



PUBLIC DISCLOSURE

August 2, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

City National Bank of Florida
Charter Number: 15977

25 West Flagler Street
Miami, FL 33130

Office of the Comptroller of the Currency

9850 NW 41st Street
Suite 260
Miami, FL 33178

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.

Table of Contents

Overall CRA Rating.....	3
Description of Institution.....	4
Scope of the Evaluation.....	7
Discriminatory or Other Illegal Credit Practices Review.....	8
State Rating.....	9
State of Florida.....	9
Appendix A: Scope of Examination.....	A-1
Appendix B: Summary of State Ratings.....	B-1
Appendix C: Definitions and Common Abbreviations.....	C-1
Appendix D: Tables of Performance Data.....	D-1

Overall CRA Rating

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

The following table indicates the performance level of City National Bank of Florida (CNB) with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on the excellent level of community development (CD) lending with CNB being a leader in CD lending, the good geographic and borrower distribution of lending, and a high percentage of the Bank’s loans being in the assessment areas (AA). Lending levels reflect good responsiveness to the AA’s credit needs. The Bank’s extensive use of innovative and/or flexible lending practices, including the excellent responsiveness to borrowers during the Novel Coronavirus Disease 2019 (COVID-19) pandemic, had a positive impact on conclusions under the Lending Test.
- The Investment Test rating is based on the excellent level of qualified CD investments and excellent responsiveness to credit and community economic development needs.
- The Service Test rating is based on the accessibility of branch offices to geographies and individuals of different income levels and the Bank being a leader in providing CD services.

Lending in Assessment Area

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

The Bank originated and purchased 82.6 percent of its total loans inside the Bank’s AAs during the evaluation period. This analysis is performed at the Bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2018	466	85.5	79	14.5	545	535,618	89.4	63,628	10.6	599,246
2019	537	76.6	164	23.4	701	412,823	80.4	100,387	19.6	513,209
2020	1,042	77.1	309	22.9	1,351	539,826	77.7	154,612	22.3	694,437
Subtotal	2,045	78.7	552	21.3	2,597	1,488,266	82.4	318,626	17.6	1,806,892
Small Business										
2018	347	71.5	138	28.5	485	130,413	72.5	49,346	27.5	179,759
2019	473	79.2	124	20.8	597	166,011	76.0	52,457	24.0	218,468
2020	8,031	84.5	1,475	15.5	9,506	978,192	80.3	239,455	19.7	1,217,647
Subtotal	8,851	83.6	1,737	16.4	10,588	1,274,616	78.9	341,258	21.1	1,615,874
Total	10,896	82.6	2,289	17.4	13,185	2,762,882	80.7	659,884	19.3	3,422,766
<i>Due to rounding, totals may not equal 100.0%</i>										

As a percentage of total loans originated or purchased inside the Bank's AAs, Home Mortgage Disclosure Act (HMDA)-reportable loans represent 18.8 percent of the total and small business loans represent 81.2 percent. Based on the dollar amount of loans funded inside the Bank's AAs, HMDA-reportable loans represent 53.9 percent of the total and small business loans represent 46.1 percent.

In response to the COVID-19 pandemic, the Bank refocused their lending efforts in 2020. As a result, the majority (95 percent) of reportable small business loans originated in 2020 were granted under the Small Business Administration's (SBA) Paycheck Protection Program (PPP). The guidelines for PPP included reduced underwriting criteria and data collection. These loans impacted our overall analysis of the geographic distribution of lending by income level of geography and our analysis and conclusions regarding the distribution of lending by income level of the borrower. Given the high volume of PPP loans during the latter part of the evaluation period, lending performance associated with home mortgage loans and small business loans are weighted equally in our analysis.

Description of Institution

City National Bank of Florida (CNB or Bank) is an intrastate commercial bank headquartered in Miami, Florida. The Bank is wholly-owned by Bci Financial Group Incorporated, a one-bank holding company headquartered in Miami, FL, which is owned by Banco de Credito e Inversiones (BCI), one of Chile's largest private banks that operates subsidiaries globally. The Bank has an operating subsidiary, BciCapital, LLC, that provides commercial lease financing and operated under the name City National Capital Finance, Inc. during a portion of the review period. Subsidiary activity had no impact on the Bank's capacity for community reinvestment and was not considered in our evaluation.

Since the last evaluation, CNB's growth has been aided through acquisition activity; however, the Bank's footprint has not changed. Bank acquisitions that occurred during the evaluation period are as follows:

Bank	State	Date of Completion	Transaction Type	Target Total Assets (\$000)
TotalBank	FL	6/15/2018	Acquisition	\$2,996,000
Executive National Bank	FL	10/9/2020	Acquisition	\$519,025

Both acquired banks were headquartered in Miami, FL, and all acquired branches were located in Miami-Dade County, within CNB's existing market. These acquisitions did not materially affect the scope of CNB's operations or products or services offered.

CNB has two AAs in Florida, Metropolitan Statistical Area (MSA) 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) and MSA 36740 (Orlando-Kissimmee-Sanford, FL). The Bank operates 34 branches with 60 ATMs located primarily at all branch locations as well as nearby areas. Miami-Dade County represents the Bank's core business.

As of December 31, 2020, CNB reported total assets of \$18.6 billion, total deposits of \$15 billion, and tier 1 capital of \$1.8 billion. Gross loans and leases totaled \$12.5 billion and represented 67.2 percent of total assets. Components of the Bank's loan portfolio include approximately 47 percent commercial real estate loans, 30 percent commercial and industrial loans, 17 percent residential real estate loans, 3 percent commercial leases, and 3 percent other loans including consumer loans.

