



PUBLIC DISCLOSURE

September 30, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Ephrata National Bank
Charter Number: 2515

31 E. Main Street
Ephrata, PA 17522

Office of the Comptroller of the Currency

1150 Northbrook Drive, Suite 303
Trevose, PA 19053

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated Satisfactory.

The following table indicates the performance level of The Ephrata National Bank with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on High Satisfactory rating in Pennsylvania. Lending levels reflect good responsiveness to assessment area (AA) credit needs. The bank demonstrated an overall adequate geographic distribution of loans and a good distribution of loans to borrowers of different income levels. Community Development (CD) loans had a positive impact on the overall Lending Test rating.
- The Investment Test rating is based on Low Satisfactory rating in Pennsylvania. There was one current period investment in a Community Development Financial Institution Fund, which provided capital investments to small businesses within the Lancaster County AA.
- The Service Test rating is based on the Low Satisfactory rating in Pennsylvania. The service delivery systems are accessible to geographies and individuals of different income levels in the AAs. The overall level of CD services is adequate.
- The bank showed responsiveness to the credit needs of its borrowers during the COVID-19 pandemic by participating in the Small Business Administration’s (SBA) Paycheck Protection Program (PPP).

Lending in Assessment Area

A high percentage of the bank’s loans are in its AA.

The bank originated and purchased 79.7 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	3,305	77.8	865	22.2	3,900	595,018	68.6	272,676	31.4	867,693
Small Business	1,248	83.6	244	16.4	1,492	167,789	88.4	22,103	11.6	189,892
Small Farm	446	82.3	96	17.7	542	58,865	79.4	15,237	20.6	74,102
Total	4,729	79.7	1,205	20.3%	5,934	821,672	72.6	310,016	27.4	1,131,687

*Source: Bank Data. Evaluation Period – January 1, 2021, to December 31, 2023.
Due to rounding, totals may not equal 100.0 percent.*

Description of Institution

The Ephrata National Bank (ENB) is a single state depository institution established in 1881. ENB's main office and headquarters are in Ephrata, Pennsylvania. Ephrata is located within Lancaster County, which is about 42 miles southeast of Harrisburg and 60 miles northwest of Philadelphia. As of December 31, 2023, ENB had total assets of \$2 billion and tier 1 capital of \$187.8 million. The bank is a wholly owned subsidiary of The Hibshman Trust for Ephrata National Bank Stock, a holding company also located in Ephrata, Pennsylvania. The bank has no affiliate activity that was considered in this evaluation. There was no merger or acquisition activity that affected the scope of the bank's operations during the evaluation period. ENB operates 13 full-service branches with attached full-service automated teller machines (ATMs) located in Lancaster, Lebanon, and Berks Counties, Pennsylvania. In 2022 the bank opened a new full-service branch in Quarryville, PA. ENB also operates two limited-service drive-through facilities, each with their own full-service ATM. Each branch has extended Saturday hours and at least one weekday with extended hours. ENB has not closed any branches since the prior CRA examination.

ENB is a full-service bank offering a variety of retail, agricultural, commercial, and money management services and products. Retail products include personal checking, savings, loans, mortgages, certificates of deposit (CDs), individual retirement accounts (IRAs), and debit and credit cards. Commercial products include business checking, savings, loans, CDs, cash management, remote deposit capture, merchant services, and debit/credit cards. Money management services include investment services, trust and investment management, estate planning, retirement planning, and charitable foundation management. The bank offers convenience banking services, including online banking, mobile banking, person-to person payments, eStatements, and safe deposit boxes.

As of December 31, 2023, net loans and leases totaled \$1.35 billion, with \$1.2 billion secured by real estate. Net loans represented 67 percent of total assets. ENB's principal lines of business are the origination of residential home mortgages, business loans, and agricultural loans. The loan portfolio, broken down by loan type, is displayed below:

Ephrata NB Loan Portfolio December 31, 2023	
Loan Category	% of Loans
Residential Real Estate	47.39%
Agricultural and Farmland Loans	19.19%
Non-Farm/Non-Residential Real Estate	15.55%
Commercial and Industrial	5.40%
Construction Loans	6.02%
Municipal Loans	3.87%
Multifamily	1.96%
Non-Depository and Other	0.16%
Consumer	0.46%

Source: Federal Deposit Insurance Corporation (FDIC) Call Report

As of this evaluation period, ENB had one rating area (state of Pennsylvania) and three AAs. The bank's primary AA is identified as Lancaster County, which includes the entire Lancaster, PA Metropolitan Statistical Area (MSA). The second AA consists of the whole of Lebanon County, which includes the entire Lebanon, PA MSA. The third AA consists of the whole of Berks County, which constitutes the entire Reading, PA MSA.

The bank received a "Satisfactory" rating on its prior CRA Performance Evaluation dated July 12, 2021. There are no financial or legal impediments that would hinder the bank's ability to help meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation is an assessment of ENB's ability to meet the credit needs of its assessment areas. The Office of the Comptroller of the Currency (OCC) evaluated ENB using the large bank CRA evaluation procedures to assess the bank's performance under the Lending, Investment, and Service Tests during the evaluation period, January 1, 2021, to December 31, 2023. For the Lending Test, the OCC evaluated all home mortgage reported under the Home Mortgage Disclosure Act (HMDA). Small business loans and small farm loans reported under the CRA were evaluated as well as CD lending activities.

