

THE PEOPLES BANK

MAIN BRANCH (Corporate Office)

103 E Wiggin St

Gambier OH 43022

(740)427-2101

MOUNT VERNON BRANCH

Opened August 2001

11423 Upper Gilchrist Rd

Mount Vernon OH 43050

(740)397-7922



CHECKING ACCOUNTS

Regular Checking

- Simplified, effortless checking - \$25.00 opening deposit
- \$200 minimum daily balance to waive \$4.00 service fee
- Free ATM / Debit Card
- Free Direct Deposit
- Free Bill Pay
- Free Online Banking

Personal Checking

- Basic or E-Statements - \$25.00 opening deposit
- \$8.00 Monthly Service Fee waived with Direct Deposit
- No minimum balance requirements
- Free ATM / Debit Card
- Free Direct Deposit
- Free Bill Pay
- Free Online Banking

Now Checking

- Basic or E-Statements - \$1,500.00 opening deposit
- \$15.00 minimum daily balance to waive service fee
- \$5.00 Service fee
- Free ATM / Debit card
- Free Direct Deposit
- Free Bill Pay
- Free Online Banking

Super Now Checking

- Basic or E-Statements - \$2,500.00 opening deposit
- \$25.00 minimum daily balance to waive service fee
- \$3.00 Service fee
- Free ATM / Debit Card
- Free Direct Deposit
- Free Bill Pay
- Free Online Banking



LOAN PRODUCTS

Residential Mortgages

Construction Loans

Home Equity Lines of Credit

Auto Loans

Commercial Loans



Effective 01/01/2023

Fee Schedule

The following fees may be assessed against your account and the following transaction limitations, if any, apply to your account.

Monthly Service Charges per Account Type	
Checking account- low balance fee <\$200 (waived 65+)	\$ 4.00
Sole Prop/Estate/Trust-low balance fee < \$200	\$3.00
Savings Account- low balance fee <\$100	\$ 3.00
Savings Account- Minors (until 18)	No Fee
Personal Convenience Checking fee	\$ 8.00 if activity exceeds 25 checks & ACHs in a month
SuperNOW maintenance fee, per statement cycle	\$3.00
NOW account low balance fee < \$1500	\$5.00
MMDA withdrawal fee-no fee for first 6 transfers or withdrawals	thereafter \$5.00 per item
Student Checking- low balance fee <\$200	\$ 4.00
Paper Statement mailing per month	2.00 per statement, per month
Printed Counter Checks	4/\$3, 8/\$5, 12/\$8
Check printing	(fee depends on style and quantity of check ordered)
Bank/ cashier's checks- non customer	\$10.00
Bank/ cashier's checks- Account holders (\$3 for 65+)	\$7.00
Overdrafts and Non-sufficient fund items (personal accounts only)	max \$155 daily \$ 31.00 per item
Representation of items previously returned NSF	max. \$155 daily \$ 31.00 per item
Savings Account- No Fee for first 6 withdrawals (ATM exempt)	\$1.00 per item
Returned Checks on Other Banks-Deposited or Cashed	\$5.00
Foreign Check Collection	\$ 6.00, correspondent bank charge & special handling, if applicable
Account closed within 30 days of opening	\$ 10.00
Inactive Account Fee	\$ 5.00 per month, if no activity for 24 months
Six month stop payment	\$ 31.00
Renewal of Six Month stop payment	\$ 31.00
Account Research	\$ 25.00 per hour (\$ 25.00 minimum)
Balancing Assistance	\$ 25.00 per hour (\$ 25.00 minimum)
Duplicate Account Statement Printout	\$ 2.00 per page
Copies of Checks	\$ 2.00 per check
Faxes out	\$ 2.00 per page
Non-proprietary ATM fee (US only - foreign bank fees vary)	\$ 1.00
Replacement of lost/damaged Debit & ATM card	\$15.00
ATM/Debit Card Easy PIN Reference #	\$5.00
Garnishments, Court Orders, Tax Levies	\$75.00
Child Support Order Processing	\$ 5.00
Wire Transfers "OUT"	\$ 40.00
International Wire Transfers	\$ 65.00
Wire transfers "IN"	\$10.00
Safe Deposit box fees (per year)	
3" x 5"	\$ 15.00 plus tax
3" x 10"	\$ 25.00 plus tax
5" x 10"	\$ 30.00 plus tax
10" x 10"	\$ 40.00 plus tax
Secure storage boxes (Upper Gilchrist Branch)	small \$ 15.00 plus tax large \$ 20.00 plus tax
Safe Deposit box or Secure Storage Drilling Fee	Lock Smith Drilling Charge plus tax

Commercial accounts may have different fees.

