

PUBLIC DISCLOSURE

January 6, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Whitaker Bank, Inc.
2001 Pleasant Ridge Drive
Lexington, Kentucky 40509

RSSD #1445943

Federal Reserve Bank of Cleveland
P.O. Box 6387
Cleveland, Ohio 44101-1387

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 the safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

Institution

CRA Rating	1
Performance Test Ratings	1
Summary of Major Factors Supporting the Ratings	1
Description of Institution	2
Scope of Evaluation	4
Conclusions with Respect to Performance Tests	7
Fair Lending or Other Illegal Credit Practices Review	12

Full Scope Review

Non-metropolitan Kentucky	13
Description of Operations	13
Conclusions with Respect to Performance Tests	23

Limited-scope Reviews

Metropolitan Areas (Lexington-Fayette Kentucky MSA)	44
Description of Operations	44
Conclusions with Respect to Performance Tests	44

Appendices

Appendix A: Scope of Evaluation Tables	45
Appendix B: Assessment Area Maps	46
Appendix C: Full-scope Lending Tables	49
Appendix D: Full-scope Demographic Tables	56
Appendix E: Full-scope Peer Tables	59
Appendix F: Limited-scope Lending Tables	63
Appendix G: Limited-scope Demographic Tables	70
Appendix H: Limited-scope Peer Tables	73
Appendix I: Glossary of Terms	78

INSTITUTION CRA RATING

CRA RATING: Satisfactory

PERFORMANCE TEST RATINGS

The following table indicates the performance level of Whitaker Bank Inc., Lexington, Kentucky (Whitaker) with respect to the lending, investment, and service tests.

PERFORMANCE LEVELS	WHITAKER BANK PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	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.

SUMMARY OF MAJOR FACTORS SUPPORTING THE RATINGS

The major factors supporting the ratings include:

- A good responsiveness to credit needs;
- A substantial majority of loans made in the bank's assessment area;
- An adequate geographic distribution of loans throughout the assessment area;
- A good distribution of loans among borrowers of different income levels, businesses of different revenue sizes, and small farms of different revenue sizes;
- Makes a relatively high level of community development loans;
- A significant level of qualified community development investments and grants;
- Retail delivery systems that are reasonably accessible to geographies and individuals of different income levels and businesses of different revenue sizes;
- A record of opening and closing banking centers that has not adversely affected the accessibility of delivery systems;
- Banking services and hours that do not vary in a way that inconveniences any portions of the assessment areas; and,
- Provides a relatively high level of community development services.

DESCRIPTION OF INSTITUTION

Overview

Whitaker is a subsidiary of Whitaker Bank Corporation of Kentucky (WBC), both of which are headquartered in Lexington, Kentucky. As of June 30, 2019, Whitaker reported assets of \$1.2 billion. WBC also owns Peoples Bank and Trust Company of Madison County located in Berea, Kentucky.

Business Lines

Whitaker operates with the following four lines of business that provide traditional banking services to business and retail clients:

- Commercial Banking – includes investment, commercial real estate & construction, term loans, lines of credit, agricultural loans and Small Business Administration funding;
- Investments – cash management services and full-service brokerage services, including private banking and trust services; and
- Retail Banking – includes checking, savings, debit cards, credit cards, real estate mortgage loans, home equity lines, and personal loans.

Assessment Areas

Below are Whitaker's assessment areas evaluated as part of this CRA Performance Evaluation.

Non-metropolitan Kentucky:

Consists of the following 26 counties: Bath, Breathitt, Clay, Estill, Fleming, Franklin, Garrard, Jackson, Knott, Knox, Laurel, Lee, Leslie, Letcher, Madison, Menifee, Mercer, Montgomery, Nicholas, Owsley, Perry, Powell, Rockcastle, Rowan, Whitley, and Wolfe.

Lexington-Fayette Kentucky MSA 30460:

This assessment area is comprised of the following six counties: Bourbon, Clark, Fayette, Jessamine, Scott and Woodford.

A detailed description of each assessment area is presented in subsequent sections of this performance evaluation and assessment area maps can be found in Appendix B.

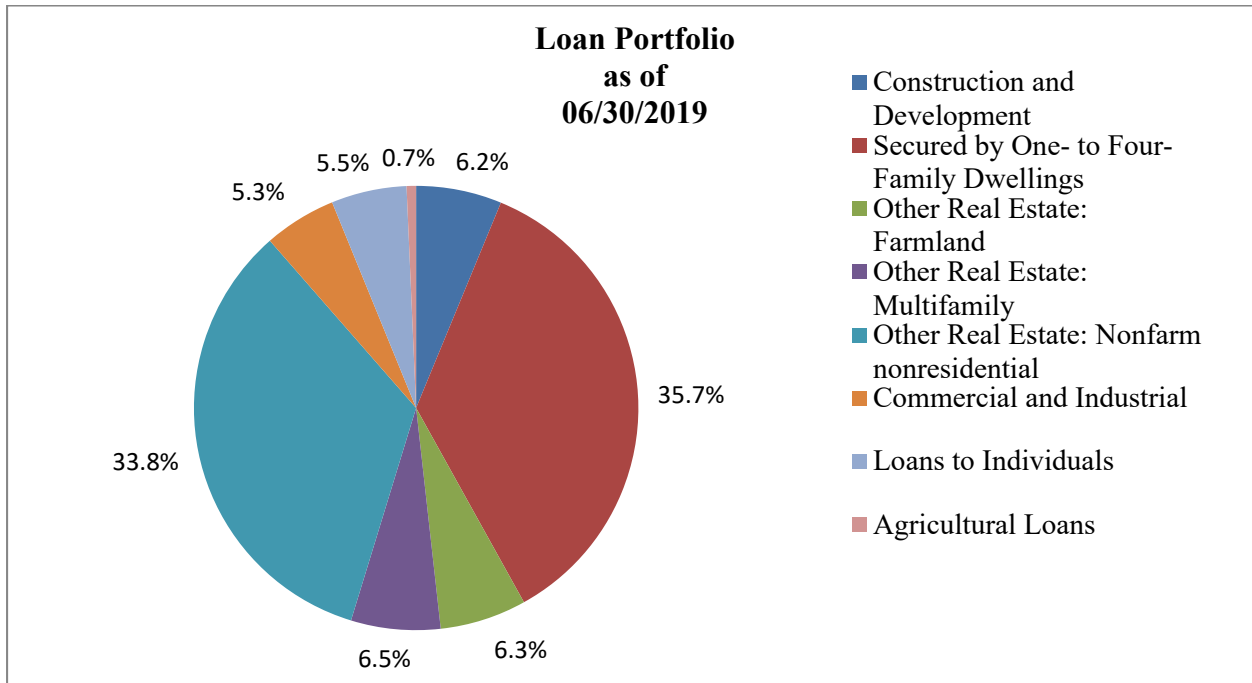
Financial Overview

Whitaker offers a variety of consumer, residential real estate, commercial, and agricultural loan products to fulfill the credit needs of the residents and businesses in its assessment areas. Consumer loan products include indirect and direct auto loans, installment loans, home equity lines of credit, real estate mortgage loans, and credit cards. Commercial loan and agricultural products include construction, real-estate secured, commercial and industrial, and Small Business Administration (SBA) loans.

The following charts display Whitaker’s loan portfolio composition as of June 30, 2019.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	6/30/2019		12/31/2018		12/31/2017	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	40,685	6.2%	45,544	7.2%	44,366	7.1%
Secured by One- to Four- Family Dwellings	233,227	35.7%	234,683	37.1%	231,487	37.0%
Other Real Estate: Farmland	41,115	6.3%	43,688	6.9%	40,833	6.5%
Other Real Estate: Multifamily	42,543	6.5%	42,556	6.7%	35,277	5.6%
Other Real Estate: Nonfarm nonresidential	220,900	33.8%	183,962	29.1%	190,602	30.5%
Commercial and Industrial	34,408	5.3%	39,548	6.3%	39,428	6.3%
Loans to Individuals	35,764	5.5%	36,893	5.8%	37,795	6.0%
Agricultural Loans	4,531	0.7%	5,075	0.8%	5,111	0.8%
Total	\$653,173	100.00%	\$631,949	100.00%	\$624,899	100.00%

* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.



Whitaker’s investment portfolio as of June 30, 2019 was \$438.9 million which represented 37.4% of total assets. Investments in U.S. treasury and agency securities comprised 44.0% of its investment portfolio; municipal securities accounted for 23.9%; other securities accounted for 28.2%; and the remaining 4.9% was comprised of interest bearing bank balances and federal funds sold.

No known legal impediments exist that would restrain Whitaker from meeting the credit needs of its assessment areas.

Previous Performance Evaluation

Whitaker's CRA performance was evaluated using the CRA procedures large banks. Whitaker received a "Satisfactory" rating as a result of the September 11, 2017 CRA Performance Evaluation. The lending test, investment test, and service test were all rated "High Satisfactory."

SCOPE OF EVALUATION

Whitaker is considered a large bank for the purposes of Regulation BB and was evaluated using the standards required for large banks. The institution is subject to the Home Mortgage Disclosure Act (HMDA) and submits Community Reinvestment Act (CRA) loan data to the Federal Reserve Board of Governors annually.

Both of Whitaker's individual assessment areas were evaluated for the lending, investment and service performance tests. The Non-metropolitan Kentucky and the Lexington-Fayette Kentucky MSA were reviewed using the full- and limited-scope examination procedures, respectively. The Non-metropolitan Kentucky assessment area received the most weight in this evaluation and is considered Whitaker's primary market. Non-metropolitan Kentucky assessment area, includes the majority of the bank's branches, highest concentration of lending (including community development activities), and a majority of deposits.

Evaluation Period and Products Reviewed

This evaluation includes an analysis of HMDA-reportable loans originated from January 1, 2017 through June 30, 2019. The evaluation also includes an analysis of CRA-reportable loans originated through January 1, 2017 through June 30, 2019. For the Non-metropolitan Kentucky assessment area HMDA products were reviewed separately in the following categories: home purchase lending using lending data from 2017-2019; home refinance using lending data from 2017-2019; and home improvement using only lending data from 2017. Home improvement loans were not used in the 2018 and 2019 lending analysis as the HMDA definition for home improvement loans changed. Prior to 2018, home improvement loans did not need to be secured by a dwelling; however, with the new definition, to be considered a home improvement loan, the loan must be secured by a dwelling. Due to this change, Whitaker did not originate sufficient home improvement properties in 2018 and 2019 to conduct a meaningful analysis. In the Lexington-Fayette MSA the HMDA products were combined and evaluated by year, as there was not enough volume to evaluate the lending by product type.

HMDA-reportable home purchase, home refinance, home improvement, CRA-reportable small business loans and small farm loans were the major lending products reviewed at this evaluation; as other consumer type loans were not included in the analysis.

Community development loans and investments funded between September 12, 2017 and January 6, 2020 were reviewed as part of the lending and investment tests. Investments with community development as a primary purpose that were funded during a prior evaluation period, but still outstanding as of January 6, 2020, also were considered. Lastly, community development services provided between September 12, 2017 and January 6, 2020 were reviewed as part of the service

test evaluation.

