

PUBLIC DISCLOSURE

September 3, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Main Street Bank Corp.
Certificate Number: 29847

151 N Market St
Wooster, Ohio 44691

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Chicago Regional Office

300 South Riverside Plaza, Suite 1700
Chicago, Illinois 60606

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit (LTD) ratio is more than reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- The bank made a majority of loans in the AAs.
- The distribution of borrowers reflects reasonable dispersion throughout the AAs.
- The geographic distribution of loans reflects reasonable penetration throughout the AAs.
- The institution did not receive any Community Reinvestment Act (CRA)-related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory

The institution's community development performance demonstrates adequate responsiveness to the needs of its AAs through community development loans, qualified investments and donations, and community development services. Examiners considered the institution's capacity and need and availability of such opportunities for community development in the institution's AAs.

DESCRIPTION OF INSTITUTION

Main Street Bank Corp. (MSB) is a full-service institution headquartered in Wooster, Ohio. MSB is wholly owned by Main Street Financial Corp, a one-bank holding company also headquartered in Wooster, Ohio. MSB received a "Satisfactory" rating at its previous FDIC Performance Evaluation, dated October 17, 2022, based on the Interagency Small Institution Examination Procedures.

MSB operates twenty full-service branches in Ohio and West Virginia, including its main office. MSB opened three new branches during the evaluation period in middle- and upper-income census tracts. In May of 2024, MSB (formerly Wayne Savings Community Bank) merged with Main Street Bank, headquartered in Wheeling, WV, and acquired five branches in Ohio and West Virginia.

MSB offers home mortgage, commercial, agricultural, and consumer loans. The primary lending focus is home mortgage lending. The institution provides a variety of deposit services, including checking, savings, money market, retirement savings accounts, and certificates of deposit. Alternative banking services include internet and mobile banking and electronic bill pay. Additionally, MSB operates automated teller machines (ATM) at all branch locations.

As of June 30, 2025, MSB had total assets of approximately \$1.4 billion, total loans of \$1.2 billion, total securities of \$158.1 million, and total deposits of \$1.2 billion. The following table illustrates the loan portfolio.

Loan Portfolio Distribution as of 6/30/2025		
Loan Category	\$(000s)	%
Construction, Land Development, and Other Land Loans	28,971	2.5
Secured by Farmland	114,889	9.8
Secured by 1-4 Family Residential Properties	522,321	44.4
Secured by Multifamily (5 or more) Residential Properties	49,535	4.2
Secured by Nonfarm Nonresidential Properties	322,997	27.4
Total Real Estate Loans	1,038,713	88.3
Commercial and Industrial Loans	113,176	9.6
Agricultural Production and Other Loans to Farmers	7,638	0.6
Consumer Loans	17,392	1.5
Obligations of State and Political Subdivisions in the U.S.	44	0.0
Other Loans	0	0.0
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	1,176,963	100.0
<i>Source: 6/30/2025 Reports of Condition and Income</i>		

Examiners did not identify any financial, legal, or other impediments that affect the bank's ability to meet the AAs credit needs.

DESCRIPTION OF ASSESSMENT AREAS

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its performance. MSB designated five AAs within the states of Ohio and West Virginia. At the prior evaluation, the AAs only consisted of the Ohio counties listed in the following table. The Weirton-Steubenville, WV-OH MSA, and Wheeling WV-OH MSA AAs were added as of May 31, 2024, as a result of the merger.

This evaluation includes three rated areas as demonstrated in the table below. MSB's AAs are in conformance with the CRA requirements; as they consists of whole geographies, do not arbitrarily exclude low- or moderate-income areas, and do not reflect illegal discrimination. Examiners provide a more detailed discussion of each AA, including economic and demographic data, in the separate AA sections of this evaluation. The following table outlines MSB's five AAs:

Description of AAs				
Rated Area	AA	Counties in AA	# of CTs	# of Branches
State of Ohio	Ohio Non-MSA AA	Ashland, Columbiana, Holmes, Wayne	79	11
	Canton-Massillon, Ohio MSA	Carrol, Stark	97	2
	Cleveland, Ohio MSA	Medina	42	1
Weirton-Steubenville, WV-OH MSA	Weirton-Steubenville, WV-OH MSA	Brooke, Hancock, Jefferson	38	2
State of West Virginia	Wheeling, WV-OH MSA	Bellmont, Marshall, Ohio	50	4
<i>Source: 2020 Census Data & Bank Data</i>				

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the previous evaluation dated October 17, 2022, to the current evaluation dated September 3, 2025. Examiners used the Interagency Intermediate Small Bank Examination Procedures to evaluate MSB's CRA performance. These procedures include the Lending Test and the Community Development Test, as detailed in the appendix. Institution's must achieve at least a "Satisfactory" rating under the Lending Test and Community Development Test to obtain an overall "Satisfactory" rating.

Examiners conducted a full-scope review for all AAs. Examiners placed greater weight on the State of Ohio Rated Area, as this area contains the largest portion of the institution's loans, deposits, and branches during the evaluation. Examiners gave less weight to the Weirton-Steubenville, WV-OH MSA and Wheeling, WV-OH MSA AAs when determining the overall rating, since both were added May 31, 2024, and the bank has only been operating in these areas for a limited period of time during this evaluation.

Activities Reviewed

Based on the June 30, 2025, Call Report and information from the bank, examiners determined MSB's primary product lines are home mortgage and small business loans. This conclusion considered the bank's business strategy, the number and dollar volume of loans originated during the evaluation period, loan portfolio composition, and the AA credit needs. Collectively, these two loan categories comprise approximately 85.6 percent of MSB's total loan portfolio. No other loan types, such as consumer or small farm loans, represented a major product line; therefore, they provided no material support for the conclusions or ratings and are not presented. Bank records indicated that the lending focus and product mix remained consistent throughout the examination period. Based on the portfolio composition, primary lending focus, and community credit needs, home mortgage loans contributed more weight to overall conclusions.

This evaluation analyzed all home mortgage loans reported on MSB's 2022, 2023, and 2024 Home Mortgage Disclosure Act (HMDA) Loan Application Registers. MSB originated 400 home mortgage loans totaling approximately \$104.7 million in 2022, 263 totaling approximately \$79.7 million in 2023, and 500 totaling approximately \$86.8 million in 2024. Examiners did not identify

any lending anomalies among years; therefore, only 2024 data will be presented under the Borrower Profile and Geographic Distribution criteria.

The bank is not required to collect small business loan data and has not elected to do so. Examiners analyzed the universe of small business loans originated or renewed in 2024. MSB originated or renewed 316 small business loans in 2024 totaling approximately \$45.8 million. The review of 2024 small business lending was believed to be consistent with the small business lending performance the bank exhibited throughout the evaluation period.

For the Lending Test, examiners analyzed and presented both the number and dollar amount of home mortgage and small business loans. In evaluating the Borrower Profile and Geographic Distribution criteria, examiners only evaluated loans extended within the AAs. Examiners used 2020 U.S. Census data, 2024 HMDA aggregate data, and 2024 D&B small business data as sources of comparable data in the Lending Test.

For the Community Development Test, examiners considered all applicable community development loans, qualified investments, and community development services since the previous CRA evaluation dated October 17, 2022.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

MSB demonstrates reasonable performance under the Lending Test. Refer to the separate analyses of each AA for more details of the bank's performance.

Loan-to-Deposit Ratio

MSB's LTD ratio is more than reasonable given the institution's size, financial condition, and the AA credit needs. The LTD ratio, calculated from Call Report data, averaged 97.8 percent over the past 11 calendar quarters from December 31, 2022, to June 30, 2025. The ratio ranged from a low of 93.5 percent as of June 30, 2025, to a high of 102.1 percent as of June 30, 2024. The ratio remained generally stable during the evaluation period. Examiners selected four similarly situated institutions (SSIs) that were comparable to MSB based on asset size, geographic location, and lending focus. As reflected in the following table, MSB's ratio was higher than all the SSIs, reflecting elevated levels of overall lending relative to these institutions.

LTD Ratio		
Bank	Total Assets as of 6/30/2025 (\$000s)	Average Net LTD Ratio (%)
Main Street Bank Corp.	1,448,348	97.8
SSI #1	1,447,525	88.1
SSI #2	1,331,882	87.6
SSI #3	1,237,818	67.3
SSI #4	1,195,299	70.4
<i>Source: Reports of Condition and Income 12/31/2022 - 6/30/2025</i>		

Assessment Area Concentration

As illustrated in the table below, MSB made a majority of home mortgage and small business loans, by number and dollar volume, within the AAs during the evaluation period.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000)				Total \$(000)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2022	316	79.0	84	21.0	400	79,350	75.8	25,370	24.2	104,720
2023	177	67.3	86	32.7	263	49,285	61.9	30,390	38.1	79,675
2024	395	79.0	105	21.0	500	62,585	72.1	24,205	27.9	86,790
Subtotal	888	76.4	275	23.6	1,163	191,220	70.5	79,965	29.5	271,185
Small Business										
2024	245	77.5	71	22.5	316	33,397	72.9	12,388	27.1	45,785
Source: 2022, 2023, & 2024 HMDA Data; Bank Data, as reported. Due to rounding, totals may not equal 100.0%.										

