacific Western Bank, Bank of America, National Association, and First-Citizens Bank & Trust Company. These competitors have deposits totaling \$40.8 billion, or 76.9 percent of total deposit market share. FNB's deposits within the Raleigh-Durham CSA account for 3.3 percent of total bank wide deposits.

During the evaluation period, FNB PA originated 1,789 and 1,321 home mortgage and small business loans in the Raleigh-Durham CSA, representing 4.2 percent and 4.5 percent of its total bank wide mortgage and small business loans respectively. Volume of home mortgage and small business loans in this AA accounted for 6.1 percent and 5.7 percent of FNB PA's total bank wide home mortgage and small business loans respectively.

Based on 2020 peer mortgage data, FNB ranks 39 out of 614 lenders in the AA, with 0.6 percent of the market share. The top five lenders in the AA are Wells Fargo Bank, National Association, Quicken Loans, State Employees Credit Union, Truist Bank, and Coastal Federal Credit Union. These five lenders account for 27.5 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 21 out of 123 lenders in the AA. FNB has 0.5 percent of the market share. The top five lenders in the AA are American Express National Bank, JPMorgan Chase Bank, Truist Financial, Wells Fargo Bank, National Association, and Bank of American, NA. These lenders account for 61.3 percent of the market share.

Low-income borrowers will be challenged with home mortgage affordability in the Raleigh-Durham CSA. We considered a mortgage payment unaffordable if the principle and interest payment would result in a DTI greater than 30.0 percent. Based on the information in Table A, low-income families earn between \$34,010 and \$39,029. Assuming the AAs median housing value of \$138,355 with no down payment, a 5.0 percent interest rate, and 30-year amortization. We determined the monthly mortgage payment would exceed 30.0 percent DTI for low-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 9.1 percent.

The Moody's Analytics report for Raleigh shows that the economy has entered a recovery phase following the recession from the Covid-19 pandemic. Unemployment was low and stable in 2018 and 2019 at 3.5 percent and 3.4 percent respectively. Unemployment for 2020 grew to 6.3 percent due to the Covid recession with a peak rate of 12.2 percent in May 2020. The three economic drivers for the area are high tech jobs, colleges, and manufacturing. Two of the three were heavily impacted by the pandemic. Population has been steadily growing for the last five years from 1.27 million in 2015 to 1.4 million in 2020. The FHFA house price index has increased from 170.0 in 2015 to 227.7 in 2020. The substantial increase contributes to the lack of housing affordability for low-income borrowers. The top five employers for the area are local government, state government, IBM Corp, WakeMed Health & Hospitals, and North Carolina State University.

The Moody's Analytics report for Durham shows that the economy has entered a recovery phase following the recession from the Covid-19 pandemic. Unemployment was low and stable in 2018 and 2019 at 3.5 percent and 3.4 percent respectively. Unemployment for 2020 grew to 6.1 percent due to the Covid recession with a peak rate of 11.1 percent in May 2020. The three economic drivers for the area

are high tech jobs, colleges, and manufacturing. Two of the three were heavily impacted by the pandemic. Population has been steadily growing for the last five years from 549,500 in 2015 to 590,000 in 2020. The FHFA house price index has increased from 180.4 in 2015 to 240.0 in 2020. The substantial increase contributes to the lack of housing affordability for low-income borrowers. The top five employers for the area are state government, Duke University & Health System, local government, IBM Corp, and UNC – Chapel Hill.

We utilized two community contacts in this AA. The first contact was a local economic development office that provides professional services to promote business activity. The second contact is a local organization committed to providing affordable housing in the community. The contacts spoke to a shrinking availability of affordable housing, presenting an opportunity for financial institutions to help finance home purchases and to assist organizations meeting this need. Furthermore, small businesses need financing to start or expand their businesses and to withstand the impacts of the pandemic. Individuals in the community would also benefit from basic education about credit to improve financial literacy.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Raleigh-Durham CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	300	8.0	23.7	28.7	37.3	2.3
Population by Geography	1,581,876	6.7	26.4	32.0	34.2	0.7
Housing Units by Geography	644,225	6.6	26.0	32.9	34.5	0.0
Owner-Occupied Units by Geography	371,527	2.3	22.2	35.1	40.4	0.0
Occupied Rental Units by Geography	222,947	13.0	31.4	29.7	25.8	0.1
Vacant Units by Geography	49,751	9.9	30.3	30.9	28.9	0.0
Businesses by Geography	174,761	4.5	21.3	32.3	41.2	0.6
Farms by Geography	4,112	3.0	22.9	41.8	32.3	0.1
Family Distribution by Income Level	388,984	21.8	16.8	18.6	42.8	0.0
Household Distribution by Income Level	594,474	22.8	16.6	17.5	43.1	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$68,020	Median Housing Value			\$229,417
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$78,057	Median Gross Rent			\$935
			Families Below Poverty Level			9.1%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in North Carolina

The Raleigh-Durham CSA was selected for analysis using full-scope procedures. The Raleigh-Durham CSA was selected due to the high percentage of bank deposits (20.6) and loans (24.2) in the state. We combined the Raleigh MSA and the Durham MSA for analysis and conclusions on performance.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

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

Conclusions for Area Receiving a full-scope review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Burlington MSA	34	61	0	4	99	1.3	0.8
Fayetteville MSA	9	45	0	3	57	0.8	1.4
Greensboro MSA	176	653	4	29	862	11.6	13.5
Greenville MSA	80	151	2	5	238	3.2	3.1
Jacksonville MSA	9	104	0	0	113	1.5	1.3
Myrtle Beach MSA	129	93	0	3	225	3.0	3.9
NC Non-MSA	461	1,501	72	43	2,077	28.1	26.9
Raleigh CSA	421	1,321	6	47	1,795	24.2	20.6
Wilmington MSA	158	373	1	10	542	7.3	6.6
Winston MSA	386	937	18	54	1,395	18.8	21.8

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Burlington MSA	\$5,247	\$5,521	\$0	\$3,574	\$14,342	1.4	0.8

Fayetteville MSA	\$1,357	\$6,006	\$0	\$2,867	\$10,230	1.0	1.4
Greensboro MSA	\$25,986	\$84,700	\$214	\$14,419	\$125,319	11.9	13.5
Greenville MSA	\$13,621	\$13,676	\$225	\$25,294	\$52,816	5.0	3.1
Jacksonville MSA	\$1,410	\$19,299	\$0	\$0	\$20,709	2.0	1.3
Myrtle Beach MSA	\$26,838	\$7,515	\$0	\$1,225	\$35,578	3.4	3.9
NC Non-MSA	\$65,912	\$123,290	\$4,834	\$22,051	\$216,087	20.5	26.9
Raleigh CSA	\$106,662	\$193,561	\$310	\$26,581	\$327,114	31.0	20.6
Wilmington MSA	\$37,556	\$52,585	\$219	\$6,761	\$97,121	9.2	6.6
Winston MSA	\$49,284	\$78,530	686	\$26,650	\$155,150	14.7	21.8

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

The following factors support the bank's adequate responsiveness to community credit needs:

- FNB has a moderately-large presence in the market, reflected in a deposit market share of 1.8 percent (9th highest in the CSA). However, competition is very strong with three of the larger eight banks being among the largest banks in the nation. The combined deposit market share of the five largest banks is 77.0 percent.
- Residential mortgage lending competition in the Raleigh-Durham CSA is significant with 752 mortgage lenders in the market.
- Competition for small business loans is also significant in the CSA with 126 lenders.
- The bank's market shares for mortgage (0.6 percent) and small business (0.5) lending are significantly below the bank's deposit market share (1.8 percent).
- The bank's market share rankings for mortgage (39) and small business (21) lending are also significantly below the ranking for deposits (9). However, the ranking for home mortgage lending is significantly higher and the ranking for small business lending is higher than the ranking for deposits, respectively, when considered in relation to the number of competitors. The bank's mortgage lending rank is in the 5th percentile and the small business lending rank is in the 17th percentile.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Residential mortgage lending is challenging in the Raleigh-Durham CSA. The opportunity to make residential real estate loans is limited because the supply of owner-occupied homes in LMI tracts is relatively limited. The low-income tracts contain 1.3 percent and the moderate-income tracts contain 12.8 percent, respectively, of the total owner-occupied housing units in the AA. Additionally, there are 752 lenders in the AA. The very strong level of competition makes it challenging to originate residential mortgage loans in the AA.
- Performance compared to the aggregate distribution of residential mortgage loans was given greater significance when analyzing the bank's lending performance. All mortgage lenders are subject to the same challenges of originating mortgage loans because of the limited supply of owner-occupied housing units in LMI tracts and the very strong competition in the AA.
- The proportion of loans in low-income geographies was below the proportion of owner-occupied housing units in those geographies and the aggregate distribution of lending in those geographies. The proportion of bank loans in moderate-income tracts was significantly below the proportion of owner-occupied housing units and well below the aggregate distribution of lending.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Small business lending is challenging in the Raleigh-Durham CSA. The competition for small business lending is strong with a total of 126 lenders. Additionally, the opportunities to make small business loans in low-income tracts is very limited with only 4.5 percent of all businesses in the CSA located in those tracts.
- Greater significance was placed on performance compared to the aggregate distribution of small business loans than compared to the AA demographics. All lenders are subject to the same challenges of originating small business loans because of the limited supply of businesses in low-income tracts and the strong competition for loans in the AA.
- FNB's level of small loans to businesses in low-income tracts exceeded the percentage of businesses in those tracts. The bank's lending in moderate-income tracts was near to the proportion of small businesses in the tracts. The bank's small business lending exceeded the aggregate distribution of lending in low-income tracts and was near to the aggregate distribution of lending in moderate-income tracts.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Housing prices are high and generally not affordable for low-income borrowers, based upon the average cost of housing and the low-income levels for the AA. Housing is generally more affordable for moderate-income borrowers. This analysis does not consider factors that can affect ability of borrowers to afford housing, such as existing debt level or the lack of liquidity for down payment and closing costs.
- The percentages of the households in the AA classified as LMI are significant with 22.8 percent classified as low-income and 16.6 percent classified as moderate-income. In addition, 11.6 percent of the population has income below the poverty line and 1.3 percent of the population receives some form of public assistance.
- The competition for lending is strong with 752 home mortgage lenders in the AA.
- Greater significance was placed on the performance compared to the aggregate distribution of residential mortgage loans because all lenders are subject to those same challenges in qualifying borrowers for loans.
- The proportions of loans to low-income borrowers were significantly below the proportion and below the aggregate distribution of loans to low-income families in the AA, respectively. The proportions of the bank's mortgage loans were well below the proportion of moderate-income families and the aggregate distribution of mortgage loans to those families.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- There was strong competition for small business lending with 126 lenders in the AA.
- The proportion of the bank's loans to businesses with revenues of \$1 million or less was below the proportion of those businesses in the AA but significantly exceeded the aggregate distribution of those loans.

Community Development Lending

The institution is a leader in making CD loans.

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

Raleigh-Durham CSA

The volume of CD lending was excellent and had a significantly positive impact on the Lending Test performance in the Raleigh-Durham CSA. During the evaluation period, FNB originated 47 CD loans totaling \$26.6 million or 28.2 percent of allocated tier 1 capital. CD loans were responsive to identified economic development community needs. By dollar volume, 100.0 percent funded economic development.

The following examples demonstrate the bank's use of complex and responsive CD loans:

- The bank made a \$5.9 million loan to fund the construction of an office building for economic development purposes. The property is located in a low-income CT and provides flexible office space and short-term leases to growing small businesses.
- The bank originated a \$2.4 million loan to purchase a retail shopping center. The loan will promote economic development by offering employment opportunities in a moderate-income CT.
- The bank made a \$2.3 million loan to repurpose a vacant property into a manufacturing plant. The loan provides economic development to a moderate-income CT by housing eight commercial tenants.
- FNB's participation in the PPP resulted in 41 CRA qualified SBA loans totaling \$12.2 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to the Raleigh-Durham CSA. Six of the PPP loans totaling \$8.8 million were made to businesses located in LMI geographies.

Product Innovation and Flexibility

FNB uses innovative and/or flexible lending practices in serving its AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 208 innovative or flexible home mortgages totaling \$34.4 million. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of institution.

Conclusions for Area Receiving a Limited-Scope Review

Based on limited-scope reviews, the bank’s performance under the Lending Test in the Greenville MSA, the Myrtle Beach MSA, and the North Carolina Non-MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope area. The bank’s performance in the Burlington MSA, the Fayetteville MSA, the Greensboro MSA, the Wilmington MSA, and the Winston-Salem MSA is excellent and stronger than the bank’s performance in the full-scope area. The performance is stronger because stronger geographic and borrower distribution in the Winston-Salem MSA and stronger borrower distribution in the Burlington MSA, the Fayetteville MSA, the Greensboro MSA, and the Wilmington MSA. Performance in the Jacksonville MSA is adequate and weaker than the bank’s performance in the full-scope AA. Performance is weaker because of the negative impact of very poor CD lending. The performance in the AAs subject to limited-scope reviews have a neutral impact on the overall Lending Test conclusions.

Refer to Tables O through R in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Raleigh-Durham CSA is excellent.

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Burlington MSA	1	\$1,186	1	\$9	2	1.4	\$1,195	2.8	1	\$9
Fayetteville MSA	1	\$847	2	\$2,305	3	2.1	\$3,152	7.5	1	\$5
Greensboro MSA	1	\$174	21	\$5,469	22	15.5	\$5,643	13.4	1	\$1,080
Greenville MSA	0	\$0	2	\$2	2	1.4	\$2	0.0	0	\$0
Jacksonville MSA	0	\$0	1	\$1	1	0.1	\$1	0.0	0	\$0
Myrtle Beach MSA	1	\$174	3	\$2	4	2.8	\$176	0.4	0	\$0
NC Non-MSA	2	\$469	8	\$3,187	10	7.0	\$3,656	8.7	0	\$0
Raleigh-Durham CSA	4	\$1,725	49	\$8,556	53	37.3	\$10,281	24.4	2	\$2,907
Wilmington MSA	2	\$469	12	\$32	14	9.9	\$501	1.2	0	\$0
Winston MSA	2	\$422	17	\$4,047	19	13.4	\$4,469	10.6	2	\$1,827
NC Statewide	3	\$5,443	9	\$7,546	12	8.5	\$12,989	30.9	0	\$0

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

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

Raleigh-Durham CSA

The bank's performance in the Raleigh-Durham CSA was excellent. The bank had a total of \$10.3 million in CD investments and grants. CD investment and grants were equivalent to 10.9 percent of allocated tier 1 capital. Throughout the evaluation period FNB made 49 CD investments and grants totaling \$8.6 million. Additionally, the AA benefitted from the ongoing impact of four prior period CD investments totaling \$1.7 million. CD investments were responsive to affordable housing needs in the AA.

Examples of CD investments include:

- FNB invested \$1.5 million in a LIHTC project to rehabilitate a 158-unit property that provides affordable housing to seniors. Of the total units, 138 will qualify for Section 8 subsidy.
- FNB invested \$1.0 million in a 297-unit affordable senior housing LIHTC project. Occupancy is limited based on those with low- or moderate-income, and some of the units will qualify for rental subsidies.
- FNB provided a \$2.4 million investment in an SBIC that provides capital to emerging and middle-market companies by providing low-cost funding.