A summary of the scope of the evaluation is in Appendix A.

Evaluation Analysis

Whitaker is being evaluated as an intrastate bank, as it operates only in the State of Kentucky. Whitaker met the CRA regulations asset-size criteria for intermediate small banks; however Whitaker chose to be evaluated under the large bank procedures. In addition, Whitaker is subject to HMDA and submits CRA loan data to the Federal Reserve Board of Governors annually.

This evaluation of Whitaker's lending record in individual assessment areas includes the use of and comparison to demographic characteristics. The primary sources for demographic data are the U.S. Census Bureau and Dun & Bradstreet.¹ Demographic characteristics of a particular assessment area are useful in analyzing a financial institution's lending record, as they provide a means of estimating loan demand and identifying lending opportunities. To understand small business and small farm loan demand, self-reported data on revenue size and geographic location from entities are collected and published by Dun & Bradstreet. However, the demographic data should not be construed as defining an expected level of lending in a particular area or to a particular group of borrowers. The data, along with housing and economic conditions information, is used to establish performance context and evaluate Whitaker accordingly.

Loans are evaluated to determine the lending activity inside and outside Whitaker's assessment areas. In addition, loans inside the assessment area are evaluated based on the geographic and borrower income distribution for each assessment area. The geographic distribution of HMDA loans is assessed by comparing the percentage of loans made in each geography type (low-, moderate-, middle-, and upper-income) to the percentage of owner-occupied units in each geography type. Small business loans are compared to the percentage of small businesses in each geographic income category. Small farm loans are compared to the percentage of small farms in each geographic income category. In addition, the gap analysis focused on 2017 lending data through June 30, 2019 lending data.

The distribution of HMDA-reportable loans by borrower income is assessed by comparing the percentage of loans made to borrowers in each income category (low-, moderate-, middle-, and upper-income) with the percentage of families in each income category. The distribution of small business loans by borrower income is assessed by comparing the percentage of loans made to businesses in each revenue category (less than or comparable to \$1 million and greater than \$1 million) to the percentage of total businesses in each revenue category. The distribution of small farm loans by borrower income is assessed by comparing the percentage of loans made to farms in each revenue category

¹ Demographic data: Includes 2010 U.S. Census Bureau, 2015 ACS, and Dun & Bradstreet data, plus the most current census data available. American Community Survey (ACS) data is part of the U.S. Census Bureau's Decennial Census Program and is designed to provide more current demographic, social, economic, and housing estimates throughout the decade. <https://dataferrett.census.gov/AboutDatasets/ACS.html>

Whitaker's lending performance also was compared to the performance of aggregate lenders in 2017 and 2018. Aggregate lenders include all lenders required to report HMDA-reportable and CRA-reportable small business lending data in the respective assessment areas. Lending market share is also discussed to give a better understanding of where Whitaker ranks in the respective areas. For retail services, Whitaker's branch distribution analysis was conducted using data as of June 30, 2019.

Community development activities were reviewed to determine whether they have community development as a primary purpose and meet the geographic requirements of the CRA. The eligibility of a loan, investment, or service is based on demographic information available to Whitaker at the time the community development activity was undertaken. Qualified community development activities were analyzed from quantitative and qualitative perspectives to better understand the volume of activity impacting a particular assessment area, for the innovativeness of those activities, and responsiveness to local community development and credit needs.

To better understand assessment area community development and credit needs, several sources were used including publicly accessible data, information submitted by Whitaker, and plans describing the community development environment in local markets. In addition, one community contact interview was conducted with a representative from an affordable housing organization and three community contacts conducted by other regulatory agencies were utilized to establish a context for the communities in which Whitaker operates and gather information on its performance. The community contact identified affordable housing as a critical need for the assessment area. In addition, the most critical need is community services targeted to low- and moderate-income individuals struggling financially and personally due to the debilitating opioid crisis that continues to put pressure on an already overly- stressed economy; to provide housing, job assistance and support services for those directly impacted by opioid abuse and also for family members that are impacted by the negative effects of opioid abuse. More detailed information obtained from individual community contacts is included in the "Description of the Institution's Operations" section for the full-scope assessment area.

In addition, three community contact interviews, conducted by other regulatory agencies, were utilized to provide perspective on the current economy of Non-metropolitan Kentucky. The community contacts represented agencies that assisted individuals and families by providing economic development and community services to the assessment area. According to the community contacts, the economy is struggling, as much of the workforce is leaving the assessment area due to a decline in large industries, such as coal and tobacco. The community contacts stated that the financial institutions were meeting the credit needs of the community; however, there are limited opportunities for financial institutions in this market. Lastly, the community contacts echoed the need for affordable housing as they expect that some industries may move into the area, but without the availability of affordable housing the economy will continue to struggle.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Whitaker's overall CRA performance is rated "Satisfactory." Details are provided below, including facts, data and analyses used to form conclusions regarding the lending, investment, and service test performance ratings. Whitaker's CRA program includes a CRA strategy to assist the bank in focusing on meeting the credit, service, and community development needs of its assessment areas. Areas for improvement in the CRA program include developing strategies to increase lending penetration, reducing the uneven distribution of community development activities, and continuing to foster collaborative relationships with community partners to help develop products and services that are responsive to credit needs in the community.

Lending Test

Whitaker's lending test performance is rated "High Satisfactory." Lending performance good in Non-metropolitan Kentucky and adequate in the Lexington-Fayette MSA. Overall geographic distribution of loans is adequate, as gaps in lending were significant. The penetration of loans among borrowers of different income levels and businesses and farms of different revenue sizes is good. In addition, Whitaker makes a relatively high level of community development loans. Whitaker's performance in the Non-metropolitan Kentucky assessment area had the greatest impact on its overall lending performance.

While Whitaker's lending distribution by geography and borrower income is referenced throughout this evaluation, detailed information about HMDA-reportable and CRA-reportable small business and small farm loans can be found in Appendices C for full-scope and Appendices F for the limited scope assessment area. In some of the assessment areas and product discussions, specific data are quoted from these tables to support relevant points; otherwise, general references are made about performance, and the reader should refer to the appendices for specific data.

Lending Activity

Whitaker's lending activity reflects a good responsiveness to the credit needs of its assessment areas taking into consideration its strategic objectives, economic conditions, and competitive factors. In the full-scope assessment area, lending activity is good in Non-metropolitan Kentucky and in the limited scope assessment area lending activity is adequate in the Lexington-Fayette KY MSA.

As the data shows in the tables below, overall, Whitaker originated more small-business related loans by volume than HMDA-related and small-farm related loans by volume; however, by dollar amount Whitaker's HMDA-related loans slightly outpaced small-business loans and significantly out-paced small farm loans. As a result small-business related and HMDA related lending typically had a greater impact on lending ratings. Overall lending was considered responsive to credit needs in both assessment areas, commensurate with deposits and no conspicuous gaps in lending activity by income category were identified. Detailed information about lending activity can be found in the Non-metropolitan Kentucky and Lexington-Fayette Kentucky assessment areas.

Assessment Area Concentration

The following tables show the number and percentage of loans located inside and outside of Whitaker's assessment areas by loan type. The first table shows lending for the year 2017 and the second table shows lending for both 2018 and 2019. As indicated below, Whitaker originated a substantial majority of total loans by volume and dollar volume to borrowers, businesses, and small farms in its assessment areas.

2017

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	232	97.5	\$5,267	98.7	6	2.5	\$72	1.3
Home Purchase - Conventional	159	91.9	\$15,142	91.9	14	8.1	\$1,329	8.1
Multi-Family Housing	4	100.0	\$3,273	100.0	0	0.0	\$0	0.0
Refinancing	119	92.2	\$13,720	85.9	10	7.8	\$2,246	14.1
Total HMDA related	514	94.5	\$37,402	91.1	30	5.5	\$3,647	8.9
Small Business	495	91.7	\$34,098	93.9	45	8.3	\$2,202	6.1
Total Small Bus. related	495	91.7	\$34,098	93.9	45	8.3	\$2,202	6.1
Small Farm	229	90.9	\$8,744	93.0	23	9.1	\$655	7.0
Total Small Farm related	229	90.9	\$8,744	93.0	23	9.1	\$655	7.0
TOTAL LOANS	1,238	92.7	\$80,244	92.5	98	7.3	\$6,504	7.5

Note: Affiliate loans not included

2018 & 2019

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	27	93.1	\$1,170	94.0	2	6.9	\$75	6.0
Home Purchase - Conventional	207	90.8	\$20,055	86.0	21	9.2	\$3,254	14.0
Multi-Family Housing	20	90.9	\$12,141	94.6	2	9.1	\$699	5.4
Other Purpose Closed-End	46	97.9	\$1,930	97.4	1	2.1	\$52	2.6
Refinancing	166	94.3	\$18,037	87.5	10	5.7	\$2,571	12.5
Total HMDA related	466	92.8	\$53,333	88.9	36	7.2	\$6,651	11.1
Small Business	719	91.9	\$50,248	88.7	63	8.1	\$6,385	11.3
Total Small Bus. related	719	91.9	\$50,248	88.7	63	8.1	\$6,385	11.3
Small Farm	326	94.5	\$13,277	88.5	19	5.5	\$1,718	11.5
Total Small Farm related	326	94.5	\$13,277	88.5	19	5.5	\$1,718	11.5
TOTAL LOANS	1,511	92.8	\$116,858	88.8	118	7.2	\$14,754	11.2

Note: Affiliate loans not included

For the 2017 lending period, within its assessment areas, Whitaker originated 94.5% of HMDA-related loans by volume and 91.1% by dollar amount; 91.7% of small business loans by volume and 93.9% by dollar amount; and 90.9% of small farm loans by volume and 93.0%, by dollar amount.

For the lending period of 2018 through June 30, 2019, within its assessment areas, Whitaker originated 92.8% of HMDA-related loans by volume and 88.9% by dollar amount; 91.9% of small business loans by volume and 88.7% by dollar amount; and 94.5% of small farm loans by volume and 88.5% by dollar amount.

This indicates Whitaker’s willingness to originate loans that meet the credit needs of its delineated assessment areas.

Distribution of Lending by Geography, Borrower Income, and Business Revenue Size

The overall geographic distribution of loans reflects an adequate penetration in the assessment area. Geographic distribution is considered adequate in Non-metropolitan Kentucky and poor in the Lexington-Fayette Kentucky MSA. In addition, significant levels of lending gaps were identified in both Non-metropolitan Kentucky and the Lexington-Fayette Kentucky MSA.

The overall distribution of loans among borrowers of different income levels, businesses of different sizes and farms of different sizes is good. HMDA-reportable lending to borrowers of different income levels is good in Non-metropolitan Kentucky and adequate in the Lexington-Fayette Kentucky MSA. The distribution of lending to businesses of different revenue levels is good in Non-metropolitan Kentucky and the Lexington-Fayette Kentucky MSA. The distribution of lending to farms of different revenue levels is excellent in Non-metropolitan Kentucky and good in the Lexington-Fayette Kentucky MSA.

HMDA-reportable, small business, and small farm lending analyses in each assessment area are discussed in detail later in this evaluation.