Borrower Profile

The distribution of borrowers reflects reasonable penetration. This conclusion is supported by reasonable performance in all rated areas. Examiners focused on the percentage by number of home mortgage loans to low- and moderate-income borrowers and small business loans to businesses with gross annual revenues (GAR) of \$1 million or less. The Borrower Profile criterion contributed more weight to overall conclusions than Geographic Distribution due to the limited number of low- and moderate- income census tracts throughout the AAs. Refer to subsequent sections for conclusions in each AA.

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the AAs. Examiners derived this conclusion based on MSB's reasonable performance in all rated areas. Examiners focused on the percentage of loans made within low- and moderate-income tracts. Refer to subsequent sections for conclusions in each AA.

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

MSB's community development performance demonstrated adequate responsiveness to the community development needs of its AA through community development loans, qualified investments, and community development services. MSB's performance in all rated areas support this conclusion. Examiners considered the institution's capacity and the need and availability of such opportunities, as well as the performance of SSIs. Refer to subsequent sections of this evaluation for specific performance.

Community Development Loans

MSB originated 11 community development loans totaling approximately \$14.7 million during the evaluation period. This level of activity represents 1.1 percent of total assets and 1.3 percent of total loans.

The bank's performance is comparable to six SSIs whose community development loans ranged from 0.4 to 4.4 percent of total assets (average of 2.2 percent) and 0.4 to 7.5 percent of total loans (average of 3.4 percent). Examiners selected SSIs based on asset size and AAs served.

Since the institution was found to be responsive to the community development needs and opportunities of its AAs, examiners qualified one loan, totaling approximately \$5.8 million outside of the AAs that benefited a broader statewide area. This loan helped finance the construction of a 102-unit affordable housing project supported by low-income housing tax credits. This loan further demonstrates the bank's responsiveness to community development needs.

MSB's community development lending has increased relative to their total assets and total loans since the previous evaluation. At the previous evaluation, community development loans made up 0.2 percent of total assets and 0.3 percent of total loans.

CD Lending by Rated Area										
AA	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
State of Ohio	1	4,000	0	0	2	1,310	0	0	3	5,310
State of West Virginia	0	0	2	686	3	1,017	1	796	6	2,499
Weirton-Steubenville, WV-OH MSA	0	0	1	1,110	0	0	0	0	1	1,110
Broader Statewide	1	5,800	0	0	0	0	0	0	1	5,800
Total	2	9,800	3	1,796	5	2,327	1	796	11	14,719
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>										

Qualified Investments

MSB made 53 qualified investments and donations totaling approximately \$7.5 million. This performance represents 0.5 percent of assets and 4.8 percent of total securities, which is comparable to SSIs that ranged from 0.0 to 1.2 percent of total assets and 0.0 to 7.9 percent of total securities.

Additionally, MSB's community development qualified investments relative to total assets and total securities remain similar to the prior evaluation where qualified investments made up 0.5 percent of total assets and 3.0 percent of total securities.

The institution was responsive to the community development needs of its AAs; therefore, examiners also considered two qualified donations totaling \$1,100 benefitting the broader statewide area.

CD Investments by Rated Area										
AA	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
State of Ohio	4	1,505	21	20	12	18	0	0	37	1,543
State of West Virginia	0	0	8	13	0	0	3	5,974	11	5,987
Weirton-Steubenville, WV-OH MSA	0	0	2	<1	0	0	1	<1	3	<1
Broader Statewide	0	0	1	1	1	<1	0	0	2	1
Total	4	1,505	32	35	13	18	4	5,973	53	7,531

Source: Bank Data. Due to rounding, totals may not equal 100.0%

Community Development Services

During the evaluation period, MSB provided 117.8 hours of financial expertise or technical assistance to different community development related organizations in the AAs. This performance is below SSIs, which ranged from 629 to 1772 hours. However, in addition to the services in the table below, MSB has a relationship with a local Habitat for Humanity to service loans at no cost to the organization. MSB currently services a total of six mortgage loans for Habitat Humanity, at no cost to the affordable housing organization, of which five were originated during the review period. Further, MSB operates four branches with ATMs in moderate-income census tracts through the rated areas, which is responsive to the banking needs of the AAs.

CD Services by Rated Area			
AA	Community Services	Economic Development	Totals
	Hours #	Hours #	Hours #
State of Ohio	56.8	2.5	59.3
State of West Virginia	40.0	3	43.0
Weirton-Steubenville, WV-OH MSA	12.5	3	15.5
Total	109.3	8.5	117.8

Source: Bank Data. Due to rounding, totals may not equal 100.0%

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices; therefore, this consideration did not affect the institution's overall CRA rating.

STATE OF OHIO – Full-Scope Review

CRA RATING FOR STATE OF OHIO: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN OHIO

The State of Ohio rated area consists of the Ohio Non-MSA; Canton-Massillon, OH MSA; and Cleveland, OH MSA AAs. MSB operates 14 of its 20 branches in the State of Ohio, and Ohio accounts for 56.1 percent of deposits and 70.0 percent of branches. Of the loans inside the bank’s AAs (by number of loans), the Ohio Rated Area makes up 77.0 percent of the home mortgage universe and 60.4 percent of the small business universe. Examiners used bank data, 2024 HMDA aggregate data, 2020 U.S. Census Data, 2024 D&B Data, and a community contact to analyze lending performance in this AA.

SCOPE OF EVALUATION - OHIO

The scope of the evaluation in the Ohio rated area is consistent with the overall scope of the institution discussed above. Performance in the State of Ohio rated area received the greatest weight in determining the overall rating as it contains the majority of deposits, loans, and branches. Refer to the overall Scope of Evaluation section above for more detail.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OHIO

LENDING TEST

MSB demonstrates reasonable performance under the Lending Test. Performance under the Borrower Profile and Geographic Distribution criteria support this conclusion. Refer to the AA sections below for details on the performance in each AA.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes inside the AAs. Examiners reached this conclusion from the overall reasonable penetration throughout each of the AAs in this rated area. A complete discussion of the performance of this criterion is in the individual AA sections of this evaluation.

Geographic Distribution

The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the AAs. This conclusion is supported by the performance in the Ohio non-MSA and Cleveland MSA AAs. A complete discussion of the performance for this criterion is in the individual AA sections of this evaluation.

COMMUNITY DEVELOPMENT TEST

MSB's demonstrated adequate responsiveness to the community development needs in this rated area through community development loans, qualified investments, and community development services. The Ohio Non-MSA received the most weight overall and primarily supported this conclusion. Refer to subsequent AA sections for specific performance.

Community Development Loans

MSB originated four community development loans, totaling approximately \$11.1 million in the Ohio rated area during the evaluation period. Since the bank was responsive to the community development credit needs within the Ohio AAs, examiners included a \$5.8 million community development loan made outside the AAs that benefited the broader statewide area of Ohio. This represents 75.5 percent of the bank's total community development lending activity, by dollar, which is consistent with the concentration of home mortgage lending activity in this Rated Area but significantly outpaces deposits. This performance also presents a significant increase in dollar volume from the prior evaluation where the bank made \$1.3 million in community development loans in the Ohio AAs. The following table illustrates the bank's qualified investments by AA.

CD Lending by AA						
AA	Affordable Housing		Economic Development		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)
Ohio Non-MSA	0	0	2	1,310	2	1,310
Canton-Massillon, OH MSA	1	4,000	0	0	1	4,000
Cleveland, OH MSA	0	0	0	0	0	0
Broader Statewide	1	5,800	0	0	1	5,800
Total	2	9,800	2	1,310	4	11,110
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>						

Qualified Investments

MSB made 39 qualified investments totaling approximately \$1.5 million in the Ohio rate area. This volume represents 20.5 percent of total qualified investment activity, by dollar, which trails the concentration of deposits and lending activity in this rated area. Examiners noted the bank did not make any qualified investments in the Cleveland, OH MSA AA. MSB's performance by dollar volume decreased from the prior evaluation where the bank made six investments or donations for a total of \$3.0 million in this rated area. The following table illustrates the bank's qualified investments by AA.

CD Investments by AA								
AA	Affordable Housing		Community Services		Economic Development		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
Ohio Non-MSA	4	1,505	21	20	11	18	36	1,543
Canton-Massillon, OH MSA	0	0	0	0	1	<1	1	<1
Cleveland, OH MSA	0	0	0	0	0	0	0	0
Broader Statewide	0	0	1	1	1	<1	2	1
Total	4	1,505	22	21	13	18	39	1,544
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>								

Community Development Services

During the evaluation period, MSB provided 59.3 hours of financial expertise or technical assistance to different community development related organizations in the Ohio rated area. This volume represents 50.3 percent of the bank's total community development service activity, which is consistent with the concentration of deposits but trails the concentration of lending activity in this rated area. Examiners noted the bank did not provide any qualified services in the Canton-Massillon, OH MSA AA and a relatively low volume of qualified services in the Cleveland, OH MSA. Further, MSB maintains two branches with ATMs located in moderate-income census tracts, which is responsive to the retail banking needs of this rated area.

The following table illustrates the bank's community development services by AA.