Statewide

The bank made 12 current and prior period investments totaling \$13.0 million outside of its AAs in the broader statewide area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Burlington MSA and Fayetteville MSA were stronger than the bank's overall performance under the Investment Test in the full-scope AA. Stronger performance was due to a higher level of investments as a percentage of allocated tier 1 capital. Performance under the Investment Test in the Greensboro MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area. The bank's performance under the Investment Test in the Greenville MSA, Jacksonville MSA, Myrtle Beach MSA, NC Non-MSA, Wilmington MSA, and Winston-Salem MSA were weaker than the bank's overall performance under the Investment Test in the full-scope area. Weaker performance was due to a smaller percentage of CD investments and grants compared to allocated tier 1 capital. Performance in limited-scope AAs had a negative impact on the Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in North Carolina is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Burlington MSA	0.8	1	1.4	0.0	100.0	0.0	0.0	0.0	28.9	46.0	25.0
Fayetteville MSA	1.4	1	1.4	0.0	0.0	100.0	0.0	1.6	17.2	63.4	16.6
Greensboro MSA	13.5	9	12.9	0.0	22.2	55.6	22.2	7.1	22.8	37.9	32.2
Greenville MSA	3.1	2	2.9	50.0	0.0	50.0	0.0	10.8	22.5	38.5	28.3
Jacksonville MSA	1.3	1	1.4	0.0	0.0	100.0	0.0	0.0	12.0	68.5	15.0
Myrtle Beach MSA	3.9	3	4.3	0.0	0.0	66.7	33.3	0.0	21.9	52.3	25.8
NC Non-MSA	26.9	20	28.6	0.0	10.0	60.0	30.0	0.0	11.7	53.9	34.5

Raleigh-Durham CSA	20.6	14	20.0	14.3	7.1	28.6	50.0	6.7	26.4	32.0	34.2
Wilmington MSA	6.6	4	5.7	25.0	25.0	25.0	25.0	13.2	17.0	40.1	29.7
Winston MSA	21.8	15	21.4	0.0	33.3	33.3	33.3	8.2	21.7	39.0	30.5

Raleigh-Durham CSA

The bank has 14 branches within the AA, with two branches in low-income CTs, and one branch in a moderate-income CT. The percentage of the bank's branches in low-income geographies exceeded the percentage of population living in those geographies. The percentage of the bank's branches in moderate-income geographies was well above the percentage of population living in those geographies. The bank's branches include deposit-taking ATMs. The bank has 14 deposit-taking ATMs located in the AA, with two in a low-income CT, and one in a moderate-income CT. The percentage of the ATMs in low-income geographies exceeded the percentage of population living in those geographies. The percentage of the ATMs in moderate-income geographies was well below the percentage of population living in those geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Burlington MSA	0	0				
Fayetteville MSA	0	0				
Greensboro MSA	1	0				1
Greenville MSA	0	0				
Jacksonville MSA	0	0				
Myrtle Beach MSA	0	0				
NC Non-MSA	0	-5			-4	-1
Raleigh-Durham CSA	0	-1				-1
Wilmington MSA	0	0				
Winston MSA	0	-2		-1		-1

Raleigh-Durham CSA

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In April 2019, the bank closed a branch located in an upper-income CT due to branch consolidation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The institution provides a good level of CD services.

FNB associates provided 413 hours of service to ten organizations that meet the definition of CD, including 297 hours of board or committee service. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

The following are examples of CD services provided in this AA:

- A bank employee provided 288 hours of board service to a nonprofit organization whose mission is to provide safe, affordable housing for working, homeless LMI individuals recovering from substance dependency. The organization's programs consist of long term recovery, vocational rehabilitation, finding employment and reintegrating their lives into the world.
- FNB's associates provided 43 hours to JA during the evaluation period. JA reaches students in classrooms and after-school locations, which is taught by volunteers that are essential for the success of their programs. The bank's associates participated as financial literacy instructors of JA's programs which the majority of students in these programs are from LMI communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Burlington MSA, NC Non-MSA, and Wilmington MSA is stronger than the bank's overall performance under the Service Test in the full-scope area. Stronger performance is due to higher percentage of branches in LMI CTs compared to the percentage of the population in those geographies. The bank's performance in the Greensboro MSA, Greenville MSA, and Winston-Salem MSA is consistent the bank's overall performance under the Service Test in the full-scope area. The bank's performance in the Fayetteville MSA, Jacksonville MSA, and Myrtle Beach MSA was weaker than performance in the full-scope AA. Weaker performance is due to a smaller percentage of bank branches in LMI CTs as compared to the population in those geographies. Performance in the limited-scope AAs had a neutral impact on the state's overall rating.

State Rating

State of Ohio

CRA rating for the State of Ohio⁶: Satisfactory
The Lending Test is rated: High Satisfactory
The Investment Test is rated: Outstanding
The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs.
- The bank exhibits adequate geographical and borrower distribution of loans.
- FNB has an excellent level of CD investments.
- The institution has an excellent level of qualified CD investment and grants, often in a leadership position.
- Its service delivery systems are unreasonably inaccessible to portions of its AAs, particularly to LMI geographies or to LMI individuals.
- The institution provides a good level of community development services.

Description of Institution's Operations in Ohio

The State of Ohio represents FNB's sixth largest rated area out of eight rating areas, with 4.1 percent of deposits. As of December 31, 2020, the bank had two AAs within the State of Ohio. These AAs include the counties of Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit in the Cleveland-Akron CSA, and Belmont in the Wheeling MSA. The AAs meet the requirements of the regulation and do not arbitrarily exclude any LMI CTs. FNB offers a full range of loan and deposit products and services through the 19 full-service branches and 18 deposit-taking ATMs located in the State of Ohio. The Cleveland-Akron CSA AA received a full-scope review.

Cleveland-Akron CSA

The Cleveland-Akron CSA (Cleveland CSA) is comprised of the counties of Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit. FNB maintains 19 full-service branches and 18 deposit taking ATMs in the AA. This AA accounts for 3.9 percent of bank wide deposits and 97.4 percent of deposits in the state of Ohio.

According to the June 30, 2020 FDIC Market Share Report, FNB ranked 13 out of 41 institutions in the AA, representing 1.0 percent market share. The five largest competitors include Key Bank, Huntington

⁶ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

National Bank, PNC Bank, Citizens Bank, and JP Morgan Chase Bank. These competitors have deposits totaling \$77.9 billion, or 71.3 percent of total deposit market share.

The bank's lending focus in the AA is on home mortgage and small business loans. Based on HMDA reported loans, the bank originated or purchased 4,529 home mortgage loans, totaling \$983.4 million in the AA during the review period. This represented 10.5 percent of home mortgage loans bank wide by number and 10.8 percent by dollar volume. Based on CRA reported loans, the bank also originated or purchased 1,791 small business loans, totaling \$252.5 million in the AA during the review period. This represented 6.1 percent of small business loans bank wide by number and 7.5 percent by dollar volume.

Based on 2020 peer mortgage data, FNB ranks 19 out of 618 lenders in the AA, with 1.3 percent of the market share. The top five lenders in the AA are The Huntington National Bank, Quicken Loans, Third Federal Savings and Loan, CrossCountry Mortgage, and Wells Fargo Bank. These five lenders account for 33.1 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 20 out of 148 lenders in the AA, with 0.6 percent of the market share. The top five lenders in the AA are JP Morgan Chase Bank, American Express National Bank, PNC Bank, The Huntington National Bank, and Capital One Bank. These lenders account for 62.4 percent of the market share.

Based on the 2015 ACS, 22.4 percent of families in the AA are low-income and 16.7 percent are moderate income. The median family income of the Akron, OH MSA is \$65,716, meaning low-income families made \$32,858 or less and moderate-income families made \$52,573 or less per year. The median family income of the Cleveland-Elyria, OH MSA is \$65,821, meaning low-income families made \$32,911 or less and moderate-income families made \$52,657 or less per year. The median housing value is \$138,355 and the median gross rent is \$765 per month. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment is \$821 for low-income borrowers in the Akron MSA and \$823 in the Cleveland MSA. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$743. This shows that housing in the AA is affordable to most income groups. As noted below, the poverty rate is high in the AA and those families would have a difficult time affording housing.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 11.3 percent.

The Bureau of Labor Statistics reports that the unemployment rate has changed significantly over the review period, as was expected given the pandemic. The average annual unemployment rate in 2018 and 2019 was 4.8 and 4.3 percent, respectively. In 2020 the average annual unemployment rate grew to 9.1 percent. This is in line with the state of Ohio unemployment rate of 4.5, 4.2, and 8.2 for 2018, 2019, and 2020, respectively. Based on Moody's Analytics, the leading industries in the area are education and health services, professional and business services, and government. The top employers in the area are Cleveland Clinic Foundation, University Hospitals, and the U.S. Office of Personnel Management. The June 2021 Moody's report notes that the area is trailing the rest of the state and the nation in recovery.

Employment recovery has stalled since late 2020, with losses in manufacturing, wholesale trade, healthcare, and consumer industries.

We utilized two community contacts in this AA. The first was a community development organization focused on providing affordable housing resources and repairs. The second community contact was an economic development organization dedicated to providing financing, workforce solutions, and technical assistance to small business owners, entrepreneurs, and various community stakeholders. These organizations indicated a need for general operating support, financial literacy and technical assistance to small businesses, and small business funding.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cleveland CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	808	18.3	22.4	33.8	24.0	1.5
Population by Geography	2,768,227	11.9	19.9	36.2	31.7	0.3
Housing Units by Geography	1,269,259	13.5	22.1	35.6	28.4	0.5
Owner-Occupied Units by Geography	741,333	6.3	16.6	39.6	37.3	0.1
Occupied Rental Units by Geography	388,232	22.1	29.8	31.3	15.9	0.9
Vacant Units by Geography	139,694	28.1	29.4	26.0	15.5	1.0
Businesses by Geography	203,570	8.9	16.3	33.9	40.3	0.6
Farms by Geography	5,153	4.2	11.6	43.0	41.1	0.1
Family Distribution by Income Level	699,389	22.4	16.7	19.7	41.1	0.0
Household Distribution by Income Level	1,129,565	25.6	15.4	16.9	42.1	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$138,355
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Median Gross Rent			\$765
			Families Below Poverty Level			11.3%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Ohio

The Cleveland-Akron CSA was selected for analysis using full-scope procedures because the AA had the largest proportion of the bank's deposits (97.4) and loans (98.7) within the rating area. We combined the Cleveland MSA and the Akron MSA for analysis and conclusions on performance.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

LENDING TEST

The bank's performance under the Lending Test in Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

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

Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank's lending capacity based on deposits, competition, and market presence. FNB only made one small loan to a farm during the evaluation period. Analysis of the bank's small farm lending is not discussed because of the very low number of loans and minimal impact on the lending activity conclusion.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Cleveland CSA	4,529	1,791	1	56	6,377	98.7	97.4
Ohio Non-MSA	61	24	0	0	85	1.3	2.6

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Cleveland CSA	\$893,403	\$252,547	\$10	\$126,831	\$1,272,791	99.5	97.4
Ohio Non-MSA	\$4,547	\$1,294	\$0	\$0	\$5,841	0.5	2.6

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

The following factors support the bank's adequate responsiveness to community credit needs:

- FNB's deposit market share of 1.0 percent reflects the bank's moderate presence in the market. The market share is the 13th largest in the Cleveland CSA. However, competition is very strong with 41 depository institutions in the CSA. The five largest depository institutions have a combined market share of 71.4 percent.
- Residential mortgage lending competition in the Cleveland CSA is significant with 618 mortgage lenders in the market.
- Competition for small business loans is also significant in the CSA with 148 lenders.
- The bank's market share for mortgage (1.3 percent) exceeds the deposit market share (1.0) and the market share for small business (0.6) lending is significantly below the bank's deposit market share.

- The bank's market share rankings for mortgage (19) and small business (20) lending are both below the ranking for deposits (13). However, the percentile rankings for home mortgage (3rd) and small business (14th) lending, respectively, are significantly higher than the ranking for deposits (32nd) when considered relative to the number of competitors for those products.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Lenders are challenged to make residential mortgage loans in the Cleveland CSA. The limited supplies of owner-occupied housing units in LMI geographies constrain the opportunity to make residential real estate loans. The low-income tracts contain 6.3 percent and the moderate-income tracts contain 16.7 percent, respectively, of the total owner-occupied housing units in the AA. Additionally, there are 618 lenders in the AA. Competition for mortgage lending is very strong and makes it very challenging to lend in the AA.
- The bank's residential mortgage lending performance relative to the aggregate distribution of residential mortgage loans was given greater significance when analyzing the bank's performance. All of the mortgage lenders in the AA are subject to the challenges because of the limited supply of owner-occupied housing units in LMI tracts and the very strong competition.
- The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and below the aggregate distribution of lending in those geographies. The proportion of bank loans in moderate-income tracts was significantly below the proportion of owner-occupied housing units and well below the aggregate distribution of lending.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Small business lending is challenging in the Cleveland-Akron-Canton CSA. Small business lending competition is strong with a total of 148 lenders in the CSA. Additionally, the opportunities to make small business loans in low-income tracts is limited with only 8.9 percent of all businesses in the CSA located in those tracts.

- Greater significance was placed on performance compared to the aggregate distribution of small business loans than compared to the AA demographics. All lenders are subject to the same challenges in originating small business loans because of the limited supply of businesses in low-income tracts and the strong competition for loans in the AA.
- FNB's proportion of small loans to businesses in low-income tracts was near to the percentage of businesses in those tracts. The bank's lending in moderate-income tracts exceeded the proportion of small businesses in the tracts. The bank's small business lending approximated the aggregate distribution of lending in low-income tracts and exceeded the aggregate distribution of lending in moderate-income tracts.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- Housing prices are generally affordable for LMI borrowers, based upon the average cost of housing and the LMI levels for the AA. This analysis is based upon some assumptions and does not consider factors that can negatively affect the ability of borrowers to afford housing, including the level of debt owed by the borrower or the lack of cash reserves for a down payment and closing costs.
- The percentages of the households in the AA classified as LMI are significant with 25.6 percent classified as low-income and 15.4 percent classified as moderate-income. Additionally, 15.0 percent of the population has income below the poverty line and 3.6 percent of the population receives some form of public assistance.
- The competition for lending is strong with 618 home mortgage lenders in the AA.
- Performance compared to the aggregate distribution of residential mortgage loans was given greater significance in concluding on the bank's home mortgage lending performance because all lenders are subject to those same challenges in qualifying borrowers for loans.
- The proportions of loans to low-income borrowers were significantly below the proportion and the aggregate distribution of loans to low-income families in the AA, respectively. The proportions of

the bank's mortgage loans were well below the proportion of moderate-income families and the aggregate distribution of mortgage loans to those families.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- There was strong competition for small business lending with 148 lenders in the AA.
- The proportion of the bank's loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA, but significantly exceeded the aggregate distribution of those loans.

Community Development Lending

The institution is a leader in making CD loans.

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

Cleveland-Akron CSA

The volume of CD lending was excellent and had a significantly positive impact on the Lending Test performance in the Cleveland CSA. During the evaluation period, FNB originated 56 CD loans totaling \$126.8 million or 111.4 percent of allocated tier 1 capital. The bank's CD loans were responsive to affordable housing community needs. By dollar volume, 44.0 percent funded affordable housing, 33.8 percent funded economic development, 20.5 percent funded community services, and 1.7 percent funded revitalization and stabilization efforts.

The following examples demonstrate the bank's use of complex and responsive CD loans:

- The bank originated three loans totaling \$32.7 million for the construction and redevelopment of affordable housing nursing facilities. Upon completion, over 51.0 percent of residents will be Ohio Medicaid recipients utilizing the PASSPORT or Assisted Living Waiver programs.
- The bank originated a \$25.0 million liquidity facility for community service purposes to a safety net hospital located in a low-income CT. This loan was made to serve as a backstop to cover medical costs associated with underinsured and Medicare/Medicaid reliant patients.

- The bank originated a \$7.4 million loan to refinance debt on a manufacturing facility in a low-income CT in the Cleveland CSA. This new loan will refinance a New Market Tax Credit transaction.
- FNB's participation in the PPP resulted in 39 CRA qualified SBA loans totaling \$29.7 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to the Cleveland-Akron CSA. 13 of the PPP loans totaling \$23.8 million were made to businesses located in LMI geographies.

Product Innovation and Flexibility

FNB uses innovative and/or flexible lending practices in serving its AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 185 innovative or flexible home mortgages totaling \$27.1 million. For a description of these products see the "Innovative and Flexible Product" section of the Overall Description of institution.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Wheeling MSA AA is adequate and weaker than the bank's overall performance under the Lending Test in the full-scope area. The bank's performance is weaker because of the negative impact of very poor CD lending. The performance in the limited-scope AA does not impact the overall Lending Test conclusions.

Refer to Tables O through R in the state of Ohio section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in Ohio is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review the bank's performance in the Cleveland CSA is excellent.