Community Development Loans

Whitaker made a relatively high level of community development loans during the evaluation period. Whitaker originated 30 community development loans totaling approximately \$3.6 million. The following table reflects the total number of community development loan by purpose, number and dollar amount.

Purpose of CD Loan	Volume	Dollar Amount
Revitalization & Stabilization	22	\$1,337,239.38
Affordable Housing	2	\$1,809,523.00
Community Services	4	\$150,201.50
Economic Development	2	\$262,556.90
Total	30	\$3,559,520.78

Non-metropolitan Kentucky has a relatively high level of community development lending and comprises about 86.7% by origination volume and 46.4% by dollar volume. The Lexington-Fayette Kentucky MSA has an adequate level of community development lending and comprises about 13.3% by origination volume and 53.6% by dollar volume. As documented in the table above, the community development loans originated during the evaluation period were for a variety of community development purposes. More information on individual community development loans can be found in the Non-metropolitan Kentucky assessment area section of this evaluation.

Flexible Lending Practices²

As of the date of this evaluation, Whitaker does not make use of flexible lending practices in its assessment area.

Investment Test

Whitaker’s performance under the investment test is rated “High Satisfactory.” Whitaker’s level of qualified community development investments in Non-metropolitan Kentucky is considered significant. Whitaker’s level of qualified community development investments in Lexington-Fayette Kentucky MSA is considered adequate.

Qualified community development investments totaled \$15.2 million in this evaluation period. Whitaker obtained two investments (6.5%) during this evaluation period totaling approximately \$2.0 million. From prior periods, Whitaker holds 29 investments (93.5%) with a current book value of approximately \$13.2 million. The following table reflects the total number of qualified community development investments by purpose, number, and dollar amount.

Purpose of CD Investment	Volume	Dollar Volume
Affordable Housing	2	\$2,034,045.14
Community Services	28	\$12,664,226.65
Revitalization/Stabilization	1	\$506,075.00
Total	31	\$15,204,346.79

The majority of Whitaker’s qualified investments by dollar and number supported community services through tax-exempt municipal bonds, with the majority being school bonds that provided capital to schools that serve majority low- and moderate-income student populations.

Qualified investments also included donations of \$142,888.62. Whitaker assists a variety of community organizations to fund outreach activities, initiatives aimed at responding to community needs, improving the financial stability of individuals and families, and revitalizing underserved communities. The following table reflects the total number of community development donations by purpose, number, and dollar amount.

² Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank’s performance negatively. These activities are largely used to augment consideration given to an institution’s performance under the quantitative criteria.

Purpose of CD Donation	Volume	Dollar Volume
Community Services	268	\$142,638.62
Revitalization/Stabilization	1	\$250.00
Total	269	\$142,888.62

More information detailing specific investments and contributions can be found in the Non-metropolitan Kentucky assessment area section of this evaluation.

Service Test

Whitaker’s performance under the service test is rated “High Satisfactory.” Whitaker has a relatively high level of performance in Non-metropolitan Kentucky and has an adequate level of performance in the Lexington-Fayette Kentucky MSA.

Retail Services

The number of branches and full-service ATMs has remained constant since the previous evaluation. During the evaluation period, Whitaker did not open or close any branches or full-service ATMs; therefore, Whitaker’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems.

Overall retail delivery systems are reasonably accessible to Whitaker’s geographies and individuals of different income levels. Retail delivery systems are adequate in both assessment areas. Performance is mainly the result of the distribution of branches and number of branches in Non-metropolitan Kentucky. Whitaker has zero branches in low- and two branches in moderate-income geographies in the Lexington-Fayette Kentucky MSA, as Whitaker’s presence is limited in this market.

Banking services do not vary or inconvenience any portion of Whitaker’s assessment areas. Banking centers are generally open six days a week and provide lobby and/or drive-thru services full days Monday through Friday and half day on Saturday.

Whitaker used additional alternative delivery systems to supplement its branch and ATM network. Alternative delivery systems primarily consist of website (whitakerbank.com) and mobile banking applications that allow for standard online banking capabilities. In addition, Whitaker offers consumers the ability to apply online for some consumer loans. The website, e-banking, and mobile-banking are available to all bank customers regardless of location or income.

Community Development Services

Whitaker’s directors, officers, and staff provide a relatively high level of community development services throughout its assessment areas with 1,734 hours of community development services supporting various service activities during the evaluation period. Community development

services are provided at a relatively high level in Non-metropolitan Kentucky and an adequate level in Lexington-Fayette Kentucky MSA.

The following table provides qualified community development services by hours. Whitaker employees had extensive involvement with organizations and activities that promote or facilitate community services targeted to low- and moderate-income individuals, economic development, promoting or facilitating affordable housing to low- and moderate-income individuals and revitalization/stabilization of low- and moderate-income areas.

Purpose of CD Service	# Hours	# Organizations
Community Services	1,014	29
Economic Development	74	1
Affordable Housing	4	1
Revitalization & Stabilization	642	3
Total	1,734	34

Whitaker’s directors, officers, and staff provided financial expertise to the community by engaging in activities that promoted or facilitated, community services for low- and moderate-income individuals, economic development, affordable housing, and revitalization and stabilization of low- and moderate-income tracts and middle-income tracts designated as distressed and/or underserved. Community development services included, but were not limited to: financial education programs; board and committee membership; various management and staff serving in financial roles for organizations, including local schools; and membership on local councils to provide financial expertise to organizations that normally would not be able to pay for this expertise.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Federal Reserve Bank of Cleveland conducted a fair lending analysis under Regulation B – Equal Credit Opportunity Act and Fair Housing Act requirements, which was performed concurrently with this CRA evaluation. Based on findings from that analysis, no evidence of discriminatory or other illegal credit practices was identified. Therefore, an adjustment to the CRA Performance Evaluation rating is not warranted.

NON-METROPOLITAN AREA
(Full-scope Review)

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN
NON-METROPOLITAN KENTUCKY**

Non-metropolitan Kentucky consists of entireties of Bath, Breathitt, Clay, Estill, Fleming, Franklin, Garrard, Jackson, Knott, Knox, Laurel, Lee, Leslie, Letcher, Madison, Menifee, Mercer, Montgomery, Nicholas, Owsley, Perry, Powell, Rockcastle, Rowan, Whitley, and Wolfe counties. The assessment area is comprised of the following census tracts:

Tract Income Level	2017-2019
	Number of Tracts
Low	2
Moderate	41
Middle	76
Upper	26
Unknown	0
Total	145

The table below details the tracts that were designated as distressed and/or underserved middle income tracts in the assessment area between the years of 2017 through 2019. The assessment area is composed of 145 census tracts total. As illustrated in the table below, in 2017, 51.0% of its tracts were designated as distressed and/or underserved and in 2018-2019, 47.0% were designated as distressed and/or underserved. The high percentage of census tracts with this designation significantly impacts the bank's ability to lend in these tracts.

Non-metropolitan Kentucky Distressed/Underserved Census Tracts by Year			
County	2017	2018	2019
Bath	2	2	2
Breathitt	2	1	1
Clay	2	1	1
Estill	4	4	4
Fleming	3	3	3
Jackson	2	2	2
Knott	5	3	3
Knox	3	2	2
Laurel	12	9	9
Lee	2	1	1
Leslie	2	1	1
Letcher	7	6	6
Madison	0	7	7
Menifee	2	1	1
Montgomery	5	5	5
Nicholas	2	2	2
Owsley	1	1	1
Perry	6	5	5
Powell	2	2	2
Rockcastle	3	3	3
Rowan	3	3	3
Whitley	4	4	4
Total	74	68	68

As of June 30, 2019, Whitaker ranked second out of 48 institutions with 8.3% of the deposit market share, Community Trust Bank, Inc. ranked first with a deposit market share of 13.6%. Traditional Bank, Inc. follows Whitaker with a deposit market share of 5.0% followed by Cumberland Valley National Bank & Trust Company and WesBanco Bank, Inc. with deposit market shares of 4.9% and 4.6%, respectively. Deposits in this assessment area accounted for 71.2% of Whitaker’s total deposits.

From January 1, 2017 through June 30, 2019, Whitaker originated 175 HMDA loans and 406 CRA loans, which represented 60.3% respectively of total loans originated during the evaluation period. This assessment area had the highest CRA and HMDA loans originated during the evaluation period.

In 2017 and 2018, Whitaker ranked third and tenth, respectively, out of 281 HMDA reporters in the assessment area. In 2017 and 2018, Whitaker ranked second and fourth, respectively out of 69 CRA reporters in the assessment area; the top CRA lender was American Express.

One community contact interview was conducted to provide additional information regarding the assessment area. The community contact represented an affordable housing agency. The contact explained that their organization provides affordable places to live, and also includes support services for individuals and families including financial literacy, homeowner support services, and mortgage financing for homebuyers, with mortgages offered as low as 0.0%. The organization also provides employment in a struggling economy and a more flexible hiring model which gives the organization to the ability to hire applicants that may not fit into the more stringent hiring practices of a Target or Wal-Mart; this especially assists those persons who have suffered from opioid abuse. The community contact explained in detail the difficulties facing the individuals and families living in the assessment area. There is a significant lack of affordable housing as many homes are vacant; however, the properties have multiple liens on them, making it impossible for someone to purchase and renovate the home. In addition, of the affordable housing stock available much of it is in unsafe neighborhoods. This reduces the ability of this agency to find housing as their mission is to provide individuals and families with safe and affordable housing. Much of the need for affordable housing is driven by the opioid crisis. The assessment area is especially impacted by the opioid epidemic, due to its placement near Interstate 75, which runs through the assessment area and is considered a major conduit in the opioid trade. According to the Richmond Register “Kentucky has been devastated by the opioid addiction crisis, especially in northern and eastern Kentucky along the I-75 corridor.” The epidemic is so bad that “four Kentuckians die every day from opioid overdoses...”³ In addition, according to the Centers for Disease Control 54 counties in Kentucky (majority of them in Eastern Kentucky) have been cited as at risk for outbreaks of Hepatitis C and HIV. The table below depicts those counties in the assessment area that are ranked in the top 5.0% of the most vulnerable counties in the nation at risk of outbreaks of HIV and/or Hepatitis C as a result of the opioid epidemic.⁴

County	National Rank ⁵
Wolfe	1
Bath	3
Perry	4
Clay	5
Leslie	8
Knox	9
Owsley	12
Whitley	14
Powell	15
Knott	17
Estill	25
Lee	30
Menifee	31
Letcher	50
Laurel	65
Mercer	214

³ https://www.richmondregister.com/news/state-attorney-general-sues-another-opioid-distributor/article_9764a584-2322-11e8-94c9-a3ba0bfa43d4.html

⁴ <https://opioid.amfar.org/KY>

⁵ National rank out of 220 counties in the nation

As depicted in the table above, 61.5% of the counties in the assessment area are ranked nationally. The statistics demonstrate that the opioid crisis is particularly difficult to control as it does not only prey on those with a low- and moderate-incomes. As a result of the crisis, the community contact stated that it is difficult for the economy to regain a foothold due to higher unemployment, higher crime, and a workforce that is debilitated by drug abuse.