CD Services by AA			
AA	Community Services	Economic Development	Totals
	Hours #	Hours #	Hours #
Ohio Non-MSA	53.3	2.5	55.8
Canton-Massillon, OH MSA	0.0	0	0
Cleveland, OH MSA	3.5	0	3.5
Total	56.8	2.5	59.3
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>			

OHIO NON-MSA AA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OHIO NON-MSA AA

The Ohio Non-MSA AA includes the entirety of Ashland, Columbiana, Holmes, and Wayne Counties in Ohio. MSB operates 11 of the 20 branches in the Ohio Non-MSA AA. This AA accounts for 48.7 percent of deposits and 55.0 percent of branches. Of the loans in the bank's AAs, the Ohio Non-MSA AA makes up 51.9 percent of the home mortgage universe and 44.9 percent of the small business loans by number of loans. Examiners used bank data, 2024 HMDA aggregate

data, 2020 U.S. Census Data, 2024 D&B Data, and a community contact to analyze lending performance in this AA.

Economic and Demographic Data

According to 2020 U.S. Census data, the Ohio Non-MSA AA includes 79 census tracts with the following income designations: 1 low-, 8 moderate-, 57 middle-, and 13 upper-income. Additionally, as of 2025, there are six census tracts in Holmes County that are considered underserved middle-income nonmetropolitan tracts. The following table presents demographic information for the AA.

Demographic Information of the Ohio Non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	79	1.3	10.1	72.2	16.5	0.0
Population by Geography	315,441	0.9	7.0	76.8	15.3	0.0
Housing Units by Geography	129,527	1.0	7.4	78.3	13.4	0.0
Owner-Occupied Units by Geography	88,513	0.6	5.1	79.2	15.1	0.0
Occupied Rental Units by Geography	30,212	1.8	12.1	76.3	9.8	0.0
Vacant Units by Geography	10,802	1.6	12.7	76.2	9.5	0.0
Businesses by Geography	27,909	0.3	6.6	78.9	14.3	0.0
Farms by Geography	1,507	0.0	1.9	82.1	16.0	0.0
Family Distribution by Income Level	80,823	17.0	17.6	23.4	42.1	0.0
Household Distribution by Income Level	118,725	21.5	15.8	18.9	43.8	0.0
Ohio Non-MSA Median Family Income		\$66,160	Median Housing Value			\$ 142,799
			Median Gross Rent			\$695
			Families Below Poverty Level			7.9%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The Geographic Distribution criterion compares the institution's home mortgage lending to the distribution of owner-occupied housing units. According to 2020 U.S. Census data, the AA contains 129,527 housing units. Of these, 68.3 percent are owner-occupied, 23.3 percent are occupied rentals, and 8.3 percent are vacant.

Examiners used the 2024 Federal Financial Institutions Examination Council (FFIEC)-updated median family income (MFI) level to analyze home mortgage loans under the Borrower Profile criterion. The following table illustrates the income categories within the Ohio Non-MSA AA.

Estimated MFI Ranges - Ohio Non-MSA AA					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024	\$ 81,600	< \$40,800	\$40,800 to < \$65,280	\$65,280 to < \$97,920	≥ \$97,920
Source: FFIEC					

The analysis of small business loans under the Borrower Profile criterion compares the distribution of loans by the GAR level. According to 2024 D&B data, 87.2 percent of the 27,909 businesses operating in the AA have a GAR of \$1.0 million or less, 3.8 percent have more than \$1.0 million, and 9.1 percent have unknown revenues. Additionally, 69.8 percent of businesses have four or fewer employees, and 91.9 percent operate from a single location.

The table below presents the unemployment rates for each county in the AA compared to state and national averages based on data from the U.S. Bureau of Labor Statistics. Unemployment rates in Columbiana County are consistently higher than state and national averages, while Ashland, Holmes, and Wayne Counties are similar to state and national averages.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Ashland	3.8	3.5	4.3
Columbiana	4.6	4.3	4.9
Holmes	2.9	3.0	3.2
Wayne	3.5	3.2	3.9
State of Ohio	4.0	3.7	4.3
National Average	3.7	3.6	4.0
Source: Bureau of Labor Statistics			

Competition

MSB operates in a moderately-competitive market for financial services when considering the geographic size and population in the Ohio Non-MSA AA. The FDIC's Summary of Deposit data as of June 30, 2025, provides some measurement of the competition. According to the data, 21 institutions operate 106 full-service branches in the AA. MSB ranks sixth and holds 7.2 percent of the deposits.

HMDA data indicates there is a relatively high level of competition for home mortgage loans among banks in the AA. In 2024, 312 lenders originated 9,406 home mortgage loans within the Ohio Non-MSA AA - the top three lenders are two large, national banks and a mortgage company. MSB ranked sixth out of this group with 2.5 percent of the lending market share.

Although MSB is not subject to CRA data collection and reporting requirements for small business loans, market share data provides a measurement of the level of competition for these loans among banks in the AA. Aggregate small business lending data for 2023, the most recent year for which

aggregate data is available, reflects 71 lenders reporting 5,038 small business loans in the Ohio Non-MSA AA. The top three lenders, one large national bank and two credit card companies, accounted for 48.8 percent of the market share.

Community Contact

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying credit needs and opportunities, including the bank's responsiveness to those needs.

Examiners contacted a local housing authority familiar with the home mortgage lending market in the AA. The contact stated that the AA has an aging population and younger residents are leaving the area to find better employment opportunities elsewhere. Further, the contact indicated local financial institutions are meeting the credit needs in the area to the best of their ability. However, they stated that housing is unaffordable to most people in the area, which limits financial institutions' opportunities to lend to low- and moderate-income individuals. The contact shared that there are tax credits and affordable housing developments in the area, which provide some opportunities for lending.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined home mortgage and small business lending represents the primary credit need in the area. Examiners also determined that affordable housing and economic development are the primary community development needs.

CONCLUSIONS ON PERFORMANCE CRITERIA IN OHIO NON-MSA

LENDING TEST

MSB demonstrated reasonable performance in the Ohio Non-MSA AA. Borrower Profile performance primarily supports this conclusion and received more weight in the overall conclusions.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. Although small business lending performance was stronger, this conclusion is supported by the reasonable performance in the more heavily weighted home mortgage lending product segment. Examiners focused on the percentage by number of home mortgage loans to low- and moderate-income borrowers and small business loans to businesses with GARs of \$1 million or less.

Home Mortgage Loans

The distribution of borrowers reflects reasonable penetration among individuals of different income levels. MSB's lending to low-income borrowers is comparable to aggregate data, while lending to moderate-income individuals slightly trails aggregate performance. The following table displays the lending distribution, by borrower income level, for home mortgage loans extended within the AA.

MSB serves as a Federal Home Loan Bank (FHLB) sponsor for a local Habitat for Humanity, which allows the organization to obtain loans for affordable housing projects. Because MSB is not the creditor for these loans, they do not appear in the table below. Although MSB does not serve as the creditor, their FHLB sponsorship makes the facilitation of these loans possible. During the evaluation period, this relationship allowed for the origination of five loans to borrowers with incomes between 30 and 80 percent of the MFI.

Distribution of Home Mortgage Loans by Borrower Income Level Ohio Non-MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	17.0	7.8	14	6.8	650	1.9
Moderate	17.6	23.4	42	20.5	5,140	14.7
Middle	23.4	24.6	43	21.0	6,435	18.4
Upper	42.1	31.2	82	40.0	16,610	47.5
NA	0.0	13.0	24	11.7	6,130	17.5
Total	100.0	100.0	205	100.0	34,965	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects excellent penetration to businesses with GARs of \$1 million or less. The following table shows that 89.1 percent of loans originated were to businesses with GARs of \$1 million or less, which is comparable to demographic data. However, examiners also reviewed MSB's results relative to six SSIs, as SSIs can be a better gauge than demographics for demand in the AA. MSB's performance ranked first among the SSIs, whose performance ranged from 29 to 86 percent (with an average of 54 percent).

Distribution of Small Business Loans by GAR Category Ohio Non-MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	87.2	98	89.1	8,860	72.8
> \$1,000,000	3.8	12	10.9	3,305	27.2
Revenue Not Available	9.1	0	0.0	0	0.0
Total	100.0	110	100.0	12,165	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Ohio Non-MSA AA. The institution's home mortgage and small business lending performance supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. Examiners focused on the comparison of aggregate data for 2024 home mortgage loans. MSB did not originate any loans in the only low-income census tract; however, this census tract contains limited owner-occupied housing units.

MSB originated six loans in moderate-income census tracts in 2024, which trails the aggregate and demographic comparative data by a little more than 2.0 percentage points. However, as mentioned, MSB serves as a FHLB sponsor for Habitat for Humanity. Of the five Habitat for Humanity loans facilitated during the review period, one was originated in a moderate-income census tract. Similar to Borrower Profile criterion, because MSB is not the creditor for these loans, they do not appear in the table. Overall, examiners consider this performance reasonable.

Geographic Distribution of Home Mortgage Loans Ohio Non-MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	0.6	0.5	0	0.0	0	0.0
Moderate	5.1	5.2	6	2.9	690	2.0
Middle	79.2	83.6	176	85.9	30,360	86.8
Upper	15.1	10.7	23	11.2	3,915	11.2
NA	0.0	--	0	0.0	0	0.0
Total	100.0	100.0	205	100.0	34,965	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. As shown in the following table, MSB's lending performance was comparable to the percentage of business within the low- and moderate-income census tracts.