The Investment Test considers the bank's responsiveness to CD needs in each AA through qualified investments, grants, and donations. The OCC also considered the complexity and innovativeness of the investments, the responsiveness of the investments to CD needs, and the bank's demonstrated leadership.

The Service Test considers both retail services and CD services. For retail services, the geographic distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies along with the impact of branch openings and closings were given the most weight. Additionally, the Service Test considers the availability and effectiveness of alternative delivery systems (ADS) for delivering retail banking services including ATMs, online banking, and mobile banking. The level and responsiveness of CD services was also evaluated.

The bank's primary lending products are home mortgage, small business, and small farm loans. Consumer loans were not considered in this evaluation. This evaluation period included two census periods. For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census for 2021 home mortgages, the 2020 U.S. Census for 2022-2023 home mortgages. The OCC used 2021 Dun and Bradstreet (D&B) data for 2021 small business and small farm loans; 2023 D&B data was used for 2022-2023 small business and small farm loans.

Two sets of tables are included in Appendix D for each census period. No affiliate activity was included in this analysis. Refer to the table in Appendix A, Scope of the Examination, for more information on the scope of the review.

Selection of Areas for Full-Scope Review

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

ENB has three AAs in Pennsylvania, as described in the "Description of Institution's Operations in Pennsylvania" section of this evaluation. The OCC completed a full-scope review for only the Lancaster County AA.

Ratings

The bank's overall CRA rating is based on its lending, investment, and service test performance within the state of Pennsylvania. The state of Pennsylvania rating is based on performance within the AAs.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c) or §195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any assessment area by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Pennsylvania

CRA rating for the State of Pennsylvania: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to AA credit needs. The geographic distribution in the Lancaster County AA is adequate. The distribution of loans among borrowers of different income levels and business and farms of different sizes in the Lancaster County AA is good. The bank originated 377 CD loans during the evaluation period, which had a positive impact on the overall Lending Test rating.
- ENB has an adequate level of qualified CD investments, donations, and grants in the AA.
- The service delivery systems are accessible to geographies and individuals of different income levels in the AAs. The overall level of CD services in the Lancaster County AA is good.
- As discussed above, the bank offered several innovative and flexible programs that focused on making home ownership affordable and promoting small businesses. These programs had a positive impact on the bank's performance.

Description of Institution's Operations in Pennsylvania

ENB designated three AAs in the state of Pennsylvania. They include the entire Lancaster, PA MSA, the entire Lebanon, PA MSA and the entire Reading, PA MSA. Refer to Appendix A for a complete list of counties included.

Lancaster MSA

The Lancaster MSA consists solely of Lancaster County where the bank operated 11 branches, including the main office. Lancaster, the largest city in the MSA, contains a majority of the AA's low- and moderate-income census tracts (CTs). In 2021, the AA consisted of 82 CTs with six low-income, 11 moderate-income, 55 middle-income, and 10 upper-income CTs. In 2023, the CTs in the AA changed due to the 2020 U.S. Census data and the number of CTs increased to 116. As of 2023, there were four low-income, 16 moderate-income, 81 middle-income, and 15 upper-income CTs. The following tables provide a summary of the demographics, including housing and business information for the Lancaster MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lancaster MSA 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	82	7.3	13.4	67.1	12.2	0.0
Population by Geography	440,888	5.2	10.4	71.4	13.1	0.0
Housing Units by Geography	170,145	4.8	11.0	70.3	13.9	0.0
Owner-Occupied Units by Geography	110,455	1.9	8.6	74.1	15.3	0.0
Occupied Rental Units by Geography	51,427	10.1	15.6	63.5	10.8	0.0
Vacant Units by Geography	8,263	10.1	15.3	60.7	14.0	0.0
Businesses by Geography	43,738	4.7	11.1	70.7	13.4	0.0
Farms by Geography	1,910	1.0	3.6	86.6	8.8	0.0
Family Distribution by Income Level	113,398	18.7	19.3	22.8	39.3	0.0
Household Distribution by Income Level	161,882	22.4	17.7	19.4	40.5	0.0
Median Family Income MSA - 29540 Lancaster, PA MSA		\$68,937	Median Housing Value			\$190,950
			Median Gross Rent			\$955
			Families Below Poverty Level			7.6%

Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Lancaster MSA 2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	116	3.4	13.8	69.8	12.9	0.0
Population by Geography	552,984	2.9	12.8	71.4	12.9	0.0
Housing Units by Geography	212,160	2.9	13.9	70.9	12.3	0.0
Owner-Occupied Units by Geography	141,505	1.5	11.3	72.5	14.7	0.0
Occupied Rental Units by Geography	62,498	5.6	19.5	67.8	7.1	0.0
Vacant Units by Geography	8,157	5.3	16.6	67.1	10.9	0.0
Businesses by Geography	60,792	3.7	11.4	69.1	15.8	0.0
Farms by Geography	2,858	0.6	8.9	77.7	12.7	0.0
Family Distribution by Income Level	143,101	17.4	19.3	24.6	38.8	0.0
Household Distribution by Income Level	204,003	22.3	16.2	20.5	41.0	0.0
Median Family Income MSA - 29540 Lancaster, PA MSA		\$82,568	Median Housing Value			\$219,308
			Median Gross Rent			\$1,086
			Families Below Poverty Level			5.7%

Source: 2020 U.S. Census and 2023 D&B Data
Due to rounding, totals may not equal 100.0%
 (*) The NA category consists of geographies that have not been assigned an income classification.