In addition, multiple community contacts were used to provide perspective on the current economy of Non-metropolitan Kentucky. According to the community contacts, the economy is struggling, as much of the workforce is leaving the assessment area due to a decline in large industries, such as coal and tobacco. The community contacts stated that financial institutions were meeting the credit needs of the community; however, there are limited opportunities for financial institutions in this market. In addition, the community contacts echoed the need for affordable housing as they expect that some industries may move into the area, but without the availability of affordable housing the economy will continue to struggle.

Population Characteristics

According to the Census Bureau's 2015 American Community Survey (ACS), the population in the assessment area was 581,821 of which 1.2% and 22.9% reside in low- and moderate-income census tracts, respectively. In addition, 77.7% of the population was 18 years of age or older, the legal age to enter into a contract. The population of age 65 and over was 14.8% and is comparable to the state of Kentucky at 14.4%.

The chart below depicts the population change among counties in the assessment area. As noted in the chart, there is limited growth in some of the counties with population decreasing in a majority of the counties. This data supports the community contacts' statement that the assessment area is losing portions of their population due to industries leaving the area and a lack of growth in employment.

Population Change					
Area	2010 Population	2015 Population	Percent Change Between 2010 and 2015	2018 Population	Percent Change Between 2015 and 2018
Bath County	11,591	12,189	5.2%	12,383	1.6%
Breathitt County	13,878	13,276	-4.3%	12,726	-4.1%
Clay County	21,730	20,866	-4.0%	20,105	-3.6%
Estill County	14,672	14,382	-2.0%	14,198	-1.3%
Fleming County	14,348	14,515	1.2%	14,432	-0.6%
Franklin County	49,285	49,969	1.4%	50,815	1.7%
Garrard County	16,912	17,226	1.9%	17,560	1.9%
Jackson County	13,494	13,369	-0.9%	13,442	0.5%
Knott County	16,346	15,690	-4.0%	15,126	-3.6%
Knox County	31,883	31,424	-1.4%	31,304	-0.4%
Laurel County	58,849	59,901	1.8%	60,669	1.3%
Lee County	7,887	6,717	-14.8%	7,033	4.7%
Leslie County	11,310	10,648	-5.9%	10,143	-4.7%
Letcher County	24,519	23,011	-6.2%	21,889	-4.9%
Madison County	82,916	88,376	6.6%	92,368	4.5%
Menifee County	6,306	6,381	1.2%	6,451	1.1%
Mercer County	21,331	21,378	0.2%	21,774	1.9%
Montgomery County	26,499	27,550	4.0%	28,203	2.4%
Nicholas County	7,135	7,061	-1.0%	7,166	1.5%
Owsley County	4,755	4,497	-5.4%	4,472	-0.6%
Perry County	28,712	27,329	-4.8%	26,092	-4.5%
Powell County	12,613	12,349	-2.1%	12,442	0.8%
Rockcastle County	17,056	16,815	-1.4%	16,750	-0.4%
Rowan County	23,333	24,392	4.5%	24,583	0.8%
Whitley County	35,637	36,027	1.1%	36,242	0.6%
Wolfe County	7,355	7,251	-1.4%	7,177	-1.0%
Kentucky	4,339,367	4,424,376	2.0%	4,468,402	1.0%

Income Characteristics

The 2015 median family income (\$44,712) in the assessment area was substantially less than the median family income for the state of Kentucky (\$55,367). As shown below, the assessment area median family income increased in 2018 and 2019 and surpassed 2015 median family income for the assessment area in 2017, 2018, and 2019. In discussions with a community contact, they stressed the need for higher wages in the assessment area, especially due to rising energy costs due to the loss of the coal industry and a lack of available affordable housing.

Borrower Income Levels													
Kentucky Non-metropolitan Counties													
HUD Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2017	\$47,800	0	-	\$23,899	\$23,900	-	\$38,239	\$38,240	-	\$57,359	\$57,360	-	& above
2018	\$49,400	0	-	\$24,699	\$24,700	-	\$39,519	\$39,520	-	\$59,279	\$59,280	-	& above
2019	\$49,800	0	-	\$24,899	\$24,900	-	\$39,839	\$39,840	-	\$59,759	\$59,760	-	& above

Between 2016 and 2017 the poverty rates in the assessment area decreased in 73.0% of the counties, increased in 15.0% of the counties and stayed constant in 12.0% of the counties. While

a majority of the counties experienced a decrease in poverty rates, 88.5% of the counties in the assessment area continued to exceed the poverty rates for Kentucky and the nation at 17.1% and 13.4%, respectively.

Non-metropolitan Kentucky Poverty Rates			
County	2016	2017	Change
Bath County	24.9	23.0	-7.6%
Breathitt County	34.3	36.2	5.5%
Clay County	42.1	41.7	-1.0%
Estill County	27.3	24.8	-9.2%
Fleming County	21.2	17.4	-17.9%
Floyd County	13.7	13.7	0.0%
Garrard County	16.3	17.0	4.3%
Jackson County	31.9	31.4	-1.6%
Knott County	38.2	34.6	-9.4%
Knox County	39.2	32.2	-17.9%
Laurel County	23.2	24.3	4.7%
Lee County	39.0	33.7	-13.6%
Leslie County	31.8	31.0	-2.5%
Letcher County	31.6	30.8	-2.5%
Madison County	21.3	17.0	-20.2%
Menifee County	24.1	25.4	5.4%
Mercer County	14.5	13.4	-7.6%
Montgomery Cou	17.9	17.7	-1.1%
Nicholas County	19.8	18.8	-5.1%
Owsley County	45.2	36.8	-18.6%
Perry County	30.9	25.9	-16.2%
Powell County	26.5	24.6	-7.2%
Rockcastle Count	24.2	21.3	-12.0%
Rowan County	25.4	23.7	-6.7%
Whitley County	29.3	26.5	-9.6%
Wolfe County	32.2	29.9	-7.1%
Kentucky	18.2	17.1	-6.0%
National	14.0	13.4	-4.3%

According to the Census Bureau's 2015 ACS, 25.1% of the 225,471 households in this assessment area are below the poverty level, 2.6% of households are receiving public assistance, and 13.1% have rent costs greater than 30.0% of their monthly income.

Housing Characteristics

According to the Census Bureau's 2015 ACS, there are 260,529 housing units of which 59.2% are owner-occupied units. In addition, there are 151,940 families in the assessment area. From an income perspective, 24.7% of total housing units and 23.7% of families reside in low- and moderate-income tracts, respectively. Furthermore, 54.6% of the housing units in low- and 58.1% in moderate-income tracts are owner-occupied units. Rental units in low- and moderate-income tracts make up 26.3% and 25.7% of the available housing units. Vacant units in low- and moderate-income census tracts account for 19.1% and 16.1%, respectively. The higher amounts of vacant and rental units impacts Whitaker's opportunities to make HMDA loans in these tracts. In addition, a local community action agency representative explained that much of the available affordable housing is not actually financed through a bank. Instead, many of the properties are sold within the family or transferred between families through inheritance; further limiting opportunities for banks to make home purchase loans.

According to the Census Bureau's 2015 ACS, the median age of housing stock for the assessment area was 38 years old, and 12.0% of the housing stock was built prior to 1950. Given that a majority of the housing stock was built prior to 1992, it would be expected that there would be opportunities for the bank to make home improvement loans. The median housing value in the assessment area was only \$89,951 with an affordability ratio of 38.9%. The affordability ratio is derived by dividing the median household income by the median housing value. The higher the affordability ratio, the more affordable a home is considered. The ratios ranged from a low of 29.2% in Madison County to a high of 54.4% in Clay County.

The median gross rent in the assessment area was \$591 as of 2015. The lowest median gross rent was \$351 in Owsley County, while the highest was \$687 in Franklin County. According to the Census Bureau's 2015 ACS, the lowest rents (those less than \$350), comprised 12.2% of the rental units, while rents of \$500 or more comprised 57.7% of units. Further, 41.3% of renters in the assessment area had rent costs greater than 30.0% of their income. The rental costs in the assessment area may be negatively impacting first time home buyers' ability to save enough money for a down payment, especially since 41.3% of renters are paying a rent that is greater than 30.0% of their income. In addition, according to one community contact, energy costs are rising due to the coal industry leaving the area. When the coal industry was stable, energy costs were significantly lowered for those living in the area; however since the loss of coal, energy costs have increased adding to the already stretched median family incomes in the assessment area.

Building permits are a leading indicator of future activity in the construction sector. As indicated in the table below, the assessment area has seen limited amounts of new building permits. This supports community contact assertions that there is limited growth in the assessment area and further demonstrates the economic stagnation present in the assessment area.

Building Permits					
County	2016	2017	Percent Change between 2016 and 2017	2018	Percent Change between 2017 and 2018
Bath	2	0	-100.0%	0	0.0%
Breathitt	0	0	0.0%	0	0.0%
Clay	0	0	0.0%	0	0.0%
Estill	0	0	0.0%	0	0.0%
Fleming	0	0	0.0%	0	0.0%
Franklin	58	85	46.6%	103	21.2%
Garrard	0	5	0.0%	0	-100.0%
Jackson	0	0	0.0%	0	0.0%
Knott	N/A	N/A	N/A	N/A	N/A
Knox	0	0	0.0%	0	0.0%
Laurel	9	8	-11.1%	4	-50.0%
Lee	N/A	N/A	N/A	N/A	N/A
Leslie	N/A	N/A	N/A	N/A	N/A
Letcher	0	0	0.0%	0	0.0%
Madison	343	248	-27.7%	329	32.7%
Menifee	N/A	N/A	N/A	N/A	N/A
Mercer	34	46	35.3%	45	-2.2%
Montgomery	59	93	57.6%	109	17.2%
Nicholas	0	1	0.0%	3	200.0%
Owsley	N/A	N/A	N/A	N/A	N/A
Perry	6	0	-100.0%	0	0.0%
Powell	0	0	0.0%	0	0.0%
Rockcastle	N/A	N/A	N/A	N/A	N/A
Rowan	24	27	12.5%	3	-88.9%
Whitley	7	14	100.0%	11	-21.4%
Wolfe	N/A	N/A	N/A	N/A	N/A
Kentucky	12,714	12,630	-0.7%	13,826	9.5%
United States	1,206,642	1,281,977	6.2%	1,328,827	3.7%

Labor, Employment, and Economic Characteristics

The table below depicts the major non-governmental industries and employers by county.⁶