We may require not less than 7 days' notice in writing before each withdrawal from an interest bearing account other than a time deposit, or from any other savings account as defined by Regulation D.

Withdrawals from a time account prior to maturity or prior to any notice period may be restricted and may be subject to penalty. See your notice of penalty for early withdrawal.

2026
EXECUTIVE TEAM



Alicia Freeman
President & CEO, The Peoples Bank & Trust
Bank of America of Cambridge Incorporated



Donna Dunmire
VP, Chief Operations Officer



Deanna Johnson
VP of Lending
NMLS #10092

GAMBIER OFFICE (MAIN OFFICE)
103 E WIGGIN ST



Katherine Lockett
AVP Finance



Penny Given
AVP Operations



Tom Corrigan
AVP Commercial Lender & Business
Development
NMLS #20849



Jessica Dunmire
Branch Manager, Gambier Office

MOUNT VERNON OFFICE
11423 UPPER GILCHRIST RD



Stephanie Dean
Branch Manager, Mount Vernon Office

GAMBIER OFFICE

Contact Us

The Peoples Bank, Gambier Main Office

PO Box 151
101 E. Wiggan Street
Gambier, Ohio 43072
Phone
Fax: 740-427-3106



MOUNT VERNON OFFICE



The Peoples Bank, Mount Vernon Branch

11421 Upper Gilchrist Road
Mount Vernon, Ohio 43050
Phone:
Fax: 740-397-6682

Main Office Lobby Hours

Monday, Wednesday & Friday 9AM-4PM

Tuesday & Thursday 9AM - 1PM

Saturday 9AM - 12PM

Main Office Drive-Thru Hours

Monday - Thursday 8:30AM - 4PM

Friday 8:30AM - 6PM

Saturday 8:30AM - 12PM

Mount Vernon Lobby Hours

Monday - Friday 9AM-4PM

Saturday 9AM - 12PM

Mount Vernon Drive-Thru Hours

Monday - Thursday 8:30AM - 5PM

Friday 8:30AM - 6PM

Saturday 8:30AM - 12PM

The Peoples Bank

Main Office

P.O. Box 101

103 E. Wiggin Street

Gambier, Ohio 43022

Phone: 740-427-2101

Fax: 740-427-3106

Mount Vernon Branch

11423 Upper Gilchrist Road

Mount Vernon, Ohio 43050

Phone: 740-397-7922

Fax: 740-397-4660

1-877-427-2101

NMLS: 64250

All Rights Reserved.

Member
FDIC



Community Activities – 03/31/2026

2024

- Financial Literacy Class, Kenyon College Students
- Memorial Day Parade, Mount Vernon
- First Friday Events, Mount Vernon
- Financial Literacy Class, Mount Vernon
- Johnny Appleseed Festival, lead sponsor, Mount Vernon
- Building Financial Literacy Class, Knox Public Library
- Halloween Adventures – Invited Kenyon Students to participate

2025

- Memorial Day Parade, Mount Vernon
- First Friday Events, Mount Vernon
- Johnny Appleseed Festival, lead sponsor, Mount Vernon
- Sponsored printing of books on the value of savings for all first graders at Wiggin St Elementary by local authors