According to the FDIC's Summary of Deposits as of June 30, 2023, ENB had \$1.54 billion in deposits in the AA which comprised 92.9 percent of total bank deposits. ENB had 9.29 percent of the deposit market share ranking 4th among all institutions. Competition was strong with 24 total FDIC-insured financial institutions operating 154 offices in the AA. The top competitors were Fulton Bank, National Association (N.A.) with 20 branches and 28.9 percent market share, Truist Bank with 22 branches and 16 percent market share, and PNC Bank, N.A. with 14 branches and 10.6 percent market share.

Competition for home mortgage and small business loans was strong in the AA. Based on the 2023 Peer Mortgage market share data (HMDA data) for Lancaster County, ENB ranked 3rd out of 361 lenders with a market share of 5.61 percent for home mortgage loans. The top three lenders were Members 1st Federal Credit Union (FCU) with 9.21 percent market share, Fulton Bank, N.A. with 7.24 percent market share, and ENB. Based on the 2023 Peer Small Business loan data (CRA loan data) in Lancaster County, ENB ranked 10th out of 116 lenders with a market share of 2.34 percent. The top three lenders were American Express National Bank with 15.8 percent market share, US Bank, N.A. with 13.6 percent market share, and JPMorgan Chase Bank, N.A. with 13.3 percent market share.

Examiners evaluated the housing affordability challenges in the AA. Based on the Federal Financial Institutions Examination Council's (FFIEC) weighted average median family income in the above tables, low-income families earned less than \$34,469 in 2021 and \$41,284 in 2022-2023, and moderate-income families earned less than \$55,150 for 2021 and \$66,054 for 2022-2023. One method to determine housing affordability assumes a maximum affordable monthly principal and interest payments of no more than 30 percent of the applicant's income based on assuming a 30-year mortgage with a six percent interest rate, and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses. Using these assumptions, a low-income borrower could afford a maximum mortgage payment of \$862 per month in 2021 and \$1,032 per month in 2022-2023. A moderate-income borrower could afford a maximum payment of \$1,379 per month in 2021 and \$1,651 per month in 2022-2023. Based on the median housing value in 2021, the median home value would result in a monthly payment of \$912. For 2022-2023, the median housing value would result in a monthly payment of \$1,032. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA. Examiners considered the poverty level across the AA in the evaluation of lending performance. Families living below the poverty level are identified as having difficulty meeting basic financial needs and, as such, are less likely to have the financial wherewithal to qualify for a home loan than those with income above the poverty level. For the Lancaster MSA, the poverty level in 2021 was 7.6 percent, improving in 2022-2023 to 5.7 percent based on the 2020 U.S. Census data.

Owner-occupied units in the AA accounted for 66.3 percent of total housing units, with only 12.8 percent in low- and moderate-income CTs. According to 2022 D&B data, 90.1 percent of businesses located in the AA have \$1 million or less in gross annual revenues. While there is a significant volume of small businesses, 84.9 percent of these businesses are in middle- and upper-income CTs.

According to the U.S. Bureau of Labor Statistics, the 2023 average unemployment rates across the AA of 2.3 percent outperformed the state unemployment rate of 3.4 percent.

Based on information from the May 2024 Moody's Analytics report, economic growth within the Lancaster MSA is advancing at a measured pace, while employment growth lags the state and U.S. overall. Education and health services which stand as the largest percentage of employment fared well, while good manufacturing has lent support. Professional/business services has been a main sore spot, reflecting steadily reduced payrolls. The overall labor force is holding steady. The economy is

considered in the middle of an expansion with the expectation that reductions in the Federal Reserve Target rate will bolster manufacturing. The largest employers in the area are Lancaster General Hospital, Giant Food Stores and Nordstrom Inc.

The OCC relied on information provided from two community contacts interviews conducted during the evaluation period to understand the AA's credit needs and opportunities. The contacts represented organizations focused on workforce development and CD investment activities within the AA. Community contacts portray un-banked and un-served persons coupled with a high and growing Hispanic population due to displacement from natural disasters in Puerto Rico. The contacts indicated a need for workplace, mental health services, and larger partnerships between banking institutions and local Community Development Financial Institutions. Contacts also noted a need for community affordable housing, small business, and general infrastructure lending. Many organizations use funding to support the needs of the low- and moderate-income individuals in the area; however, there is a significant need for funds to support the general operations of these organizations to provide this support to those in most need.

Scope of Evaluation in Pennsylvania

Examiners selected the Lancaster County AAs for a full-scope review. Examiners completed a full-scope review for the Lancaster County AA as it was the largest AA in Pennsylvania in terms of deposits, branches, and lending activity. Examiners opted for limited-scope reviews of the Lebanon MSA and Reading MSA based on the volume of deposits, branches, and lending activities.