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cleveland CSA	2	\$1,816	58	\$28,417	50	95.2	\$30,233	94.2	1	\$1,080
Ohio Non-MSA	1	\$12	0	\$0	1	1.6	\$12	0.1	0	\$0
Ohio Statewide	0	\$0	2	\$1,821	2	3.2	\$1,821	5.7	0	\$0

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

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

Cleveland CSA

FNB made a total of 60 CD investments and grants totaling \$30.2 million. CD investments and grants were equivalent to 26.6 percent of allocated tier 1 capital. Throughout the evaluation period the bank made 58 CD investments and grants totaling \$28.4 million. Additionally the AA benefitted from the ongoing impact of two prior period CD investments totaling \$1.8 million. CD investments and grants were responsive to affordable housing needs in the AA. The bank also has one unfunded commitment of \$1.1 million.

Examples of CD investments that were innovative and responsive include:

- FNB invested \$3.0 million in a LIHTC project to rehabilitate a 154-unit property that provides affordable housing to seniors. Of the total units, 54 will qualify for Section 8 subsidy.
- FNB provided a \$2.0 million investment to construct a 74-unit affordable LIHTC project. One hundred percent of the units will qualify for Section 8 subsidies.
- FNB invested \$7.2 million in a mortgage backed security (MBS) secured by 195 multifamily loans, some of which are very low- or low-income units.

Statewide

The bank also made two current period investments totaling \$1.8 million outside of its AAs in the broader statewide area. Statewide CD investments had a neutral impact on the Investment Test rating.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Ohio Non-MSA is weaker than the bank's overall performance under the Investment Test in the full-scope area. Weaker performance is due to a smaller percentage of CD investments and grants compared to allocated tier 1 capital. Performance in limited-scope AA had a neutral impact on the bank's overall Investment Test rating.

SERVICE TEST

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

Conclusions for Areas Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland CSA is adequate. We considered the bank's performance context, the bank's presence in the AA, the bank's low share of deposits relative to other financial institutions in the AA, and the high competition from local and regional financial institutions for providing services in the AA.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cleveland CSA	97.4	19	95.0	0.0	10.5	15.8	73.7	11.9	19.9	36.2	31.7
Ohio Non-MSA	2.6	1	5.0	0.0	0.0	100.0	0.0	0.0	18.7	66.6	14.7

The bank has 19 branches within the AA, with no branches in a low-income CT, and two branches in moderate-income CTs. The percentage of the bank's branches in low-income geographies is significantly below the percentage of population living in those geographies. The percentage of the bank's branches in moderate-income geographies is well below the percentage of population living in those geographies. The bank's branches include deposit-taking ATMs. The bank has 19 deposit-taking ATMs located in the AA, with none in a low-income CT, and two in moderate-income CTs. The percentage of ATMs in LMI CTs is well below the level of population in the LMI areas.

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

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the assessment period, the bank closed two branches located in an upper-income CT due to branch consolidation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The institution provides a relatively high level CD services.

FNB associates provided 670 hours of service to 26 organizations that meet the definition of CD, including 350 hours of board or committee service. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

The following are examples of CD services provided in this AA:

- A bank employee served 255 hours of board service to two different local nonprofit CDC organizations. Their mission is to strengthen neighborhoods in the AA. The CDC develop affordable and market rate housing, promotes economic development activity through various commercial initiatives, provides grants for vacant property acquisition, and below market rate interest loans to businesses for job creation.
- A bank employee provided 75 hours of board service to a nonprofit organization whose mission is to provide access to basic human services to LMI residents in need of assistance. The organization offers hot meals, hospitality, clothing and household goods, emergency services, advocacy, a family shelter, housing solutions, and workforce development training to those in need at no charge.
- FNB's associates provided 195 hours to a nonprofit workforce development organization that serves teens and young adults living in economically distressed areas in the AA. Their school-based programs focus on career readiness and internships. The bank's associates participated in mock interviews, resume building, and an employee served on the board of the organization.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Wheeling MSA is weaker than the bank's overall performance under the Service Test in the full-scope area. The weaker performance is due to the branch distribution in LMI geographies. Performance in the limited-scope AAs had a neutral impact on the Service Test rating.

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania⁷: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: High Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect adequate responsiveness to AA credit needs.
- FNB exhibits good geographical and borrower distribution of loans.
- The bank is a leader in providing CD loans. CD lending had a significantly positive impact on the Lending Test rating.
- The bank had a significant level of qualified CD investments
- Its service delivery systems are reasonably accessible to geographies and individuals of different income levels in its AAs.
- The institution provides a good level of community development services.

Description of Institution's Operations in Pennsylvania

The State of Pennsylvania represents FNB's largest rated area out of eight rating areas, in terms of deposits. As of December 31, 2020, the bank delineated 12 AAs within the State of Pennsylvania. These AAs include the counties of Blair in the Altoona MSA, Chester in the Chester MSA, Monroe in the East Stroudsburg MSA, Erie in the Erie MSA, Cumberland, Dauphin, Lebanon, and York in the Harrisburg-York-Lebanon CSA, Cambria in the Johnstown MSA, Lancaster in the Lancaster MSA, Bedford, Clinton, Crawford, Greene, Huntingdon, Indiana, Juniata, Lawrence, Mifflin, Northumberland, Schuylkill, Snyder, Somerset, Susquehanna, Union, and Venango in the Pennsylvania non-MSA, Berks in the Reading MSA, Lackawanna, Luzerne, and Wyoming in the Scranton MSA, Centre in the State College MSA, and Lycoming in the Williamsport MSA. The AAs meet the requirements of the regulation and do not arbitrarily exclude any LMI CTs. FNB offers a full range of loan and deposit products and services through the 102 full-service branches and 79 deposit-taking ATMs located in the AA.

According to the June 30, 2020 FDIC Market Share Report, FNB held \$20.3 billion in deposits, ranking eighth out of 176 institutions in the state, and representing 3.6 percent market share. The five largest competitors in the AA include PNC Bank, National Association, Wells Fargo Bank, National Association, The Bank of New York Mellon, Citizens Bank, National Association, and BNY Mellon,

⁷ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

National Association. These competitors have deposits totaling \$272 billion, representing 52.2 percent of total deposit market share. FNB's deposits within the State of Pennsylvania account for 34.1 percent of bank wide deposits.

In comparison to the percentage of deposits relative to the bank's total deposits in Pennsylvania, FNB PA originated 26.3 and 31.9 percent of the number of its home mortgage loans and small business loans respectively.

Erie MSA

The Erie MSA is comprised of Erie county. FNB has nine full-service branches and 11 deposit-taking ATMs in the AA. Competition is modest. According to the June 30, 2020 FDIC Market Share Report, FNB held \$974.0 million in deposits, ranking third out of 11 institutions in the MSA, and representing 15.4 percent market share. The five largest competitors in the AA include PNC Bank, National Association, Northwest Bank, Marquette Savings Bank, CNB Bank, and Citizens Bank, National Association. These competitors have deposits totaling \$5.0 billion, representing 78.6 percent of total deposit market share. FNB's deposits within the MSA account for 3.4 percent of bank wide deposits.

During the evaluation period, FNB PA originated 879 and 1,011 home mortgage and small business loans in the Erie MSA, representing 2.0 percent and 3.4 percent of its total bank wide home mortgage and small business loans respectively. Volume of home mortgage and small business loans in this AA accounted for 1.4 percent and 3.8 percent of FNB PA's total bank wide home mortgage and small business loans respectively.

Low-income borrowers will find housing to be affordable in the area. We considered a mortgage payment unaffordable if the principle and interest payment would result in a DTI greater than 30.0 percent. Based on the information in Table A, low-income families earn \$29,373. Assuming the AAs median housing value of \$116,085 with no down payment, a 5.0 percent interest rate, and 30-year amortization. We determined the monthly mortgage payment would not exceed 30.0 percent DTI for low-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 11.9 percent. This shows that the poverty rate in this area is higher than many other areas around the country, making home ownership unattainable for many in the AA.

The Moody's Analytics report for Erie shows that the economy has entered a recovery phase following the recession from the Covid-19 pandemic. Unemployment was stable in 2018 and 2019 at 4.9 percent and 4.6 percent respectively. Unemployment for 2020 grew to 9.8 percent due to the Covid recession with a peak rate of 17.3 percent in April 2020. Two of the three economic drivers for the area, manufacturing and tourism, were heavily impacted by the pandemic. Additionally, the area has seen eight consecutive years of population decline primarily driven by working-age adults leaving the area. The FHFA house price index has increased from 164.1 in 2018 to 177.9 in 2020. Housing starts are relatively stable and are not a concern due to the population outflow from the area. The top five employers for the area are local government, state government, UPMC Hamot, Wabtec, and Erie Indemnity Co.

Based on 2020 peer mortgage data, FNB ranks 8 out of 170 lenders in the AA, with 3.7 percent of the market share. The top five lenders in the AA are Northwest Bank, Marquette Savings Bank, Quicken Loans, Erie Federal Credit Union, PNC Bank, National Association. These five lenders account for 41.3 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 6 out of 72 lenders in the AA. FNB has 5.2 percent of the market share. The top five lenders in the AA are PNC Bank, NA, American Express National Bank, JPMorgan Chase Bank, NA, Synchrony Bank, Capital One Bank, NA. These lenders account for 60.2 percent of the market share.

We utilized one community contact within this AA and reviewed the HUD Consolidated Plan 2020-2024 to identify needs within the community. The one contact we used was a development corporation committed to supporting the overall revitalization of the community. Both sources communicated a strong need for affordable housing units given increasing rents and housing costs. Additional opportunities for financial institutions include assisting organizations with employment and training programs to help fill the shortage of workers, and to provide funds to revitalize the community as many public facilities require upgrades.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Erie MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	72	15.3	13.9	43.1	25.0	2.8
Population by Geography	279,858	9.6	12.9	46.3	30.4	0.8
Housing Units by Geography	119,827	10.8	13.7	46.6	28.9	0.0
Owner-Occupied Units by Geography	72,273	4.5	8.8	50.6	36.2	0.0
Occupied Rental Units by Geography	37,661	21.1	21.4	39.6	17.9	0.0
Vacant Units by Geography	9,893	17.9	20.0	44.1	17.9	0.0
Businesses by Geography	18,297	12.5	12.0	44.2	31.2	0.0
Farms by Geography	508	2.6	7.3	46.7	43.5	0.0
Family Distribution by Income Level	69,932	21.1	17.6	20.8	40.5	0.0
Household Distribution by Income Level	109,934	24.3	15.9	17.7	42.1	0.0
Median Family Income MSA - 21500 Erie, PA MSA		\$58,746	Median Housing Value			\$116,085
			Median Gross Rent			\$688
			Families Below Poverty Level			11.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Harrisburg CSA

The Harrisburg-York-Lebanon CSA (Harrisburg CSA) is comprised of Cumberland, Dauphin, Lebanon, and York counties. FNB has 12 full-service branches and 20 deposit-taking ATMs in the AA. According to the June 30, 2020 FDIC Market Share Report, FNB held \$2.4 billion in deposits, ranking fourth out of 29 institutions in the MMSA, and representing 8.3 percent market share. The five largest competitors in the AA include PNC Bank, National Association, Manufacturers and Traders Trust Company, Fulton Bank, National Association, Wells Fargo Bank, National Association, and Truist Bank. These

competitors have deposits totaling \$16.6 billion, representing 56.7 percent of total deposit market share. FNB's deposits within the CSA account for 8.4 percent of bank wide deposits.

During the evaluation period, FNB PA originated 2048 and 1639 home mortgage and small business loans in the Harrisburg-York-Lebanon CSA, representing 4.8 percent and 5.6 percent of its total bank wide home mortgage and small business loans respectively. Volume of home mortgage and small business loans in this AA accounted for 4.5 and 6.2 percent of FNB PA's total bank wide home mortgage and small business loans respectively.

Based on 2020 peer mortgage data, FNB ranks 20 out of 454 lenders in the AA, with 1.28 percent of the market share. The top five lenders in the AA are Members 1st Federal Credit Union, Quicken Loans, Wells Fargo Bank, National Association, York Traditions Bank, and Pennsylvania State Employees Credit Union. These five lenders account for 26.0 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 14 out of 111 lenders in the AA. FNB has 1.5 percent of market share. The top five lenders in the AA are American Express National Bank, JPMorgan Chase Bank, NA, US Bank, NA, Citibank, NA, and Capital One Bank, NA. These lenders account for 50.5 percent of the market share.

Low-income borrowers will be challenged with home mortgage affordability in the Harrisburg CSA. We considered a mortgage payment unaffordable if the principle and interest payment would result in a DTI greater than 30 percent. Based on the information in Table A, low-income families earned between \$32,838 and \$34,862. Assuming the AAs median housing value of \$166,518 with no down payment, a 5.0 percent interest rate, and 30-year amortization. We determined the monthly mortgage payment would exceed 30 percent DTI for low-income borrowers.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 7.8 percent.

The Harrisburg-Carlisle report from Moody's Analytics shows a modest population of 579,500 with strong growth into the state's third highest population area behind Philadelphia and Pittsburgh. The Harrisburg economy has entered a recovery phase following a recession from the Covid-19 pandemic. Unemployment was stable in 2018 and 2019 at 3.8 percent and grew to 7.8 percent for 2020. Unemployment levels reached a peak in April 2020 at 13.6 percent driven by the effects of the pandemic. The area's economic drivers of logistics, financial services, and state government all saw pandemic related impacts. The housing market has seen a significant rise in price as indicated by the FHFA housing price indicator moving from 181.8 to 197.2 from 2018 through 2020. Net growth in the area will continue to drive pricing up over the near term as housing starts have not fully recovered from the pandemic. Single family starts were 1,344 in 2018, 1,154 in 2019, and 1,309 in 2020. The top five employers for the area are state government employees, local government employees, UPMC Pinnacle, federal government employees, and Highmark Inc.

We utilized two community contacts within the AA. The first contact is a local redevelopment authority tasked with enhancing affordable housing availability and small business development. The second contact is a human services organization that supports members of the community in times of need by offering food, clothing, household essentials, and assisting with utility bill payments. The contacts highlighted a need for quality affordable housing, as homes are deteriorating yet the cost to rent or

purchase remains high due to high demand increasing prices. There are opportunities for financial institutions to offer first-time homebuyer programs, especially among those with low credit scores, as well as offer home improvement loans. Another need in the community is to support local area small businesses by offering access to capital to expand the businesses and promote job growth. One of the contacts also indicated a need for funding for public transportation as current infrastructure is not reliable and does not extend to rural communities.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Harrisburg-York-Lebanon CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	235	10.6	16.6	54.0	17.9	0.9
Population by Geography	1,087,957	6.7	13.0	59.0	20.7	0.6
Housing Units by Geography	459,846	7.2	14.2	59.0	19.6	0.0
Owner-Occupied Units by Geography	298,504	2.9	10.0	63.1	24.0	0.0
Occupied Rental Units by Geography	126,752	14.8	22.5	51.4	11.3	0.0
Vacant Units by Geography	34,590	16.5	20.2	51.0	12.3	0.0
Businesses by Geography	91,197	6.7	14.8	57.2	21.3	0.0
Farms by Geography	3,126	1.4	5.4	71.1	22.1	0.0
Family Distribution by Income Level	284,003	19.4	18.3	22.3	40.0	0.0
Household Distribution by Income Level	425,256	22.4	16.9	19.6	41.1	0.0
Median Family Income MSA - 25420 Harrisburg-Carlisle, PA MSA		\$71,723	Median Housing Value			\$166,518
Median Family Income MSA - 30140 Lebanon, PA MSA		\$65,676	Median Gross Rent			\$849
Median Family Income MSA - 49620 York-Hanover, PA MSA		\$69,846	Families Below Poverty Level			7.8%
<i>Source: 2015 ACS and 2020 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in Pennsylvania

The Harrisburg-Lebanon-York CSA and Erie MSA were selected for analysis using full-scope procedures. The Harrisburg-York-Lebanon CSA had the largest percent of the bank's deposits (24.8), loans (17.9) within the rating area. The Erie MSA was selected for analysis using full-scope procedures because the AA had not received a full-scope review in a recent examination. We combined the Harrisburg MSA, Lebanon MSA, and the York-Hanover MSA into the Harrisburg CSA, for analysis and conclusions on performance. The Chester MSA was reviewed 1/1/2018 through 9/14/2018, due to the fact the bank closed their only branch in the AA on 9/14/2018. In our conclusions of full-scope AAs, we gave more weight to the Harrisburg CSA due to the fact it had a significantly larger share of the statewide deposits and loans.