Geographic Distribution of Small Business Loans Ohio Non-MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	0.3	0	0.0	0	0.0
Moderate	6.6	6	5.5	485	4.0
Middle	78.9	956	86.4	10,818	88.9
Upper	14.3	8	7.3	803	6.6
NA	0.0	1	0.9	59	0.5
Total	100.0	110	100.0	12,165	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

MSB demonstrated adequate responsiveness to the community development needs of the Ohio Non-MSA AA through community development loans, qualified investments and donations, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities.

Community Development Loans

In 2025, MSB originated two community development loans benefitting economic development revitalization projects totaling approximately \$1.3 million during the evaluation period in the Ohio Non-MSA AA. This volume represents 8.9 percent of the total qualified lending originated by the bank but is an increase in dollar volume since the prior evaluation, where MSB originated four community development loans for \$474,000. A notable example of the community development loans in this AA includes MSB's 2025 origination of a loan for approximately \$1.3 million to finance the purchase and renovation of a warehouse that will be used to house multiple businesses, including a warehousing and distribution center, creating new jobs for LMI individuals (Economic Development).

Qualified Investments

MSB made 36 qualified investments during the review period totaling approximately \$1.5 million. This performance represents 20.5 percent of the bank's total qualified investment activity but is an increase from the prior evaluation where the bank made one qualified investment totaling \$750,000. The following table illustrates the bank's qualified investments by year and purpose.

CD Investments - Ohio Non-MSA AA								
AA	Affordable Housing		Community Services		Economic Development		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (Partial Year)	1	4	5	3	0	0	6	7
2023	1	1,500	1	1	0	0	2	1,501
2024	1	<1	5	8	2	1	8	9
2025 (YTD)	1	1	10	8	9	17	20	26
Total	4	1,505	21	20	11	18	36	1,543
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>								

A notable example of the bank's qualified investments includes the bank's 2023 investment in a \$1.5 million in a Low-Income Housing Tax Credit for an affordable housing project.

Community Development Services

During the evaluation period, MSB employees provided 55.8 hours of financial expertise or technical assistance to multiple community-development related organizations in the Ohio Non-MSA AA. This volume of hours represents 47.4 percent of the bank's total community development service activity. The prior examination evaluated performance in instances. At the prior examination, the bank provided 68 instances of financial expertise or technical assistance.

Examiners consider the bank’s current performance comparable to the prior examination. The following table illustrates the bank’s community development services by year and purpose.

MSB operates one branch with an ATM in a moderate-income census tract in this AA.

CD Services - Ohio Non MSA AA			
Year	Community Services	Economic Development	Totals
	Hours #	Hours #	Hours #
2022 (Partial Year)	3	0	3
2023	19.3	0	19.3
2024	0	0	0
2025 (YTD)	31	2.5	33.5
Total	53.3	2.5	55.8
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>			

Notable examples of the bank’s community development services include:

- In 2022 and 2023, an MSB employee served as a Board member for a local food bank (Community Service).
- In 2025, a bank employee served on the finance committee for a local women’s shelter (Community Service).

CANTON-MASSILLON, OH MSA – Full Scope Review

DESCRIPTION OF INSTITUTION’S OPERATIONS IN CANTON-MASSILLON, OH MSA

MSB operates 2 of the 20 branches in the Canton-Massillon, OH MSA AA, which includes all census tracts in Carrol and Stark Counties. This AA accounts for 3.6 percent of deposits and 10.0 percent of branches. Among the loans in the bank’s AAs (by number of loans), the Canton-Massillon, OH MSA AA makes up 18.0 percent of the home mortgage universe and 11.8 percent of the small business loans. Given the volume of branches, loans and deposits within this AA, it did not receive as much weight in the overall conclusions as the Ohio Non-MSA AA. Examiners used bank data, 2024 HMDA aggregate data, 2020 U.S. Census Data, 2024 D&B Data, and a community contact to analyze lending performance in this AA.

Economic and Demographic Data

According to 2020 U.S. Census data, the Canton-Massillon, OH MSA AA contains 97 census tracts with the following income designations: 8 low-, 17 moderate-, 49 middle-, and 23 upper-income tracts. The following table presents demographic information for the AA.

Demographic Information of the Canton-Massillon, OH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	97	8.3	17.5	50.5	23.7	0.0
Population by Geography	401,574	6.2	13.7	53.0	27.1	0.0
Housing Units by Geography	180,622	6.7	15.1	53.7	24.5	0.0
Owner-Occupied Units by Geography	113,969	3.2	10.3	56.6	29.9	0.0
Occupied Rental Units by Geography	51,639	12.5	23.6	47.4	16.5	0.0
Vacant Units by Geography	15,014	13.2	22.8	53.3	10.7	0.0
Businesses by Geography	60,710	3.6	9.0	49.0	38.4	0.0
Farms by Geography	794	0.6	1.4	67.6	30.4	0.0
Family Distribution by Income Level	105,697	19.6	18.8	21.5	40.1	0.0
Household Distribution by Income Level	165,608	23.5	16.4	18.4	41.6	0.0
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$70,028	Median Housing Value			\$ 132,179
			Median Gross Rent			\$737
			Families Below Poverty Level			9.6%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The Geographic Distribution criterion compares the institution's home mortgage lending to the distribution of owner-occupied housing units. According to 2020 U.S. Census data, the AA contains 180,622 housing units. Of these, 63.1 percent are owner-occupied, 28.6 percent are occupied rentals, and 8.3 percent are vacant.

Examiners used the 2024 FFIEC-updated MFI level to analyze home mortgage loans under the Borrower Profile criterion. The following table illustrates the income categories within the Canton-Massillon, OH MSA AA.

Estimated MFI Ranges Canton-Massillon, OH MSA AA					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024	\$ 85,500	< \$42,750	\$42,750 to < \$68,400	\$68,400 to < \$102,600	≥ \$102,600
Source: FFIEC					

The analysis of small business loans under the Borrower Profile criterion compares the distribution of loans by the GAR level. According to 2024 D&B data, 91.6 percent of the 60,710 businesses

operating in the AA have a GAR of \$1.0 million or less, 2.2 percent have more than \$1.0 million, and 6.2 percent have unknown revenues. Additionally, 58.4 percent of businesses have four or fewer employees, and 94.9 percent operate from a single location, indicating the level of opportunity to serve small businesses.

The table below presents the unemployment rates for each county in the AA compared to state and national averages based on data from the U.S. Bureau of Labor Statistics. Unemployment rates in Carroll and Stark Counties are consistently higher than state and national averages.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Carroll	4.5	4.2	4.8
Stark	4.1	3.9	4.5
State of Ohio	4.0	3.7	4.3
National Average	3.7	3.6	4.0
<i>Source: Bureau of Labor Statistics</i>			

Competition

MSB operates in a moderately-competitive market for financial services when considering the geographic size and population in the Canton-Massillon, OH MSA AA. The FDIC's Summary of Deposit data as of June 30, 2025, provides some measurement of the competition. According to the data, 18 institutions operate 96 full-service branches in this AA. MSB holds 0.4 percent of the deposits in the AA.

HMDA data indicates there is a high level of competition for home mortgage loans among banks lenders in the AA. In 2024, 352 lenders originated 15,375 home mortgage loans within the Canton-Massillon, OH MSA AA - the top three lenders being a large national bank and two mortgage companies. MSB ranked 41st out of this group with 0.6 percent of the lending market share.

Although MSB is not subject to CRA data collection and reporting requirements for small business loans, market share data provides a measurement of the level of competition for these loans among banks in the AA. Aggregate small business lending data for 2023 reflects 86 lenders reported 6,724 small business loans in the Canton-Massillon, OH MSA AA. The top three lenders, a large national bank and two credit card companies, accounted for 56.1 percent of the market share.

Community Contact

Examiners reviewed a previous community contact with a local housing organization in the AA. The contact stated that the housing in the area is aging and there are limited efforts for redevelopment. According to the contact, the primary needs of the area are home mortgage lending to support homeownership and small business loans. The contact stated that the area has the capacity to host many more small businesses than currently exist. The contact also stated that the area would benefit from financial literacy courses.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, bank management, and demographic and economic data, examiners determined home mortgage and small business loans are the primary credit needs of the AA. Examiners also determined that affordable housing and economic development to be the primary community development needs.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CANTON-MASSILLON, OH MSA

LENDING TEST

MSB demonstrated reasonable performance in the Canton-Massillon, OH MSA AA. Borrower profile performance primarily supports this conclusion.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. MSB's strong small business performance mitigated weaknesses identified with home mortgage lending. Examiners focused on the percentage by number of small business loans to businesses with GARs of \$1 million or less and home mortgage loans to low- and moderate-income borrowers.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is poor. MSB's lending to low-income borrowers was comparable to aggregate data; however, lending to moderate-income borrowers was significantly below aggregate performance. The following table displays the lending distribution, by borrower income level, for home mortgage loans extended within the AA.

Distribution of Home Mortgage Loans by Borrower Income Level Canton-Massillon, OH MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	19.6	10.8	7	9.9	805	8.1
Moderate	18.8	22.9	10	14.1	890	9.0
Middle	21.5	22.5	12	16.9	1,350	13.6
Upper	40.1	28.8	36	50.7	6,020	60.5
NA	0.0	15.0	6	8.5	880	8.9
Total	100.0	100.0	71	100.0	9,945	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects excellent penetration. MSB's lending to businesses with GARs of less than \$1 million is comparable to demographic data. However, examiners also reviewed MSB's results relative to five SSIs, as SSIs can be a better gauge than demographics for demand in the AA. MSB's performance ranked first among the SSIs, whose performance ranged

from 19 to 75 percent, with an average of 53 percent. This comparison demonstrates excellent performance for MSB. The following table illustrates the distribution of small business loans by GAR level in the AA.