The OCC gave more consideration to the bank's performance within the Lancaster County AA when determining the overall state rating as it represented ENB's largest market with the most deposits, lending activity, and branch distribution. According to the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2023, 92.92 percent of ENB's total deposits in Pennsylvania were in the Lancaster, PA MSA, with only 3.56 percent in the Reading, PA MSA, and 3.51 in the Lebanon, PA MSA. Of the total home mortgage loan originations and purchases inside the AAs during the evaluation period, 79.8 percent were in the Lancaster County AA. Of the total small business loan originations and purchases inside the AAs during the evaluation period, 86.5 percent were in the Lancaster County AA. Eleven of the bank's thirteen branches were in the Lancaster County AA. The OCC based conclusions for the Lending Test on loan products weighted in accordance with their relative volume. As a result, more weight was given to home mortgage activity and least weight was given to small farms loans. Refer to the "Scope of the Evaluation" section under the state of Pennsylvania section for more details regarding how the areas were weighted in arriving at the respective ratings.

In arriving at overall conclusions, examiners gave more consideration to the bank's performance within the Lancaster County AA when determining the overall state rating as it represented ENB's largest market with the most deposits, lending activity, and branch distribution. Additionally, conclusions for the Lending Test on loan products are weighted in accordance with their relative volume. As a result, more weight was given to home mortgage activity than small business and small farm loans.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Lancaster County AA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs. In drawing overall conclusions, examiners considered the bank's operations, which are focused on home mortgage and small business lending. Examiners also considered the bank's market presence and competition within the AAs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State Loans	%State Deposits
Lancaster County AA	2,421	1,080	312	377	4,190	80.6	92.9
Berks County AA	291	92	65	61	509	9.8	3.6
Lebanon County AA	323	76	69	30	498	9.6	3.5
Total	3,035	1,248	446	468	5,197	100.0	100.0

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

Dollar Volume of Loans (\$000s)*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	%State*	%State Deposits
Lancaster County AA	461,862	149,357	40,223	31,772	683,214	79.6	92.9
Berks County AA	68,640	5,786	9,678	2,687	86,791	10.1	3.6
Lebanon County AA	64,516	12,646	8,964	2,120	88,246	10.3	3.5
Total	595,018	167,789	58,865	36,579	858,251	100.0	100.0

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

According to the FDIC's Summary of Deposits as of June 30, 2023, ENB ranked 4th out of 24 depository institutions (83rd percentile) with a deposit market share of 9.3 percent. The top three depository institutions, Fulton Bank, NA, Truist Bank, and PNC Bank, NA, accounted for 55.5 percent of the deposits in the AA.

Based on the 2023 HMDA market share data, ENB ranked 3rd out of 361 lenders (99th percentile) with a market share of 5.6 percent. The top two lenders were Members 1st FCU with 9.2 percent market share and Fulton Bank, NA with 7.2 percent market share.

Based on the 2022 CRA small business loan data, ENB ranked 10th out of 116 lenders (91st percentile) with a market share of 2.3 percent. The top three lenders were American Express National Bank with 15.8 percent market share, US Bank NA with 13.6 percent market share, and JPMorgan Chase Bank, NA with 13.3 percent market share.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

The overall geographic distribution of the bank's home mortgage lending was adequate. In evaluating the geographic distribution of the bank's home mortgage lending, the moderate-income geographies contained significantly greater opportunities for owner-occupied lending than in low-income geographies, therefore carried significantly more weight in the assessment of performance.

2021

The geographic distribution of the bank's home mortgage lending was poor.

The percentage of home mortgage loans in low-income geographies was below the percentage of owner-occupied housing units in those geographies and well below the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies was well below the percentage of owner-occupied housing units in those geographies and significantly below the aggregate percentage of all reporting lenders.

2022-2023

The geographic distribution of the bank's home mortgage lending was adequate.

The percentage of home mortgage loans in low-income geographies was significantly below both the percentage of owner-occupied housing units in those geographies and the aggregate percentage of all reporting lenders. The percentage of home mortgage loans in moderate-income geographies exceeded the percentage of owner-occupied housing units in those geographies and was near to the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

Overall, the geographic distribution of the bank's small loans to businesses was poor. In evaluating the geographic distribution of the bank's small loans to businesses, the moderate-income geographies contained significantly greater opportunities for lending than in low-income geographies, therefore carried significantly more weight in the assessment of performance.

2021

The geographic distribution of the bank's small loans to businesses was poor.

The percentage of small loans to businesses in low-income geographies was significantly below both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders.

2022-2023

The geographic distribution of the bank's small loans to businesses was poor.

The percentage of small loans to businesses in low-income geographies was significantly below both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders. The percentage of small loans to businesses in moderate-income geographies was below both the percentage of businesses in those geographies and the aggregate percentage of all reporting lenders.

Small Loans to Farms

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

Overall, the geographic distribution of the bank's small loans to farms was excellent. Moderate-income geographies contained more opportunities for lending than in low-income geographies, therefore carried more weight in the assessment of performance.