In performing our analysis, we placed greater weight on the bank's home mortgage lending as home mortgage loans represented the majority of the bank's lending activity. Loans to businesses received greater weight than lending to farms.

The ratings for the state of Pennsylvania are primarily based on the results of the full-scope review of the Harrisburg CSA and the Erie MSA, but were also influenced by performance in the limited-scope areas. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performances in both the Erie MSA and the Harrisburg-Lebanon-York CSA are excellent.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank's lending capacity based on deposits, competition, and market presence. FNB only made 12 small loans to farms in the Erie MSA and four small loans to farms in the Harrisburg CSA during the evaluation period. Analysis of the bank's small farm lending is not discussed because of the very low number of loans in the full-scope AAs and its minimal impact on the lending activity conclusion.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Altoona MSA	709	635	12	30	1,386	6.5	6.4
Chester MSA	111	39	0	0	150	0.7	0.0
East Stroudsburg MSA	65	94	1	4	164	0.8	0.5
Erie MSA	879	1,011	12	34	1,936	9.1	9.9
Harrisburg CSA	2,048	1,639	4	131	3,822	17.9	24.8
Johnstown MSA	917	728	24	51	1,720	8.0	8.3
Lancaster MSA	512	517	1	41	1,071	5.0	3.8
Pennsylvania Non-MSA	3,973	2,941	110	115	7,139	33.4	26.6
Reading MSA	493	389	1	11	894	4.2	4.2
Scranton MSA	722	665	0	7	1,394	6.5	6.1
State College MSA	684	581	57	28	1,350	6.3	7.9
Williamsport MSA	194	161	3	8	366	1.7	1.4

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State* Loans	%State Deposits
Altoona MSA	85,154	64,832	201	3,681	153,868	5.2	6.4
Chester MSA	36,942	4,798	0	0	41,740	1.4	0.0
East Stroudsburg MSA	9,392	13,034	21	6,744	29,191	1.0	0.5
Erie MSA	114,226	130,440	204	34,389	279,259	9.4	9.9
Harrisburg CSA	374,189	211,680	602	85,571	672,042	22.7	24.8
Johnstown MSA	73,684	66,555	1,797	10,420	152,456	5.1	8.3
Lancaster MSA	132,500	90,859	30	26,858	250,247	8.5	3.8
Pennsylvania Non-MSA	403,042	299,764	7,519	63,789	774,114	26.1	26.6
Reading MSA	69,454	43,398	75	19,783	132,710	4.5	4.2

Scranton MSA	106,454	81,033	0	5,252	192,739	6.5	6.1
State College MSA	147,038	58,508	2,227	10,631	218,404	7.4	7.9
Williamsport MSA	22,483	21,027	443	19,935	63,888	2.2	1.4

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

Erie MSA

The following factors support the bank's adequate responsiveness to community credit needs:

- FNB has a large presence in a very small market consisting of ten depository institutions in addition to the bank. Its deposit market share is 15.4 percent (3rd highest in the MSA). The largest depository institution in the MSA has deposit market share of 34.7 percent and is one of the largest national banks in the country.
- Competition for residential mortgage loans in the Erie MSA is very strong with 232 lenders in the market.
- Small business lending competition is also strong in the MSA with 73 lenders.
- The bank's market shares for mortgage (3.7 percent) and small business (5.2) lending are significantly below the bank's deposit market share (15.4 percent).
- The market share rankings for the bank's mortgage (8) and small business (6) lending are also significantly below the ranking for the market share for deposits (3). However, the market share rankings for both lending products are significantly higher than the ranking for deposits when they are considered in relation to the number of competitors. The bank's mortgage lending rank is in the 3rd percentile and the small business lending rank is in the 8th percentile compared to the rank for deposits of 27th.

Harrisburg CSA

The following factors support the bank's adequate responsiveness to community credit needs:

- The bank has a large presence in the Harrisburg CSA with a deposit market share of 8.3 percent, representing the 4th highest deposit market share in the CSA. Competition is strong and consists of some very large institutions. The largest depository institution in the CSA has deposit market share of 17.3 percent and is one of the largest national banks in the country. The three depository institutions larger than FNB have a combined market share of 43.8 percent.
- Competition for residential mortgage loans is very strong with 577 lenders in the CSA.
- Small business lending competition is strong in the CSA with 111 lenders.
- The market shares for the bank's mortgage (1.3 percent) and small business (1.5 percent) lending are significantly below the its deposit market share (8.3 percent).

- The market share rankings for the bank's mortgage (20) and small business (14) lending are also significantly below the ranking for the market share for deposits (4). However, the market share ranking for mortgage lending is significantly higher than the ranking for deposits when they are considered in relation to the number of competitors. The ranking for small business lending approximates the ranking for deposits. The bank's mortgage lending rank is in the 4th percentile and the small business lending rank is in the 13th percentile compared to the rank for deposits of 14th.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

Erie MSA

- Lenders are challenged to make residential mortgage loans in the Erie MSA. The limited supplies of owner-occupied housing units in LMI geographies subject lenders to limited opportunities to make residential real estate loans. Low-income tracts contain 4.5 percent and the moderate-income tracts contain 8.8 percent, respectively, of the total owner-occupied housing units in the AA. Additionally, competition for mortgage lending is strong with a total of 232 lenders in the AA. The strong competition for mortgage lending makes it challenging to lend in the AA.
- The bank's mortgage lending performance compared to the aggregate distribution of residential mortgage loans was given greater significance when analyzing the bank's performance. All of the mortgage lenders in the AA were subject to the challenges because of the limited supply of owner-occupied housing units in LMI tracts and the very strong competition.
- The proportion of loans in low-income geographies was significantly below the proportion of owner-occupied housing units and near to the aggregate distribution of lending in those geographies. The proportion of bank loans exceeded both the proportion of owner-occupied housing units and the aggregate distribution of lending.

Harrisburg CSA

- Lenders are challenged to make residential mortgage loans in the Harrisburg-York-Lebanon CSA. The limited supplies of owner-occupied housing units in LMI geographies constrain the opportunity to make residential real estate loans. The low-income tracts contain 2.9 percent and the moderate-income tracts contain 10.0 percent, respectively, of the total owner-occupied housing units in the AA. Additionally, there are 577 lenders in the AA. The large number of competitors makes mortgage lending very challenging in the AA.

- The bank's residential mortgage lending performance compared to the aggregate distribution of residential mortgage loans was given greater significance when concluding on the bank's performance. All of the mortgage lenders in the AA are challenged to make loans because of the limited supply of owner-occupied housing units in LMI tracts and the very strong competition.
- The proportions of loans in LMI geographies were near to the proportions of owner-occupied housing units and exceeded the aggregate distributions of lending in those geographies.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is good. The following information was taken into consideration when determining this rating.

Erie MSA

- Small business lending in the Erie MSA is competitive with a total of 73 lenders.
- FNB's proportion of small loans to businesses in low-income tracts was near to both the percentage of businesses and the aggregate distribution of lending in those tracts. The bank's lending in moderate-income tracts was below both the proportion of small businesses and the aggregate distribution of lending in those tracts.

Harrisburg CSA

- The Harrisburg CSA is a very competitive market for small business lending with a total of 111 small business lenders. Small business lending in low-income tracts is also made challenging with a small percentage of businesses (6.70 percent) in those tracts.
- Because the market is challenging for small business lending, more significance was placed on performance compared to the aggregate distribution of small business loans than compared to the AA demographics.
- FNB's proportion of small loans to businesses in low-income tracts was below to the percentage of businesses in those tracts. The bank's lending in moderate-income tracts exceeded the proportion of small businesses in the tracts. The bank's small business lending was near the aggregate distribution of lending in low-income tracts and significantly exceeded the aggregate distribution of lending in moderate-income tracts.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is adequate. The following information was taken into consideration when determining this rating.

Erie MSA

- Housing prices are generally affordable for LMI borrowers, based upon the average cost of housing and the LMI levels for the AA. This analysis is also based upon some assumptions, but does not consider factors that can negatively affect the borrower's ability to afford housing, including the level of debt owed by the borrower or the lack of cash reserves for a down payment and closing costs.
- The percentages of the households in the AA classified as LMI are significant with 24.3 percent classified as low-income and 15.9 percent classified as moderate-income. Additionally, 16.2 percent of the population has income below the poverty line and 4.1 percent of the population receives some form of public assistance.
- The competition for lending is strong with 232 home mortgage lenders in the AA.
- Performance compared to the aggregate distribution of residential mortgage loans was given greater significance in concluding on the bank's home mortgage lending performance because all lenders are subject to those same challenges in qualifying borrowers for loans.
- The proportions of loans to low-income borrowers were significantly below the proportion and the aggregate distribution of loans to low-income families in the AA, respectively. The proportions of the bank's mortgage loans were near to the proportion of moderate-income families and below the aggregate distribution of mortgage loans to those families, respectively.

Harrisburg CSA

- Housing prices are generally not affordable for low-income borrowers, based upon the average cost of housing and the low-income levels for the AA. This analysis relies upon some assumptions to reach the conclusion on affordability. It also does not consider factors that can negatively affect a borrower's ability to afford housing, including the level of debt owed by the borrower or the lack of cash reserves for a down payment and closing costs.
- The percentages of the households in the AA classified as LMI are significant with 22.4 percent classified as low-income and 16.9 percent classified as moderate-income. Additionally, 10.2 percent

of the population has income below the poverty line and 2.7 percent of the population receives some form of public assistance.

- The competition for mortgage lending is strong with 577 lenders in the AA.
- Performance compared to the aggregate distribution of residential mortgage loans was given greater significance in concluding on the bank's home mortgage lending performance because all lenders are subject to those same challenges in qualifying borrowers for loans.
- The proportions of loans to low-income borrowers were significantly below the proportion and below the aggregate distribution of loans to low-income families in the AA, respectively. The proportions of the bank's mortgage loans were near to the proportion of moderate-income families and the aggregate distribution of mortgage loans to those families.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

Erie MSA

- Competition for small business lending was strong with 73 lenders in the AA.
- The proportion of the bank's loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA but significantly exceeded the aggregate distribution of those loans.

Harrisburg CSA

- There was strong competition for small business lending with 111 lenders in the AA.
- The proportion of the bank's loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA but exceeded the aggregate distribution of those loans.

Community Development Lending

The institution is a leader in making CD loans.

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

Erie MSA

The volume of CD lending was excellent and had a significantly positive impact on the Lending Test performance in the Erie MSA. During the evaluation period, FNB originated 34 CD loans totaling \$34.4 million or 35.2 percent of allocated tier 1 capital. CD loans were responsive to identified revitalization and stabilization community needs. By dollar volume, 48.0 percent funded revitalization and stabilization efforts, 40.3 percent funded economic development, 7.4 percent funded affordable housing, and 4.4 percent funded community services.

The following examples demonstrate the bank's use of complex and responsive CD loans:

- The bank originated a \$16.5 million loan to revitalize a historic theater in a low-income CT in the Erie MSA. The project will serve as an initiative to stabilize and modernize the surrounding community.
- The bank originated a \$2.5 million loan to construct an affordable housing complex. The property is a LIHTC project and will include both new construction and renovations on existing low-income housing properties.
- FNB's participation in the PPP resulted in 30 CRA qualified SBA loans totaling \$12.3 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to the Erie MSA. Eight of the PPP loans totaling \$11.4 million were made to businesses located in an LMI geography.

Harrisburg CSA

The volume of CD lending was excellent and had a significantly positive impact on the Lending Test performance in the Harrisburg CSA. During the evaluation period, FNB originated 131 CD loans totaling \$85.6 million or 35.2 percent of allocated tier 1 capital. CD loans were responsive to identified affordable housing community needs. By dollar volume, 48.6 percent funded affordable housing, 44.1 percent funded economic development, and 7.4 percent funded community services.

The following examples demonstrate the bank's use of complex and responsive CD loans:

- The bank originated two loans totaling \$40.0 million to refinance and improve the headquarters of an affordable housing agency. The loan will enable the agency to expand affordable housing services to clients outside of the state.
- The bank originated two loans totaling \$6.9 million to redevelop a commercial property located in a moderate-income CT. The funding will enable the borrower to improve the property and stabilize tenancy.
- FNB's participation in the PPP resulted in 121 CRA qualified SBA loans totaling \$28.5 million. These loans were made for a qualified CD purpose and/or to non-profits providing CD activities and services to the Harrisburg MMSA. Six of the PPP loans totaling \$8.0 million were made to businesses located in LMI geographies.

Product Innovation and Flexibility

FNB makes extensive use of innovative and/or flexible lending practices in serving its AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 265 innovative or flexible home mortgages totaling \$35.0 million. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of institution.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s performance under the Lending Test in the East Stroudsburg MSA, the Pennsylvania Non-MSA, the Reading MSA, the Scranton MSA, and the Williamsport MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope areas. The bank’s performance in the Johnstown MSA, the Lancaster MSA, and the State College MSA is good and weaker than the bank’s performance in the full-scope areas. The bank’s performance in the Altoona MSA and the Chester MSA is adequate and also weaker than the bank’s performance in the full-scope areas. The weaker performance in the Altoona MSA, Johnstown MSA, and the State College MSA is due to weaker CD lending performance. The weaker performance in the Chester MSA is due to weaker mortgage lending performance. The weaker performance in the Lancaster MSA is due to weaker borrower distribution of home mortgage lending. The performance in the AAs subject to limited-scope reviews do not impact the overall conclusions.

Refer to Tables O through R in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Erie MSA is excellent and performance in the Harrisburg CSA is good.

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Altoona MSA	1	\$44	11	\$2,421	12	4.8	\$2,465	2.4	0	\$0
Chester MSA	0	\$0	0	\$0	0	0.0	\$0	0.0	0	\$0
East Stroudsburg MSA	0	\$0	1	\$2,423	1	0.1	\$2,423	2.3	0	\$0
Erie MSA	2	\$2,299	29	\$6,313	31	12.5	\$8,612	8.3	0	\$0
Harrisburg MSA	12	\$8,723	38	\$7,829	50	20.2	\$16,552	15.9	0	\$0
Johnstown MSA	2	\$1,990	26	\$5,091	28	11.3	\$7,081	6.8	0	\$0
Lancaster MSA	5	\$2,216	17	\$9,111	22	8.9	\$11,327	10.9	0	\$0
Pennsylvania Non-MSA	2	\$1,229	33	\$18,851	35	14.1	\$20,080	19.3	0	\$0
Reading MSA	5	\$1,940	6	\$277	11	4.4	\$2,217	2.1	1	\$747
Scranton MSA	1	\$2,630	11	\$6,122	12	4.8	\$8,752	8.4	0	\$0
State College MSA	2	\$907	29	\$11,043	31	12.5	\$11,950	11.4	0	\$0
Williamsport MSA	1	\$19	6	\$14	7	2.8	\$33	0.1	0	\$0
Statewide	3	\$4,319	5	\$8,208	8	3.2	\$12,527	12.0	0	\$0

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

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

Erie MSA

The bank exhibited excellent performance in the AA. The bank had 31 CD investments and grants totaling \$8.6 million. CD investments and grants were equivalent to 8.8 percent of allocated tier 1 capital. Throughout the evaluation period the bank made 29 CD investments and grants totaling \$6.3 million. Additionally the bank benefitted from the ongoing impact of two prior period CD investments totaling \$2.3 million. CD investments and grants were responsive to affordable housing needs in the AA.

Examples of CD investments include:

- FNB invested \$1.2 million in a LIHTC project to construct a 40-unit residential property that provides affordable housing.
- FNB invested \$5.0 million in a LIHTC to an affordable housing community that has a total of 25 units, including 15 single family homes. The units are restricted to LMI individuals.

Harrisburg CSA

The bank exhibited good performance in the AA. The bank had 50 CD investments and grants totaling \$16.6 million. CD investments and grants were equivalent to 6.8 percent of allocated tier 1 capital. Throughout the evaluation period the bank made 38 CD investments and grants totaling \$7.8 million. Additionally, the AA benefitted from the ongoing impact of 12 prior period CD investments totaling \$8.7 million. CD investments were responsive to affordable housing and economic development needs in the AA.