Distribution of Small Business Loans by GAR Category Canton-Massillon, OH MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	91.6	26	89.7	3,265	68.5
> \$1,000,000	2.2	3	10.3	1,500	31.5
Revenue Not Available	6.2	0	0.0	0	0.0
Total	100.0	29	100.0	4,765	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Geographic Distribution

The geographic distribution of loans reflects poor dispersion throughout the Canton-Massillon, OH MSA AA. MSB's poor performance in home mortgage and small business lending supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor dispersion throughout the AA. Examiners focused on the comparison of aggregate data for 2024 home mortgage loans. MSB's lending in low-income census tracts in 2024 was comparable to aggregate performance. However, MSB made no home mortgage loans in moderate-income census tracts in 2024.

Geographic Distribution of Home Mortgage Loans Canton-Massillon, OH MSA AA						
Tract Income Level	% of Owner- Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	3.2	3.7	2	2.8	150	1.5
Moderate	10.3	11.1	0	0.0	0	0.0
Middle	56.6	55.6	50	70.4	6,160	61.9
Upper	29.9	29.6	19	26.8	3,635	36.6
Total	100.0	100.0	71	100.0	9,945	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the AA. As shown in the following table, MSB's lending performance was comparable to the percentage of businesses within the low-income census tracts and significantly trailed demographic data in moderate-income census tracts.

Geographic Distribution of Small Business Loans Canton-Massillon, OH MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	3.6	1	3.5	40	0.8
Moderate	9.0	1	3.5	704	14.8
Middle	49.0	23	79.3	2,794	58.6
Upper	38.4	4	13.8	1,227	25.8
Total	100.0	29	100.0	4,765	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

MSB demonstrated poor responsiveness to the community development needs of the Canton-Massillon, OH MSA AA through community development loans, qualified investments and donations, and community development services. Examiners considered the institution's capacity and the need and availability of such opportunities.

Community Development Loans

In 2023, MSB originated one community development loan totaling \$4.0 million in the Canton-Massillon, OH MSA AA. The loan supported the construction of 42 affordable housing units in the AA. This performance represents 27.2 percent of the bank's total community development lending and is an increase in the dollar volume since the prior evaluation where the bank originated one community development loan totaling \$43,000 in this AA.

Qualified Investments

MSB made one qualified donation during the review period totaling \$250 which went to a local economic development organization. This performance is less than 0.1 percent of the bank's total qualified investment activity and is a significant decrease since the prior evaluation, where the bank received prior period credit for one investment totaling \$36,000. The following table illustrates the bank's qualified investments by year and purpose.

Community Development Services

During the evaluation period, MSB employees did not provide any financial expertise or technical assistance to community-development related organizations in the Canton-Massillon, OH MSA AA. This is consistent with performance at the prior evaluation.

CLEVELAND, OH MSA – Full Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CLEVELAND, OH MSA

MSB operates 1 of the 20 branches in the Cleveland, OH MSA AA which consists of all census tracts in Medina County. The AA accounts for 3.8 percent of deposits and 5.0 percent of branches.

Among the loans in the bank’s AAs (by number of loans), the Cleveland, OH MSA AA makes up 7.1 percent of the home mortgage universe and 3.7 percent of small business loans. Given the volume of branches, loans and deposits within this AA, it did not receive as much weight in the overall conclusions as the Ohio Non-MSA and the Canton-Massillon, OH MSA AAs. Examiners used bank data, 2024 HMDA aggregate data, 2020 U.S. Census Data, 2024 D&B Data, and a community contact to analyze lending performance in this AA.

Economic and Demographic Data

According to 2020 U.S. Census data, the Cleveland, OH MSA AA includes 42 census tracts with the following income designations: no low-, 2 moderate-, 16 middle-, and 24 upper-income. The following table presents demographic information for the AA.

Demographic Information of the AA Cleveland, OH MSA - Medina only						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	42	0.0	4.8	38.1	57.1	0.0
Population by Geography	182,470	0.0	3.6	40.0	56.5	0.0
Housing Units by Geography	72,938	0.0	4.5	42.3	53.3	0.0
Owner-Occupied Units by Geography	55,479	0.0	2.9	39.0	58.1	0.0
Occupied Rental Units by Geography	14,260	0.0	9.8	53.3	36.9	0.0
Vacant Units by Geography	3,199	0.0	7.7	49.5	42.8	0.0
Businesses by Geography	19,857	0.0	3.3	36.8	59.9	0.0
Farms by Geography	412	0.0	1.5	40.3	58.3	0.0
Family Distribution by Income Level	49,326	11.3	15.5	19.7	53.5	0.0
Household Distribution by Income Level	69,739	13.8	12.6	17.0	56.6	0.0
Median Family Income MSA - 17410 Cleveland, OH MSA		\$75,548	Median Housing Value			\$ 212,174
			Median Gross Rent			\$893
			Families Below Poverty Level			3.8%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

The Geographic Distribution criterion compares the institution’s home mortgage lending to the distribution of owner-occupied housing units. According to 2020 U.S. Census data, the AA contains 72,938 housing units. Of these, 76.1 percent are owner-occupied, 19.6 percent are occupied rentals, and 4.4 percent are vacant.

Examiners used the 2024 FFIEC-updated MFI level to analyze home mortgage loans under the Borrower Profile criterion. The following table illustrates the income categories within the Cleveland, OH MSA AA.

Estimated MFI Ranges - Cleveland, OH MSA AA					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024	\$ 94,100	< \$47,050	\$47,050 to < \$75,280	\$75,280 to < \$112,920	≥ \$112,920
Source: FFIEC					

The analysis of small business loans under the Borrower Profile criterion compares the distribution of loans by the GAR level. According to 2024 D&B data, 89.7 percent of the 19,857 businesses operating in the AA have a GAR of \$1.0 million or less, 3.3 percent have more than \$1.0 million, and 7.0 percent have unknown revenues. Additionally, 68.9 percent of businesses have four or fewer employees, and 93.6 percent operate from a single location, indicating the level of opportunity to serve small businesses.

The table below presents the unemployment rates for each county in the AA compared to state and national averages based on data from the U.S. Bureau of Labor Statistics. The unemployment rate in Medina County has fallen below state and national averages over the last two years.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Medina	3.9	3.1	3.3
Ohio	4.0	3.7	4.3
National Average	3.7	3.6	4.0
Source: Bureau of Labor Statistics			

Competition

MSB operates in a moderately-competitive market for financial services when considering the geographic size and population in the Cleveland, OH MSA AA. The FDIC's Summary of Deposit data as of June 30, 2025, provides some measurement of the competition. According to the data, 17 institutions operate 40 full-service branches within the Cleveland, OH MSA AA. MSB holds 0.7 percent of the deposits in the AA.

HMDA data indicates there is a high level of competition for home mortgage loans among banks in the AA. In 2024, 292 lenders originated 7,816 home mortgage loans within the Cleveland, OH MSA AA - the top three lenders being two large national banks and one mortgage company. MSB ranked 50th out of this group with 0.4 percent of the lending market share.

Although MSB is not subject to CRA data collection and reporting requirements for small business loans, market share data provides a measurement of the level of competition for these loans among in the AA. Aggregate small business lending data for 2023 reflects 83 lenders reporting 3,889 small

business loans in the Cleveland, OH MSA AA. The top three lenders, one large national bank and two credit card companies, accounted for 53.1 percent of the market share.

Community Contact

Examiners contacted a local economic development organization familiar with the AA. The contact stated Medina County is one of the most affluent counties in the state; however, there is still a high demand for affordable housing in the area. The contact emphasized that rising home valuations and cost of construction have made housing unaffordable to many people in the county, creating the need for affordable housing in the area. Additionally, the contact stated the job market in the area is strong with many well-paying jobs available and that small businesses have seen significant increases in capital investment over the past decade, contributing to a strong local economy. However, the contact stated small business credit needs still exist.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, institution management, and demographic and economic data, examiners determined that home mortgage and small business loans represent the primary credit needs of the AA. In addition, affordable housing continues to be a primary community development need in the AA.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CLEVELAND, OH MSA

LENDING TEST

MSB demonstrated reasonable performance in the Cleveland, OH MSA AA. Borrower Profile and Geographic Distribution performance support this conclusion.

Borrower Profile

The distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. While results in the small business lending segment were stronger, the institution's home mortgage lending performance supports this criterion conclusion. Examiners focused on the percentage by number of home mortgage loans to low- and moderate-income borrowers and small business loans to businesses with GARs of \$1 million or less.

Home Mortgage Loans

The distribution of home mortgage loans to individuals of different income levels, including low- and moderate-income borrowers, is reasonable. While MSB's lending to low-income borrowers was below aggregate performance, their lending to moderate-income borrowers exceeded aggregate performance. As a result, examiners considered the overall performance reasonable. The following table displays the lending distribution, by borrower income level, for home mortgage loans extended within the AA.