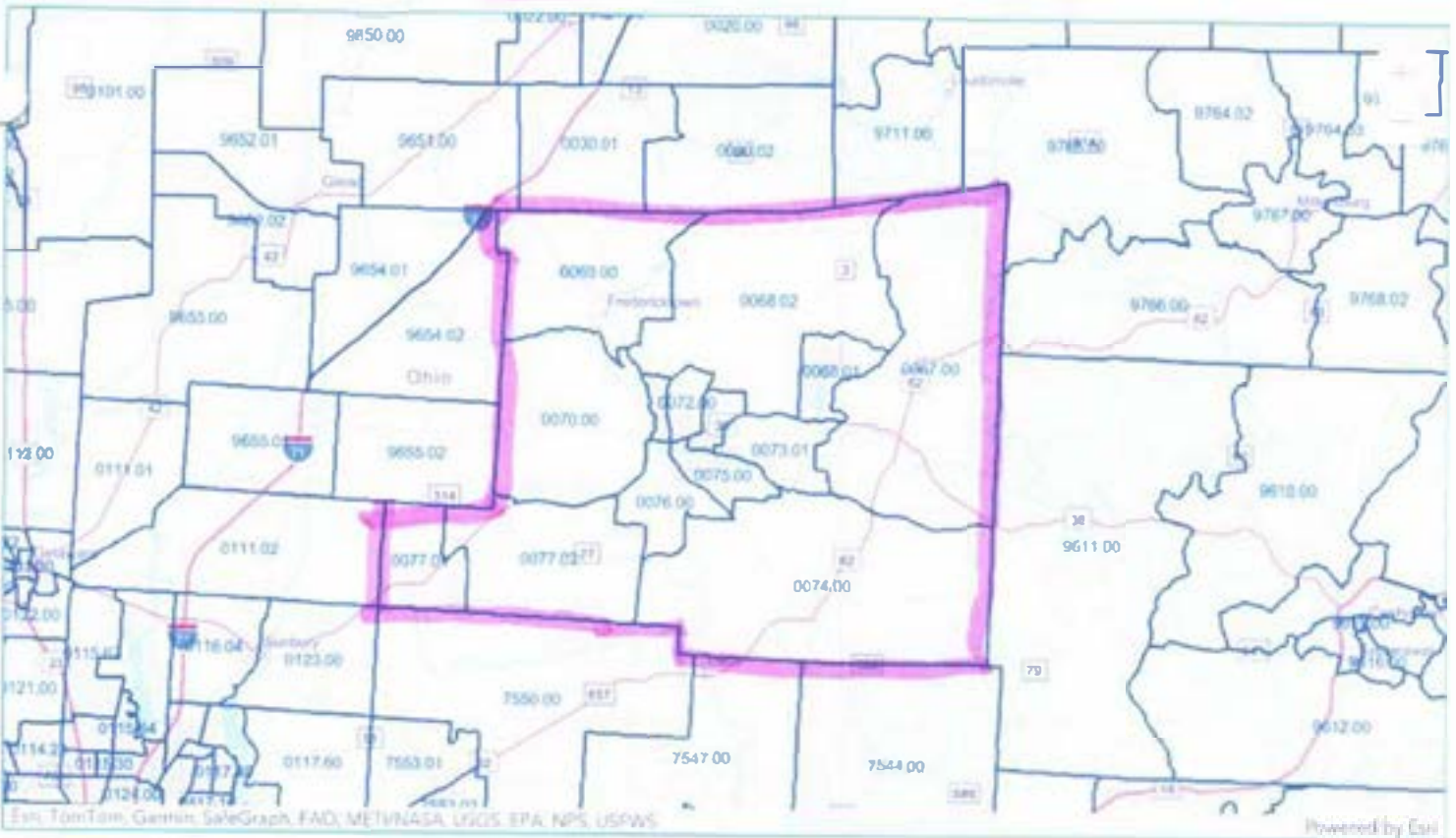
- Knox County Job and Family Services – Ambitiously Adopted 10 Foster Children for Christmas

2026

- Worked with local nonprofit to create housing loans for low to moderate income families
- Sponsored local high school baseball team