Examples of CD investments include:

- FNB invested in a \$5.0 million LIHTC to provide funding for the new construction of a 52-unit affordable housing community for LMI individuals.
- FNB provided a \$1.0 million equity equivalent investment to a CDFI. The organizations provides affordable loans, business training, and counseling to businesses in LMI communities.

Statewide

FNB had three prior and five current period CD investments totaling \$12.5 million within the state of Pennsylvania that could not be allocated to their AAs. The investments included two LIHTCs providing affordable housing, two MBS, and one SBIC in the current period, and three MBS in the prior period. Statewide CD investments had a neutral impact on the Investment Test rating in Pennsylvania.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews the bank's performance under the Investment Test in the East Stroudsburg MSA, Lancaster MSA, Scranton MSA, and State College MSA is stronger than the bank's overall performance. Stronger performance is due to higher level of CD investments compared to allocated tier 1 capital in the respective AAs. Performance in the Johnstown MSA and Pennsylvania Non-MSA is consistent with the bank's overall performance. The bank's performance in the Altoona MSA, Reading MSA, and Williamsport MSA is weaker than the bank's overall performance. Weaker performance is due to smaller percentage of CD investments as compared to allocated tier 1 capital. Performance in the limited-scope AAs had a neutral impact on the overall rating.

SERVICE TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Erie MSA and the Harrisburg CSA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Altoona MSA	6.4	6	5.9	0.0	16.7	83.3	0.0	6.0	11.3	74.0	8.8
East Stroudsburg MSA	0.5	1	1.0	0.0	0.0	100.0	0.0	0.0	11.2	83.4	5.3
Erie MSA	9.9	9	8.8	11.1	11.1	55.6	22.2	9.6	12.9	46.3	30.4
Harrisburg CSA	24.8	12	11.8	0.0	25.0	66.7	8.3	6.7	13.0	59.0	20.7
Johnstown MSA	8.3	10	9.8	0.0	20.0	60.0	20.0	1.8	16.5	55.1	26.6
Lancaster MSA	3.8	4	3.9	0.0	50.0	50.0	0.0	4.3	10.6	73.6	11.6
Pennsylvania Non-MSA	26.6	37	36.3	5.4	21.6	64.9	8.1	1.2	8.4	79.6	9.2
Reading MSA	4.2	4	3.9	0.0	0.0	100.0	0.0	15.5	5.5	55.7	23.3
Scranton MSA	6.1	9	8.8	0.0	22.3	55.6	22.2	3.2	20.5	52.2	23.6
State College MSA	7.9	9	8.8	0.0	33.3	0.0	33.3	3.3	20.9	40.6	22.9
Williamsport MSA	1.4	1	1.0	0.0	0.0	100.0	0.0	5.8	11.7	75.9	6.6

Erie MSA

The bank has nine branches within the AA, with one branch in a low-income CT, and one branch in a moderate-income CT. The percentage of the bank's branches in LMI geographies is near to the percentage of population living in the LMI geographies. The bank's branches include deposit-taking ATMs. The bank has 11 deposit-taking ATMs located in the AA, with one in a low-income CT, and three in moderate-income CTs.

Harrisburg CSA

The bank has 12 branches within the AA, with no branches in a low-income CTs, and three branches in moderate-income CTs. The percentage of the bank's branches in low-income geographies is significantly below the percentage of population living in those geographies. The percentage of the bank's branches in moderate-income geographies exceeded the percentage of population living in those geographies. The bank's branches include deposit-taking ATMs. The bank has 13 deposit-taking ATMs located in the AA, with none in a low-income CT, and three in moderate-income CTs.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Altoona MSA	0	-4	0	0	-4	0
East Stroudsburg MSA	0	0	0	0	0	0
Erie MSA	0	0	0	0	0	0
Harrisburg MSA	0	-2	0	0	-2	0
Johnstown MSA	0	-3	0	-2	0	-1
Lancaster MSA	0	-2	0	0	-2	0
Pennsylvania Non-MSA	0	-13	0	-3	-9	-1
Reading MSA	0	-2	0	0	-2	0
Scranton MSA	0	-2	0	-1	-1	0
State College MSA	0	-2	0	0	-1	-1
Williamsport MSA	0	0	0	0	0	0

*Erie*MSA

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

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Harrisburg CSA

To the extent changes have been made, the institution's opening and closing of branches in the AA has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to

LMI individuals. During the assessment period, the bank closed two branches which were located in middle-income CTs due to a branch consolidation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

Overall, the bank provides a good level of CD services.

Erie MSA

The institution provides an adequate level of CD services in the AA.

FNB associates provided 304 hours of service to 26 organizations that meet the definition of CD, including 126 hours of board or committee service. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

The following are examples of CD services provided in this AA:

- Several bank employees provided 94 hours of board and committee service to a nonprofit organization whose mission is to eliminate poverty in the AA through empowerment, education, and community partnership. Their adult and youth programs offer matched savings for a home, education, or starting a business. They also provide housing assistance Programs to low income families.
- FNB's associates provided 16 hours to JA during the evaluation period. JA reaches students in classrooms and after-school locations, which is taught by volunteers that are essential for the success of their programs. The bank's associates participated as financial literacy instructors of JA's programs and served on the JA board. The majority of students in these programs are from LMI communities.
- A bank employee provided 104 hours of financial education to a nonprofit organization whose mission is to transform lives through affordable homeownership. Their programs build and sell homes to low-income families enabling them to grow and thrive in safe, affordable, and stable housing.

Harrisburg CSA

The institution provides a relatively high level of CD services.

FNB associates provided 476 hours of service to 18 organizations that meet the definition of CD, including 166 hours of board or committee service. Services consist of board and committee memberships and providing financial literacy, mentoring, and technical assistance.

The following are examples of CD services provided in this AA:

- A bank employee provided 231 hours of board service to a nonprofit organization that serves as a small business resource. They support small business by funding, encouraging redevelopment, access to networking, business-to-business promotion, facilitating expansion, advocacy, and workforce development among many other services within in the AA.
- FNB's associates provided 58 hours to Junior Achievement (JA) during the evaluation period. JA reaches students in classrooms and after-school locations, which is taught by volunteers that are essential for the success of their programs. The bank's associates participated as financial literacy instructors of JA's programs which the majority of students in these programs are from LMI communities.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance in the Pennsylvania Non-MSA is stronger than the bank's overall performance. Stronger performance is due to a higher percentage of branches in LMI geographies. The bank's performance in the Altoona MSA, Johnstown MSA, Lancaster MSA, Scranton MSA, State College MSA is consistent with the bank's overall performance under the Service Test in the full-scope areas. The bank's performance under the Service Test in the East Stroudsburg MSA, Reading MSA, and Williamsport MSA is weaker than the bank's overall performance under the Service Test in the full-scope areas. The weaker performance is due to branch distribution in LMI geographies. Performance in the limited-scope AAs had a positive impact on the Service Test rating, primarily due to stronger branch distribution in the Pennsylvania Non-MSA, which accounts for 36.3 percent of the bank branches in Pennsylvania.

State Rating

State of South Carolina

CRA rating for the State of South Carolina⁸: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Needs to Improve

The Service Test is rated: Needs to Improve

The major factors that support this rating include:

- Lending levels reflect good responsiveness to community needs.
- The bank exhibits good geographical and borrower distribution.
- The bank is a leader in making CD loans. CD loans had a significantly positive impact on the Lending Test rating.
- The institution has a very poor level of qualified CD investments and grants in the full-scope AA. Statewide and the limited-scope AA had a positive impact on the Investment Test performance in South Carolina.
- Its service delivery systems are unreasonably inaccessible to portions of its AAs, particularly to LMI individuals.
- The institution provides few, if any, community development services.

Description of Institution's Operations in South Carolina

The State of South Carolina represents FNB's smallest rating area out of eight rating areas, with 0.5 percent of deposits. As of December 31, 2020, the bank had two AAs within the State of South Carolina. These AAs include Charlestown County in the Charlestown MSA and Cherokee County in the South Carolina Non-MSA. The AAs meet the requirements of the regulation and do not arbitrarily exclude any LMI CTs.

FNB offers a full range of loan and deposit products and services through the three full-service branches and three deposit-taking ATMs located in the state of South Carolina. According to the June 30, 2020 FDIC Market Share Report, FNB held \$183.6 million in deposits, ranking 47 out of 75 institutions in the state, representing 0.2 percent market share. The five largest competitors in the AA include Wells Fargo Bank, Banks of America, Truist Bank, First-Citizens Bank & Trust Company, and South State Bank. These competitors have deposits totaling \$67.1 billion, representing 63.8 percent of total deposit market share.

⁸ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

South Carolina Non-MSA

The South Carolina Non-MSA is comprised of Cherokee County. FNB maintains one full-service branch and one deposit taking ATM in the AA. This AA accounts for 0.3 percent of total bank wide deposits and 67.4 percent of deposits in the state of South Carolina. The South Carolina Non-MSA accounts for approximately 0.5 percent of bank wide HMDA and small business loans combined.

According to the June 30, 2020 FDIC Market Share Report, FNB ranked third out of seven institutions in the AA, representing 15.9 percent market share. FNB's deposits totaled \$95.5 million. The two competitors carrying a larger market share than FNB are First Piedmont Federal Savings and Loan Association of Gaffney and Bank of America. These competitors have deposits totaling \$346.0 million, or 57.4 percent of total deposit market share.

The bank's lending focus in the AA is on home mortgage and small business loans. Based on HMDA reported loans, the bank originated or purchased 33 home mortgage loans, totaling \$2.8 million in the AA during the review period. This represented 0.1 percent of home mortgage loans bank wide by number and 0.1 percent by dollar volume. Based on CRA reported loans, the bank also originated or purchased 102 small business loans, totaling \$10.7 million in the AA during the review period. This represented 0.3 percent of small business loans bank wide by number and 0.3 percent by dollar volume.

Based on 2020 peer mortgage data, FNB ranks 23 out of 169 lenders in the AA, with 0.9 percent of the market share. The top five lenders in the AA are First Piedmont Federal Savings, Quicken Loans, PennyMac Loan Services, Midland Mortgage Corporation, and Ark-La-Tex Financial Services. These five lenders account for 34.8 percent of the market share. Based on 2019 peer small business data, the most recent available, the bank ranks 13 out of 42 lenders in the AA, with 1.7 percent of the market share. The top five lenders in the AA are American Express National Bank, Synchrony Bank, Bank of America, JPMorgan Chase Bank, and Wells Fargo Bank. These lenders account for 55.7 percent of the market share.

Based on the 2015 ACS, 23.7 percent of families in the AA are low-income and 16.5 percent are moderate income. The median family income of the Non-MSA portion of South Carolina is \$44,609, meaning low-income families made \$22,305 or less and moderate-income families made \$35,687 or less per year. The median housing value is \$88,914 and the median gross rent is \$629 per month. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payment of no more than 30.0 percent of the applicant's income. The calculated maximum affordable monthly mortgage payment is \$558 for low-income borrowers in the AA. Assuming a 30-year mortgage with a 5.0 percent interest rate, and not considering any down payment, homeowner's insurance, real estate taxes, or additional monthly expenses, the monthly mortgage payment for a home at the MSA median housing value would be \$477. This shows that housing in the AA is affordable to most income groups. As noted below, the poverty rate is high in the AA and those families would have a difficult time affording housing.

The poverty level across the AA was considered in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. The 2019 national poverty rate was 10.5 percent, compared to the poverty rate in the AA of 18.9 percent.

The Bureau of Labor Statistics reports that the unemployment rate has changed significantly over the review period, as was expected given the pandemic. The average annual unemployment rate in 2018 and 2019 was 3.6 and 3.0 percent, respectively. In 2020 the average annual unemployment rate grew to 8.0 percent. This is above the state of South Carolina unemployment rate of 3.4, 2.8, and 6.2 for 2018, 2019, and 2020, respectively. According to the Upstate SC Alliance, the top industries in the area are government, education, and manufacturing. The top employers are the local government, the Cherokee County School District, and Nestle USA.

We utilized two community contacts in this AA. Both contacts were economic development organizations dedicated to attracting new jobs and capital investments in the region. These groups indicated the need in the area is affordable housing due to gentrification driving up home costs. Additionally, there is a need for small business and minority lending.

Table A – Demographic Information of the Assessment Area						
Assessment Area: SC Non-MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	30.8	53.8	15.4	0.0
Population by Geography	55,863	0.0	27.5	51.4	21.1	0.0
Housing Units by Geography	23,993	0.0	27.0	52.3	20.7	0.0
Owner-Occupied Units by Geography	13,941	0.0	23.1	52.8	24.0	0.0
Occupied Rental Units by Geography	6,582	0.0	34.9	51.9	13.2	0.0
Vacant Units by Geography	3,470	0.0	27.9	50.8	21.3	0.0
Businesses by Geography	2,382	0.0	21.7	60.7	17.5	0.0
Farms by Geography	103	0.0	13.6	62.1	24.3	0.0
Family Distribution by Income Level	13,630	23.7	16.5	18.0	41.8	0.0
Household Distribution by Income Level	20,523	25.2	15.2	16.1	43.4	0.0
Median Family Income Non-MSAs - SC		\$44,609	Median Housing Value			\$88,914
			Median Gross Rent			\$629
			Families Below Poverty Level			18.9%
<i>Source: 2015 ACS and 2020 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in South Carolina

The South Carolina Non-MSA was selected for analysis using full-scope procedures because it had the largest percent of the bank’s loans (60.9) within the rating area and was an AA throughout the evaluation period. The Charleston MSA was reviewed 3/4/19 through 12/31/2020 due to this being a new AA for the bank, due to a branch opening on 3/14/2019.

The Charlestown MSA was chosen for a limited-scope review but includes a high percentage of deposits (20.5) and loans (14.4) in the state showing the importance in the AA.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more

information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

LENDING TEST

The bank's performance under the Lending Test in South Carolina is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the South Carolina Non-MSA is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs considering the number and dollar amount of home mortgage and small business loans relative to the bank's lending capacity based on strong competition for loans, very limited competition for deposits, and the bank's limited presence in the market, reflected by only one branch and a relatively-small deposit base. FNB did not make any small loans to a farm during the evaluation period, therefore a meaningful analysis could not be performed.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Charleston MSA	105	113	0	5	223	60.9	32.6
South Carolina Non-MSA	33	102	0	8	143	39.1	67.4

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

Dollar Volume of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Charleston MSA	47,179	14,736	0	3,353	65,268	55.8	32.6
South Carolina Non-MSA	2,802	10,738	0	38,120	51,660	44.2	67.4

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

The following factors support the bank's good responsiveness to community credit needs:

- As described above, FNB has only one branch in the market. However, it has the third highest deposit market share of 15.9 percent in the South Carolina Non-MSA AA. The very limited competition for deposits in the AA has the effect of inflating the bank's deposit market share. There are seven depository institutions in the AA with the largest having a deposit market share of 39.0 percent and each of the five largest institutions having market shares exceeding 10 percent.

- The competition for residential mortgage loans is significantly stronger than the competition for deposits. There are 169 mortgage lenders in the AA.
- Competition for small business loans is also stronger than the competition for deposits in the AA with 42 lenders.
- The bank's market shares for mortgage (0.9 percent) and small business (1.7) lending, respectively, are significantly below the bank's deposit market share of 15.9 percent. However, the significant differences in levels of competition for deposits and loan products are a primary contributor to the differences in market shares for deposits and loan products.
- The market share rankings for mortgage (23) and small business (13) lending, respectively, are both significantly below the ranking for deposits (3). However, when considered in the context of the level of competition for loans in the AA, the market share rankings for the bank's home mortgage (14th) and small business (31st) lending, respectively, are higher than the ranking for deposits (43rd).

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of home mortgage loan originations and purchases for this evaluation is good. The following information was taken into consideration when determining this rating.