Distribution of Home Mortgage Loans by Borrower Income Level Cleveland, OH MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	11.3	7.2	1	3.6	75	1.8
Moderate	15.5	17.0	8	28.6	1,030	24.0
Middle	19.7	21.4	2	7.1	130	3.0
Upper	53.5	40.7	15	53.6	2,645	61.7
NA	0.0	13.8	2	7.1	410	9.6
Total	100.0	100.0	28	100.0	4,290	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects excellent penetration of loans to businesses with GARs of \$1 million or less. MSB's performance is comparable to demographic data. However, examiners also reviewed MSB's results relative to three SSIs, as SSIs can be a better gauge than demographics for demand in the AA. MSB's performance ranked first among the SSIs, whose performance in lending to businesses at or below \$1 million threshold ranged from 28 to 82 percent, with an average of 52 percent. This comparison demonstrates excellent performance for MSB. The following table illustrates the distribution of small business loans by GAR level in the AA.

Distribution of Small Business Loans by GAR Category Cleveland, OH MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	89.7	8	88.9	2,566	95.7
> \$1,000,000	3.3	1	11.1	115	4.3
Revenue Not Available	7.0	0	0.0	0	0.0
Total	100.0	9	100.0	2,681	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Geographic Distribution

The geographic distribution of loans reflects reasonable dispersion throughout the Cleveland, OH MSA AA. While results in the lower-weighted small business lending segment were weaker, the institution's home mortgage lending performance supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the AA. Examiners focused on the comparison of aggregate data for 2024 home mortgage loans. MSB's lending in moderate-income census tracts mirrored aggregate performance.

Geographic Distribution of Home Mortgage Loans Cleveland, OH MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Moderate	2.9	3.6	1	3.6	25	0.6
Middle	39.0	40.5	19	67.9	3,295	76.8
Upper	58.1	56.0	8	28.6	970	22.6
Total	100.0	100.0	28	100.0	4,290	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The geographic distribution of small business loans reflects poor dispersion throughout the AA. As shown in the following table, MSB's did not make any small business loans within the moderate-income census tracts.

Geographic Distribution of Small Business Loans Cleveland, OH MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate	3.3	0	0.0	0	0.0
Middle	36.8	6	66.7	1,966	73.3
Upper	59.9	3	33.3	715	26.7
Total	100.0	9	100.0	2,681	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

MSB demonstrated poor responsiveness to the community development needs of the Cleveland, OH MSA AA through community development loans, qualified investments and donations, and community development services. Examiners considered the institution's capacity, and the need and availability of such opportunities.

Community Development Loans

MSB did not originate any community development loans during the evaluation period in the Cleveland, OH MSA AA. This performance is a decrease from the prior evaluation, where the bank originated two community development loans totaling approximately \$183,000.

Qualified Investments

MSB did not make any qualified investments, grants or donations during the review period. This performance is a decrease from the prior evaluation where the bank had two qualified investments totaling \$1.1 million in the AA.

Community Development Services

During the evaluation period, MSB employees provided 3.5 hours of financial expertise or technical assistance to one community-development related organization in the Cleveland, OH MSA AA. This represents 3.0 percent of the bank's total qualified hours and is an increase from the prior evaluation, where the bank did not provide any community development services. Additionally, the bank operates one branch with an ATM in a moderate-income census tract in this AA.

STATE OF WEST VIRGINIA – Full-Scope Review

CRA RATING FOR STATE OF WEST VIRGINIA: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN STATE OF WEST VIRGINIA

The State of West Virginia rated area consists of the Wheeling, WV-OH MSA AA. The AA is comprised of the entirety of Marshall and Ohio Counties in West Virginia and Belmont County in Ohio. MSB operates 4 of the 20 branches in the AA. The AA accounts for 35.7 percent of deposits and 20.0 percent of branches. Among the loans in the bank's AAs (by number of loans), the Wheeling, WV-OH MSA AA makes up 18.7 percent of the home mortgage universe and 29.4 percent of the small business universe. Examiners used bank data, 2024 HMDA aggregate data, 2020 U.S. Census Data, 2024 D&B Data, and a community contact to analyze lending performance in this AA.

Economic and Demographic Data

According to 2020 U.S. Census data, the Wheeling, WV-OH MSA AA includes 50 census tracts with the following income designations: 1 low-income, 14 moderate-income, 24 middle-income, 10 upper-income, and 1 with no income designation. The following table presents demographic information for the AA.

Demographic Information of the Wheeling, WV-OH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	50	2.0	28.0	48.0	20.0	2.0
Population by Geography	139,513	1.1	18.3	57.9	22.1	0.7
Housing Units by Geography	68,834	1.0	20.8	58.7	18.3	1.2
Owner-Occupied Units by Geography	41,245	1.2	17.3	60.2	20.8	0.5
Occupied Rental Units by Geography	14,131	1.1	28.5	49.7	17.6	3.0
Vacant Units by Geography	13,458	0.5	23.2	63.4	11.5	1.4
Businesses by Geography	11,340	0.3	23.1	45.9	29.5	1.2
Farms by Geography	258	0.4	9.3	68.2	21.7	0.4
Family Distribution by Income Level	34,435	20.9	17.3	20.6	41.3	0.0
Household Distribution by Income Level	55,376	25.5	15.0	17.2	42.3	0.0
Median Family Income MSA - 48540 Wheeling, WV-OH MSA		\$65,607	Median Housing Value			\$ 119,286
			Median Gross Rent			\$639
			Families Below Poverty Level			9.3%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

According to the 2020 U.S. Census data, the AA consists of 68,834 housing units, of which 59.9 percent are owner-occupied, 20.5 percent are occupied rental units, and 19.6 percent are vacant. The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units in the AA.

Examiners used the 2024 FFIEC-updated MFI level to analyze home mortgage loans under the Borrower Profile criterion. The following table illustrates the income categories within the AA.

MFI Ranges - Wheeling, WV-OH MSA AA				
Median Family Incomes	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024 (\$80,600)	<\$40,300	\$40,300 To <\$64,480	\$64,480 To <\$96,720	≥\$96,720
Source: FFIEC				

According to 2024 D&B data, there were 11,340 businesses in the AA. Approximately 83.6 percent of businesses had GARs of \$1.0 million or less, 3.8 percent had GARs over \$1.0 million, and 12.6

percent had unknown revenues. Of these businesses, 87.6 percent operate out of a single location, and 70.2 percent operate with four or fewer employees.

Examiners considered unemployment data when evaluating MSB's ability to lend within the AA. According to the U.S. Bureau of Labor Statistics, the unemployment rates in the Wheeling, WV-OH MSA AA trended slightly higher than state and national averages. The following table illustrates the unemployment rates for the evaluation period.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Bellmont	5.0	4.5	5.2
Marshall	4.9	4.8	4.8
Ohio	4.3	4.1	4.0
State of Ohio	4.0	3.7	4.3
State of West Virginia	3.9	3.9	4.1
National Average	3.7	3.6	4.0
Source: Bureau of Labor Statistics			

Competition

There is a moderate level of competition in the Wheeling, WV-OH MSA AA. According to the FDIC Summary of Deposits, as of June 30, 2024, 14 institutions operated 53 branches within the AA. MSB ranked fourth with a market share of 6.7 percent. The leading institution accounted for 45.5 percent of the total deposit market share in the AA.

Examiners used 2024 aggregate HMDA data to determine the level of home mortgage lending competition in the AA. According to this data, 188 lenders originated or purchased 3,766 home mortgage loans in the Wheeling, WV-OH MSA AA. The top three lenders, including two large national banks and a credit union, account for 25.6 percent of the total market share. MSB ranked 9th with 2.8 percent of the market share.

Although MSB is not subject to CRA data collection and reporting requirements for small business loans, market share data provides a measurement of the level of competition for these loans among in the AA. Aggregate small business lending data for 2023 reflects 53 lenders reporting 1,626 small business loans in the Wheeling, WV-OH MSA AA. The top three lenders, two credit card companies and one large national bank, accounted for 53.3 percent of the market share.

Community Contact

Examiners contacted a local housing authority familiar with the economy and housing market in the AA. The contact stated that Wheeling, WV, is economically depressed and emphasized affordable housing as the primary credit need in the area. The contact stated the area lacks entry-level jobs that pay enough, and even when an individual can find a job, many are unable to find suitable housing they can afford. They stated the housing stock in the area is aging and in need of critical repairs, which many people cannot afford. Additionally, the contact mentioned there was recently a flood

that damaged homes, vehicles, and roads, exacerbating the existing need for rehabilitation in the area.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, institution management, and demographic and economic data, examiners determined that home mortgage loans represent the primary credit needs of the AA. In addition, affordable housing and economic development are primary community development needs in the AA.

SCOPE OF EVALUATION – STATE OF WEST VIRGINIA

The scope of the evaluation in the West Virginia rated area is consistent with the overall scope of the institution discussed above. Since the State of West Virginia rated area is new as of May 31, 2024, examiners weighted performance in this area less than the State of Ohio rated area. Refer to the overall Scope of Evaluation section above for more detail.

CONCLUSIONS ON PERFORMANCE CRITERIA IN STATE OF WEST VIRGINIA

LENDING TEST

Overall, MSB demonstrated reasonable performance under the Lending Test. Borrower Profile and Geographic Distribution performance support this conclusion.

Borrower Profile

The distribution of home mortgage and small business loans reflects reasonable penetration among individuals of different income levels and businesses of different sizes. MSB's strong small business performance mitigated weaknesses identified with the home mortgage lending.