State Code	County Code	Tract Code	Tract Income Level	Distressed or Underserved Tract	Tract Median Family Income %	2024 FFIEC Est.MSA/MD non-MSA/MD Median Family Income	2024 Est. Tract Median Family Income	2020 Tract Median Family Income	Tract Population	Tract Minority %	Minority Population	Owner Occupied Units	1- to 4-Family Units
39	083	0067.00	Middle	No	98.32	\$81,600	\$80,229	\$65,054	5209	4.95	258	1421	2005
39	083	0068.01	Upper	No	122.59	\$81,600	\$100,033	\$81,108	5737	6.97	400	1949	2848
39	083	0068.02	Middle	No	106.43	\$81,600	\$86,847	\$70,417	5051	4.57	231	1432	1843
39	083	0069.00	Middle	No	101.20	\$81,600	\$82,579	\$66,957	6260	5.27	330	1689	2261
39	083	0070.00	Middle	No	112.48	\$81,600	\$91,784	\$74,422	3170	6.75	214	1003	1308
39	083	0071.00	Moderate	No	73.24	\$81,600	\$59,764	\$48,456	3618	9.81	355	576	1636
39	083	0072.00	Middle	No	83.55	\$81,600	\$68,177	\$55,278	5329	9.35	498	1122	2046
39	083	0073.01	Unknown	No	0.00	\$81,600	\$0	\$0	3447	17.26	595	508	698
39	083	0073.02	Middle	No	114.27	\$81,600	\$93,244	\$75,606	3407	7.84	267	826	1198
39	083	0074.00	Upper	No	122.76	\$81,600	\$100,172	\$81,224	5709	4.76	272	1654	2421
39	083	0075.00	Middle	No	89.99	\$81,600	\$73,432	\$59,539	4331	9.14	396	723	1446
39	083	0076.00	Middle	No	95.57	\$81,600	\$77,985	\$63,230	4775	9.05	432	1491	2428
39	083	0077.01	Upper	No	127.33	\$81,600	\$103,901	\$84,242	3283	5.76	189	1044	1358
39	083	0077.02	Upper	No	149.03	\$81,600	\$121,608	\$98,600	3395	6.66	226	1189	1488

* Will automatically be included in the 2025 Distressed or Underserved Tract List



● Matched Address.
MSA: || State: || County: || Tract Code:

● Selected Tract
MSA: || State: || County: || Tract Code:

BNA Analysis
 Knox County OH
 Loans: Current Balances
 04/03/2026
 Includes sold Fannie's

As of 04/03/2026

BLOCK #	# OF LOANS	DOLLAR AMOUNT	GEO AREA	PERCENTAGE
1111	44	\$	6,992,882.42 Out of Area	11.880%
67	32	\$	3,890,436.88 Danville	6.610%
68	23	\$	1,774,424.18 Apple Valley	3.015%
68.01	30	\$	4,136,952.44 Apple Valley S *	7.028%
68.02	21	\$	1,954,062.20 Apple Valley N *	3.320%
69	8	\$	612,453.80 Fredericktown	1.041%
70	20	\$	2,887,152.85 Mt. Vernon West	4.905%
71	14	\$	1,993,850.00 Mt. Vernon N West	3.387%
72	29	\$	2,704,370.00 Mt. Vernon N	4.594%
73	63	\$	10,253,592.00 Gambier, MT V. E	17.420%
73.01	28	\$	3,811,023.90 Gambier, MT V. E	6.475%
73.02	8	\$	806,985.07 Mt. Vernon N. East	1.371%
74	41	\$	5,932,711.05 Martinsburg	10.079%
75	34	\$	4,555,256.79 Mt. V SE Gambie W	7.739%
76	42	\$	5,159,888.68 Mt. V. S W	8.766%
77	6	\$	997,500.00 Centerburg	1.695%
77.02	4	\$	397,599.18 Mt. Vernon SW and Centerburg N.	0.675%
TOTALS	447	\$	58,861,141.44	100%
		\$	58,861,141.44 System Balance Check	

As of 4/3/2026 the FFIEC site shows BNA #71 as no longer a moderate income tract in Knox County

*** Note: FFIEC continues to split the GEO codes so that there are additional. These GEO areas divide up the entire county and the title is just a representation of that area. For example, in recent years, the census started to divide Apple Valley into North and South. In 2018, the 98 was dropped (ex 9871.00), but since all of our loans were already coded, we chose not to go back and recode each loan with 00's.**

PUBLIC DISCLOSURE

February 17, 2026

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Peoples Bank
Certificate Number: 389

103 E Wiggin St
Gambier, Ohio 43022

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 (LMI) 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.