CNB offers a full range of financial products and services. The Bank strategically focuses on commercial real estate lending, corporate cash management, and private banking. Other lines of business include wealth management services, personal and business banking, and corporate banking, providing existing clients with comprehensive banking services. CNB originates small loans to businesses and uses its real estate lending expertise to originate CD loans. The Bank has a residential mortgage loan department that specializes in loans to low- and moderate-income (LMI) borrowers. CNB continues to focus on residential lending as a part of the Bank's strategy that includes Fannie Mae, Federal Housing Administration (FHA), and Veterans Administration (VA) product offerings, as well as a unique portfolio of CitySmart products. In addition to loan originations, CNB purchased home mortgage loans during the evaluation period to support lending goals for LMI borrowers.

During the evaluation period, the Bank faced various competitive and economic challenges in its efforts to meet the credit needs in its AAs. There is significant competition in the Bank's AAs with many large national and regional financial institutions. The limited supply of available housing for LMI people as well as high housing costs makes it challenging to make residential home loans. Purchasing these types of loans from other financial institutions has diminished during the evaluation period. These factors were considered when determining the CRA performance and are discussed throughout this performance evaluation.

There were no legal or financial factors impeding the Bank's ability to help meet the credit needs of its AAs during the evaluation period. CNB's performance was rated "Outstanding" in the last performance evaluation dated July 9, 2018.

COVID-19 Pandemic

During 2020, the COVID-19 pandemic affected the Bank's operations and customers. In March 2020, counties in the AAs were placed on COVID-19 lockdown, which limited the ability of Bank personnel to provide in-person CD services and caused many businesses and organizations to close for varied

periods of time. COVID-19 restrictions continued through the end of 2020. Affected industries included, but were not limited to, leisure and hospitality, retail trade, and health care and social assistance workers. According to the Florida Housing Coalition, there are over 1 million affected employees in the South Florida area, including 330,000 leisure and hospitality workers, 333,446 retail trade workers, and 366,546 health care and social assistance workers. Employment has not fully recovered. Some businesses permanently closed while others are still adjusting. Additionally, approximately 20 percent of renters statewide are behind on monthly payments. As renters are struggling to make payments, prospective homeowners are struggling to find affordable homes.

In response to COVID-19, CNB implemented new processes and made contributions to qualified organizations. In part, the Bank provided virtual online services to assist the financial needs of customers and small business owners to help in revitalizing and stabilizing the community. To assist its customers, management provided homeowners and other loan customers with payment deferrals and also waived late payment fees.

The Bank offered all loan customers forbearance or payment deferral options. The commercial loan forbearance was intended to suspend the payment for 90 days due to reductions in cash flow as a result of COVID-19. Commercial borrowers could request additional 90-day extensions. Consumer and residential deferrals were granted up to 180 days at customer request, and borrowers could request additional deferment beyond these initial timeframes. The Bank's COVID-19 deferrals peaked in May 2020, at \$2.9 billion, or 26 percent of total loans.

The Bank created a Mortgage Deferred Payment Program for borrowers impacted by COVID-19 through job loss, illness, or death in the family. According to Bank data, this program assisted over 500 existing mortgage clients to defer payments on over \$400 million in outstanding principal balances. The Bank continues to work with its customers and is making special considerations if customers require longer payment deferrals. In addition, the program provided customers the option to add the deferred amount to the outstanding balance if needed.

CNB took a very active role in lending under the SBA's PPP. Management allocated over 190 employees to the task and 27,000 hours to close approximately 9,400 loans totaling \$1.86 billion. CNB was one of the few banks offering PPP loans for non-customers, with approximately 40 percent of funding going to new clients. The Bank provided swift relief and approval of PPP loans, which helped to support the retention of approximately 250,000 jobs. Many of those jobs were for LMI workers and families. According to CNB data, approximately 70 percent of PPP loans were for amounts less than \$100,000.

CNB was also very active in the Federal Reserve's Main Street Lending Program (MSLP) intended to facilitate lending to support small and medium-sized for-profit businesses and non-profit organizations impacted by the pandemic. During 2020, the Bank funded 371 loans totaling \$2 billion. To put the Bank's lending efforts into perspective, CNB's participation in the MSLP represented approximately 30 percent of the total number of loans originated nationally. Eleven other Florida-based banks also originated MSLP loans, however, CNB funded over 90 percent of loans in the state.

In addition to the various lending programs and services offered during the pandemic, CNB made contributions through grants and donations to assist community organizations and provide COVID-19 relief. In part, the Bank contributed \$1 million to create the CNB Covid Relief Fund aimed at supporting nonprofit organizations confronting COVID-19 and its resulting economic impacts. The fund targeted three areas of critical need: community hospitals and healthcare providers on the

frontlines; nonprofits addressing the food insecurity crisis; and organizations that serve vulnerable segments of the population, including those with special needs or experiencing homelessness. These donations were considered in the Investment Test rating.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses the Bank’s record of meeting the credit needs of its AAs under the large bank Lending, Investment, and Service Tests. In evaluating the Bank’s lending performance, we reviewed residential mortgage loans subject to filing under HMDA, small loans to businesses, and CD loans, as reported under CRA. We also evaluated CRA qualified investments and CD services.

The evaluation period for the Lending, Investment, and Service Tests is January 1, 2018 through December 31, 2020. Our conclusions related to CD loans, qualified investments including donations, and CD services were based on the number and dollar amounts made during the evaluation period. In addition, we considered the level of innovation, complexity, responsiveness to community credit needs and the degree to which these instruments are not routinely provided by private investors.

We evaluated CNB’s lending performance based on its primary loan products, which include home mortgage loans and small loans to businesses. While the Bank offers small farm and consumer loans, these products are not a primary focus for the Bank. As a result, the Bank did not originate or purchase a sufficient volume of these loans and we did not consider these as part of our evaluation, as an analysis of this data would not be meaningful. Therefore, tables for these products are not included in this report.

With an evaluation period end date of December 31, 2020, Bank qualifying activities performed in response to the significant impact the COVID-19 pandemic had on economies across the United States are addressed in this evaluation.