Home Mortgage Loans

The distribution of home mortgage loans to individuals reflects poor performance. MSB's performance to both low- and moderate-income borrowers trails aggregate data. The following table illustrates the distribution of home mortgage loans by borrower income level.

Distribution of Home Mortgage Loans by Borrower Income Level Wheeling, WV-OH MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	20.9	10.6	2	2.7	160	1.4
Moderate	17.3	19.3	11	14.9	1,255	11.0
Middle	20.6	20.3	12	16.2	1,220	10.7
Upper	41.3	29.9	36	48.7	6,500	57.2
NA	0.0	19.9	13	17.6	2,235	19.7
Total	100.0	100.0	74	100.0	11,370	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans in reflects excellent penetration to businesses with GARs of \$1 million or less. The bank's lending to businesses with GARs of less than \$1 million exceeds demographic data. This performance is considered excellent, especially considering 75.5 percent of businesses in this AA have a GAR of less than \$250,000. The following table illustrates the distribution of small business loans by GAR level in the AA.

Distribution of Small Business Loans by GAR Category Wheeling, WV-OH MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	83.6	64	88.9	5,856	77.3
> \$1,000,000	3.8	8	11.1	1,718	22.7
Revenue Not Available	12.6	0	0.0	0	0.0
Total	100.0	72	100.0	7,574	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Geographic Distribution

Overall, the geographic distribution reflects reasonable dispersion throughout the AA. As mentioned, the bank added this AA in mid-2024. MSB's strong small business performance mitigated weaknesses identified with the home mortgage lending.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects poor dispersion throughout the Wheeling, WV-OH MSA AA. Although MSB only originated one loan in a low-income census tract, this performance is consistent with aggregate data. The bank's performance in moderate-income census tracts trails aggregate data. The following table reflects home mortgage lending performance in each census tract category within the AA.

Geographic Distribution of Home Mortgage Loans Wheeling, WV-OH MSA AA						
Tract Income Level	% of Owner- Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	1.2	0.9	1	1.4	125	1.1
Moderate	17.3	17.1	7	9.5	1,035	9.1
Middle	60.2	58.1	36	48.7	4,950	43.5
Upper	20.8	23.6	29	39.2	5,165	45.4
NA	0.5	0.3	1	1.4	95	0.8
Total	100.0	100.0	74	100.0	11,370	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The geographic distribution of small farm loans reflects excellent dispersion. MSB only originated one loan in low-income census tracts; however, only 0.3 percent of businesses are located in these tracts. MSB's lending in moderate-income census tracts significantly exceeds demographic data. The following table presents small business lending performance in each census tract category within the AA.

Geographic Distribution of Small Business Loans Wheeling, WV-OH MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	0.3	1	1.4	15	0.02
Moderate	23.1	25	34.7	3,058	40.4
Middle	45.9	22	30.6	2,704	35.7
Upper	29.5	22	30.6	1,583	20.9
NA	1.2	2	2.8	214	2.8
Total	100.0	72	100.0	7,574	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

MSB's community development performance demonstrates adequate responsiveness to the community development needs of its AA through community development loans and qualified investments. Examiners considered the institution's capacity, the need and availability of such opportunities, as well as performance of SSIs.

Community Development Loans

MSB originated six community development loans totaling approximately \$2.5 million in the Wheeling, WV-OH MSA AA during the review period. This performance represented 17.0 percent of the bank's total qualified lending performance, which trails the bank's operations (lending, deposits, branches) in this AA. The following table illustrates the institution's activity by year and purpose.

CD Lending - Wheeling, WV-OH MSA AA								
Year	Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)	#	\$(000s)
2022 (Partial Year)	0	0	0	0	0	0	0	0
2023	0	0	2	217	0	0	2	217
2024	2	686	0	0	0	0	2	686
2025 (YTD)	0	0	1	800	1	796	2	1,596
Total	2	686	3	1,017	1	796	6	2,499
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>								

Notable examples of the bank's Community Development lending include:

- In 2025, the bank originated a loan for \$800,000 to construct a local restaurant that relocated to a moderate-income census tract creating additional low- and moderate-income jobs in the area (Economic Development).
- In 2025, the bank originated a loan for \$796,000 to a construction company for the development of a commercial building in a moderate-income census tract (Revitalize and Stabilize).

Qualified Investments

MSB made 11 investments totaling approximately \$6.0 million during the review period. This performance represents 79.4 percent of the bank's total qualified investments and donations, significantly exceeding the bank's operations (lending, deposits, etc.) in this AA. The following table illustrates the institution's activity by year and purpose.

CD Investments - Wheeling, WV-OH MSA AA						
Year	Community Services		Revitalize or Stabilize		Totals	
	#	\$(000s)	#	\$(000s)	#	\$(000s)
Prior Period	0	0	1	4,463	1	4,463
2022 (Partial Year)	0	0	1	1,490	1	1,490
2023	0	0	0	0	0	0
2024	1	5	0	0	1	5
2025 (YTD)	7	8	1	20	8	28
Total	8	13	3	5,973	11	5,986
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>						

Notable examples of the bank's qualified investments include:

- In 2021, the bank invested approximately \$7.6 million into bonds for the development of new city infrastructure in a moderate-income census tract. The bank received prior period credit for the book value (approximately \$4.5 million) of the bond at the time of the evaluation (Revitalize or Stabilize).
- In 2022, the bank invested approximately \$1.5 million into bonds for the development of new city infrastructure in a moderate-income census tract (Revitalize or Stabilize).

Community Development Services

During the evaluation period, bank officers and employees provided 43 hours of community service through 13 different initiatives offering financial expertise or technical assistance to different community development organizations in the AA. This level of activity represents 36.5 percent of total community development hours provided by the bank during the review period. The following table illustrates the community development services by year and purpose.

MSB operates two branches with ATMs in moderate-income census tracts within this AA.

CD Services - Wheeling, WV-OH MSA			
Year	Community Services	Economic Development	Totals
	Hours #	Hours #	Hours #
2022 (Partial Year)	0	0	0
2023	0	0	0
2024	16	3	19
2025 (YTD)	24	0	24
Total	40	3	43
<i>Source: Bank Data. Due to rounding, totals may not equal 100.0%</i>			

WEIRTON-STEUBENVILLE, WV-OH MULTI-STATE MSA– Full-Scope Review

CRA RATING FOR WEST VIRGINIA: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

DESCRIPTION OF INSTITUTION’S OPERATIONS IN WEIRTON-STEUBENVILLE, WV-OH MSA

This rated area consists of the Steubenville, WV-OH MSA. The AA is comprised of the entirety of Brooke and Hancock Counties in West Virginia and Jefferson County in Ohio. MSB operates 2 of the 20 branches in the AA. The AA accounts for 8.2 percent of deposits and 10.0 percent of branches. Among the loans in the bank’s AAs (by number of loans), the Weirton-Steubenville, WV-OH MSA AA makes up 4.3 percent of the home mortgage loan universe and 10.2 percent of the small business loan universe. Examiners used bank data, 2024 HMDA aggregate data, 2020 U.S. Census Data, 2024 D&B Data, and a community contact to analyze lending performance in this AA.

Economic and Demographic Data

According to 2020 U.S. Census data, the Weirton-Steubenville, WV-OH MSA AA includes 38 census tracts with the following income designations: 1 low-income, 4 moderate-income, 28 middle-income, and 5 upper-income. The following table presents demographic information for the AA.

Demographic Information of the Assessment Area Weirton-Steubenville, WV-OH MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	38	2.6	10.5	73.7	13.2	0.0
Population by Geography	116,903	3.0	7.6	73.1	16.3	0.0
Housing Units by Geography	57,554	2.8	8.5	74.1	14.7	0.0
Owner-Occupied Units by Geography	35,519	0.4	5.8	77.5	16.4	0.0
Occupied Rental Units by Geography	14,490	6.7	12.8	69.0	11.5	0.0
Vacant Units by Geography	7,545	6.7	13.3	67.5	12.5	0.0
Businesses by Geography	7,744	6.1	7.6	68.0	18.4	0.0
Farms by Geography	141	0.0	5.0	83.0	12.1	0.0
Family Distribution by Income Level	30,823	19.6	18.2	22.3	40.0	0.0
Household Distribution by Income Level	50,009	24.1	16.0	18.7	41.2	0.0
Median Family Income MSA - 48260 Weirton-Steubenville, WV-OH MSA		\$61,496	Median Housing Value			\$ 98,465
			Median Gross Rent			\$638
			Families Below Poverty Level			10.8%
Source: 2020 Census And 2024 D&B Data (*) The NA category consists of geographies that have Not been assigned an income classification. Due to rounding, totals may not equal 100%.						

According to the 2020 U.S. Census data, the AA consists of 57,554 housing units, of which 61.7 percent are owner-occupied, 25.2 percent are occupied rental units, and 13.1 percent are vacant. The Geographic Distribution criterion compares home mortgage loans to the distribution of owner-occupied housing units in the AA.

Examiners used the 2024 FFIEC-updated MFI level to analyze home mortgage loans under the Borrower Profile criterion. The following table illustrates the income categories within the AA.