TABLE OF CONTENTS

INSTITUTION RATING	1
DESCRIPTION OF INSTITUTION	1
DESCRIPTION OF ASSESSMENT AREA.....	2
SCOPE OF EVALUATION.....	5
CONCLUSIONS ON PERFORMANCE CRITERIA.....	6
DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW	10
APPENDICES	11
SMALL BANK PERFORMANCE CRITERIA.....	11
GLOSSARY.....	12

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 following points summarize the institution’s Community Reinvestment Act (CRA) Performance:

- The loan-to-deposit (LTD) ratio is reasonable given the institution's size, financial condition, and assessment area (AA) credit needs.
- The institution originated a substantial majority of its home mortgage and small business loans in the AA.
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The distribution of borrowers reflects poor penetration among individuals of different income levels (including LMI) and to businesses of different sizes.
- The institution did not receive any CRA related complaints since the last evaluation; therefore, this factor did not affect the rating.

DESCRIPTION OF INSTITUTION

The Peoples Bank (Peoples), headquartered in Gambier, Ohio, is a wholly owned subsidiary of Peoples Bancshares of Gambier, Inc., a single bank holding company also headquartered in Gambier, Ohio. The institution received a “Needs To Improve” rating at its previous FDIC Performance Evaluation, dated January 9, 2024, based on the Interagency Small Institution Examination Procedures.

Peoples operates a main office in Gambier, Ohio, and a full-service branch in Mount Vernon, Ohio, both located in Knox County. Peoples had no merger or acquisition activities since the previous evaluation. Further, the bank did not open or close any branches since the previous evaluation.

The institution offers a variety of products and services, including deposit and lending products. Deposit products include checking, savings, certificates of deposit, and money market accounts. Alternative banking services include online and mobile banking, as well as electronic bill pay. Additionally, deposit-taking automated teller machines are at each branch location. The bank’s primary lending focus is home mortgage and small business loans. Additionally, Peoples offers consumer loans and maintains a referral relationship to originate loans through the Federal Housing Administration and Veterans Administration.

According to the Reports of Condition and Income (Call Report) as of December 31, 2025, Peoples reported total assets of \$58.4 million, total loans of \$30.8 million, and total securities of \$21.1 million. Deposits totaled \$52.3 million. The following table illustrates the institution's loan portfolio distribution:

Loan Portfolio Distribution as of 12/31/2025		
Loan Category	\$(000)	%
Construction, Land Development, and Other Land Loans	481	1.6
Secured by Farmland	523	1.7
Secured by 1-4 Family Residential Properties	22,359	72.7
Secured by Nonfarm Nonresidential Properties	4,526	14.7
Total Real Estate Loans	27,889	90.7
Commercial and Industrial Loans	1,749	5.7
Consumer Loans	1,156	3.8
Less: Unearned Income	(42)	(0.2)
Total Loans	30,752	100.0
<i>Source: Call Report</i>		

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

DESCRIPTION OF ASSESSMENT AREA

The CRA requires each financial institution to define one or more AAs within which examiners will evaluate its CRA performance. Peoples designated a single AA, consisting of the entirety of Knox County, Ohio, located in a non-Metropolitan Statistical Area (MSA) in central Ohio. The AA conforms with CRA requirements as it consists of whole, contiguous census tracts (CTs) and does not arbitrarily exclude LMI CTs.

Economic and Demographic Data

The current evaluation uses the 2020 U.S. Census data and D&B data to assess performance. The AA includes 14 CTs with the following income designations: one moderate-, eight middle-, and four upper-income CTs, as well as one unclassified CT in which Kenyon College is located. The following table illustrates relevant demographic information for the AA during the evaluation period.

Demographic Information of the Assessment Area Knox County, OH						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	N/A* % of #
Geographies (Census Tracts)	14	0.0	7.1	57.1	28.6	7.1
Population by Geography	62,721	0.0	5.8	59.8	28.9	5.5
Housing Units by Geography	25,899	0.0	6.4	59.1	31.6	2.9
Owner-Occupied Units by Geography	16,627	0.0	3.5	58.4	35.1	3.1
Occupied Rental Units by Geography	6,400	0.0	14.3	61.7	21.1	2.9
Vacant Units by Geography	2,872	0.0	6.2	57.3	35.0	1.5
Businesses by Geography	5,327	0.0	4.8	64.2	28.7	2.4
Farms by Geography	364	0.0	0.6	63.7	33.0	2.8
Family Distribution by Income Level	16,092	15.5	17.7	23.7	43.1	0.0
Household Distribution by Income Level	23,027	18.0	14.5	19.5	47.9	0.0
Ohio Non-MSA Median Family Income		\$66,160	Median Housing Value			\$ 163,072
Families Below Poverty Level		7.7%	Median Gross Rent			\$756
<i>Source: 2020 Census and 2025 D&B Data. (*) The NA category consists of geographies without an income classification. Due to rounding, totals may not equal 100%.</i>						

The Geographic Distribution criterion compares the institution's home mortgage lending to the distribution of owner-occupied housing units in the AA. Examiners used the Federal Financial Institutions Examination Council (FFIEC) median family income (MFI) ranges to analyze home mortgage lending under the Borrower Profile criterion. The following table outlines the income ranges within the AA during the evaluation period.