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 AAs 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 the State Rating section for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The Bank’s overall rating is based on its lending and CD performance within the state of Florida. The state rating is based on performance in all Bank AAs. Refer to the “Scope” section under the State Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

The Lending Test received the most weight when arriving at an overall rating. Lending performance on home mortgage loans and small businesses loans reportable under the HMDA and CRA requirements

during the evaluation period were weighted equally. Generally, equal emphasis is given to the geographic distribution of loans and lending by borrower income level. Greater weight was generally given to performance compared to aggregate lenders than to performance relative to demographic factors in lending. The level and responsiveness of the Bank's CD lending to meet the credit needs of the community was also factored into the Lending Test. For the Investment Test, the level of current period investments was more heavily weighted as well as the responsiveness to the community needs. For the Service Test, Retail Banking Services is more heavily weighted than Community Development Services.

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 Florida

CRA rating for the State of Florida: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- Lending levels reflect good responsiveness to the AA's credit needs.
- The Bank exhibits a good geographic distribution of loans in its AA.
- The Bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the Bank.
- CNB is a leader in making CD loans, which had a significant impact on the overall Lending Test.
- The Bank's extensive use of innovative and/or flexible lending practices, including the excellent responsiveness to the COVID-19 pandemic.
- CNB had an excellent level of qualified CD investments and grants, often in a leadership position, and excellent responsiveness to credit and community economic development needs.
- Service delivery systems are accessible to geographies and individuals of different income levels in the AA.
- The Bank is a leader in providing CD services with excellent responsiveness to AA needs.

Description of Institution's Operations in Florida

CNB has two AAs in Florida. The Bank's primary AA is wholly comprised of MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) which is commonly referred to as "South Florida." CNB's second AA is wholly comprised of MSA 36740 (Orlando-Kissimmee-Sanford, FL) which is commonly referred to as "Central Florida." Refer to appendix A, Scope of Examination, for a listings of all Bank AAs.

CNB operates 34 branches and has 60 ATMs in the state of Florida. There are 24 branches in Miami-Dade County, five branches in Broward County, three branches in Palm Beach County, and two branches in Orange County. ATM facilities are located primarily at all branch locations as well as nearby areas. MSA 33100 is the Bank's primary market with Miami-Dade County representing the Bank's core business.

MSA 33100 represents the Bank's most significant market in terms of deposit concentrations, branch distribution, and reportable loans. As of June 30, 2020, deposits in this AA comprised 96.6 percent of

CNB's total deposits. Additionally, 94.1 percent of the Bank's branches were located in this AA and 92.4 percent of reportable loan originations were generated in this AA.

CNB provides a full range of loan and deposit products and services in the state. The Bank strategically focuses on commercial real estate lending while residential real estate lending represents a smaller segment of operations. As part of the Bank's commitment to increase residential lending to LMI borrowers, the Bank has a residential mortgage loan department that focuses on originating loans to these borrowers. At the end of the evaluation period, the Bank hired additional mortgage loan originators as part of their strategy to further increase residential lending.

Banking competition is very strong in Florida. Based on the FDIC's Deposit Market Share Report as of June 30, 2020, CNB reported \$13.3 billion in deposits, representing 1.87 percent of the overall market share of deposits in the state of Florida and ranked 12th out of 196 FDIC-insured financial institutions. Major competitors include Bank of America, National Association (N.A.), Wells Fargo Bank, N.A., Truist Bank, and JPMorgan Chase Bank, N.A. that all together hold approximately 50.4 percent of deposits in the state. Specific deposit market share data for the full-scope AA is discussed within performance test conclusions and in the market profile below.

We reviewed information from four community contacts with four organizations working in the AA that included nonprofit housing and economic development organizations. Community contacts indicate that affordable housing is a critical need in the AA, including construction of more affordable and workforce housing, rental subsidies, and homeownership tax credits for LMI housing. Another identified need is capital for small businesses, particularly due of the impact of COVID-19.

MSA 33100 (Miami-Fort Lauderdale-West Palm Beach, FL)

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami-Fort Lauderdale-West Palm Beach, FL MSA 33100						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,219	6.2	28.2	29.5	33.6	2.5
Population by Geography	5,861,000	5.8	28.9	31.5	33.4	0.4
Housing Units by Geography	2,484,604	5.5	27.9	30.9	35.3	0.3
Owner-Occupied Units by Geography	1,248,038	2.6	23.2	32.9	41.2	0.2
Occupied Rental Units by Geography	799,004	10.1	36.4	30.1	22.9	0.5
Vacant Units by Geography	437,562	5.6	25.9	26.7	41.2	0.6
Businesses by Geography	1,153,160	4.1	21.8	28.1	44.7	1.2
Farms by Geography	15,598	4.7	24.5	29.6	40.8	0.4
Family Distribution by Income Level	1,330,793	23.1	17.0	17.7	42.2	0.0
Household Distribution by Income Level	2,047,042	25.1	15.7	16.6	42.6	0.0
Median Family Income MD - 22744 Fort Lauderdale-Pompano Beach-Sunrise, FL		\$61,809	Median Housing Value			\$227,861
Median Family Income MD - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Gross Rent			\$1,194

Median Family Income MD - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL	\$65,914	Families Below Poverty Level	13.5%
<i>Source: 2015 ACS and 2020 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.</i>			

MSA 33100 consists of three Metropolitan Divisions (MD), including: MD 33124 (Miami-Miami Beach-Kendall, FL) which consists of Miami-Dade County, MD 22744 (Fort Lauderdale-Pompano Beach-Deerfield, FL) which consists of Broward County, and MD 48424 (West Palm Beach-Boca Raton-Boynton Beach, FL) which consists of Palm Beach County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to U.S. Census data, the AA consists of 1,219 census tracts (CT), of which 76 are low-income, 344 are moderate-income, 359 are middle-income, 409 are upper-income, and 31 have not been assigned an income classification. The poverty level for the AA is high with 13.5 percent of families living below the poverty level.

According to the U.S. Bureau of Labor Statistics, as of December 31, 2020, the unemployment rate in the Miami-Ft. Lauderdale-Palm Beach, FL MSA was 5.6 percent, which was lower than the national average of 6.7 percent. During the evaluation period the unemployment rate ranged from a low of 2.4 percent (December 2019) to a high of 13.8 percent (July 2020).