- There are no low-income census tracts in the South Carolina Non-MSA.
- The small number of owner-occupied houses in moderate-income tracts creates challenges for FNB and other lenders to make residential real estate mortgage loans in those tracts. The moderate-income tracts contain only 3,224 units of owner-occupied houses, representing 23.1 percent of total owner-occupied units in the AA.
- The large percentage of low-income households in moderate-income tracts also creates challenges for making mortgage loans in those tracts. Low-income households represent 34.1 percent of total households in moderate-income tracts.
- Competition for home mortgage lending is strong with 169 lenders in the AA.
- The bank's level of lending in moderate-income geographies was below the proportion of owner-occupied housing units in those areas. The aggregate distribution of lending in the AA was low, reflecting the challenges to make residential mortgage loans in the AA. However, FNB's level of

mortgage lending in moderate-income geographies exceeded the aggregate distribution of lending in the AA.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the bank's overall geographic distribution of small loans to businesses for this evaluation is adequate. The following information was taken into consideration when determining this rating.

- There are no low-income census tracts in the SC Non-MSA AA.
- Competition for small business lending is strong with 42 lenders in the AA.
- FNB's level of small loans to businesses in moderate-income tracts is below the percentage of businesses in those tracts. The bank's lending is also below the aggregate distribution of lending in the AA.

Lending Gap Analysis

Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any gaps in the geographic distribution of loans in all full-scope AAs. Examiners did not identify any unexplained conspicuous gaps in any of the areas they reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

Based on the data in the tables and the following considerations, the bank's overall borrower distribution of home mortgage loan originations and purchases for this evaluation is excellent. The following information was taken into consideration when determining this rating.

- Home prices are considered affordable for LMI borrowers, based upon the average cost of housing and the LMI levels for the AA. This analysis does not consider factors that can affect housing affordability for borrowers, such as existing debt level or the lack of liquidity for down payment and closing costs.
- A significant percentage of the households in the AA are LMI with 25.2 percent classified as low-income and 15.2 percent classified as moderate-income. In addition, 21.5 percent of the population

has income below the poverty line and 1.8 percent of the population receives some form of public assistance.

- The AA has 169 home mortgage lenders and competition is strong.
- Greater significance was placed on the performance compared to the aggregate distribution of residential mortgage loans because all lenders would be subject to the same challenges in qualifying borrowers for loans.
- The proportion of bank loans to low-income borrowers was significantly below the percentage of low-income families. The proportion of loans to moderate-income families exceeded the percentage of those families. The bank's lending to LMI families significantly exceeded the lending conducted by its competitors, represented by the aggregate distribution of loans to both groups of families.

Small Loans to Businesses

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

Based on the data in the tables and the following considerations, the distribution of the bank's originations and purchases of small loans to businesses by revenue category is good. The following information was taken into consideration when determining this rating.

- The AA has 42 lenders originating small business loans, representing strong competition for those loans.
- The proportion of the bank's loans to businesses with revenues of \$1.0 million or less was below the proportion of those businesses in the AA and significantly exceeded the aggregate distribution of small business loans.

Community Development Lending

The institution is a leader in making CD loans.

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

South Carolina Non-MSA

The volume of CD lending was excellent and had a significantly positive impact on the Lending Test performance in the South Carolina Non-MSA. During the evaluation period, FNB originated eight CD loans totaling \$38.1 million or 398.1 percent of allocated tier 1 capital. The bank's CD loans were responsive to community service needs. By dollar volume, 99.7 percent funded community services efforts and 0.3 percent funded economic development.

The following examples demonstrate the bank's use of complex and responsive CD loans:

- The bank originated a \$38.0 million loan to refinance debt and construct a library at a Minority Servicing Institution. The loan was made through the USDA Community Facilities Loan Program, and funding will allow the institution to further serve those with financial difficulty accessing higher education.
- FNB’s participation in the PPP resulted in seven CRA qualified SBA loans totaling \$120.0 thousand. All PPP loans were made to non-profits providing CD activities and services to the South Carolina Non-MSA.

Product Innovation and Flexibility

FNB makes extensive use of innovative and/or flexible lending practices in serving it’s AAs credit needs. FNB supported affordable housing through participation in numerous flexible home mortgage loan programs including those with down payment assistance, flexible underwriting, and reduced PMI. FNB made 20 innovative or flexible home mortgages totaling \$3.0 million. For a description of these products see the “Innovative and Flexible Product” section of the Overall Description of institution.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the Charleston MSA is consistent with the bank’s overall performance under the Lending Test in the full-scope areas.

Refer to Tables O through R in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank’s performance under the Investment Test in South Carolina is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the South Carolina Non-MSA is very poor.

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments	
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$	#	\$(000’s)
Charleston MSA	0	\$0	13	\$5,180	13	86.7	\$5,180	84.9	0	\$0
South Carolina Non-MSA	0	\$0	0	\$0	0	0.0	\$0	0.0	0	\$0
Statewide	1	\$668	1	\$250	2	13.3	\$918	15.1	0	\$0

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

South Carolina Non-MSA

FNB’s CD investment performance is very poor. FNB made zero CD investments or grants throughout the evaluation period.

Statewide

FNB had two CD investments totaling \$918 thousand within the state of South Carolina that could not be allocated to their AAs. One investment was a LIHTC and the other was an MBS, both supporting affordable housing. Statewide CD investment performance had a neutral impact on the Investment Test performance in the state of South Carolina.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank’s performance under the Investment Test in the Charleston MSA is stronger than the bank’s overall performance under the Investment Test in the full-scope area. Stronger performance is due to significantly higher percentage in the amount of investments compared to the allocated tier one capital to the AA. FNB made 13 CD investments and grants during the evaluation period totaling \$5.2 million, which represented 49.0 percent of allocated tier one capital. Performance in the limited scope AA had a positive impact on the overall Investment Test rating for the state of South Carolina.

SERVICE TEST

The bank’s performance under the Service Test in South Carolina is rated Needs to Improve.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the South Carolina Non-MSA is poor. We considered the bank’s performance context, the bank’s limited presence in the AA, the bank’s low share of deposits relative to other financial institutions in the AA, and the high competition from local and regional financial institutions for providing services in the AA.

Retail Banking Services

Delivery systems are unreasonably inaccessible to significant portions of the AA, particularly LMI geographies and/or LMI individuals.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charleston MSA	32.6	2	66.7	0.0	0.0	0.0	100.0	12.7	17.2	29.8	38.7

South Carolina Non-MSA	67.4	1	33.3	0.0	0.0	100.0	0.0	0.0	27.5	51.4	21.1
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The bank has one branch within the South Carolina Non-MSA, with no branches in LMI CTs. The percentage of the bank's branches in LMI geographies is significantly below the percentage of population living in the LMI geographies. The bank's branch includes a deposit-taking ATM.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Charleston MSA	2	0	0	0	0	2
South Carolina Non-MSA	0	-1	0	0	-1	0

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In April 2020, the bank closed a branch located in a middle-income CT due to a branch consolidation.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and/or individuals. All branches operate during traditional banking hours.

The bank complements its traditional service delivery methods with certain alternative retail delivery systems, such as deposit-taking ATMs, direct deposit, telephone banking, mobile banking, and online banking. We placed no significant weight on these services, as no data was available to determine their impact on LMI individuals.

Community Development Services

The institution provides a low level of, few if any CD services. FNB did not conduct any service activity during the evaluation period within the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Charleston MSA is consistent with the bank's overall performance under the Service Test in the full-scope area. Performance in the limited-scope AAs had a neutral impact on the state's overall rating.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

Time Period Reviewed:	1/1/2018 through 12/31/2020	
Bank Products Reviewed:	Home mortgage, small business, and small farm loans Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
First National Insurance Agency First National Trust First National Investment Services	Affiliate Affiliate Affiliate	CD Investments and Services
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		Counties
Charlotte MMSA	Full-scope	Iredell, Mecklenburg, Rowan, Union, and York
Pittsburgh MMSA	Full-scope	Allegheny, Armstrong, Beaver, Brooke, Butler, Fayette, Jefferson, Washington, and Westmorland
Youngstown MMSA	Full-scope	Mahoning, Trumbull, and Mercer
Maryland		
Baltimore CSA	Full-scope	Ann-Arundel, Baltimore, Harford, Howard, Queen Anne’s, Baltimore City, and Montgomery
North Carolina		
Burlington MSA	Limited-scope	Alamance
Fayetteville MSA	Limited-scope	Cumberland
Greensboro MSA	Limited-scope	Guilford and Rockingham
Greenville MSA	Limited-scope	Pitt
Jacksonville MSA	Limited-scope	Onslow
Myrtle Beach MSA	Limited-scope	Brunswick
North Carolina Non-MSA	Limited-scope	Raleigh
Raleigh-Durham CSA	Full-scope	Durham, Johnston, Orange, and Wake
Wilmington MSA	Limited-scope	New Hanover and Pender
Winston-Salem MSA	Limited-scope	Davidson, Forsyth, Stokes, and Yadkin
Ohio		
Cleveland CSA	Full-scope	Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit
Wheeling MSA	Limited-scope	Belmont
Pennsylvania		
Altoona MSA	Limited-scope	Blair
Chester MSA	Limited-scope	Chester
East Stroudsburg MSA	Limited-scope	Monroe
Erie MSA	Full-scope	Erie
Harrisburg CSA	Full-scope	Cumberland, Dauphin, Lebanon, and York
Johnstown MSA	Limited-scope	Cambria
Lancaster MSA	Limited-scope	Lancaster
Pennsylvania Non-MSA	Limited-scope	Bedford, Clinton, Crawford, Greene, Huntingdon, Indiana, Juniata, Lawrence, Mifflin,

		Northumberland, Schuylkill, Snyder, Somerset, Susquehanna, Union, and Venango
Reading MSA	Limited-scope	Berks
Scranton MSA	Limited-scope	Lachawanna, Luzern, and Wyoming
State College MSA	Limited-scope	Centre
Williamsport MSA	Limited-scope	Lycoming
South Carolina		
Charlestown MSA*	Limited-scope	Charlestown
South Carolina Non-MSA	Full-scope	Cherokee

*Partial evaluation period.

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank of Pennsylvania				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Pennsylvania	Outstanding	High Satisfactory	High Satisfactory	Outstanding
MMSA or State:				
Charlotte MMSA	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Pittsburgh MMSA	Outstanding	Outstanding	High Satisfactory	Outstanding
Youngstown MMSA	Outstanding	High Satisfactory	High Satisfactory	Outstanding
Maryland	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
North Carolina	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Ohio	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
Pennsylvania	Outstanding	High Satisfactory	High Satisfactory	Outstanding
South Carolina	Outstanding	Needs to Improve	Needs to Improve	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Metropolitan Division: As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an

employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-,

and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -** Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography –** Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower -** Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2018-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Charlotte MMSA	1,891	480,535	100.0	145,840	3.2	2.8	2.5	19.6	11.9	14.1	37.1	36.3	30.1	40.0	49.1	53.2	0.0	0.0	0.0
Total	1,891	480,535	100.0	145,840	3.2	2.8	2.5	19.6	11.9	14.1	37.1	36.3	30.1	40.0	49.1	53.2	0.0	0.0	0.0

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Charlotte MMSA	1,891	480,535	100.0	145,840	22.5	3.8	4.2	16.8	10.5	13.1	18.6	15.9	18.4	42.1	55.3	48.5	0.0	14.5	15.8	
Total	1,891	480,535	100.0	145,840	22.5	3.8	4.2	16.8	10.5	13.1	18.6	15.9	18.4	42.1	55.3	48.5	0.0	14.5	15.8	

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charlotte MMSA	1,622	231,398	100.0	51,101	7.2	8.6	6.8	18.7	17.5	17.2	28.0	33.9	28.5	45.4	39.7	46.8	0.8	0.2	0.6	
Total	1,622	231,398	100.0	51,101	7.2	8.6	6.8	18.7	17.5	17.2	28.0	33.9	28.5	45.4	39.7	46.8	0.8	0.2	0.6	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data. "</i> <i>Due to rounding, totals may not equal 100.0%</i>																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charlotte MMSA	1,622	231,398	100.0	51,101	87.6	56.9	47.1	4.0	34.9	8.4	8.2	
Total	1,622	231,398	100.0	51,101	87.6	56.9	47.1	4.0	34.9	8.4	8.2	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Pittsburgh MMSA	10,637	1,737,955	100.0	102,472	2.7	1.5	1.2	17.4	12.4	11.2	51.9	45.9	46.4	28.0	40.2	41.2	0.0	0.0	0.0	
Total	10,637	1,737,955	100.0	102,472	2.7	1.5	1.2	17.4	12.4	11.2	51.9	45.9	46.4	28.0	40.2	41.2	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Pittsburgh MMSA	10,637	1,737,955	100.0	102,472	21.1	7.2	7.7	17.5	15.4	16.6	20.6	20.2	21.1	40.8	47.3	41.0	0.0	10.0	13.6	
Total	10,637	1,737,955	100.0	102,472	21.1	7.2	7.7	17.5	15.4	16.6	20.6	20.2	21.1	40.8	47.3	41.0	0.0	10.0	13.6	
<i>Source: 2015 ACS Census ; 01/01/2018 - 01/31/2020 Bank Data, 2020 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018-20**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Pittsburgh MMSA	7,002	747,540	100.0	45,731	4.8	3.3	4.1	16.1	17.0	16.8	42.1	45.0	43.7	36.3	34.0	35.0	0.8	0.6	0.4
Total	7,002	747,540	100.0	45,731	4.8	3.3	4.1	16.1	17.0	16.8	42.1	45.0	43.7	36.3	34.0	35.0	0.8	0.6	0.4

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Pittsburg MMSA	7,002	747,540	100.0	45,731	85.3	62.8	45.7	4.8	25.5	9.9	11.7	
Total	7,002	747,540	100.0	45,731	85.3	62.8	45.7	4.8	25.5	9.9	11.7	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>												

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018-20	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Pittsburgh MMSA	45	2,377	100.0	220	1.9	0.0	1.8	13.8	4.4	14.1	57.9	66.7	70.9	26.3	11.1	12.7	0.1	0.0	0.5	
Total	45	2,377	100.0	220	1.9	0.0	1.8	13.8	4.4	14.1	57.9	66.7	70.9	26.3	11.1	12.7	0.1	0.0	0.5	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-20
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Pittsburgh MMSA	37	2,377	100.0	220	96.8	81.1	48.2	1.9	2.7	1.3	16.2
Total	37	2,377	100.0	220	96.8	81.1	48.2	1.9	2.7	1.3	16.2
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data Due to rounding, totals may not equal 100.0%</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Youngstown MMSA	2,416	244,199	100.0	18,150	5.1	1.4	0.8	12.5	5.3	6.2	53.0	59.7	53.7	29.3	33.7	39.2	0.0	0.0	0.0	
Total	2,416	244,199	100.0	18,150	5.1	1.4	0.8	12.5	5.3	6.2	53.0	59.7	53.7	29.3	33.7	39.2	0.0	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2018-20	
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Youngstown MMSA	2,416	244,199	100.0	18,150	20.5	6.2	6.8	18.4	17.4	18.1	20.6	21.6	22.8	40.5	46.2	37.3	0.0	8.6	15.0	
Total	2,416	244,199	100.0	18,150	20.5	6.2	6.8	18.4	17.4	18.1	20.6	21.6	22.8	40.5	46.2	37.3	0.0	8.6	15.0	
<i>Source: 2015 ACS Census ; 01/01/2018 - 01/31/2020 Bank Data, 2020 HMDA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>																				

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Youngstown MMSA	1,545	161,313	100.0	8,296	7.8	7.5	7.2	12.5	11.2	10.9	44.8	51.3	42.9	34.9	30.0	39.0	0.0	0.0	0.0	
Total	1,545	161,313	100.0	8,296	7.8	7.5	7.2	12.5	11.2	10.9	44.8	51.3	42.9	34.9	30.0	39.0	0.0	0.0	0.0	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Youngstown MMSA	1,545	161,313	100.0	8,296	81.4	65.0	44.7	6.0	28.0	12.6	7.0	
Total	1,545	161,313	100.0	8,296	81.4	65.0	44.7	6.0	28.0	12.6	7.0	

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018-20		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Youngstown MMSA	52	1,613	100.0	115	2.3	0.0	0.0	5.9	0.0	0.0	57.4	59.6	60.9	34.4	3.8	39.1	0.0	0.0	0.0		
Total	52	1,613	100.0	115	2.3	0.0	0.0	5.9	0.0	0.0	57.4	59.6	60.9	34.4	3.8	39.1	0.0	0.0	0.0		