2021

The bank did not originate or purchase any small loans to farms in low- or moderate-income geographies during the analysis period, but the bank's performance is reasonable. Aggregate lenders also reported no lending in low-income geographies and only 0.3 percent were originated or purchased in moderate-income geographies. Demographic data from the tables above indicate there were only 19 farms in low-income geographies and 69 farms in moderate-income geographies, which limited lending opportunities.

2022-2023

The geographic distribution of the bank's small loans to farms was excellent.

The percentage of small loans to farms in moderate-income geographies was near to the percentage of farms in those geographies and exceeded the aggregate percentage of all reporting lenders. The bank did not originate or purchase any small loans to farms in low-income geographies during the analysis period, comparable to aggregate lenders. Demographic data from the tables above indicate there were only 17 farms located in low-income geographies, which limited lending opportunities.

Lending Gap Analysis

The lending gap analysis is based on consideration of performance during the evaluation period, within the bank's AAs, and on the information available at the time of the evaluation. The lending gap analysis examines the bank's lending performance by income distribution, particularly in LMI tracts, but is not an assessment of the bank's lending performance in majority-minority areas. Examiners reviewed summary reports and maps and analyzed home mortgage and small business lending activity to identify any unexplained, conspicuous gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps in the areas reviewed.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

The overall borrower distribution of the bank's home mortgage lending was good. In evaluating the bank's distribution of loans to borrowers of different income levels the OCC considered challenges low-income borrowers would likely face to qualify and afford home mortgage financing in the AA.

2021

The borrower distribution of the bank's home mortgage lending was good.

The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and below the aggregate percentage of all reporting lenders. Aggregate lenders were similarly well below the percentage of low-income families. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

2022-2023

The borrower distribution of the bank's home mortgage lending was good.

The percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but near to the aggregate percentage of all reporting lenders. Aggregate lenders were similarly well below the percentage of low-income families. The percentage of home mortgage loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of all reporting lenders.

Small Loans to Businesses

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

The overall borrower distribution of the bank's small business lending was good.

2021

The borrower distribution of the bank's small business lending was excellent.

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was near to the percentage of those businesses and exceeded the aggregate percentage of all reporting lenders.

2022-2023

The borrower distribution of the bank's small business lending was adequate.

The percentage of small loans to businesses with gross annual revenues of \$1 million or less was well below the percentage of those businesses and below the aggregate percentage of all reporting lenders. Aggregate lenders were similarly well below the percentage of demographics.

Small Loans to Farms

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

The overall borrower distribution of the bank's small farm lending was good.

2021

The borrower distribution of the bank's small farm lending was good.

The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of those farms but exceeded the aggregate percentage of all reporting lenders.

2022-2023

The borrower distribution of the bank's small farm lending was good.

The percentage of small loans to farms with gross annual revenues of \$1 million or less was below the percentage of those farms but approximated the aggregate percentage of all reporting lenders.

Community Development Lending

The institution is a leader in making CD loans.

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

The level of CD lending in the Lancaster County AA is excellent. ENB made 377 CD loans totaling \$31.8 million, which represented 16.9 percent of tier 1 capital as of December 31, 2023.

The following are examples of the bank's CD loans that illustrate the leadership and responsiveness to the CD lending needs of the AA:

- ENB processed 359 PPP loans totaling \$28.5 million that supported area businesses during the COVID-19 pandemic.
- The bank originated 18 loans totaling \$3.6 million that supported affordable housing. Loan proceeds were used to fund the purchase, construction, and/or renovation of 42 units offering affordable rents, 17 of which are located in moderate-income CTs.

Product Innovation and Flexibility

The institution makes limited use of innovative and/or flexible lending practices in order to serve AA credit needs.

The bank has a program specifically designed for low- and moderate-income persons and families to purchase their first home. The "Great Start" program offers 20- and 30-year home mortgage loans with a variety of flexible terms including loan to value ratios up to 97 percent allowing for minimal funds provided by the borrower, no minimum credit score, and flexible documentation requirements. During the evaluation period, the bank made 13 loans in the Lancaster County AA.

The bank participates in the FHLBank Pittsburgh's First Front Door program, which provides grants to first time homebuyers with income below 80 percent of the median. Funds can be used to help with the downpayment or closing costs. During the evaluation period, two borrowers received grants.

ENB also offers a "Wealth Builder Home Loan", which is a 15-year mortgage designed to build equity twice as fast as a traditional 30-year mortgage. The terms are flexible including financing up to 97 percent for refinance and 103 percent on purchase or construction, and no monthly private mortgage insurance. The product is not limited to first-time homebuyers and does require a minimum credit score of 700. Sellers can contribute up to 6% toward closing costs. During the evaluation period, the bank made six loans in the Lancaster County AA.

Finally, the bank has a program specifically designed for low- and moderate-income persons to offer unsecured small dollar loans to individuals and families. The "Good Samaritan Loan Program" works with the Lancaster, PA Good Samaritan Services to provide loans up to \$5,000 for a 1-3-year term. Good Samaritan Services (GSS) is a Christian ministry that provides safe, comfortable housing and supportive services to men, women, and children experiencing homelessness. ENB offers unsecured loans to residents of GSS shelters in Ephrata on flexible terms that include no minimum credit score,

repayment based on a percentage of income, and waiving of past due fees. During the evaluation period, the bank made 18 loans in the Lancaster County AA.