MFI Ranges					
Year	MFI	Low <50%	Moderate 50% to <80%	Middle 80% to <120%	Upper ≥ 120%
2025	\$81,600	<\$40,800	\$40,800 to < \$65,280	\$65,280 to < \$97,920	≥ \$97,920
2025	\$ 85,200	< \$42,600	\$42,600 to < \$68,160	\$68,160 to < \$102,240	≥ \$102,240
<i>Source: FFIEC</i>					

Examiners considered unemployment data when evaluating the institution's ability to lend within the AA. Data obtained from the U.S. Bureau of Labor Statistics (U.S. BLS) indicates unemployment rates were relatively stable and represent a level of full employment. The unemployment rate in Knox County was consistent state and national levels in 2024 and slightly above the state levels in 2025. The following table illustrates the average unemployment rates for evaluation period.

Unemployment Data		
	2024	2025
Knox County	4.1	4.6
Ohio	4.2	4.0
USA	4.1	4.4
Source: U.S. BLS		

Competition

According to the FDIC Deposit Market Share data as of June 30, 2025, 11 financial institutions operated 18 branches within Knox County, resulting in a moderately-competitive market for banking services. Of 11 institutions, Peoples ranked fifth with 5.1 percent of the deposit market share. The top two institutions accounted for 65.5 percent of the deposit market share.

Although the Home Mortgage Disclosure Act (HMDA) regulations do not require Peoples to report home mortgage data, aggregate data is nonetheless useful in determining the level of demand and competition for such loans. However, the analysis of loans under the Lending Test does not include a direct comparison against aggregate data. The 2024 aggregate mortgage data revealed that 198 lenders, subject to the HMDA data collection requirements, reported 1,629 home mortgage loan originations in the AA. This data reflects moderate competition for home mortgage loans within the AA.

Within the lone moderate-income tract in the AA, 2024 aggregate mortgage data revealed 42 lenders reported 102 home mortgage loan originations. This data reflects a moderate level of competition for home mortgage loans within the moderate-income tract.

Although the CRA regulations do not require the institution to report data about its small business lending, aggregate data is nonetheless useful in determining the level of demand and competition for such loans. In 2024, 46 lenders, subject to the CRA data collection requirements, originated or purchased 1,044 small business loans throughout the AA. The top five lenders, of which four are primarily credit card issuers, originated or purchased 69.6 percent of the small business loans in the AA. This data reflects a high level of competition in the AA for small business loans.

Community Contacts

As part of the evaluation process, examiners contact third parties active in the AA to assist in identifying community credit needs. This information helps determine what credit opportunities are available and whether local financial institutions are responsive to those needs. For this evaluation, examiners conducted an interview with a local economic development organization within the AA.

The community contact stated a recent study reflected the AA’s ongoing need for affordable single-family housing for families and seniors, as well as small business lending. The contact stated the institutions operating within the AA are providing support through continuous non-profit engagement and commitment to financial literacy to prepare LMI families for home ownership.

Credit Needs

Considering information from the community contact, institution management, and demographic and economic data, examiners determined home mortgage and small business loans represent the primary credit needs within the AA.

SCOPE OF EVALUATION

General Information

This evaluation covers the period from the last evaluation, dated January 9, 2024, to the date of this evaluation. Examiners used the Interagency Small Institution Examination Procedures to evaluate the CRA performance. The Appendix discusses the small institution performance criteria.

Activities Reviewed

Examiners identified home mortgage and small business lending as the institution's primary product lines. Examiners considered business strategy, the number and dollar volume of loans originated during the evaluation period, loan portfolio composition, and AA credit needs. Examiners weighed home mortgage loans more heavily, considering the overall loan portfolio composition and dollar volume of activity. In addition, examiners weighed the Borrower Profile performance criterion more heavily than Geographic Distribution due to the limited number of LMI CTs within the AA.