⁶ <https://datausa.io> and <https://thinkkentucky.com>

County	Primary Employment Sectors	Major Employers
Bath	Manufacturing; Health Care & Social Assistance; & Educational Services.	Olympia; Owingsville
Breathitt	Health Care & Social Assistance; Retail Trade; & Educational Services.	Jackson Appalachian Regional Manufacturing
Clay	Health Care & Social Assistance; Educational Services; & Retail Trade.	Kentucky Mountain Industries;
Estill	Manufacturing; Retail Trade & Educational Services	Carhartt Inc.; Ravenna Lumber
Fleming	Manufacturing; Retail Trade & Educational Services	Raymond Tinnerman Automotive Inc.; Toyo Seat USA Corp.; Greentree Forest Products Inc.
Franklin	Public Administration; Retail Trade; & Manufacturing	Jim Beam; Buffalo Trace Distillery; Montaplast of North America
Garrard	Health Care & Social Assistance; Manufacturing; Construction	Allison Abrasives; Copperhead Environmental Consulting Inc.
Jackson	Retail Trade; Manufacturing; Education Services; Health Care & Social Assistance	Phoenix Products Inc.; Senture LLC;
Knott	Health Care & Social Assistance; Educational Services; & Retail Trade.	Troublesome Creek Times; Design De SIGN
Knox	Health Care & Social Assistance; Educational Services; & Retail Trade.	CSRA (call center); Jackson WWS Inc. (Commercial Dishwashers)
Laurel	Retail Trade; Manufacturing; Health Care & Social Assistance	ABC Automotive Casting LLC; Bimbo Bakeries; Borden dAiry Company of Kentucky, LLC
Lee	Health Care & Social Assistance; Manufacturing; Educational Services	Beattyville Enterprise; Lee County Wood Products
Leslie	Health Care & Social Assistance; Educational Services; Mining, Quarrying, & Oil & Gas Extraction	BPM Lumber; 4M Lumber
Letcher	Health Care & Social Assistance; Educational Services; Retail Trade	BPM Lumber; Drill Steel Service; Mountain Aggregates Pine Mountain Quarry
Madison	Educational Services; Manufacturing; Health Care & Social Assistance	Berea College; Hyster-Yale Group, Inc.; KI(USA) Corporation; Hitachi Automotive Systems Americas Inc.
Menifee	Manufacturing; Educational Services; Retail Trade	Boneal Inc.; Ferrell's Logging & Lumber Inc.
Mercer	Manufacturing; Health Care & Social Assistance; Retail Trade	Coming Inc.; Essity; Hitachi Automotive Systems Americas Inc.; Toyota Boshoku Kentucky LLC
Montgomery	Manufacturing; Retail Trade; Health Care & Social Assistance	Metrie Inc.; Cooper Standard Automotive; Nestle Prepared Foods
Nicholas	Manufacturing; Construction; Health Care & Social Assistance	Lee-Lynn Machining Inc.; Fryman's Welding LLC
Owsley	Health Care & Social Assistance; Public Administration; Educational Services	Booneville Sentinel Inc. (newspaper)
Perry	Health Care & Social Assistance; Educational Services; Retail Trade	Sykes Enterprises Inc.; AA Mine Service; Wayne Supply
Powell	Health Care & Social Assistance; Construction	Heritage Millworks LLC; Natural Bridge Stone Co.; Stantek Manufacturing LLC
Rockcastle	Manufacturing; Health Care & Social Assistance; Educational Services	SOURCEHOV Inc.; Hanson Aggregates
Rowan	Educational Services; Health Care & Social Assistance; Retail Trade	Family Dollar Stores Inc.; Morehead Wood Products Company; Regal Beloit America Inc.; SRG Global
Whitley	Educational Services; Manufacturing; Health Care & Social Assistance	Firestone Industrial Products; Senture LLC; Williamsburg Plastics
Wolfe	Manufacturing; Public Administration; Educational Services	Lion Distribution; S&S Lumber Co.; JSW Farm the Chop Shop

The following table illustrates the average unemployment rates for 2017 and 2018 for the counties in the assessment area, Kentucky, and the nation.

Unemployment Rates
Assessment Area: Non-metropolitan Kentucky

Area	Years - Annualized	
	2017	2018
Bath County	7.9	6.7
Breathitt County	8.8	7.3
Clay County	8.9	7.1
Estill County	6.0	5.5
Fleming County	6.1	5.4
Franklin County	4.1	3.7
Garrard County	4.9	4.4
Jackson County	8.5	7.0
Knott County	8.6	6.9
Knox County	7.6	6.2
Laurel County	5.9	5.1
Lee County	8.5	6.3
Leslie County	10.2	7.1
Letcher County	9.4	6.5
Madison County	4.3	3.9
Menifee County	8.8	7.6
Mercer County	4.9	4.5
Montgomery Cou	6.7	6.0
Nicholas County	5.6	4.6
Owsley County	8.4	7.1
Perry County	8.3	6.3
Powell County	6.7	6.0
Rockcastle Coun	5.9	4.9
Rowan County	5.8	5.2
Whitley County	5.8	5.0
Wolfe County	9.2	7.7
Kentucky	4.9	4.3
National	4.4	3.9

Not Seasonally Adjusted

Data extracted on October 2, 2019

Unemployment rates declined in all of the counties in the assessment area from 2017 to 2018. The highest unemployment rate was in Wolfe County (7.7%), while Franklin County (3.7%) had the lowest unemployment rate. All of the counties had higher unemployment rates in 2017 and 2018 than Kentucky and the nation. Community contacts indicated that higher unemployment rates in

this assessment area may be the result of the opioid crisis as well as the energy industry leaving the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NON-METROPOLITAN KENTUCKY

Lending Test

Whitaker’s performance under the lending test in this assessment area is good. Whitaker’s lending activity demonstrates a good responsiveness to the credit needs of the community and Whitaker has a relatively high level of community development loans. Whitaker has an adequate geographic distribution of loans, a significant level of lending gaps, and a good distribution among borrowers of different income levels, businesses of different revenue sizes and farms of different revenue sizes. Whitaker exhibits a good record of serving the credit needs of highly economically disadvantaged areas in its assessment area, low-income individuals, or businesses and farms with gross annual revenues of \$1 million or less, consistent with safe and sound operations.

Geographic distribution and borrower distribution received equal weight, given the amount of low- and moderate-income tracts and distressed and/or underserved middle-income census tracts. Greatest consideration was given to the evaluation of small business, followed by residential mortgage lending (home purchase, refinance, and home improvement), and small farm lending based on the overall volume of loans. Details of Whitaker’s small business, HMDA, and small farm lending and information regarding peer lending is in Appendices C and E.

Lending Activity

Lending levels reflect a good responsiveness to the credit needs in the assessment area. The percentage of Whitaker’s lending in Non-metropolitan Kentucky is 78.5%, while the percentage of total deposits is lower at 71.2%. Whitaker originated 1,094 CRA loans and 677 HMDA loans and had a significant level of lending gaps in this assessment area during the evaluation period.

Geographic Distribution of Loans

Whitaker’s overall distribution of lending among geographies is adequate. Small business lending is adequate, HMDA lending is good, and small farm lending is good. There are significant lending penetration gaps in 2017, 2018, and 2019. The following gaps in lending were noted in the assessment area.

Tract Income Level	Percentage of Lending Penetration		
	2017	2018	2019
Low	50.0%	50.0%	50.0%
Moderate	39.0%	34.1%	29.3%
Middle	73.7%	68.4%	60.5%
Upper	69.2%	69.2%	53.8%
Total	62.8%	58.6%	50.3%

Overall, lending gaps are significant; however, economic factors make it significantly more difficult to originate HMDA and CRA loans. The assessment area is comprised of counties that have high unemployment rates due to industries leaving the area, substantial poverty rates, lower wages, a significant opioid epidemic, lack of affordable housing, and a number of census tracts designated as distressed and/or underserved. In speaking with members of the community, it appears that institutions are doing their best to serve the needs of the community; however, these issues pose significant barriers to institutions in their ability to make HMDA and CRA loans.

Small Business Loans

The overall geographic distribution of small business loans in the assessment area is considered adequate, given Whitaker's strong performance in low-income tracts compared to proxy and the aggregate of all lenders. In addition, the assessment area is economically depressed due to industries leaving the area, depressed wages, high unemployment rates, and a number of middle-income tracts designated as distressed and/or underserved.

2017

Whitaker made eleven loans in low-income tracts totaling \$455,000.00. This represents 2.8% of small business loans by volume and 1.7% by dollar amount, which was well above the percentage of businesses in these tracts (proxy) at 0.7% by both volume and dollar amount. The percentage of loans by volume and dollar amount also significantly exceeded the 2017 aggregates at 0.8% and 1.0%. Given Whitaker's strong performance compared to the aggregate of all lenders and the percentage of businesses (proxy), the geographic distribution of small business loans in low-income tracts is excellent.

Whitaker made 34 loans in moderate-income tracts totaling \$2.0 million. This represents 8.5% by volume and 7.5% by dollar amount, which was below the proxy by both volume and dollar amount. The percentage of loans by volume and dollar amount was comparable to the 2017 aggregates at 16.0% and 13.9%. Small business lending in moderate-income tracts is impacted by the depressed economy, demonstrated in the high unemployment rate of 14.9% in moderate-income tracts. Given Whitaker's performance compared to the aggregate of all lenders and the proxy, the geographic distribution of small business loans in moderate-income tracts is adequate.

Whitaker made 276 loans in middle-income tracts totaling \$19.3 million. This represents 69.2% by volume and 70.4% by dollar amount, which was above the proxy and the aggregate of all lenders by both volume and dollar amount. Whitaker made 78 loans in upper-income tracts totaling \$5.6 million. This represents 19.5% by volume and 20.5% by dollar amount, which was below the proxy and aggregate of all lenders.

The geographic distribution of small business loans for 2017 is considered good, given Whitaker's excellent lending in low-income tracts, adequate lending in moderate-income tracts, and its lending in middle-income tracts, many of which are distressed and/or underserved.

2018

Whitaker made twelve loans in low-income tracts totaling \$278,000.00. This represents 3.3% by volume and 1.2% by dollar amount, which significantly exceeded the proxy of 0.8% by volume and dollar amount. The percentage of loans by volume and dollar amount also significantly exceeded the 2018 aggregate of all lenders at 0.9%. Therefore, the geographic distribution of small business loans in low-income tracts is excellent.

Whitaker made 27 loans in moderate-income tracts totaling \$1.5 million. This represents 7.3% by volume and 6.5% by dollar amount, which was below the proxy of 17.8% by volume and dollar amount. The percentage of loans was below the aggregate of 15.1% by volume and comparable to the aggregate by dollar amount. Therefore, the geographic distribution of small business loans in moderate-income tracts is poor.

Whitaker made 277 loans in middle-income tracts totaling \$19.0 million. This represents 75.1% by volume and 79.7% by dollar amount, which exceeded the proxy and aggregate of all lenders by both volume and dollar amount. Whitaker made 53 loans in upper-income tracts totaling \$3.0 million, which was below the proxy by volume and dollar amount and below the aggregate by volume and dollar amount.

The geographic distribution of small business loans for 2018 is considered adequate, given Whitaker's excellent lending in low-income tracts and its lending in middle-income tracts which served distressed and/or underserved tracts.

2019

Whitaker made four loans totaling \$67,000.00 in low-income tracts. This represents 2.0% by volume and 0.6% by dollar amount, which significantly exceeded the proxy of 0.8% by volume and slightly below the proxy by dollar volume. The geographic distribution of lending in low-income tracts is considered excellent.

Whitaker made 15 loans totaling \$558,000.00 in moderate-income tracts. This represents 7.6% by volume and 4.7% by dollar amount, which was below the proxy of 17.8% by volume and dollar amount. The geographic distribution of lending in moderate-income tracts is considered poor.