Housing affordability is a challenge in the AA. Considering the median family income and the high poverty level, LMI families have difficulty affording mortgage payments without subsidies given the high housing costs and added costs of insurance and taxes. The 2015 American Community Survey (ACS) Census estimates the median value of owner-occupied housing units for MSA 33100 to be \$227,861. Based on the median family income at the MSA level, low-income is considered less than 50 percent of the median family income, which would be an income of less than \$28,803 per year. Moderate income is less than 80 percent of the median income, or \$46,085, but not less than 50 percent of the median family income. Rents are also high in the AA with a median monthly gross rent of \$1,194. LMI renters, particularly low-income, also need rental subsidies to assist with rental payments. Approximately 23.2 percent of households spend more than 30 percent of their income for rental payments.

The lack of affordable housing inventory and high housing costs are key challenges for LMI families to purchase homes. Housing and rental prices continue to increase, and the COVID-19 pandemic has led to soaring home prices and an even more limited supply than before the global pandemic. The Miami Association of Realtors reported that existing single-family homes in Miami-Dade, Broward, and Palm Beach counties finished 2020 with a median sale price of \$402,000, \$400,000, and \$389,500, increasing by 10.1, 9.6, and 9.7 percent, respectively, when compared to the prior year. The median sale price for existing townhomes and condominiums also increased during 2020 to \$264,000, \$189,000, and \$205,000 in Miami-Dade, Broward, and Palm Beach counties, increasing by 7.8, 10.5, and 12.6 percent, respectively, when compared to the prior year. Months' supply of inventory, which is an important indicator of consumer demand and market performance, reflects limited supply in many neighborhoods. As a result, lack of supply is impacting property sales, particularly for single-family homes. Additionally, many lower priced properties are quickly purchased for cash by investors, further limiting the number of affordable homes available to LMI buyers. In 2020, approximately 22 percent of all homes sales in the AA were cash purchases.

Another factor impacting the ability of LMI borrowers to qualify for and purchase homes in the AA is the relatively high cost of insurance and property taxes that lower borrower purchasing power. Based on the most recent tax data available, the median property taxes for Miami-Dade, Broward, and Palm Beach counties were \$2,756, \$2,664, and \$2,679, respectively, ranking among the highest in the state.

According to Dunn and Bradstreet, there were 1,153,160 non-farm businesses in the AA for 2020, of which approximately 93 percent are considered small business. Small businesses are defined as having revenues of \$1 million or less.

The banking industry in the AA is very competitive for loans, deposits, and investments, as well as CRA CD opportunities. Competition is strong and consists of numerous mortgage lenders, national, state, and community banks, credit unions, and other non-bank financial institutions that offer a wide variety of home mortgage loan products and small business loans. However, unlike CNB, many of the institutions the Bank competes against do not take deposits and some of the competing institutions such as the credit card banks generate a larger number of loans, but with smaller average loan amounts. Based on the Federal Deposit Insurance Corporation's (FDIC) Deposit Market Share Report as of June 30, 2020, CNB had a deposit market share of 4.62 percent and ranked 7th out of 84 FDIC-insured financial institutions in MSA 33100. Major competitors include Bank of America, N.A., Wells Fargo Bank, N.A., JPMorgan Chase Bank, N.A., and Truist Bank that all together hold approximately 49.8 percent of AA deposits.

Investment opportunities are highly competitive with banks purchasing investments to support affordable housing for LMI individuals/geographies and small business lending. Many community banks tend to purchase mortgage backed securities with home mortgages to LMI people or loans in LMI geographies, affordable housing multifamily properties, or SBA loan pools in their AAs. The opportunity to make donations/grants to qualifying organizations that have missions that support the CRA CD purpose are available. CD lending opportunities are available in the AA including opportunities to partner with nonprofit organizations that have a CD mission or purpose. There are numerous nonprofit organizations located in the AA that provide various services to LMI people or small businesses, such as affordable housing opportunities, financial literacy training, support for economic development activities, and more.

Scope of Evaluation in Florida

We evaluated CNB's performance in the state of Florida by analyzing the Bank's lending performance and its CD lending, investment, and service performance from January 1, 2018 through December 31, 2020.

Bank delineated AAs located in the same MSA are combined, analyzed, and presented as one AA for purposes of this evaluation. CNB has two AAs located in Florida comprised of MSA 33100 that includes the counties of Miami-Dade, Broward, and Palm Beach and MSA 36740 that includes Orange, Lake, Seminole, and Osceola counties.

We selected MSA 33100 for a full-scope review as the AA represents the Bank's most significant market in terms of deposit concentrations, branch distribution, and reportable loans. As of June 30, 2020, deposits in this AA comprised 96.6 percent of CNB's total deposits. Additionally, 94.1 percent of the Bank's branches were located in this AA and 92.4 percent of reportable loan originations were generated in this AA. We completed a limited-scope review of MSA 36740, as this represents the

Bank's smallest market. The Bank's overall rating is based primarily on the AA that received a full-scope review. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The Bank's performance under the Lending Test in Florida is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope:							
MSA 33100	1,803	8,274	0	178	10,255	92.4	96.6
Limited Scope:							
MSA 36740	242	577	0	18	837	7.5	3.4
Statewide Loans with Indirect Benefit	0	0	0	10	10	0.1	-

*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* Loans	%State Deposits
Full Scope:							
MSA 33100	1,406,300	1,206,216	0	1,157,729	3,770,245	91.4	96.6
Limited Scope:							
MSA 36740	81,966	68,400	0	138,451	288,817	7.0	3.4
Statewide Loans with Indirect Benefit	0	0	0	64,132	64,132	1.6	-

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

Refer to the tables above for the facts and data used to evaluate CNB's lending activity. The Bank did not originate or purchase small farm loans or consumer loans in any AA to perform a meaningful analysis.