Examiners analyzed the full universe of home mortgage loans originated between January 1, 2024, and December 31, 2025. The institution originated 23 home mortgage loans totaling \$4.4 million in 2024, and 26 home mortgage loans totaling approximately \$2.8 million in 2025. The 2020 U.S. Census data provided a standard of comparison for home mortgage loans originated in 2024 and 2025.

Examiners analyzed the full universe of small business loans originated between January 1, 2024, and December 31, 2025. The institution originated 10 small business loans totaling \$957,000 in 2024, and 10 small business loans totaling \$1.5 million in 2025. Examiners used 2024 and 2025 D&B data, as a standard of comparison for small business loans originated in 2024 and 2025, respectively.

Examiners analyzed and presented both the number and dollar volume of home mortgage and small business loans. However, examiners emphasized performance relative to the number of loans originated, as this is a better indicator of the number of individuals and small businesses served. In evaluating the Geographic Distribution and Borrower Profile criteria, examiners only evaluated loans extended within the AA.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

The institution demonstrated reasonable performance under the Lending Test. While the results under the Borrower Profile criterion were weaker, the performance within the remaining criteria supports this conclusion.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given the institution’s size, financial condition, and AA credit needs. The LTD ratio, calculated from Call Report data, averaged 61.3 percent over the last seven calendar quarters from March 31, 2024, to September 30, 2025. The ratio ranged from a high of 66.4 percent as of September 30, 2024, to a low of 58.4 percent as of March 31, 2024. As shown in the following table, the average LTD ratio is reasonably comparable to similarly situated institutions. Examiners selected comparable institutions based on their asset size, geographic location, and loan portfolio distribution.

LTD Ratio Comparison		
Institution	Total Assets as of 9/30/2025 (\$000s)	Average Net LTD Ratio (%)
The Peoples Bank	57,508	61.4
Similarly Situated Institution #1	61,580	71.2
Similarly Situated Institution #2	94,475	58.0
Similarly Situated Institution #3	67,800	55.0

Source: Reports of Condition and Income (3/30/2024 - 9/30/2025)

Assessment Area Concentration

The institution originated a substantial majority of home mortgage and small business loans by number and dollar volume, with the AA. The results were strongest in the more heavily weighed home mortgage lending product segment. The following table illustrates the lending activity inside and outside of the AA.

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											
2024	21	91.3	2	8.7	23	4,257	96.8	139	3.2	4,396	
2025	24	92.3	2	7.7	26	2,697	95.2	135	4.8	2,832	
Subtotal	45	91.8	4	8.2	49	6,954	96.2	274	3.8	7,228	
Small Business											
2024	9	90.0	1	10.0	10	871	91.0	86	9.0	957	
2025	7	70.0	3	30.0	10	1,165	79.5	301	20.5	1,466	
Subtotal	16	80.0	4	20.0	20	2,036	84.0	387	16.0	2,423	

Source: Bank Data.

Geographic Distribution

Overall, the geographic distribution of loans reflects reasonable dispersion throughout the AA. Performance in both loan product segments reviewed supports this conclusion. As the AA does not include any low-income CTs, examiners focused on performance in the one moderate-income CT.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion within the moderate-income CT in 2024 and 2025. Of the 1,666 housing units in the lone moderate-income CT (tract 0071.00), only 576 (or 34.6 percent) are owner-occupied housing units, which reflects limited lending opportunity. As demonstrated below, the bank’s concentration of lending in the moderate-income CT exceeded the concentration of owner-occupied housing units in 2024.

Geographic Distribution of Home Mortgage Loans					
Tract Income Level	% of Owner-Occupied Housing Units	#	%	\$(000s)	%
Moderate					
2024	3.5	2	9.5	470	11.0
2025	--	1	4.2	56	2.1
Middle					
2024	58.4	8	38.1	1,488	35.0
2025	--	17	70.8	1,820	67.5
Upper					
2024	35.1	5	23.8	994	23.4
2025	--	5	20.8	696	25.8
NA					
2024	3.1	6	28.6	1,305	30.7
2025	--	1	4.2	125	4.6
Total					
2024	100.0	21	100.0	4,257	100.0
2025	100.0	24	100.0	2,697	100.0

Source: 2020 Census; Bank Data. "--" data not available. Due to rounding, totals may not equal 100.0%.