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-20
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Youngstown MMSA	33	1,613	100.0	115	97.3	60.6	59.1	1.4	3.0	1.3	36.4
Total	33	1,613	100.0	115	97.3	60.6	59.1	1.4	3.0	1.3	36.4
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>											

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Baltimore CSA	4,640	1,647,576	100.0	232,291	4.7	1.2	2.5	17.9	8.4	13.7	36.2	31.9	36.1	41.2	58.4	47.7	0.1	0.0	0.1	
Total	4,640	1,647,576	100.0	232,291	4.7	1.2	2.5	17.9	8.4	13.7	36.2	31.9	36.1	41.2	58.4	47.7	0.1	0.0	0.1	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2018-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Baltimore CSA	4,640	1,647,576	100.0	232,291	22.4	4.0	6.3	16.9	10.2	16.9	19.6	14.8	19.7	41.1	53.5	34.6	0.0	17.6	22.4
Total	4,640	1,647,576	100.0	232,291	22.4	4.0	6.3	16.9	10.2	16.9	19.6	14.8	19.7	41.1	53.5	34.6	0.0	17.6	22.4

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Baltimore CSA	2,663	299,586	100.0	90,208	5.7	4.7	4.3	18.1	17.2	16.4	35.2	37.9	35.4	40.6	39.9	43.5	0.5	0.3	0.3		
Total	2,663	299,586	100.0	90,208	5.7	4.7	4.3	18.1	17.2	16.4	35.2	37.9	35.4	40.6	39.9	43.5	0.5	0.3	0.3		

*Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Baltimore CSA	2,663	299,586	100.0	90,208	88.6	51.7	48.3	4.2	28.2	7.2	20.1	
Total	2,663	299,586	100.0	90,208	88.6	51.7	48.3	4.2	28.2	7.2	20.1	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data Due to rounding, totals may not equal 100.0%</i>												

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Burlington MSA	109	19,332	1.5	7,484	0.0	0.0	0.0	22.9	23.9	18.0	47.8	49.5	50.9	29.3	26.6	31.2	0.0	0.0	0.0
Fayetteville MSA	37	6,658	0.5	15,672	0.8	0.0	0.1	11.1	8.1	7.2	65.7	56.8	62.6	22.4	35.1	30.1	0.0	0.0	0.0
Greensboro MSA	657	165,165	9.0	26,239	3.4	1.2	1.6	16.3	10.5	10.4	40.2	41.1	35.4	40.1	47.2	52.6	0.0	0.0	0.0
Greenville MSA	220	38,805	3.0	6,856	4.5	4.1	5.8	19.5	6.4	9.6	40.3	40.5	43.1	35.7	49.1	41.5	0.0	0.0	0.0
Jacksonville MSA	40	8,833	0.5	12,812	0.0	0.0	0.0	3.8	7.5	2.0	76.3	70.0	79.2	19.9	22.5	18.8	0.0	0.0	0.0
Myrtle Beach MSA	728	190,386	10.0	13,877	0.0	0.0	0.0	19.0	8.0	10.8	52.9	47.5	50.4	28.1	44.5	38.8	0.0	0.0	0.0
NC Non-MSA	1,647	282,812	22.5	27,145	0.0	0.0	0.0	9.5	6.0	4.4	54.2	51.2	35.8	36.3	42.7	59.8	0.0	0.0	0.0
Raleigh-Durham CSA	1,789	499,151	24.5	132,090	2.3	1.7	2.1	22.2	10.7	17.4	35.1	35.5	35.6	40.4	52.0	45.0	0.0	0.2	0.0
Wilmington MSA	611	170,053	8.4	21,612	4.9	4.4	4.3	14.4	8.8	7.4	44.4	34.2	46.4	36.3	52.5	41.9	0.0	0.0	0.0
Winston-Salem MSA	1,475	233,409	20.2	26,815	3.6	1.4	2.0	17.0	13.7	12.4	43.6	46.4	38.1	35.7	38.4	47.4	0.1	0.0	0.1
Total	7,313	1,614,604	100.0	290,602	2.2	1.3	1.7	17.1	9.8	12.6	44.4	43.5	41.3	36.2	45.3	44.4	0.0	0.0	0.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Burlington MSA	109	19,332	1.5	7,484	21.8	7.3	4.9	17.8	15.6	16.2	18.3	19.3	21.1	42.1	45.0	40.4	0.0	12.8	17.5
Fayetteville MSA	37	6,658	0.6	15,672	21.4	7.1	1.9	17.5	10.5	8.8	19.9	13.5	15.5	41.3	45.9	26.8	0.0	39.3	46.9
Greensboro MSA	657	165,165	9.0	26,239	21.3	4.9	4.6	17.7	14.5	15.1	18.0	20.5	18.5	42.9	54.9	43.9	0.0	5.2	17.8
Greenville MSA	220	38,805	3.0	6,856	24.2	6.8	3.6	16.2	13.6	14.3	17.5	18.6	19.5	42.1	57.3	42.4	0.0	3.6	20.1
Jacksonville MSA	40	8,833	0.6	12,812	18.2	11.1	1.3	18.6	5.6	8.4	23.9	19.4	17.5	39.3	65.0	27.6	0.0	15.0	45.2
Myrtle Beach MSA	728	190,386	10.0	13,877	18.6	3.2	2.4	17.3	9.1	9.4	20.3	16.1	17.3	43.7	66.1	54.6	0.0	5.6	16.3
NC Non-MSA	1,647	282,812	22.5	27,145	19.0	3.0	1.4	16.8	9.7	6.7	18.8	18.6	13.8	45.5	63.1	57.0	0.0	5.5	21.1
Raleigh-Durham CSA	1,789	499,151	24.5	132,090	21.8	4.0	5.5	16.8	10.7	16.0	18.6	13.8	20.6	42.8	57.4	43.7	0.0	14.0	14.2
Wilmington MSA	611	170,053	8.4	21,612	22.7	3.4	5.2	17.6	8.3	15.8	18.4	14.1	18.4	41.3	66.0	42.4	0.0	8.2	18.2
Winston-Salem MSA	1,475	233,409	20.2	26,815	22.8	5.4	5.1	17.5	16.4	16.6	18.7	22.5	21.1	40.9	51.1	40.0	0.0	4.6	17.3
Total	7,313	1,614,604	100.0	290,602	21.4	4.2	4.4	17.2	11.7	14.0	18.9	17.7	19.1	42.5	58.6	43.3	0.0	7.8	19.2

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Burlington MSA	61	5,521	1.2	2,718	0.0	0.0	0.0	24.6	24.6	22.3	48.2	52.5	51.4	27.2	23.0	26.3	0.0	0.0	0.0	
Fayetteville MSA	45	6,006	0.9	4,580	2.4	0.0	2.7	18.1	22.2	17.0	59.2	48.9	57.3	20.1	28.9	23.0	0.2	0.0	0.0	
Greensboro MSA	653	84,700	12.5	13,081	4.7	3.5	4.3	20.4	21.7	21.2	32.7	39.5	33.5	42.1	35.2	40.9	0.2	0.0	0.1	
Greenville MSA	151	13,676	2.9	2,695	16.6	10.6	14.0	16.3	7.9	16.7	36.8	44.4	38.6	30.2	37.1	30.7	0.0	0.0	0.0	
Jacksonville MSA	104	19,299	2.0	2,235	0.0	0.0	0.0	11.7	33.7	11.2	68.2	54.8	68.1	19.3	11.5	20.6	0.8	0.0	0.1	
Myrtle Beach MSA	93	7,515	1.8	3,005	0.0	0.0	0.0	19.0	21.5	20.9	46.9	38.7	45.7	34.1	39.8	33.3	0.0	0.0	0.0	
NC Non-MSAs	1,501	123,290	28.7	10,572	0.0	0.0	0.0	10.8	11.4	9.7	46.2	50.6	43.3	43.0	38.0	46.9	0.0	0.0	0.0	
Raleigh CSA	1,321	193,561	25.2	43,487	4.5	5.6	4.3	21.3	18.5	20.4	32.3	34.1	32.2	41.2	41.6	42.9	0.6	0.2	0.3	
Wilmington MSA	373	52,585	7.1	8,322	12.4	19.0	11.4	11.5	15.0	12.4	34.6	29.5	36.6	41.2	35.7	39.3	0.3	0.8	0.3	
Winston MSA	937	78,530	17.9	10,966	6.5	6.5	5.4	18.3	22.2	17.1	36.2	43.8	38.0	38.4	27.1	39.0	0.6	0.4	0.6	
Total	5,239	584,683	100.0	101,661	4.8	4.7	4.4	18.6	17.4	18.0	37.5	42.0	37.5	38.7	35.7	39.9	0.4	0.2	0.2	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Burlington MSA	61	5,521	1.2	2,718	84.1	67.2	44.0	4.8	29.5	11.1	3.3
Fayetteville MSA	45	6,006	0.9	4,580	86.4	55.6	46.5	3.3	28.9	10.3	15.6
Greensboro MSA	653	84,700	12.5	13,081	86.0	54.5	47.0	4.3	34.5	9.7	11.0
Greenville MSA	151	13,676	2.9	2,695	85.2	68.9	45.4	3.9	20.5	10.9	10.6
Jacksonville MSA	104	19,299	2.0	2,235	86.6	45.2	42.5	2.9	50.0	10.5	4.8
Myrtle Beach MSA	93	7,515	1.8	3,005	90.4	76.3	52.1	2.6	19.4	7.0	4.3
NC Non-MSAs	1,501	123,290	28.7	10,572	85.3	67.2	46.4	4.2	23.7	10.5	9.1
Raleigh CSA	1,321	193,561	25.2	43,487	88.4	56.7	48.1	3.5	35.1	8.2	8.2
Wilmington MSA	373	52,585	7.1	8,322	87.8	60.1	46.9	3.7	31.1	8.5	8.8
Winston MSA	937	78,530	17.9	10,966	86.5	62.4	48.1	4.5	27.7	9.1	9.8
Total	5,239	584,683	100.0	101,661	87.2	61.3	47.4	3.8	29.6	9.0	9.1
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>											

Table S: Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2018-20	
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	
Burlington MSA	0	0	0.0	46	0.0	0.0	0.0	16.4	0.0	13.0	51.8	0.0	52.2	31.8	0.0	34.8	0.0	0.0	0.0	
Fayetteville MSA	0	0	0.0	36	0.8	0.0	16.7	8.8	0.0	0.0	65.1	0.0	50.0	25.3	0.0	33.3	0.0	0.0	0.0	
Greensboro MSA	4	214	6.3	108	2.3	0.0	1.9	13.1	25.0	7.4	45.0	50.0	64.8	39.7	0.0	25.9	0.0	0.0	0.0	
Greenville MSA	2	225	5.7	59	4.4	0.0	1.7	16.0	0.0	35.6	43.6	100.0	32.2	36.1	0.0	30.5	0.0	0.0	0.0	
Jacksonville MSA	0	0	0.0	38	0.0	0.0	0.0	7.1	0.0	2.6	75.5	0.0	97.4	17.4	0.0	0.0	0.0	0.0	0.0	
Myrtle Beach MSA	0	0	0.0	15	0.0	0.0	0.0	31.0	0.0	33.3	47.4	0.0	60.0	21.6	0.0	6.7	0.0	0.0	0.0	
NC Non-MSAs	72	4,834	78.7	575	0.0	0.0	0.0	8.8	9.7	11.7	61.1	63.9	75.1	30.1	11.1	13.2	0.0	0.0	0.0	
Raleigh CSA	6	310	9.4	273	3.0	0.0	3.7	22.9	0.0	42.1	41.8	16.7	30.0	32.3	66.7	24.2	0.1	0.0	0.0	
Wilmington MSA	1	219	2.9	79	8.4	0.0	6.3	23.4	0.0	53.2	37.5	0.0	20.3	30.6	100.0	20.3	0.1	0.0	0.0	
Winston MSA	18	686	14.0	142	2.1	0.0	2.8	17.2	27.8	23.9	45.8	16.7	52.8	34.6	11.1	20.4	0.3	0.0	0.0	
Total	105	6,493	100.0	1,371	2.3	0.0	2.0	17.1	12.4	21.8	48.6	51.4	57.0	32.0	14.3	19.1	0.1	0.0	0.0	

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Burlington MSA	--	--	--	46	98.3	--	39.1	1.4	--	0.3	--	
Fayetteville MSA	--	--	--	36	96.2	--	44.4	1.9	--	1.9	--	
Greensboro MSA	3	214	3.7	108	97.1	66.7	45.4	1.5	33.3	1.4	0.0	
Greenville MSA	2	225	2.4	59	95.2	50.0	42.4	3.1	0.0	1.7	50.0	
Jacksonville MSA	--	--	--	38	96.1	--	44.7	2.1	--	1.8	--	
Myrtle Beach MSA	--	--	--	15	96.8	--	53.3	2.3	--	0.9	--	
NC Non-MSAs	61	4,834	74.4	575	96.6	63.9	49.9	1.5	13.1	1.8	23.0	
Raleigh CSA	5	310	6.1	273	95.7	40.0	53.1	2.3	20.0	2.0	40.0	
Wilmington MSA	1	219	1.2	79	95.4	100.0	29.1	2.6	0.0	2.1	0.0	
Winston MSA	10	691	12.2	142	97.6	60.0	54.2	1.2	20.0	1.2	20.0	
Total	82	6,493	100.0	1,371	96.4	62.2	48.5	1.9	14.6	1.7	23.2	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
Cleveland CSA	4,529	893,403	98.7	127,685	6.3	1.9	2.6	16.6	6.2	11.2	39.6	27.9	38.2	37.3	63.9	47.9	0.1	0.0	0.0	
Wheeling MSA	61	4,547	1.3	1,859	0.0	0.0	0.0	15.9	19.7	12.1	72.6	75.4	70.1	11.4	4.9	17.8	0.0	0.0	0.0	
Total	4,590	897,950	100.0	129,544	6.1	1.9	2.6	16.6	6.4	11.3	40.5	28.5	38.6	36.6	63.1	47.5	0.1	0.0	0.0	

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2018-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Cleveland CSA	4,529	893,403	98.7	127,685	22.4	3.1	7.0	16.7	10.1	17.6	19.7	14.7	20.8	41.1	52.6	38.9	0.0	19.5	15.8
Wheeling MSA	61	4,547	1.7	1,859	18.8	9.8	8.2	19.9	19.7	17.7	21.2	32.8	21.2	40.0	36.1	35.8	0.0	4.7	17.1
Total	4,590	897,950	100.0	129,544	22.3	3.2	7.0	16.8	10.2	17.6	19.7	15.0	20.8	41.1	52.4	38.8	0.0	19.3	15.8

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2018-20**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Cleveland CSA	1,791	252,547	98.7	53,321	8.9	7.5	7.8	16.3	16.8	14.9	33.9	26.5	32.6	40.3	48.5	44.2	0.6	0.7	0.5
Ohio Non-MSA	24	1,294	1.3	862	0.0	0.0	0.0	15.8	25.0	17.9	64.4	75.0	64.7	19.8	0.0	17.4	0.0	0.0	0.0
Total	1,815	253,841	100.0	54,183	8.7	7.4	7.6	16.3	16.9	15.0	34.4	27.2	33.1	39.9	47.8	43.8	0.6	0.7	0.5

Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cleveland CSA	1,791	252,547	98.7	53,321	83.6	62.8	46.9	6.3	27.5	10.1	9.7	
Ohio Non-MSA	24	1,294	1.3	862	78.2	50.0	32.4	5.7	37.5	16.1	12.5	
Total	1,815	253,841	100.0	54,183	83.5	62.6	46.7	6.3	27.7	10.2	9.7	
<i>Source: 2020 D&B Data; 01/01/2018 - 12/31/2020 Bank Data; 2019 CRA Aggregate Data, Due to rounding, totals may not equal 100.0%</i>												