The Bank's lending activity is good. CNB originated a good volume of loans in the AA relative to its capacity based on deposits, competition, market presence, and business strategy.

According to the FDIC Deposit Market Share data as of June 30, 2020, CNB ranked 7th out of 84 financial institutions with a deposit market share of 4.62 percent, placing the Bank in the 8th percentile.

Mortgage Loans

CNB's proportion of home mortgage loans (by the number of loans) is significantly lower than its deposit market share. According to 2020 Peer Mortgage Data, the Bank had a 0.40 percent lender market share of home loans, ranking 48th out of 1,076 mortgage lenders in MSA 33100, placing CNB in the 4th percentile. The market share by dollar volume is slightly better at 0.67 percent and moves the Bank's rank to 33rd but still well below the deposit market share. Given the highly competitive home mortgage market in the AA from specialized home mortgage companies and state and nationwide banks that offer a wider selection of mortgage products, as well as considering the Bank's lending strategy focused on commercial lending, the lending activity for home mortgages is considered good. The top five mortgage lenders hold approximately 24.8 percent of the total lender market share. The top five lenders are Quicken Loans, Wells Fargo Bank, N.A., United Wholesale Mortgage, Caliber Home Loans, and Paramount Residential Mortgage.

Business Loans

The 2019 Peer Small Business Data was the most recent peer information available at the time of this evaluation. Data published for 2019 was inaccurate due to a transmission error when the Bank originally uploaded their business loan data to the Federal Reserve. Resubmitted data was validated and manually calculated in our analysis below.

The Bank's lending to businesses is significantly lower than its deposit market share. The Bank has approximately a 0.16 percent market share of small loans to businesses by the number of loans and ranked 37th out of 228 reporting lenders. The market share by dollar volume is larger at 2.27 percent and moves the Bank's rank to 9th, placing CNB in the 4th percentile, but still lower than the deposit market share. The market share and rank are good considering market competition and the small average dollar amount of the loans originated by the top five lenders. These credit card banks had small average sized loans ranging from \$6,000 to \$35,000 compared to CNB's average loan size of approximately \$350,500. The top five lenders are American Express, JPMorgan Chase Bank, N.A., Bank of America, N.A., CitiBank N.A., and Wells Fargo Bank, N.A. Their total lender share is 72.1 percent based on the number of loans.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of Florida 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 geographic distribution of home mortgage loans in the full-scope AA is excellent. The Bank's mortgage lending in low-income geographies exceeds the percentage of owner-occupied housing units

and also exceeds the aggregate lending in low-income geographies. For moderate-income geographies, the lending was near to the percentage of owner-occupied units but exceeds the aggregate lending.

Small Loans to Businesses

Refer to Table Q in the state of Florida 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.

The majority of small business loans originated during the evaluation period were granted in 2020 under the SBA's PPP in response to the COVID-19 pandemic. The guidelines for PPP included reduced underwriting criteria and data collection. As a result, our evaluation gives greater consideration to small business lending activity in 2018 and 2019 to assess the geographic distribution of loans to businesses.

The geographic distribution of small loans to businesses is good given the performance context discussed above. The Bank's percentage of small loans to businesses in low-income geographies was near to the percentage of businesses in low-income geographies and somewhat lower than the aggregate lending. The percentage of small loans to businesses in moderate-income geographies was near to both the percentage of businesses in moderate-income geographies and the aggregate lending.

When business loan data from 2020 is excluded, the percentage of small loans to businesses in low-income geographies is near to the percentage of businesses in low-income geographies and also near to the aggregate lending. The percentage of small loans to businesses in moderate-income geographies exceeds both the percentage of businesses in moderate-income geographies and the aggregate lending.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained conspicuous gaps existed. We reviewed summary reports, maps, and analyzed CNB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

Refer to Table P in the state of Florida 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.

During the evaluation period, performance context issues made it difficult to provide home mortgage loans to low-income borrowers in the AA. For this reason, more weight was given to lending to moderate-income borrowers in reaching our conclusions.

The distribution of home mortgage loans by income level of the borrower in the AA is good given the performance context discussed above. The percentage of home mortgage loans to low-income borrowers is significantly lower than the percentage of low-income families but exceeds the aggregate

lending. The percentage of home mortgage loans to moderate-income borrowers is near to the percentage of moderate-income families and exceeds the aggregate lending.

Small Loans to Businesses

Refer to Table R in the state of Florida 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 majority of small business loans originated during the evaluation period were granted in 2020 under the SBA's PPP. The guidelines for PPP included reduced underwriting criteria and business revenue was not collected nor considered in the lending decision. As a result, our evaluation gives greater consideration to small business lending activity in 2018 and 2019 to assess the borrower revenue distribution of loans to businesses.

The borrower distribution of small loans to businesses is adequate in the AA considering the performance context factors discussed above. During the evaluation period, the percentage of loans to small businesses (businesses with annual revenues of \$1 million or less) is significantly lower than the percentage of businesses identified as having revenues of \$1 million or less and lower than the aggregate lending for these businesses.

When business loan data from 2020 is excluded, the percentage of loans to small businesses is lower than the percentage of businesses identified as having revenues of \$1 million or less and near to the aggregate lending for these businesses.

Community Development Lending

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

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

The Bank originated a total of 178 CD loans totaling \$1.16 billion within the AA, representing 64 percent of tier 1 capital. CD loans exhibited excellent responsiveness to the credit and community needs in the AA and primarily supported revitalization, stabilization, and community services. Examples of CD loans originated during the evaluation period include:

- \$67 million loan to fund the construction of a hotel with retail and office space. The hotel is located in a moderate-income tract and will provide jobs for LMI individuals in the community.
- \$7.12 million loan to develop a medical facility, which provides services primarily to senior citizens, including Medicare recipients. This medical facility is in a low-income tract.
- \$13.9 million loan to refinance existing debt and provide new funds for other purposes including capital improvements to a 148-unit apartment community located in Pompano Beach, FL. The property is a low-income housing project that consists of 22 residential buildings that have been allocated low-income tax credits.
- \$9.8 million loan to refinance an industrial complex located in Dania Beach, FL. The property is located in a low-income census tract and provides jobs to the area.