Small Business

The geographic distribution of small business loans reflects reasonable dispersion. While the bank’s results are limited to one originated loan in 2024 in the moderate-income CT, this represents an improvement from the previous evaluation and (given the limited volume of loans and low concentration of business in that geography) exceeds the comparable demographic for 2024. The following table shows performance for small business loans in 2024 and 2025.

Geographic Distribution of Small Business Loans					
Tract Income Level	% of Businesses	#	%	\$(000s)	%
Moderate					
2024	4.8	1	11.1	450	51.7
2025	4.8	0	0.0	0	0.0
Middle					
2024	64.7	6	66.7	376	43.2
2025	64.2	5	71.4	900	77.3
Upper					
2024	28.0	2	22.2	45	5.2
2025	28.7	1	14.3	198	17.0
NA					
2024	2.5	0	0.0	0	0.0
2025	2.4	1	14.3	67	5.8
Total					
2024	100.0	9	100.0	871	100.0
2025	100.0	7	100.0	1,165	100.0
<i>Source: 2024 and 2025 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.</i>					

Borrower Profile

The distribution of borrowers reflects poor penetration among individuals of different income levels and to businesses of different sizes. While small business lending performance was stronger, the institution’s home mortgage lending performance supports this conclusion as home mortgage lending performance received greater weight in the evaluation

Home Mortgage Loans

The penetration of home mortgage loans to individuals of different income levels, including LMI borrowers, is poor. Affordable home mortgage lending was noted as a credit need in the AA by the community contact.

In 2024, the institution did not originate any home mortgage loans to low-income borrowers. In 2025, the institution originated two home mortgage loans to low-income borrowers. While this performance is an improvement from the previous performance evaluation in which the institution did not originate any mortgages to low-income borrowers, the institution’s performance is still considered poor, when considering the opportunities available to originate home mortgage loans to low-income families in its assessment area and the institution’s capacity to originate such loans. For moderate-income borrowers, the institution’s performance was below the percentage of moderate-income families who reside in institution’s AA, and lending to moderate-income borrowers further declined in 2025.

The following table illustrates home mortgage loan performance in each borrower income category.

Distribution of Home Mortgage Loans by Borrower Income Level					
Borrower Income Level	% of Families	#	%	\$(000s)	%
Low					
2024	15.5	0	0.0	0	0.0
2025	--	2	8.3	155	5.8
Moderate					
2024	17.7	2	9.5	239	5.6
2025	--	0	0.0	0	0.0
Middle					
2024	23.7	4	19.1	484	11.4
2025	--	10	41.7	1,104	40.9
Upper					
2024	43.1	15	71.4	3,534	83.0
2025	--	12	50.0	1,438	53.3
Total					
2024	100.0	21	100.0	4,257	100.0
2025	--	24	100.0	2,697	100.0
<i>Source: 2020 Census; Bank Data. "--" data not available.</i>					

Small Business

The penetration of small business loans is reasonable. In 2024, every small business loan the institution originated in its AA was to a business with revenues at or below \$1 million. Although the percentage of loans to small businesses declined in 2025, performance is reasonable given the overall low level of small business lending and the noted high level of competition for small business lending in the AA.

Distribution of Small Business Loans by Gross Annual Revenue Category					
Gross Revenue Level	% of Businesses	#	%	\$(000s)	%
<= \$1,000,000					
2024	89.5	9	100.0	871	100.0
2025	90.2	4	57.1	224	19.2
> \$1,000,000					
2024	3.0	0	0.0	0	0.0
2025	2.7	3	42.9	941	80.8
Revenue Not Available					
2024	7.6	0	0.0	0	0.0
2025	7.2	0	0.0	0	0.0
Total					
2024	100.0	9	100.0	871	100.0
2025	100.0	7	100.0	1,165	100.0
<i>Source: 2024 and 2025 D&B Data; Bank Data.</i>					

Response to Complaints

Peoples did not receive any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the rating.

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.

APPENDICES

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).

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.

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.

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.

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.

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 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.

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.