Estimated MFI Ranges Weirton-Steubenville, WV-OH MSA AA					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2024	\$ 72,100	< \$36,050	\$36,050 to < \$57,680	\$57,680 to < \$86,520	≥ \$86,520
Source: FFIEC					

According to 2024 D&B data, there were 7,744 businesses in the AA. Approximately 85.0 percent of businesses had GARs of \$1.0 million or less, 3.1 percent had GARs over \$1.0 million, and 11.9 percent had unknown revenues. Of these businesses, 88.6 percent operate out of a single location, and 70.4 percent operate with four or fewer employees.

Examiners considered unemployment data when evaluating MSB’s ability to lend within the AA. According to the U.S. Bureau of Labor Statistics, the unemployment rates in Brooke and Hancock Counties trended slightly higher than state and national averages, while unemployment rates in Jefferson County was below both state and national averages. The following table illustrates the unemployment rates for the evaluation period.

Unemployment Rates			
Area	2022	2023	2024
	%	%	%
Brooke	4.4	4.8	5.4
Hancock	4.7	5.5	5.7
Jefferson	2.5	2.7	2.7
State of Ohio	4.0	3.7	4.3
State of West Virginia	3.9	3.9	4.1
National Average	3.7	3.6	4.0
<i>Source: Bureau of Labor Statistics</i>			

Competition

There is a moderate level of competition in the Weirton-Steubenville, WV-OH MSA AA. According to the FDIC Summary of Deposits, as of June 30, 2024, 11 institutions operated 33 branches within the AA. MSB ranked tenth with a market share of 3.7 percent. The top three institutions accounted for 57.4 percent of the total deposit market share in the AA.

Examiners used 2024 aggregate HMDA data to determine the level of home mortgage lending competition in the AA. According to this data, 194 lenders originated or purchased 3,170 home mortgage loans in the Weirton-Steubenville, WV-OH MSA AA. The top three lenders, including two large national banks and a local savings bank, account for 33.1 percent of the total market share. MSB ranked 18th with 1.0 percent market share.

Although MSB is not subject to CRA data collection and reporting requirements for small business loans, market share data provides a measurement of the level of competition for these loans among in the AA. Aggregate small business lending data for 2023 reflects 54 lenders reporting 1,196 small business loans in the Weirton-Steubenville, WV-OH MSA AA. The top three lenders, two credit card companies and one large national bank, accounted for 45.9 percent of the market share.

Community Contact

Examiners contacted a local economic development organization familiar with the economy and housing market in the AA. The contact stated the area has an aging population made up of mostly blue-collar workers. They stated there has been a general decline in the population in the area due to limited job opportunities stemming from the decline of the local steel industry. The contact stated the declining job market and population have affected the overall economy and quality of life for residents in the area. The contact also stated there is a need for new businesses in the area to attract new residents, which creates a need for small business lending. In terms of housing, the contact indicated that the existing houses are aging and in need of critical repairs. The contact also stated

the high cost of repairs for existing homes and high cost for new construction have made housing generally unaffordable, which creates a need for affordable housing.

Credit and Community Development Needs and Opportunities

Considering information from the community contact, institution management, and demographic and economic data, examiners determined that home mortgage and small business loans represent the primary credit needs of the AA. In addition, affordable housing and economic development continue to be a primary community development need in the AA.

SCOPE OF EVALUATION – WEIRTON-STEUBENVILLE, WV-OH MSA

The scope of the evaluation in the Weirton-Steubenville, WV-OH MSA rated area is consistent with the overall scope of the institution discussed above. Since the Weirton-Steubenville, WV-OH MSA rated area is new as of May 31, 2024, examiners weighted performance in this area less than the State of Ohio and West Virginia rated areas. Refer to the overall Scope of Evaluation section above for more detail.

CONCLUSIONS ON PERFORMANCE CRITERIA IN WEIRTON-STEUBENVILLE, WV-OH MSA

LENDING TEST

Overall, MSB demonstrated reasonable performance under the Lending Test. The performance in Borrower Profile and Geographic Distribution supports this conclusion.

Borrower Profile

Overall, the distribution of borrowers reflects reasonable penetration among individuals of different income levels, including low- and moderate- income, and businesses of different sizes given the demographics of the AA. The conclusion is supported by consistent home mortgage and small business performance.

Home Mortgage Loans

The distribution of home mortgage loans reflects reasonable penetration among individuals of different income levels. MSB did not originate any loans to low-income borrowers. However, performance to moderate-income borrowers exceeds aggregate data. The following table illustrates MSB's distribution of home mortgage loans.

Distribution of Home Mortgage Loans by Borrower Income Level Weirton-Steubenville, WV-OH MSA AA						
Borrower Income Level	% of Families	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	19.6	6.8	0	0.0	0	0.0
Moderate	18.2	20.8	4	23.5	430	21.3
Middle	22.3	23.7	3	17.7	255	12.7
Upper	40.0	32.7	8	47.1	760	37.7
NA	0.0	16.1	2	11.8	570	28.3
Total	100.0	100.0	17	100.0	2,015	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The distribution of small business loans reflects reasonable penetration among businesses of different sizes. While the bank's lending performance trails the corresponding demographic data, examiners reviewed MSB's results relative to two SSIs, as SSIs can be a better gauge than demographics for demand in the AA. The SSI's performances were 57 and 89 percent (71 percent average) within the \$1 million or less revenue segment. This further supports the reasonable conclusion for MSB's performance.

Distribution of Small Business Loans by GAR Category Weirton-Steubenville, WV-OH MSA AA					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000	85.0	18	72.0	3,852	62.0
> \$1,000,000	3.1	7	28.0	2,360	38.0
Revenue Not Available	11.9	0	0.0	0	0.0
Total	100.0	25	100.0	6,212	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Geographic Distribution

Overall, the geographic distribution reflects reasonable dispersion throughout the AA. Consistent home mortgage and small business lending support this conclusion.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the Weirton-Steubenville, WV-OH MSA AA. MSB did not originate any loans in the sole low-income census tract; however, only 0.4 percent of owner-occupied housing units comprise this tract. Lending in the moderate-income census tracts is comparable to aggregate data. The following table tables lending performance within each tract income level.

Geographic Distribution of Home Mortgage Loans Weirton-Steubenville, WV-OH MSA AA						
Tract Income Level	% of Owner-Occupied Housing Units	HMDA Aggregate % of #	#	%	\$(000s)	%
Low	0.4	0.1	0	0.0	0	0.0
Moderate	5.8	5.4	1	5.9	75	3.7
Middle	77.5	78.7	12	70.6	1,300	64.5
Upper	16.4	15.9	4	23.5	640	31.8
Total	100.0	100.0	17	100.0	2,015	100.0
<i>Source: 2020 Census; Bank Data, as reported; 2024 HMDA Data. Due to rounding, totals may not equal 100.0%.</i>						

Small Business Loans

The geographic distribution of small business loans reflects reasonable dispersion throughout the AA. MSB's lending performance in the low-income census tracts significantly exceeds the corresponding demographic data. However, the bank did not originate any loans in moderate-income census tracts. The following table details lending performance within each tract income level.

Geographic Distribution of Small Business Loans Weirton-Steubenville, WV-OH MSA AA					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Low	6.1	3	12.0	710	11.4
Moderate	7.6	0	0.0	0	0.0
Middle	68.0	18	72.0	4,612	74.2
Upper	18.4	3	12.0	854	13.8
NA	0.0	1	4.0	36	0.6
Total	100.0	25	100.0	6,212	100.0
<i>Source: 2024 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

COMMUNITY DEVELOPMENT TEST

MSB demonstrates adequate responsiveness to the community development needs of the Weirton-Steubenville, WV-OH MSA AA through community development loans and qualified investments and donations. Examiners considered the bank's capacity and the need and availability of such opportunities.

Community Development Loans

MSB originated one community development loan totaling \$1.1 million in this AA during the review period. This volume of lending represents 7.5 percent of the bank's total qualified lending, consistent with the size of its operations in this AA.

Qualified Investments

MSB made three qualified donations totaling \$700 in this AA during the review period toward community service and revitalization and stabilization activities. This volume represents less than one percent of the bank's total qualified investment activity, significantly trailing the percentage of the bank's operations in this AA.

Community Development Services

During the review period, MSB employees provided 15.5 hours of community development services by providing financial expertise or technical assistance to community development-related organizations. This volume represents 13.2 percent of the bank's qualified service hours, exceeding the size of the bank's operations in this AA.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

- 1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
- 2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
- 3) The geographic distribution of the bank's loans;
- 4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
- 5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

- 1) The number and amount of community development loans;
- 2) The number and amount of qualified investments;
- 3) The extent to which the bank provides community development services; and
- 4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
OHIO	Satisfactory	Satisfactory	Satisfactory
WEIRTON-STEUBENVILLE, WV-OH MSA	Satisfactory	Satisfactory	Satisfactory
WEST VIRGINIA	Satisfactory	Satisfactory	Satisfactory

GLOSSARY

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

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

- (1) Support affordable housing for low- and moderate-income individuals;
- (2) Target community services toward low- and moderate-income individuals;
- (3) Promote economic development by financing small businesses or farms; or
- (4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

- (1) Has as its primary purpose community development; and
- (2) Except in the case of a wholesale or limited purpose bank:
 - (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
 - (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

- (1) Has as its primary purpose community development;
- (2) Is related to the provision of financial services; and
- (3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

- (1) An unemployment rate of at least 1.5 times the national average;
- (2) A poverty rate of 20 percent or more; or
- (3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants; the amount of loan requested; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA**): All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.