- \$5 million line of credit to refinance newly constructed single-family homes that provide affordable rental housing. The property is located in a low-income census tract in east Ft. Lauderdale and is part of a 500-unit project (single-family homes, townhomes, multifamily, and duplexes) to provide workforce and affordable housing.
- \$2.6 million PPP loan to a company that manages medical offices throughout Miami-Dade and Palm Beach counties and primarily serves senior patients. Job retention included 131 LMI individuals employed by the company.

Statewide CD Loans with Indirect Benefit

During the evaluation period, an additional ten CD loans totaling \$64.1 million were granted in Florida, outside the Bank's AAs.

Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices in order to serve AA credit needs. CNB's use of these flexible programs had a positive impact on conclusions under the Lending Test.

CNB showed excellent responsiveness to the credit needs of its borrowers during the COVID-19 pandemic. The Bank provided loan modification opportunities, such as loan forbearance and deferrals to customers, and participated heavily in the SBA's PPP. During 2020, the Bank originated approximately 9,400 PPP loans totaling \$1.86 billion that helped to support or retain over 250,000 jobs. Under the Federal Reserve's MSLP, the Bank originated 371 loans totaling \$2 billion to support small and medium-sized businesses impacted by the pandemic.

The Bank offers a variety of innovative and flexible loan products to meet the credit needs of LMI individuals or geographies. During the evaluation period, the Bank offered several loan products, programs, and partnerships that provided approximately \$429 million in loan assistance (through funding, refinance, payment deferral, and down payment assistance) to 994 borrowers, which benefited LMI individuals and families. Some of the programs offered by the Bank include the following:

Financial Hardship Payment Deferment and Loan Modification Program

This program provided a payment deferment option for existing CNB customers meeting certain criteria, who experienced financial hardship as a result of the pandemic. The borrower's payments were deferred, and the Bank did not charge interest on the deferred payment. The Bank also has a Loan Modification Program for qualified borrowers which provided a reduced interest rate for the term of the loan, reducing the monthly mortgage payment. During the evaluation period, a total of 565 borrowers with loan balances totaling \$406 million were aided under these programs.

CitySmart Community Mortgage Program

This program is available to LMI borrowers to assist with the purchase or refinance of a home. The mortgage provides more flexible underwriting criteria than a traditional loan, including low credit score requirements, high LTV ratios - without private mortgage insurance requirements, alternative credit allowed, and closing cost and down payment assistance. During the evaluation period, the Bank originated 121 CitySmart mortgages totaling \$13.7 million. In partnership with various county and city municipalities, CNB community development bankers assisted 81 families to receive \$4.9 million in down payment assistance. The Bank also offers reduced rates through the CitySmart Mortgage Special

Reduced Rate Program. The program grants a reduced interest rate to assist borrowers in qualifying for higher price homes. A total of 14 loans with combined balances of \$1.5 million were originated under this program.

CNB Housing Foundation

To address the need for affordable housing in the community, CNB established the foundation in late 2017. The purpose of the foundation was to create, develop, purchase, refurbish, and improve the availability of affordable housing inventory to LMI borrowers in the community. CNB's Board of Directors made a \$1 million initial commitment to the foundation and together with Bank employees and community members, worked with community organizations, other financial institutions, and other stakeholders to facilitate homeownership to LMI borrowers. Under this new partnership, CNB provided three borrowers with the assistance needed to purchase a home.

Community Advantage City Line

This program caters to small business owners to assist with working capital. It provides a revolving line of credit up to \$10,000. The program has flexible guidelines for new businesses (operating less than two years) and reduced closing costs. During the evaluation period, a promotion was offered with no application fee charged. This initiative resulted in 196 small business owners gaining access to \$2 million in working capital.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the Bank's performance under the Lending Test in MSA 36740 (Orlando-Kissimmee-Sanford, FL) is consistent with the Bank's overall performance under the Lending Test in the full-scope area.

Refer to Tables O, P, Q, and R in the state of Florida section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The Bank's performance under the Investment Test in Florida is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank's performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution 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)
Full-Scope:										
MSA 33100	3	31,470	191	75,858	194	85.1	107,328	78.8	0	0
Limited-Scope:										
MSA 36740	1	834	29	12,643	30	13.1	13,477	9.9	0	0
Statewide Investments with Direct Benefit	0	0	2	2,250	2	0.9	2,250	1.6	0	0
Statewide/Regional Investments with Indirect Benefit	0	0	2	13,163	2	0.9	13,163	9.7	0	0
Total	4	32,304	224	103,914	228	100.0	136,218	100.0	0	0

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

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

Qualified investments totaled \$107.3 million, with 12 current period investments totaling \$74.4 million, 179 donations totaling \$1.5 million, and three prior period investments totaling \$31.5 million. Total investments represent 6.42 percent of allocated tier 1 capital.

Investments include qualifying mortgage-backed securities (MBS) supporting mortgages and loans with the purpose of providing affordable housing (including rental housing) to LMI residents in the AA. Investments were especially responsive to AA needs as access to affordable housing is limited. Specific examples of affordable housing investments include:

- \$22.5 million investment in an affordable housing project where 100 percent of units are restricted to LMI tenants.
- \$19.7 million investment in partnership with the Florida Housing Finance Corporation where 100 percent of units are restricted to LMI tenants for a 50-year period.
- \$8.8 million MBS investment in an affordable housing complex located in a low-income census tract in Broward County.
- \$11 million low-income housing tax credit investment to fund an affordable housing complex where 100 percent of units are Section 8 housing.
- Investment in the CNB Housing Foundation provided \$269,000 to facilitate three LMI housing transactions.