Whitaker made 141 loans in middle-income tracts totaling \$9.1 million. This represents 71.2% by volume and 77.7% by dollar amount which exceeded the proxy of 57.5% by volume and dollar amount. Whitaker made 38 loans in upper-income tracts totaling \$1.9 million. This represents 19.2% by volume and 16.9% by dollar amount which was below the proxy at 24.0% by volume and dollar amount.

The geographic distribution of small business loans for 2019 is considered adequate, given Whitaker's excellent lending in low-income tracts and its lending in middle-income tracts which served distressed and/or underserved tracts.

HMDA

The overall geographic distribution of HMDA loans (home purchase, refinance, and home improvement) is good given Whitaker's strong performance in low-income tracts compared to proxy and the aggregate of all lenders. In addition, the assessment area is economically depressed due to industries leaving the area, depressed wages, high unemployment rates, rising energy costs due to the coal industry leaving the area, and the widespread opioid epidemic impacting all facets of the assessment area.

2017

Home Purchase Loans

Whitaker made seven home purchase loans totaling \$405,000.00 in low-income tracts. This is 5.6% by volume and 3.8% by dollar amount, which was significantly above the percentage of owner-occupied units in these tracts (proxy) at 1.3% by volume and dollar amount. In addition, the percentage of loans by volume and dollar amount significantly exceeded the aggregate of all lenders at 0.6% by volume and 0.4% by dollar amount. Therefore, lending in low-income tracts is considered excellent.

Whitaker made nine home purchase loans (7.1%) totaling \$496,000.00 (4.7%) in moderate-income tracts. Whitaker's home purchase lending in moderate-income tracts was below the proxy of 22.9% by volume and significantly below the proxy (20.5%) by dollar amount. Whitaker's lending, was adequate when compared to the aggregate of all lenders by volume at 12.7% but below the aggregate by dollar amount 9.7%. While lending in moderate-income tracts was limited, unemployment in moderate-income tracts was 14.9% and 30.5% of families living in moderate-income tracts live below the poverty level. Therefore, when these factors are taken into account, Whitaker's lending in moderate-income tracts is considered adequate.

Whitaker made 68.3% of its loans in middle-income tracts by volume and 75.3% by dollar amount, which was above the proxy at 54.7% by both volume and dollar amount. Lending in middle-income tracts exceeded the aggregate of all lenders by volume (52.7%) and dollar amount (48.6%). Whitaker made 19.0% of its loans in upper-income tracts by volume and 16.2% by dollar amount which was comparable to the proxy at 21.2% by volume and dollar amount. Lending in upper-income tracts was below the aggregate of all lenders by volume (34.0%) and dollar amount (41.2%).

Therefore, Whitaker's home purchase lending in 2017 is good.

Refinance Loans

In 2017, Whitaker made 91 refinance loans totaling \$10.6 million.

Whitaker made six refinance loans totaling \$715,000.00 in low-income tracts. This is 6.6% by volume and 6.8% by dollar amount, which was significantly above the percentage of owner-

occupied units in these tracts (proxy) at 1.3% by volume and dollar amount. In addition, the percentage of loans by volume and dollar amount significantly exceeded the aggregate of all lenders at 0.7% by volume and 0.6% by dollar amount. Therefore, lending in low-income tracts is considered excellent.

Whitaker made five refinance loans totaling \$497,000.00. This is 5.5% by volume and 4.7% by dollar amount. Whitaker's refinance lending in moderate-income tracts was significantly below the proxy of 22.9% by volume and dollar amount and below the aggregate of all lenders at 12.0% by volume and 9.8% by dollar amount. While lending was significantly below the proxy by volume and dollar amount, unemployment in moderate-income tracts is at 14.9% and the moderate-income tracts have a higher vacancy rate at 16.1%. Lastly, the median housing value for homes in moderate-income tracts is depressed at \$64,000.00 which may impact the bank's ability to originate refinance loans if property values are not increasing. In addition, in moderate-income tracts the vacancy rate is significant at 16.1%, further reducing available housing stock. Therefore, lending in moderate-income tracts is poor.

Whitaker made 72.5% of its refinance loans in middle-income tracts by volume and 68.2% by dollar amount, which was above the proxy at 54.7% by both volume and dollar amount. Lending in middle-income tracts exceeded the aggregate of all lenders at 50.6% by volume and 47.1% by dollar amount. Whitaker made 15.4% of its refinance loans in upper-income tracts by volume and 20.3% by dollar amount which was comparable to the proxy at 21.2% by volume and dollar amount. Lending in upper-income tracts was below the aggregate of all lenders at 36.7% by volume and 42.5% by dollar amount.

Therefore, Whitaker's refinance lending in 2017 is adequate.

Home Improvement Loans

In 2017, Whitaker made 213 home improvement loans totaling \$4.7 million.

Whitaker made 17 home improvement loans totaling \$305,000.00 in low-income tracts. This is 8.0% by volume and 6.5% by dollar amount, which was significantly above the percentage of owner-occupied units in these tracts (proxy) at 1.3% by volume and dollar amount. In addition, the percentage of loans by volume and dollar amount significantly exceeded the aggregate of all lenders at 2.3% by volume and 1.1% by dollar amount. Therefore, lending in low-income tracts is considered excellent.

Whitaker made 17 home improvement loans totaling \$174,000.00 in moderate-income tracts. This is 8.0% by volume and 3.7% by dollar amount. Whitaker's home improvement lending in moderate-income tracts was below the proxy of 22.9% by volume and significantly below by dollar amount. Whitaker's lending was below the aggregate of all lenders at 16.9% by volume and 14.0% by dollar amount. While lending in moderate-income tracts was below the proxy and aggregate, the moderate-income tracts have a high unemployment rate of 14.9% and a significantly depressed median housing value of \$64,000.00; these two factors severely limit the bank's ability to make home improvement loans. Therefore, lending in moderate-income tracts is poor.

Whitaker made 71.8% of its home improvement loans in middle-income tracts by volume and 82.3% by dollar amount, which was above the proxy at 54.7% by both volume and dollar amount. Lending in middle-income tracts exceeded the aggregate of all lenders at 57.8% by volume and 49.2% by dollar amount. Whitaker made 12.2% of its home improvement loans in upper-income tracts by volume and 7.5% by dollar amount which was comparable to the proxy at 21.2% by volume and below by dollar amount. Lending in upper-income tracts was comparable to the aggregate of all lenders at 22.9% by volume and below the aggregate at 35.6% by dollar amount (35.6%).

Therefore, Whitaker's home improvement lending in 2017 is adequate

2018

Home Purchase Loans

In 2018, Whitaker made 105 home purchase loans totaling \$8.4 million.

Whitaker made six home purchase loans totaling \$748,000.00 in low-income tracts. This is 5.7% by volume and 8.9% by dollar amount, which was significantly above the percentage of owner-occupied units in these tracts (proxy) at 1.3% by volume and dollar amount. In addition, the percentage of loans by volume and dollar amount significantly exceeded the aggregate of all lenders at 0.5% by volume and 0.4% by dollar amount. Therefore, lending in low-income tracts is considered excellent.

Whitaker made 14 home purchase loans totaling \$1.5 million in moderate-income tracts. This is 13.3% by volume and 18.1% by dollar amount. Whitaker's home purchase lending in moderate-income tracts was comparable to the proxy of 22.9% by volume and slightly below the proxy by dollar amount. Whitaker, exceeded the aggregate of all lenders by volume at 12.5% and dollar amount at 9.9%. Therefore, Whitaker's lending in moderate-income tracts is considered good.

Whitaker made 70.5% of its loans home purchase loans in middle-income tracts by volume and 60.0% by dollar amount, which was above the proxy at 54.7% by both volume and dollar amount. Lending in middle-income tracts exceeded the aggregate of all lenders by volume and dollar amount. Whitaker made 10.5% of its home purchase loans in upper-income tracts by volume and 13.0% by dollar amount which was below to the proxy at 21.2% by volume and comparable by dollar amount. Lending in upper-income tracts was below the aggregate of all lenders by volume and dollar amount.

Therefore, Whitaker's home purchase lending in 2018 is good.

Refinance Loans

In 2018, Whitaker made 93 refinance loans totaling \$8.2 million.

Whitaker made four refinance loans totaling \$142,000.00 in low-income tracts. This is 4.3% by volume and 1.7% by dollar amount, which was significantly above the percentage of owner-

occupied units in these tracts (proxy) at 1.3% by volume and dollar amount. In addition, the percentage of loans by volume and dollar amount significantly exceeded the aggregate of all lenders at 0.4% by volume and 0.3% by dollar amount. Therefore, lending in low-income tracts is considered excellent.

Whitaker made five refinance loans totaling \$205,000 in moderate-income tracts. This is 5.4% by volume and 2.5% by dollar amount. Whitaker's refinance lending in moderate-income tracts was significantly below the proxy of 22.9% by volume and dollar amount and below the aggregate of all lenders at 12.9% by volume and 10.4% by dollar amount. While lending was below the proxy and aggregate, 51.8% of the available housing units in moderate tracts are either rental or vacant, which significantly impact the bank's ability to originate refinance loans. In addition, in moderate-income tracts the unemployment rate is significant at 14.9%, further limiting the housing stock that is available to originate refinance loans. Therefore, lending in moderate-income tracts is poor.

Whitaker made 68.8% of its refinance loans in middle-income tracts by volume and 61.3% by dollar amount, which was above the proxy at 54.7% by both volume and dollar amount. Lending in middle-income tracts exceeded the aggregate of all lenders at 51.2% by volume and 47.9% by dollar amount. Whitaker made 21.5% of its refinance loans in upper-income tracts by volume and 34.5% by dollar amount which was above to the proxy at 21.2% by volume and dollar amount. Lending in upper-income tracts was below the aggregate of all lenders at 35.4% by volume and 41.2% by dollar amount.

Therefore, Whitaker's refinance lending in 2018 is good.

2019

Home Purchase Loans

In 2019, Whitaker made 53 home purchase loans totaling \$4.5 million.

Whitaker made eight home purchase loans totaling \$538,000.00 in low-income tracts. This is 15.1% by volume and 11.9% by dollar amount, which was significantly above the percentage of owner-occupied units in these tracts (proxy) at 1.3% by volume and dollar amount. Therefore, lending in low-income tracts is considered excellent.

Whitaker made five home purchase loans totaling \$768,000.00. This is 9.4% by volume and 17.0% by dollar amount. Whitaker's home purchase lending in moderate-income tracts was below the proxy of 22.9% by volume and comparable to the proxy by dollar amount. In moderate-income tracts, 51.8% of housing units are rental or vacant, which substantially limits Whitaker's ability to originate home purchase homes. In addition due to the lack of affordable housing available in these tracts Whitaker's lending in moderate-income tracts is considered adequate.

Whitaker made 67.9% of its home purchase loans in middle-income tracts by volume and 65.7% by dollar amount, which was above the proxy at 54.7% by both volume and dollar amount. Whitaker made 7.5% of its home purchase loans in upper-income tracts by volume and 5.4% by dollar amount which was below the proxy at 21.2% by volume and dollar amount.

Therefore, Whitaker's home purchase lending in 2019 is good.

Refinance Loans

In 2019, Whitaker made 34 refinance loans totaling \$3.6 million.