Conclusions for Areas Receiving Limited Scope Reviews

Based on a limited-scope review, the bank’s performance under the Lending Test in the Lebanon County AA is consistent with the bank’s overall performance under the Lending Test in the full-scope area.

Based on a limited scope review, the bank’s performance under the Lending Test in the Berks County AA is weaker than the bank’s overall performance under the Lending Test in the full-scope area due to very poor geographic distribution of the bank’s home mortgage lending and small loans to businesses in the AA. The bank’s performance in Berks County AA did not have a negative impact on the overall Lending Test conclusion given the bank’s limited presence in the county.

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

INVESTMENT TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Lancaster County AA is adequate.

ENB made 71 total CD investments or donations totaling \$8.49 million, which represented 4.5 percent of tier 1 capital as of December 31, 2023.

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

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

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Lancaster County AA	1	\$6,734	72	\$1,756	72	100	\$8,490	100	1	\$1,115

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

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

The bank provides CD investments through a certified Community Development Entity, which demonstrates a primary mission of serving or providing investment capital for low-income communities or low-income persons and maintains accountability to low-income communities. The fund invests in variety of small business, primarily through the Lancaster County AA. These businesses are generally

located in LMI geographies and include minority- and woman-owned businesses. During the evaluation period, the bank contributed \$1,000,000 to the fund.

The bank made 101 qualifying donations totaling \$1,054,078 during the evaluation period. Of this, \$384,021 of the donations were for providing housing and shelter to low- and moderate-income persons and families. \$379,634 of the donations were related to community services such as housing and food services to families and individuals in need, educational improvement tax credits, as well as donations to school programs which promote financial literacy and career readiness among LMI schools. The bank provided grants of \$47,672 to an economic development organization to revitalize Ephrata Bourgh and promote small businesses within the area.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Berks and Lebanon AAs is consistent with the bank's overall performance under the Investment Test in the full-scope area.

SERVICE TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Lancaster County AA is good.

Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits % of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
				Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Lancaster County AA	92.9	11	84.6	0	9.1	72.7	18.2	2.9	12.8	71.4	12.9
Berks County AA	3.6	1	7.7	0	0	0	100	2.4	8.5	60.4	28.7
Lebanon County AA	3.5	1	7.7	0	0	100	0	6.7	14.2	60.9	18.3

The bank's branch distribution in low- and moderate-income geographies was below the percentage of the population living within those geographies. All branches had at least one full-service deposit taking ATM. Alternate delivery systems included online banking and bill pay as well as mobile banking.

Distribution of Branch Openings/Closings						
	Branch Openings/Closings					
Assessment Area	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Lancaster County AA	1	0	0	0	1	0
Berks County AA	0	0	0	0	0	0
Lebanon County AA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has improved, the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

During the evaluation period the bank opened one new branch in 2022 in Quarryville, located in the Lancaster County AA. The branch is located in a middle-income census tract, four miles from the nearest moderate-income census tract. Services and business hours did not vary in a way that inconvenienced its AAs, particularly low- and moderate-income geographies and/or individuals. ENB offered traditional banking products and services at all branch locations in the AAs. Branches within the Lancaster County AA maintain similar hours with one another. The one branch located in a moderate-income census tract, the bank's main branch is closed on Saturdays. The two branches adjacent to Ephrata are open one hour earlier on Monday through Friday. In addition, the Blue Ball branch, located approximately two miles from a moderate-income tract.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly low- and moderate-income geographies and/or individuals.

Community Development Services

The institution provides an adequate level of CD services.

During the evaluation period, ENB employees provided 83 service activities totaling 984 hours to 11 organizations in the Lancaster County AA. The bank's services were responsive to identified needs in the AA of affordable housing, community services, financial literacy, and economic development. ENB employees also provided an additional 174 service hours to three organizations in the broader regional area.

- One individual served on the board of an organization which offers support to individuals experiencing homelessness and poverty serving over 600 people annually in Lancaster and Chester Counties, providing 187 hours of services during the evaluation period.
- Two individuals provided volunteers services for an organization which offers free tax preparation services to LMI families in the area, providing 202 hours during the evaluation period.
- Several individuals provide volunteer services to an organization which promotes economic mobility through mobilizing resources, people, and organizations. The group organizes an annual food box drop which provides several hundred boxes of food which are donated throughout Lancaster County.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Berks and Lebanon County AAs is weaker than the bank's overall performance under the Service Test in the full-scope area. Both the distribution of the branch network to low- and moderate-income geographies as well as the community development services are the performance of the full scope area. Based on the scope of the bank's operations in these AAs relative to the full scope area, weighted impact to the overall conclusions is limited.

Appendix A: Scope of Examination

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

Time Period Reviewed:	(01/01/21 to 12/31/23)	
Bank Products Reviewed:	Home mortgage, small business, small farm Community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Pennsylvania		
Lancaster MSA	Full-scope	Whole of Lancaster County
Lebanon MSA	Limited-scope	Whole of Lebanon County
Reading MSA	Limited-scope	Whole of Berks County

Appendix B: Summary of MMSA and State Ratings

RATINGS: The Ephrata National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
The Ephrata National Bank	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
State:				
Pennsylvania	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.

Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography **2021**

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate
Berks County AA 2021	103	22,445,135	9.2	18,425	7.1	1.9	5.1	4.1	0.0	3.6	61.1	60.2	60.5	27.7	37.9	30.8	0.0	0.0	0.0
Lancaster County AA 2021	910	168,650,162	80.9	19,338	1.9	1.4	2.7	8.6	4.3	10.7	74.1	86.5	69.0	15.3	7.8	17.6	0.0	0.0	0.0
Lebanon County AA 2021	112	19,126,920	10.0	4,295	1.9	1.8	2.4	14.5	6.3	16.2	67.7	82.1	62.0	15.9	9.8	19.5	0.0	0.0	0.0
Total	1,125	210,222,217	100.0	42,058	4.2	1.5	3.7	7.2	4.1	8.2	67.7	83.6	64.6	20.9	10.8	23.5	0.0	0.0	0.0
<i>Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			
<i>The Ephrata National Bank (10000002515) excluded from Aggregate</i>																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022-23	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate		
Berks County AA 2023	188	46,194,598	9.8	9,300	3.3	0.0	4.9	8.4	1.6	11.3	59.3	57.4	55.6	29.0	41.0	28.2	0.0	0.0	0.0		
Lancaster County AA 2023	1,511	293,212,098	79.1	10,249	1.5	0.7	2.8	11.3	12.3	13.6	72.5	79.0	68.2	14.7	8.0	15.5	0.0	0.0	0.0		
Lebanon County AA 2023	211	45,388,612	11.0	3,053	4.0	4.3	5.4	9.4	12.3	13.6	64.6	55.9	60.6	22.1	27.5	20.4	0.0	0.0	0.0		
Total	1,910	384,795,308	100.0	22,602	2.5	1.0	4.0	9.9	11.3	12.7	66.4	74.3	62.0	21.1	13.4	21.4	0.0	0.0	0.0		
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																					
<i>The Ephrata National Bank (10000002515) excluded from Aggregate</i>																					

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Berks County AA 2021	103	22,445,135	9.2	18,425	21.4	5.8	9.2	17.2	27.2	20.2	21.4	21.4	22.5	40.1	44.7	31.3	0.0	1.0	16.7
Lancaster County AA 2021	910	168,650,162	80.9	19,338	18.7	5.1	7.1	19.3	23.0	20.9	22.8	27.3	23.5	39.3	42.5	34.2	0.0	2.2	14.4
Lebanon County AA 2021	112	19,126,920	10.0	4,295	20.4	10.7	9.1	18.6	25.9	20.5	25.7	36.6	22.7	35.3	25.9	27.8	0.0	0.9	20.0
Total	1,125	210,222,217	100.0	42,058	20.0	5.7	8.2	18.3	23.6	20.6	22.5	27.6	23.0	39.2	41.1	32.2	0.0	2.0	16.0
<i>Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			
<i>The Ephrata National Bank (10000002515) excluded from Aggregate</i>																			

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Berks County AA 2023	188	46,194,598	9.8	9,300	20.3	5.9	10.5	18.1	17.6	22.1	22.0	27.1	23.2	39.5	47.3	28.9	0.0	2.1	15.3	
Lancaster County AA 2023	1,511	293,212,098	79.1	10,249	17.4	5.6	7.0	19.3	22.9	22.7	24.6	25.8	25.5	38.8	43.0	34.0	0.0	2.8	10.9	
Lebanon County AA 2023	211	45,388,612	11.0	3,053	20.6	7.1	11.0	18.1	21.8	22.9	22.6	27.5	24.2	38.6	37.9	27.5	0.0	5.7	14.3	
Total	1,910	384,795,308	100.0	22,602	18.9	5.8	9.0	18.7	22.3	22.5	23.4	26.1	24.4	39.1	42.8	31.0	0.0	3.0	13.2	
<i>Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				
<i>The Ephrata National Bank (10000002515) excluded from Aggregate</i>																				

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Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Berks County AA 2021	65	2,757	9.5	9,186	11.5	1.5	9.2	5.1	0.0	4.8	56.2	56.9	57.1	27.2	41.5	28.3	0.0	0.0	0.6
Lancaster County AA 2021	581	60,375	84.7	11,851	4.7	0.2	3.7	11.1	7.4	10.0	70.7	84.0	73.0	13.4	8.4	12.9	0.0	0.0	0.4
Lebanon County AA 2021	40	5,073	5.8	1,762	2.0	2.5	1.5	21.7	7.5	16.1	57.4	85.0	66.3	18.9	5.0	15.8	0.0	0.0	0.4
Total	686	68,205	100.0	22,799	7.2	0.4	5.5	9.6	6.7	8.7	63.8	81.5	66.4	19.4	11.4	19.0	0.0	0.0	0.5
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																			
<i>The Ephrata National Bank (10000002515) excluded from Aggregate</i>																			