Consideration was given to the ongoing impact prior period investments made on the current evaluation period within the AA. These investments consisted of:

- \$20.6 million in a CRA qualified investment fund backed by multiple mortgages on properties that are helping to provide affordable rental housing to LMI residents in the AA. Additionally, the investment includes an SBA loan that provides financing to a business that provides jobs for LMI individuals. This investment includes a \$6.6 million portion acquired during the TotalBank acquisition.

- \$10.4 million in a CRA qualified investment fund that provides monies for single-family and multi-family affordable housing to LMI residents in the AA. This investment includes a \$2 million portion acquired during the TotalBank acquisition.
- \$500,000 investment to support LMI seniors residing in a senior housing facility in the AA. This investment was acquired during the TotalBank acquisition.

Included in our analysis, but not reflected in the table above was a \$24.2 million prior period investment in a local stadium bond that provided permanent jobs for primarily LMI workers. This investment benefitted the AA during the majority of the evaluation period until funds were repaid in April 2020.

Donations, grants, and sponsorships were made to organizations that promote affordable housing and provide community services to LMI individuals. An example of donations responsive to AA needs include:

- Approximately \$394,000 was provided in the form of mortgage down payment and closing costs to assist 99 LMI families achieve homeownership.

CNB also created a \$1 million Covid Relief Fund to provide assistance to local non-profit organizations confronting COVID-19 and its resulting economic impacts. Fifteen organizations received \$845,000 from the fund benefitting areas of critical need including community hospitals and healthcare providers on the frontlines; nonprofits addressing the food insecurity crisis; and organizations that serve vulnerable segments of the population, including those with special needs or experiencing homelessness.

Statewide Investments with Direct Benefit

CNB made two qualified investments totaling \$2.3 million in a statewide LMI scholarship fund that benefits the Bank's AA.

Statewide/Regional Investments with Indirect Benefit

In addition to the investments that benefit the Bank's AAs, CNB made two qualified investments totaling \$13.2 million outside the Bank's AA. One is a \$11.3 million investment in an affordable housing project where 100 percent of units are restricted to LMI tenants. The second was a \$1.9 million investment in a certified Community Development Entity that develops neighborhood shopping centers primarily in LMI areas in metropolitan markets within the Southeastern United States with funds allocated to Florida markets outside the Bank's AAs.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the Bank's performance under the Investment Test in MSA 36740 (Orlando-Kissimmee-Sanford, FL) 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 Florida is rated High Satisfactory.

The evaluation of the Bank’s Service Test performance takes into consideration the impact of the COVID-19 pandemic. Most of the Bank’s AA markets were in government-mandated lockdowns where residents were required to limit activities outside of the home and businesses reduced operations. This significantly impacted the ability to perform CD services. As noted elsewhere, community services were especially crucial during the COVID-19 pandemic.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the Bank’s performance in MSA 33100 (Miami-Ft. Lauderdale-Palm Beach, FL) is good.

Retail Banking Services

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

Distribution of Branch Delivery System												
Assessment Area	Deposits	Branches							Population			
	% of Rated Area Deposits in AA	# of Bank Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)					% of Population within Each Geography			
				Low	Mod	Mid	Upp	N/A	Low	Mod	Mid	Upp
Full-Scope:												
MSA 33100	96.6	32	94.1	0.0	6.3	40.6	50.0	3.1	5.8	28.9	31.5	33.4
Limited Scope:												
MSA 36740	3.4	2	5.9	0.0	100.0	0.0	0.0	0.0	2.5	28.2	36.9	32.4

* The N/A category consists of population geographies that have not been assigned an income classification.

The Bank has 32 branches in the AA, with none in low-income geographies and two in moderate-income geographies. The percentage of the Bank’s branches located in low- and moderate-income geographies was well below the percentage of the population residing in these geographies.

In the AA, CNB has 13 branches in middle-income and 16 branches in upper-income geographies, as well as one branch with no income designation. Of these 30 branches, 18 are adjacent to either low-income (4) or moderate-income (14) geographies. Home mortgage and business lending patterns during the evaluation period indicate the Bank is serving individuals and businesses in neighboring LMI geographies.

Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings						
	# of Branch Openings	# of Branch Closings	Net change in Branch Location (+ or -)				
			Low	Mod	Mid	Upp	N/A
MSA 33100	21	13	-2	+1	+7	+2	0

* The N/A category consists of population geographies that have not been assigned an income classification.

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies and/or to low- and moderate-income individuals.

Through two bank acquisitions, CNB obtained 21 branches during the evaluation period and ultimately closed 13 branches (through a combination of both acquired and legacy branches). Branch closures include two located in low-income geographies and one in a moderate-income geography. In conjunction with the bank acquisitions, management assessed each location and the services offered at each branch. Services once provided by closed branches are still available at existing nearby locations with minimal inconvenience to the Bank's customer base.

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.

To better assist customers, 25 branches (78 percent) offer bilingual services and all branches operate during similar banking hours. The Bank complements its traditional service delivery methods in the AA with certain alternative retail delivery systems, including deposit-taking ATMs, telephone banking, mobile banking, and online banking with bill pay, wire services, and remote deposit capture (RDC). CNB offers 57 ATM facilities (61 percent are deposit taking) located primarily at all branch locations as well as nearby areas. Four ATMs (7 percent) are located in low-income geographies and another four (7 percent) are in moderate-income geographies. CNB customers also have free access to any Presto! ATM located at Publix grocery stores throughout the AA. No weight was placed on these alternative delivery services, as no data was available to determine the impact on, or usage by, LMI individuals.

CNB offers several low-cost deposit products to assist in meeting the needs of the business community.