Whitaker made two refinance loans totaling \$345,000.00 in low-income tracts. This is 5.9% by volume and 9.6% by dollar amount, which was significantly above the percentage of owner-occupied units in these tracts (proxy) at 1.3% by volume and dollar amount. Therefore, lending in low-income tracts is considered excellent.

Whitaker made two refinance loans totaling \$105,000 in moderate-income tracts. This is 5.9% by volume and 2.9% by dollar amount. Whitaker's refinance lending in moderate-income tracts was below the proxy of 22.9% by volume and significantly below by dollar amount. Therefore, lending in moderate-income tracts is poor.

Whitaker made 55.9% of its refinance loans in middle-income tracts by volume and 53.3% by dollar amount, which was above the proxy at 54.7% by both volume and slightly below by dollar amount. Whitaker made 32.4% of its refinance loans in upper-income tracts by volume and 34.2% by dollar amount which was above to the proxy at 21.2% by volume and dollar amount.

Therefore, Whitaker's refinance lending in 2019 is good.

Small Farm Loans

The overall geographic distribution of small farm loans in the assessment area is considered good, given Whitaker's strong performance in low -income tracts compared to proxy and the aggregate of all lenders as well as limited opportunities to make small farm loans in the assessment area.

2017

In 2017, Whitaker made 170 small farm loans totaling \$6.4 million.

Whitaker made nine small farm loans in low-income tracts totaling \$121,000.00 which represents 5.3% of small farm loans by volume and 1.9% by dollar amount. Whitaker's small farm lending was significantly above the percentage of farms in these tracts (proxy) at 0.4% by both volume and dollar amount. The percentage of loans by volume and dollar amount also significantly exceeded the 2017 aggregate of all lenders at 1.5% and 0.6%, respectively. Therefore, the geographic distribution of small farm loans in low-income tracts is excellent.

Whitaker made 19 small farm loans in moderate-income tracts totaling \$529,000.00 which represents 11.2% of small farm loans by volume and 8.3% by dollar amount. Whitaker's small farm lending was comparable to the percentage of farms in these tracts (proxy) at 15.3% by both volume and dollar amount. The percentage of loans by volume and dollar amount also exceeded

the 2017 aggregate of all lenders at 8.6% and 8.3%. Therefore, the geographic distribution of small farm loans in moderate-income tracts is good.

Whitaker made 107 small farm loans in middle-income tracts totaling \$4.4 million. This represents 62.9% by volume and 68.5% by dollar amount, which was above the proxy at 57.3% by both volume and dollar amount. Whitaker's lending in middle-income tracts was comparable to the aggregate of all lenders of 65.8% by volume and 73.5% by dollar amount. Whitaker made 35 small farm loans in upper-income tracts totaling \$1.4 million. This represents 20.6% by volume and 21.2% by dollar amount, which was below the proxy by volume and dollar amount at 27.0% and comparable to the aggregate of all lenders by volume at 23.9% and above by dollar amount at 17.5%.

Therefore, Whitaker's geographic distribution of small farm loans in 2017 is good.

2018

In 2018, Whitaker made 156 small farm loans totaling \$5.9 million.

Whitaker made five small farm loans in low-income tracts totaling \$403,000, which represents 3.2% by volume and 6.9% by dollar amount. Whitaker's small farm lending in low-income tracts was significantly above the proxy at 0.4% by both volume and dollar amount and significantly above the aggregate of all lenders of 0.9% by volume and 2.0% by dollar amount. Therefore, the geographic distribution of small farm loans in low-income tracts is excellent.

Whitaker made ten small farm loans in moderate-income tracts totaling \$251,000, which represents 6.4% by volume and 4.3% by dollar amount. Whitaker's small farm lending in moderate-income tracts was below the proxy of 15.1% by both volume and dollar amount. When compared to the aggregate of all lenders, however, Whitaker's small farm lending was adequate by volume of 10.9% and below the aggregate at 8.6% by dollar amount. Therefore, Whitaker's lending to small farms in moderate-income tracts is considered poor.

Whitaker made 71.2% of its small farm loans in middle-income tracts by volume and 71.7% by dollar amount which was above the proxy of 57.6% by volume and dollar amount and above the aggregate of all lenders by volume of 66.5% and 69.0% by dollar amount. Whitaker's small farm lending in upper-income tracts was 19.2% by volume and 17.1% by dollar amount which was below the proxy of 26.9% by volume and dollar amount and below the aggregate of all lenders of 20.8% by volume and 20.3% by dollar amount.

The geographic distribution of small farm loans for 2018 is considered adequate.

2019

In 2019, Whitaker made 71 small farm loans totaling \$2.9 million.

Whitaker made one small farm loan in low-income tracts totaling \$33,000, which represents 1.4% by volume and 1.1% by dollar amount. Whitaker's small farm lending in low-income tracts was

significantly above the proxy at 0.4% by both volume and dollar amount. Therefore, the geographic distribution of small farm loans in low-income tracts is excellent.

Whitaker made six small farm loans in moderate-income tracts totaling \$140,000, which represents 8.5% by volume and 4.8% by dollar amount. Whitaker's small farm lending in moderate-income tracts was below the proxy of 15.1% by volume dollar amount. Therefore, Whitaker's lending to small farms in moderate-income tracts is considered adequate.

Whitaker made 67.6% of its small farm loans in middle-income tracts by volume and 70.9% by dollar amount which was above the proxy of 57.6% by volume and dollar amount. Whitaker's small farm lending in upper-income tracts was 22.5% by volume and 23.2% by dollar amount which was below the proxy of 26.9% by volume and dollar amount.

The geographic distribution of small farm loans for 2019 is considered good.

Distribution by Borrower Income and Revenue Size of the Business and Farm

Whitaker's overall distribution among borrowers of different income levels, businesses of different revenue sizes, and small farms of different revenue sizes is good. Borrower distribution is good for small business lending, good for HMDA lending, and excellent for small farm lending.

Small Business Lending

Whitaker's overall distribution among businesses of different revenue sizes is considered good. Whitaker's lending to small businesses was comparable to the proxy and exceeded the aggregate of all lenders. In addition, a significant majority of Whitaker's small business loans were made in amounts of \$100,000.00 or less which indicates a willingness to work with small businesses.

2017

Whitaker made 399 small business loans totaling \$27.5 million to businesses of different sizes, and 325 (81.5%) of these loans totaling \$13.5 million (49.2%) were made to businesses with revenues of \$1 million or less in 2017. While this is well below the percentage of small businesses in the assessment area at 89.8% by volume and dollar amount, the percentage of loans by volume and dollar amount exceeded the 2017 aggregates at 50.1% and 46.0%. Therefore, the distribution of small business loans to businesses of different sizes is good considering Whitaker's performance relative to the aggregate of all lenders.

In addition, during the evaluation period, Whitaker made a good percentage of small dollar loans (86.0% by volume) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

2018

Whitaker made 369 small business loans totaling \$23.9 million to businesses of different sizes, and 295 (79.9%) of these loans totaling \$13.2 million (55.0%) were made to businesses with revenues of \$1 million or less in 2018. This is slightly below the percentage of small businesses in the assessment area at 90.7% by volume and dollar amount. In addition, the percentage of loans by volume and dollar amount significantly exceeded the aggregate by volume and dollar amount at 44.4% and 38.9%, respectively. Therefore, the distribution of small business loans to businesses of different sizes is good

In addition, during the evaluation period, Whitaker made a good percentage of small dollar loans (86.4% by volume) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

2019

Whitaker made 198 small business loans totaling \$11.8 million to businesses of different sizes, and 157 (79.3%) of these loans totaling \$5.5 million (46.4%) were made to businesses with revenues of \$1 million or less in 2019. This is slightly below the percentage of small businesses in the assessment area at 90.7% by volume and dollar amount. Therefore, the distribution of small business loans to businesses of different sizes is good.

In addition, during the evaluation period, Whitaker made a good percentage of small dollar loans (86.9% by volume) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

HMDA Lending

Overall, Whitaker HMDA lending to borrowers of different income levels, specifically low- and moderate-income borrowers is considered good.

2017

Home Purchase

In 2017, Whitaker made 126 home purchase loans totaling \$10.6 million. Whitaker made 15 (11.9%) home purchase loans totaling \$1.4 million to borrowers with unknown-income designations. The aggregate of all lenders by comparison made 20.7% of home purchase loans by both volume and dollar amount to borrowers with unknown-income designations.

Whitaker made three (2.4%) home purchase loans, totaling \$90,000.00 (0.8%) by dollar amount to low-income borrowers, which was well below the percentage of families (proxy) at 25.6% by volume and dollar amount. However, the percentage of loans by volume was comparable to the aggregate of all lenders by volume and dollar amount at 3.3% and 1.5%. Therefore, the borrower distribution of home purchase loans to low-income borrowers is poor.

Whitaker made 22 (17.5%) home purchase loans, totaling \$1.2 million (10.9%) by dollar amount to moderate-income borrowers, which was well above the percentage of families (proxy) at 16.2%

by volume and comparable by dollar amount. In addition, Whitaker's percentage of loans by volume exceeded the aggregate of all lenders by volume and dollar amount at 14.8% and 9.7%, respectively. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Whitaker made 24 home purchase loans totaling \$1.4 million to middle-income borrowers. This represents 19.0% by volume and 13.1% by dollar amount which was above the proxy at 17.2% by volume and below the proxy by dollar amount. The percentage of loans was also below the aggregate of lenders by volume and dollar amount at 22.0% and 19.3%, respectively.

Whitaker made 62 home purchase loans totaling \$6.5 million to upper-income borrowers. This represents 49.2% by volume and 61.6% by dollar amount which was above the proxy at 41.0% by volume and below the proxy by dollar amount. The percentage of loans was also above the aggregate of lenders by volume and dollar amount at 39.1% and 48.8%.

Therefore, Whitaker's home purchase lending to borrowers of different income levels is considered good.

Refinance

In 2017, Whitaker made 91 refinance loans totaling \$10.6 million. Whitaker made 17 (18.7%) refinance loans totaling \$4.0 million to borrowers with unknown-income designations. The aggregate of all lenders by comparison made 18.9% of refinance loans by both volume and 20.7% dollar amount to borrowers with unknown-income designations.

Whitaker made five (5.5%) refinance loans, totaling \$182,000.00 or 1.7% by dollar amount to low-income borrowers, which was well below the percentage of families (proxy) at 25.6% by volume and dollar amount. However, the percentage of loans by volume exceeded the aggregate of all lenders by volume at 4.1% and was comparable by and dollar amount at 1.9%. Given that Whitaker outperformed the aggregate and the economic constraints imposed on low-income borrowers, Whitaker's refinance lending to low-income borrowers is considered adequate.

Whitaker made 18 (19.8%) refinance loans, totaling \$1.4 million or 13.2% by dollar amount to moderate-income borrowers, which was well above the percentage of families (proxy) at 16.2% by volume and comparable by dollar amount. In addition, Whitaker's percentage of loans by volume exceeded the aggregate of all lenders by volume and dollar amount at 11.3% and 7.0%, respectively. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Whitaker made 10 refinance loans totaling \$864,000.00 to middle-income borrowers. This represents 11.0% by volume and 8.2% by dollar amount which was below the proxy at 17.2% by volume and dollar amount. The percentage of loans was also below the aggregate of lenders by volume and dollar amount at 16.9% and 13.5%.