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Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2022-23
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Berks County AA 2023	27	3,029	4.8	8,177	9.3	0.0	6.8	13.5	3.7	12.2	49.5	66.7	50.9	27.6	29.6	29.6	0.0	0.0	0.5	
Lancaster County AA 2023	499	88,982	88.8	12,170	3.7	0.4	2.6	11.4	8.4	10.4	69.1	83.6	71.3	15.8	7.6	15.3	0.0	0.0	0.4	
Lebanon County AA 2023	36	7,573	6.4	2,348	6.6	2.8	5.0	13.8	13.9	10.7	61.7	80.6	67.0	17.9	2.8	16.7	0.0	0.0	0.7	
Total	562	99,584	100.0	22,695	6.1	0.5	4.4	12.4	8.5	11.1	61.2	82.6	63.4	20.3	8.4	20.6	0.0	0.0	0.5	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				
<i>The Ephrata National Bank (10000002515) excluded from Aggregate</i>																				

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Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Berks County AA 2021	65	2,757	9.5	9,186	87.6	95.4	49.8	4.3	4.6	8.1	0.0
Lancaster County AA 2021	581	60,375	84.7	11,851	87.7	80.9	49.3	4.7	19.1	7.6	0.0
Lebanon County AA 2021	40	5,073	5.8	1,762	86.4	80.0	51.8	4.2	20.0	9.4	0.0
Total	686	68,205	100.0	22,799	87.6	82.2	49.7	4.5	17.8	7.9	0.0
<p><i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i></p> <p><i>The Ephrata National Bank (10000002515) excluded from Aggregate</i></p>											

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Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-23	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Berks County AA 2023	27	3,029	4.8	8,177	89.5	55.6	54.8	3.4	44.4	7.0	0.0	
Lancaster County AA 2023	499	88,982	88.8	12,170	90.1	41.3	55.3	3.5	58.7	6.4	0.0	
Lebanon County AA 2023	36	7,573	6.4	2,348	88.6	52.8	56.9	3.3	47.2	8.0	0.0	
Total	562	99,584	100.0	22,695	89.8	42.7	55.3	3.5	57.3	6.8	0.0	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												
<i>The Ephrata National Bank (10000002515) excluded from Aggregate</i>												

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Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Berks County AA 2021	14	2,292	11.3	367	2.1	0.0	0.3	1.2	0.0	0.0	68.6	85.7	90.4	28.1	14.3	9.0	0.0	0.0	0.3
Lancaster County AA 2021	93	12,849	75.0	1,021	1.0	0.0	0.0	3.6	0.0	0.3	86.6	96.8	94.8	8.8	3.2	4.9	0.0	0.0	0.1
Lebanon County AA 2021	17	2,235	13.7	166	0.0	0.0	0.0	5.1	0.0	0.0	75.5	88.2	88.7	19.4	11.8	11.3	0.0	0.0	0.0
Total	124	17,376	100.0	1,554	1.3	0.0	0.1	2.8	0.0	0.2	78.5	94.4	93.2	17.4	5.6	6.5	0.0	0.0	0.1
<p>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</p> <p>The Ephrata National Bank (10000002515) excluded from Aggregate</p>																			

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Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-23**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Berks County AA 2023	51	7,386	15.8	345	1.9	0.0	0.0	4.8	11.8	6.1	64.8	74.5	74.2	28.6	13.7	19.1	0.0	0.0	0.6
Lancaster County AA 2023	219	27,374	68.0	1,122	0.6	0.0	0.0	8.9	7.8	7.6	77.7	90.0	83.2	12.7	2.3	9.0	0.0	0.0	0.2
Lebanon County AA 2023	52	6,729	16.1	200	1.5	0.0	0.0	2.9	0.0	1.7	74.1	90.4	78.0	21.5	9.6	20.2	0.0	0.0	0.0
Total	322	41,489	100.0	1,667	1.1	0.0	0.0	6.8	7.1	6.6	73.0	87.6	80.6	19.0	5.3	12.5	0.0	0.0	0.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

The Ephrata National Bank (10000002515) excluded from Aggregate

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Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Berks County AA 2021	14	2,292	11.3	367	96.8	78.6	72.9	1.9	21.4	1.2	0.0
Lancaster County AA 2021	93	12,849	75.0	1,021	96.9	80.6	80.4	2.4	19.4	0.7	0.0
Lebanon County AA 2021	17	2,235	13.7	166	98.0	82.4	64.0	1.4	17.6	0.6	0.0
Total	124	17,376	100.0	1,554	97.0	80.6	77.0	2.1	19.4	0.9	0.0
<p>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</p> <p>The Ephrata National Bank (10000002515) excluded from Aggregate</p>											

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-23	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Berks County AA 2023	51	7,386	15.8	345	97.3	76.5	73.9	1.6	23.5	1.1	0.0	
Lancaster County AA 2023	219	27,374	68.0	1,122	96.9	79.9	80.9	2.1	20.1	1.1	0.0	
Lebanon County AA 2023	52	6,729	16.1	200	98.5	76.9	69.4	0.7	23.1	0.7	0.0	
Total	322	41,489	100.0	1,667	97.2	78.9	78.1	1.8	21.1	1.0	0.0	
<p><i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i></p> <p><i>The Ephrata National Bank (10000002515) excluded from Aggregate</i></p>												

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