- “CNB@Work” is available to the employees of the Bank’s business clients, and benefits include no maintenance charges on a CNB@Work checking account, complimentary use of the online banking platform with free bill pay, free unlimited use of 24/7 telephone banking and funds transfers between accounts, free safety deposit box for one year, free notary services, and discounted pricing on consumer loan rates (excluding equity lines of credit and CD loans), subject to credit approval and program requirements. During the evaluation period, 230 new CNB@Work accounts were opened.
- “CitySmart Ultimate Small Business Checking” is catered to small businesses and includes minimal fees and low monthly balance requirements. In addition, it provides the business owner with a personal checking account and check card at no charge. During the evaluation period, 9,144 new accounts were opened.
- “Non-Profit Checking” is a checking account offered to non-for-profit organizations. Benefits include low minimum account balance requirements and an unlimited number of monthly transactions. During the evaluation period, 224 new accounts were opened.

Community Development Services

The institution is a leader in providing CD services.

Considering the level of participation and the number of organizations and individuals benefiting, the level of CD services is excellent. During the evaluation period, at least 30 different officers and employees performed approximately 3,024 community development service hours to at least 70 different qualifying organizations in the AA, frequently in positions of leadership. They shared their

financial expertise to provide technical assistance to organizations that provide CD services by serving as board members, officers, and loan or finance committee members to organizations that help provide affordable housing opportunities, as well as economic development opportunities, small business lending, and community services to LMI individuals and families.

CNB employees, through the Bank's initiatives or various organizations, participated in numerous homebuyers and financial literacy workshop events as leaders, teachers, or facilitators. During the evaluation period, the Bank's Community Development Lenders participated in over 225 homebuyer and financial literacy workshops, attended by more than 6,000 consumers. Most of the workshops were held in partnership with AA HUD Certified Housing Counseling Agencies whose primary mission is to help provide education as well as affordable housing to LMI residents. The Bank's portion of the workshops focus on financial education, including such topics as savings, credit repair, predatory lending, money management, financial literacy, foreclosure prevention, and pre- and post-homeownership counseling and business finance.

An example of CD services provided includes:

- CNB partnered with Housing Foundation of America (HFA) and participated in over 125 homebuyer workshops wherein over 70 percent of workshop attendees were LMI individuals. In addition to monthly homebuyer club meetings (focused on assisting first-time homebuyers), CNB provided one-on-one counseling sessions to over 700 consumers during the evaluation period. Due to the impact of COVID-19 and government mandated lockdowns, virtual workshops were offered during the pandemic, with over 3,800 attendees participating in 2020. Training materials are tailored to the respective audience with both English and Spanish speaking workshops offered.

Additionally, employees participated in other non-qualifying volunteer, outreach, and fundraising service activities that benefitted LMI individuals and non-profit organizations located within the Bank's AA.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the Bank's performance under the Service Test in MSA 36740 (Orlando-Kissimmee-Sanford, FL) is consistent with the Bank's overall performance under the Service Test in the full-scope area.

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:	01/01/18 to 12/31/20	
Bank Products Reviewed:	Home mortgage and small business loans Community development loans, qualified investments, and community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Florida		
MSA 33100 (Miami-Fort Lauderdale-West Palm Beach, FL)	Full-scope	Counties of Miami-Dade, Broward, and Palm Beach
MSA 36740 (Orlando-Kissimmee-Sanford, FL)	Limited-scope	Counties of Orange, Lake, Seminole, and Osceola

Appendix B: Summary of State Ratings

RATINGS CITY NATIONAL BANK OF FLORIDA				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
CITY NATIONAL BANK of FLORIDA	Outstanding	Outstanding	High Satisfactory	Outstanding
State:				
FLORIDA	Outstanding	Outstanding	High Satisfactory	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2018-2020

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
MSA 33100	1,803	1,406,300	88.2	231,840	2.6	2.7	1.9	23.2	20.6	18.0	32.9	19.6	32.7	41.2	56.7	47.1	0.2	0.4	0.3
MSA 36740	242	81,966	11.8	138,396	1.0	1.7	0.8	21.1	21.9	15.4	39.1	37.2	40.0	38.8	39.3	43.7	0.0	0.0	0.0
Total	2,045	1,488,266	100.0	370,236	2.1	2.6	1.5	22.6	20.7	17.1	34.6	21.7	35.4	40.5	54.6	45.9	0.1	0.3	0.2

Source: 2015 ACS Census ; 01/01/2018 - 12/21/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2018-2020

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
MSA 33100	1,803	1,406,300	88.2	231,840	23.1	2.1	2.1	17.0	13.9	10.1	17.7	9.5	18.2	42.2	54.5	51.9	0.0	20.1	17.7
MSA 36740	242	81,966	13.2	138,396	21.5	3.3	3.0	18.1	28.9	12.8	19.2	17.4	20.1	41.2	40.5	44.6	0.0	10.3	19.6
Total	2,045	1,488,266	100.0	370,236	22.7	2.2	2.4	17.3	15.6	11.1	18.1	10.4	18.9	41.9	52.9	49.2	0.0	18.9	18.4

Source: 2015 ACS Census ; 01/01/2018 - 12/21/2020 Bank Data, 2020 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2018-2020

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
MSA 33100	8,274	1,206,216	93.5	281,179	4.1	3.3	4.5	21.8	18.1	22.2	28.1	21.0	27.2	44.7	55.0	44.9	1.2	2.5	1.2
MSA 36740	577	68,400	6.5	72,612	1.6	1.6	1.5	25.5	24.6	24.7	34.6	28.6	34.1	38.3	45.1	39.6	0.0	0.2	0.0
Total	8,851	1,274,616	100.0	353,791	3.5	3.2	3.9	22.7	18.6	22.7	29.6	21.5	28.6	43.2	54.4	43.8	1.0	2.4	1.0

Source: 2020 D&B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2018-2020

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
MSA 33100	8,274	1,206,216	93.5	281,179	93.0	5.8	48.2	2.7	6.6	4.3	87.5
MSA 36740	577	68,400	6.5	72,612	91.7	3.8	49.0	2.6	2.1	5.7	94.1
Total	8,851	1,274,616	100.0	353,791	92.7	5.7	48.4	2.7	6.4	4.6	87.9

Source: 2020 D&B Data; 01/01/2018 - 12/21/2020 Bank Data; 2019 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%