

COMMUNITY REINVESTMENT ACT POLICY

CONNEAUT SAVINGS BANK

Approved by the Board of Directors on

January 26, 2016

Conneaut Savings Bank the (“Bank”) is committed to helping serve the credit needs of the community in which we do business. It is our policy to try to respond to all creditworthy segments of our market. We believe that doing so is basic to good business practice, and to the Bank's own long-term vitality.

In pursuing this commitment, we shall assure that we comply with the letter and spirit of the Community Reinvestment Act (CRA). We recognize that this shall require us to take a proactive, rather than passive, approach to determining and meeting community needs, including those of creditworthy low and moderate income areas and individuals.

I. Assignment of Responsibilities

A. Role of the Board of Directors

The Board of Directors shall appoint a CRA officer to carry out this policy.

The Board shall stay informed of our CRA performance through periodic evaluation of internal and agency examination reports.

B. CRA Officer

The Bank shall have a CRA Officer who shall report, for CRA purposes, to the Board and the chief executive officer annually.

The CRA officer shall be responsible for administering the program described in this policy and for reporting to management, and management to the Board, on its implementation.

C. Cooperation of Staff

The CRA Officer shall be responsible for training staff and encourage their cooperation so that our CRA performance is not weakened. The staff will also be informed of any concerns reflected in internal audits, agency examinations, and/or community protests or complaints.

II. Technical Compliance

The CRA officer shall assure that the Bank meets the requirements of CRA, including:

- ② Developing and implementing an appropriate CRA compliance program.
- ② Assuring that applicable public disclosure documents are readily available as required.
- ② Assuring that the standard CRA Notice is posted in our offices as required.
- ② Maintaining proper files of public comments relating to our CRA performance.
- ② Submitting the CRA policy to the Board for review and action periodically.

III. CRA Performance Program

The CRA officer shall establish a CRA program to assure that the Bank performs well under the small institution performance criteria in the regulation. This program shall include the following.

A. Ascertaining Community Needs

It is the policy of this Bank to make an active effort to determine the credit needs of our community, including those of low and moderate income areas and individuals.

The CRA officer shall assure that this is done by identifying people who can speak to these needs, such as community organizations, government officials, non-profit groups, businesses, trade associations, and church and educational leaders.

The CRA officer shall establish a program to assure that these people are contacted by the Bank regularly.

The people contacted shall be asked their opinions as to; a) how well the Bank is serving the segments of the community for which the contact can speak, and b) whether there are unmet, potentially profitable credit needs in these areas.

B. CRA Audits

The CRA Officer shall conduct an annual review of our CRA performance prior to the periodic submission of our CRA program to the Board. The review shall evaluate the Bank's performance with respect to this policy and to the regulation.

The CRA Officer shall make recommendations for changes in our program to the Board of Directors.

C. Review of Complaints

The CRA officer shall regularly review complaints received by the Bank for any indication of problems that could lead to protests or examiner criticism of our CRA performance. The officer shall recommend action to address any significant complaints to management. All CRA-related complaints shall be maintained in the CRA comment file, as required, and shall be accompanied by the Bank's response to them, where applicable.

As a general rule, the Bank shall respond to any CRA related complaints from community organizations by inviting them to meet with us to discuss the problem and potential solutions.

D. Relations with Community Groups

The CRA Officer shall continue the practice of maintaining contacts in the Community that will assure that the Bank meets the needs of those with low and moderate income.

We shall supplement these regular channels at any time that we receive an indication that a community group has a concern. Our policy shall be to agree to any reasonable request to meet with such organizations. We shall meet at a time and place convenient to both groups. Senior management will be available whenever requested by a group that appears to represent a

legitimate segment of our community. Our stance is to be as open, accessible and flexible as possible.

IV. Conneaut Savings Bank's Primary Lending/Assessment Geographical Area(s) are defined as follows:

Ohio Assessment areas defined as follows:

Census Tracts:	Entire Tract
1.01	Entire Tract
1.02	Entire Tract
1.03	Entire Tract
2	Entire Tract
10	Austinburg Township
11	Jefferson Township
12	Entire Tract

Girard, Pennsylvania Assessment areas defined as follows:

Census Tracts: 101.01	Springfield Twp.
101.03	Conneaut Twp.
101.04	Elk Creek
101.07	Cranesville
101.09	Albion
102.01	Girard Borough
102.02	Girard Twp.

CRA Mission Statement

Conneaut Savings Bank is committed to helping serve the needs of our entire community, including low and moderate income areas. We believe that we can fulfill this commitment, consistent with safe and sound operations, by following several simple guidelines.

First, we will actively seek to understand the credit needs of our markets, including low and moderate income areas.

Second, we will actively strive to assure that our products and services are responsive to the needs of our community, including low and moderate income areas, and priced fairly to our customers at a reasonable return to the Bank.

Third, we will actively strive to assure that creditworthy potential customers in our community, including those in low and moderate income areas, are aware of the services we offer and of the fact that we want their business.

Fourth, we will actively work to assure that our own personnel understand and share the Bank's commitment to serving low and moderate income customers and are equipped with the knowledge, products, delivery systems, and motivation needed to do so effectively.