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Altoona MSA	709	85,154	6.3	3,793	3.1	1.6	1.9	9.0	5.8	7.7	77.6	76.0	76.5	10.2	16.6	13.9	0.0	0.0	0.0
Chester MSA	111	36,942	1.0	34,481	2.1	0.0	1.9	14.7	13.5	12.4	42.5	50.5	40.6	40.7	36.0	45.1	0.0	0.0	0.0
East Stroudsburg MSA	65	9,392	0.6	7,135	0.0	0.0	0.0	8.0	13.8	10.8	86.4	78.5	84.9	5.6	7.7	4.3	0.0	0.0	0.0
Erie MSA	879	114,226	7.8	8,092	4.5	1.6	1.9	8.8	9.2	6.6	50.6	45.3	46.2	36.2	43.9	45.2	0.0	0.0	0.0
Harrisburg-CSA	2,048	374,189	18.1	53,789	2.9	2.6	2.1	10.0	8.5	8.1	63.1	51.8	59.6	24.0	37.1	30.2	0.0	0.0	0.0
Johnstown MSA	917	73,684	8.1	3,222	1.4	0.3	0.2	13.3	5.5	5.1	59.3	63.8	57.0	26.0	30.4	37.7	0.0	0.0	0.0
Lancaster MSA	512	132,500	4.5	22,540	1.6	2.1	1.9	8.8	7.2	9.3	76.1	67.4	73.6	13.5	23.2	15.2	0.0	0.0	0.0
PA Non-MSA	3,973	403,042	35.1	24,625	0.5	0.3	0.3	6.9	4.3	4.4	82.8	86.2	81.7	9.7	9.2	13.6	0.0	0.0	0.0
Reading MSA	493	69,454	4.4	16,556	7.1	11.6	4.2	4.1	5.9	3.7	61.1	48.9	60.4	27.7	33.7	31.7	0.0	0.0	0.0
Scranton MSA	722	106,454	6.4	16,295	1.6	0.6	1.4	14.2	8.3	12.0	56.5	47.5	51.4	27.6	43.5	35.2	0.0	0.1	0.0
State College MSA	684	147,038	6.0	5,597	0.0	0.0	0.0	16.0	17.4	14.6	51.7	42.7	45.8	31.5	39.2	38.4	0.8	0.7	1.2
Williamsport MSA	194	22,483	1.7	4,052	1.4	0.5	1.1	7.2	6.7	6.5	84.3	85.6	83.4	7.0	7.2	9.0	0.0	0.0	0.0
Total	11,307	1,574,557	100.0	200,177	2.2	1.5	1.8	9.7	7.1	8.6	66.2	66.3	60.8	21.9	25.1	28.9	0.0	0.1	0.0

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

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Altoona MSA	709	85,154	6.3	3,793	19.9	7.5	5.3	18.7	15.1	15.3	21.9	23.8	21.0	39.5	50.2	43.1	0.0	3.4	15.5
Chester MSA	111	36,942	1.0	34,481	18.9	4.1	6.5	17.0	9.0	17.4	21.2	19.8	25.2	42.9	34.2	38.8	0.0	34.2	12.1
East Stroudsburg MSA	65	9,392	0.6	7,135	20.7	8.3	4.9	18.1	15.4	15.9	21.3	24.6	20.5	39.9	47.7	37.1	0.0	9.2	21.7
Erie MSA	879	114,226	7.8	8,092	21.1	3.8	7.9	17.6	14.6	19.8	20.8	25.0	21.9	40.5	46.5	36.4	0.0	10.1	13.9
Harrisburg CSA	2,048	374,189	18.1	53,789	19.4	5.4	7.7	18.3	14.7	18.6	22.3	19.7	21.6	40.0	51.1	33.8	0.0	9.1	18.3
Johnstown MSA	917	73,684	8.1	3,222	19.5	8.1	7.0	19.4	17.9	16.7	20.8	24.4	20.1	40.3	46.5	40.7	0.0	3.2	15.5
Lancaster MSA	512	132,500	4.5	22,540	18.3	2.9	5.0	19.2	10.0	19.9	23.1	18.6	23.3	39.4	60.5	36.2	0.0	8.0	15.7
PA Non-MSA	3,973	403,042	35.1	24,625	19.4	6.8	6.8	18.8	18.5	17.3	21.9	23.1	21.8	40.0	47.0	39.5	0.0	4.7	14.6
Reading MSA	493	69,454	4.4	16,556	21.4	8.9	7.9	17.2	19.1	19.0	21.4	19.9	21.5	40.1	44.0	33.0	0.0	8.1	18.6
Scranton MSA	722	106,454	6.4	16,295	21.3	8.7	7.8	17.6	14.5	16.6	20.5	21.2	20.4	40.6	50.4	35.7	0.0	5.1	19.5
State College MSA	684	147,038	6.0	5,597	19.6	7.6	6.7	18.5	15.9	15.7	21.5	24.9	24.1	40.3	47.2	41.6	0.0	4.4	11.8
Williamsport MSA	194	22,483	1.7	4,052	20.0	6.2	4.6	18.7	15.5	15.6	22.1	24.2	22.6	39.2	51.5	42.0	0.0	4.0	15.2
Total	11,307	1,574,557	100.0	200,177	19.8	6.5	6.9	18.2	16.3	18.0	21.7	22.4	22.4	40.3	48.5	36.6	0.0	6.3	16.2

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

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Altoona MSA	635	64,832	6.8	1,749	7.9	3.8	6.1	8.3	7.1	7.4	76.0	81.1	76.7	7.9	8.0	9.8	0.0	0.0	0.0
Chester MSA	39	4,798	0.4	13,900	2.7	0.0	2.2	12.3	10.3	13.0	42.3	35.9	43.8	42.7	53.8	41.0	0.0	0.0	0.0
East Stroudsburg MSA	94	13,034	1.0	3,443	0.0	0.0	0.0	19.0	23.4	16.2	75.8	68.1	76.8	5.2	8.5	6.9	0.0	0.0	0.0
Erie MSA	1,011	130,440	10.8	4,011	12.5	10.1	11.0	12.0	10.0	13.4	44.2	46.4	43.9	31.2	33.5	31.7	0.0	0.0	0.0
Harrisburg CSA	1,639	211,680	17.4	17,374	6.7	4.0	4.6	14.8	16.6	11.4	57.2	57.8	61.8	21.3	21.5	22.2	0.0	0.0	0.0
Johnstown MSA	728	66,555	7.7	1,894	1.9	1.8	1.7	18.4	16.1	14.3	48.2	53.2	51.8	31.4	29.0	32.2	0.0	0.0	0.0
Lancaster MSA	517	90,859	5.5	11,444	4.1	5.0	3.3	11.2	20.7	9.9	72.4	62.7	73.0	12.4	11.6	13.9	0.0	0.0	0.0
PA Non-MSA	2,941	299,764	31.3	13,880	2.6	3.5	2.2	9.1	6.0	6.9	76.3	80.1	78.6	11.8	10.4	12.3	0.2	0.0	0.1
Reading MSA	389	43,398	4.1	7,102	10.8	17.5	7.5	5.1	8.7	4.3	57.0	50.9	59.3	27.1	22.9	28.9	0.0	0.0	0.0
Scranton MSA	665	81,033	7.1	9,949	2.7	2.9	2.7	19.2	21.1	17.6	51.4	50.7	52.5	24.7	24.8	25.6	2.2	0.6	1.7
State College MSA	581	58,508	6.2	2,148	2.0	0.0	0.0	18.3	21.2	18.4	38.5	47.2	41.7	31.7	22.7	32.8	9.7	9.0	7.0
Williamsport MSA	161	21,027	1.7	1,861	5.0	5.0	4.4	16.6	9.9	15.6	71.4	76.4	71.8	7.0	8.7	8.2	0.0	0.0	0.0
Total	9,400	1,085,928	100.0	88,755	4.8	4.6	3.7	13.0	12.3	11.4	59.0	63.9	61.4	22.6	18.6	23.2	0.6	0.6	0.4

Source: 2020 D&B Data; 01/01/2018 - 01/31/2020 Bank Data; 2019 CRA Aggregate Data
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Altoona MSA	112	14,146	6.9	1,779	77.8	41.1	44.7	7.5	34.8	14.6	24.1
Chester MSA	7	669	0.4	13,260	85.3	28.6	46.5	6.5	0.0	8.3	71.4
East Stroudsburg MSA	20	4,534	1.2	2,979	86.1	50.0	45.7	4.3	35.0	9.6	15.0
Eric MSA	203	31,648	12.6	3,671	78.4	42.9	41.8	7.9	37.4	13.7	19.7
Harrisburg CSA	199	42,007	12.3	15,796	81.1	48.7	46.8	6.0	37.7	12.9	13.6
Johnstown MSA	123	12,742	7.6	1,796	76.9	46.3	43.8	6.9	25.2	16.2	28.5
Lancaster MSA	115	24,536	7.1	11,030	83.6	42.6	50.0	6.8	44.3	9.5	13.0
PA Non-MSA	561	70,981	34.7	12,863	80.0	45.3	45.2	6.2	36.2	13.8	18.5
Reading MSA	49	5,897	3.0	6,603	83.0	51.0	47.9	6.5	22.4	10.4	26.5
Scranton MSA	117	20,041	7.2	9,485	81.9	58.1	42.2	6.0	33.3	12.0	8.5
State College MSA	80	7,858	5.0	2,085	79.7	47.5	46.0	5.5	28.8	14.7	23.8
Williamsport MSA	29	6,662	1.8	1,633	79.9	48.3	40.2	6.0	37.9	14.1	13.8
Total	1,615	241,721	100.0	82,980	81.8	46.3	46.0	6.3	35.0	11.9	18.7

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

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2018-20

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Altoona MSA	12	201	5.2	23	1.2	0.0	0.0	2.7	0.0	0.0	89.8	75.0	95.7	6.3	16.7	4.3	0.0	0.0	0.0
Chester MSA	0	0	0.0	324	1.4	0.0	0.0	16.3	0.0	38.0	49.0	0.0	47.8	33.2	0.0	14.2	0.0	0.0	0.0
East Stroudsburg MSA	1	21	0.9	18	0.0	0.0	0.0	6.0	0.0	0.0	83.2	100.0	94.4	10.8	0.0	5.6	0.0	0.0	0.0
Erie MSA	12	204	5.6	51	2.6	0.0	0.0	7.3	0.0	5.9	46.7	25.0	43.1	43.5	41.7	51.0	0.0	0.0	0.0
Harrisburg CSA	4	602	3.0	577	1.4	0.0	0.0	5.4	0.0	1.6	71.1	175.0	84.1	22.1	0.0	14.4	0.0	0.0	0.0
Johnstown MSA	24	1,797	11.2	34	0.4	0.0	0.0	7.8	0.0	2.9	56.8	66.7	73.5	35.0	4.2	23.5	0.0	0.0	0.0
Lancaster MSA	1	30	0.9	1,276	0.8	0.0	0.0	3.1	0.0	0.2	86.0	100.0	95.3	10.0	0.0	4.5	0.0	0.0	0.0
PA Non-MSA	110	7,519	57.5	840	0.3	0.0	0.0	1.3	0.0	0.4	86.4	113.6	90.5	11.9	8.2	9.2	0.0	0.0	0.0
Reading MSA	1	75	1.0	320	2.2	0.0	0.3	0.9	0.0	0.0	69.1	0.0	90.9	27.9	200.0	8.8	0.0	0.0	0.0
Scranton MSA	0	0	0.0	62	1.3	0.0	0.0	11.0	0.0	3.2	55.1	0.0	61.3	32.3	0.0	35.5	0.3	0.0	0.0
State College MSA	57	2,227	19.3	123	0.2	0.0	0.0	15.2	50.9	48.0	56.6	17.5	40.7	27.3	10.5	11.4	0.7	0.0	0.0
Williamsport MSA	3	443	3.0	78	0.5	0.0	0.0	4.3	0.0	0.0	90.6	233.3	100.0	4.6	0.0	0.0	0.0	0.0	0.0
Total	321	13,119	100.0	3,726	1.1	0.0	0.0	6.0	9.0	5.4	71.9	55.8	84.8	21.0	7.8	9.7	0.0	0.0	0.0

Source: 2020 D&B Data; 01/01/2018 - 01/31/2020 Bank Data; 2019 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Altoona MSA	11	201	4.7	23	95.3	54.5	43.5	3.1	9.1	1.6	36.4
Chester MSA	--	--	--	324	94.1	--	73.5	4.5	--	1.4	--
East Stroudsburg MSA	1	21	0.4	18	97.5	0.0	72.2	1.0	0.0	1.6	100.0
Eric MSA	8	204	3.4	51	95.5	37.5	47.1	3.0	0.0	1.6	62.5
Harrisburg CSA	7	602	3.0	577	97.4	100.0	69.0	1.4	0.0	1.2	0.0
Johnstown MSA	17	1,797	7.3	34	97.3	29.4	52.9	1.6	52.9	1.2	17.6
Lancaster MSA	1	30	0.4	1,276	96.4	0.0	83.6	2.8	100.0	0.8	0.0
PA Non-MSA	134	7,519	57.5	840	97.4	83.6	55.4	1.7	6.0	0.9	10.4
Reading MSA	2	75	0.9	320	96.5	100.0	69.7	2.2	0.0	1.3	0.0
Scranton MSA	--	--	--	62	97.2	--	61.3	1.9	--	0.9	--
State College MSA	45	2,227	19.3	123	97.5	88.9	70.7	1.3	4.4	1.1	6.7
Williamsport MSA	7	443	3.0	78	97.8	85.7	56.4	1.6	0.0	0.5	14.3
Total	233	13,119	100.0	3,726	96.6	77.7	70.5	2.3	9.0	1.1	13.3

*Source: 2020 D&B Data; 01/01/2018 - 01/31/2020 Bank Data; 2019 CRA Aggregate Data,
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2018-20	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Charleston MSA	105	47,179	76.1	33,291	6.4	3.8	3.4	14.8	2.9	9.9	31.4	29.5	32.4	46.9	62.9	53.6	0.5	1.0	0.7		
SC Non-MSA	33	2,802	23.9	1,234	0.0	0.0	0.0	23.1	15.2	12.4	52.8	60.6	52.1	24.0	24.2	35.5	0.0	0.0	0.0		
Total	138	49,981	100.0	34,525	5.5	2.9	3.3	15.9	5.8	10.0	34.3	37.0	33.1	43.8	53.6	52.9	0.5	0.7	0.7		

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower **2018-20**

Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Charleston MSA	105	47,179	86.6	33,291	22.8	2.8	3.5	15.2	6.7	12.2	17.6	2.4	17.9	44.4	66.7	47.3	0.0	22.9	19.1
SC Non-MSA	33	2,802	46.2	1,234	23.7	8.3	2.6	16.5	22.7	13.9	18.0	21.2	23.8	41.8	57.6	41.2	0.0	10.0	18.5
Total	138	49,981	100.0	34,525	22.9	2.8	3.5	15.3	8.7	12.3	17.7	6.5	18.1	44.1	64.5	47.1	0.0	18.1	19.0

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

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2018-20	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charleston MSA	113	14,736	52.6	12,894	11.6	15.9	10.9	16.2	14.2	13.9	25.3	20.4	25.3	44.7	48.7	47.3	2.2	0.9	2.6	
SC Non-MSA	102	10,738	47.4	524	0.0	0.0	0.0	21.7	15.7	19.7	60.7	52.9	62.6	17.5	31.4	17.7	0.0	0.0	0.0	
Total	215	25,474	100.0	13,418	10.9	8.4	10.5	16.6	14.9	14.2	27.4	35.8	26.7	43.1	40.5	46.2	2.1	0.5	2.5	
<i>Source: 2020 D&B Data; 01/01/2018 - 01/31/2020 Bank Data; 2019 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i>																				

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2018-20	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston MSA	113	14,736	52.6	12,894	84.2	65.5	43.9	4.9	22.1	10.9	12.4	
SC Non-MSA	102	10,738	47.4	524	78.3	54.9	38.0	4.7	27.5	17.0	17.6	
Total	215	25,474	100.0	13,418	83.8	60.5	43.7	4.9	24.7	11.3	14.9	
<p><i>Source: 2020 D&B Data; 01/01/2018 - 01/31/2020 Bank Data; 2019 CRA Aggregate Data. Due to rounding, totals may not equal 100.0%</i></p>												