Whitaker made 41 refinance loans totaling \$4.2 million to upper-income borrowers. This represents 45.1% by volume and 39.6% by dollar amount which was above the proxy at 41.0% by

volume and below the proxy by dollar amount. The percentage of loans was also below the aggregate of lenders by volume and dollar amount at 48.8% and 56.8%, respectively.

Therefore, Whitaker's refinance lending to borrowers of different income levels is considered good.

Home Improvement

In 2017, Whitaker made 213 home improvement loans totaling \$4.7 million. Whitaker made five (2.3%) home improvement loans totaling \$614,000.00 to borrowers with unknown-income designations. The aggregate of all lenders by comparison made 5.5% of home improvement loans by volume and 9.4% by dollar amount to borrowers with unknown-income designations.

Whitaker made 38 (17.8%) home improvement loans, totaling \$335,000.00 or 7.2% by dollar amount to low-income borrowers, which was below the percentage of families (proxy) at 25.6% by volume and well below the proxy by dollar amount. However, the percentage of loans by volume exceeded the aggregate of all lenders by volume and dollar amount at 10.6% and 3.9%, respectively. Given that Whitaker outperformed the aggregate and was comparable to the proxy by volume, lending to low-income borrowers is considered good.

Whitaker made 48 (22.5%) home improvement loans, totaling \$465,000.00 or 10.0% by dollar amount to moderate-income borrowers, which was well above the percentage of families (proxy) at 16.2% by volume and comparable by dollar amount. In addition, Whitaker's percentage of loans by volume exceeded the aggregate of all lenders by volume and dollar amount at 17.7% and 7.3%. Therefore, the borrower distribution of home improvement loans to moderate-income borrowers is excellent.

Whitaker made 49 home improvement loans totaling \$783,000.00 to middle-income borrowers. This represents 23.0% by volume and 16.8% by dollar amount which exceeded the proxy at 17.2% by volume and slightly below by dollar amount. The percentage of loans was also exceeded the aggregate of lenders by volume and dollar amount at 21.8% and 14.3%.

Whitaker made 73 home improvement loans totaling \$2.5 million to upper-income borrowers. This represents 34.3% by volume and 52.8% by dollar amount which was slightly below the proxy at 41.0% by volume and above the proxy by dollar amount. The percentage of loans was also below the aggregate of lenders by volume and dollar amount at 44.4% and 65.1%.

Therefore, Whitaker's home improvement lending to borrowers of different income levels is considered excellent.

2018

Home Purchase

In 2018, Whitaker made 105 home purchase loans totaling \$8.4 million. Whitaker made 18 (17.1%) home purchase loans totaling \$2.2 million to borrowers with unknown-income

designations. The aggregate of all lenders by comparison made 18.0% of home purchase loans by both volume and 18.4% by dollar amount to borrowers with unknown-income designations.

Whitaker made seven (6.7%) home purchase loans, totaling \$240,000.00 or 2.9% by dollar amount to low-income borrowers, which was below the percentage of families (proxy) at 25.6% by volume and significantly below by dollar amount. However, the percentage of loans by volume and dollar amount exceeded the aggregate of all lenders at 3.7% and 1.8%, respectively. Given that Whitaker significantly outperformed the 2017 aggregate and that there is limited housing stock available that is affordable to low-income borrowers, Whitaker's home purchase lending is considered adequate.

Whitaker made 19 (18.1%) home purchase loans, totaling \$799,000.00 or 9.5% by dollar amount to moderate-income borrowers, which was above the percentage of families (proxy) at 16.2% by volume and comparable by dollar amount. In addition, Whitaker's percentage of loans by volume exceeded the aggregate of all lenders by volume at 15.5% and was slightly less by dollar amount at 10.2%. Therefore, the borrower distribution of home purchase loans to moderate-income borrowers is excellent.

Whitaker made 17 home purchase loans totaling \$879,000.00 to middle-income borrowers. This represents 16.2% by volume and 10.5% by dollar amount which was below the proxy at 17.2% by volume and dollar amount. The percentage of loans was also below the aggregate of lenders by volume and dollar amount at 24.9% and 21.8%, respectively.

Whitaker made 44 home purchase loans totaling \$4.3 million to upper-income borrowers. This represents 41.9% by volume and 51.0% by dollar amount which was above the proxy at 41.0% by volume and dollar amount. The percentage of loans was also above the aggregate of lenders by volume and dollar amount at 37.9% and 47.8%, respectively.

Therefore, Whitaker's home purchase lending to borrowers of different income levels is considered good.

Refinance

In 2018, Whitaker made 93 refinance loans totaling \$8.2 million. Whitaker made seven (7.5%) refinance loans totaling \$791,000.00 to borrowers with unknown-income designations. The aggregate of all lenders by comparison made 10.9% of refinance loans by both volume and 12.6% dollar amount to borrowers with unknown-income designations.

Whitaker made six (6.5%) refinance loans, totaling \$511,000.00 or 6.3% by dollar amount to low-income borrowers, which was well below the percentage of families (proxy) at 25.6% by volume and dollar amount. However, the percentage of loans by volume exceeded the aggregate of all lenders by volume at 5.7% and significantly exceeded the aggregate by dollar amount at 3.2%. Given that Whitaker outperformed the aggregate and the economic constraints imposed on low-income borrowers, Whitaker's refinance lending is considered adequate.

Whitaker made 21 (22.6%) refinance loans, totaling \$1.0 million or 12.7% by dollar amount to moderate-income borrowers, which was well above the percentage of families (proxy) at 16.2% by volume and comparable by dollar amount. In addition, Whitaker's percentage of loans by volume significantly exceeded the aggregate of all lenders by volume and dollar amount at 14.0% and 9.2%., respectively. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Whitaker made 16 refinance loans totaling \$921,000.00 to middle-income borrowers. This represents 17.2% by volume and 11.3% by dollar amount which was equal to the proxy of 17.2% by volume and below the proxy by dollar amount. The percentage of loans was also below the aggregate of lenders by volume and dollar amount at 20.0% and 16.1%, respectively.

Whitaker made 43 refinance loans totaling \$4.9 million to upper-income borrowers. This represents 46.2% by volume and 60.0% by dollar amount which was above the proxy at 41.0% by volume and below the proxy by dollar amount. The percentage of loans was also below the aggregate of lenders by volume of 49.4% and above by dollar amount of 58.9%.

Therefore, Whitaker's refinance lending to borrowers of different income levels is considered good, given the economic constraints and that Whitaker is consistently able to generate a higher volume of refinance loans than its peers.

2019

Home Purchase

In 2019, Whitaker made 53 home purchase loans totaling \$4.5 million. Whitaker made 9 (17.0%) home purchase loans totaling \$951,000.00 to borrowers with unknown-income designations.

Whitaker made four (7.5%) home purchase loans, totaling \$216,000.00 or 4.8% by dollar amount to low-income borrowers, which was below the percentage of families (proxy) at 25.7% by volume and significantly below by dollar amount. The lending in 2019 is substantially similar to the originations made in 2017 and 2018 for home purchase loans, with the only difference being that the aggregate data is not available for comparison for 2019 lending data. Therefore, it can be assumed that given the depressed economy the bank is making an adequate amount of home purchase loans to low-income borrowers. .

Whitaker made seven (13.2%) home purchase loans, totaling \$259,000.00 or 5.7% by dollar amount to moderate-income borrowers, which was slightly below percentage of families (proxy) at 16.2% by volume and well below by dollar amount. Given that the median housing value is approximately \$89,000.00 it would be expected that the dollar amounts lent to moderate-income borrowers would be less than the proxy. Therefore, Whitaker's lending to borrowers of moderate-incomes is considered good based on their volume of lending.

Whitaker made nine home purchase loans totaling \$514,000.00 to middle-income borrowers. This represents 17.0% by volume and 11.4% by dollar amount which was slightly below the proxy at 17.3% by volume and below the proxy by dollar amount.

Whitaker made 24 home purchase loans totaling \$2.6 million to upper-income borrowers. This represents 45.3% by volume and 57.0% by dollar amount which was above the proxy at 40.9% by volume and dollar amount.

Therefore, Whitaker's home purchase lending to borrowers of different income levels is considered adequate.

Refinance

In 2019, Whitaker made 34 refinance loans totaling \$3.6 million. Whitaker made four (11.8%) refinance loans totaling \$594,000.00 to borrowers with unknown-income designations.

Whitaker made one (2.9%) refinance loan, totaling \$100,000.00 or 2.8% by dollar amount to low-income borrowers, which was well below the percentage of families (proxy) at 25.7% by volume and dollar amount. Therefore, the bank's lending to low-income borrowers is considered poor.

Whitaker made seven (20.6%) refinance loans, totaling \$455,000.00 or 12.7% by dollar amount to moderate-income borrowers, which was well above the percentage of families (proxy) at 16.2% by volume and comparable by dollar amount. Therefore, the borrower distribution of refinance loans to moderate-income borrowers is excellent.

Whitaker made seven refinance loans totaling \$418,000.00 to middle-income borrowers. This represents 20.6% by volume and 11.7% by dollar amount which was above the proxy of 17.2% by volume and below the proxy by dollar amount.

Whitaker made 15 refinance loans totaling \$2.0 million to upper-income borrowers. This represents 44.1% by volume and 56.3% by dollar amount which was above the proxy at 41.0% by volume and below the proxy by dollar amount.

Therefore, Whitaker's refinance lending to borrowers of different income levels is considered adequate, given the economic constraints of low land moderate-income borrowers and that Whitaker is consistently able to generate a higher volume of refinance loans than its peers.

Small Farm Lending

Whitaker's overall lending to small farms of different revenue sizes is considered excellent. Whitaker's lending was slightly below the proxy and consistently exceeded the aggregate of all lenders. In addition, 94.1% of its originated loans were for loan amounts of \$100,000.00 or less which tends to represent amounts typically requested by small farms.

2017

Whitaker made 170 small farm loans totaling \$6.4 million to farms of different sizes, and 164 (96.5%) of these loans totaling \$6.1 million (96.6%) were made to farms with revenues of \$1 million or less. This lending is almost equal to the percentage of small farms in the assessment

area at 98.2% and exceeds the aggregate of all lenders by volume and dollar amount at 65.8% and 81.0%, respectively. Therefore, the distribution of small farm loans to farms of different sizes is excellent.

In addition, during the evaluation period, Whitaker made a good percentage of small dollar loans (94.1%) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

2018

Whitaker made 156 small farm loans totaling \$5.9 million to farms of different sizes, and 145 (92.9%) of these loans totaling \$5.5 million or 93.9% by dollar amount were made to farms with revenues of \$1 million or less. This lending is slightly below the percentage of small farms in the assessment area at 98.2% and significantly exceeds the aggregate of all lenders by volume and dollar amount at 52.8% and 76.4% respectively. Therefore, the distribution of small farm loans to farms of different sizes is excellent.

In addition, during the evaluation period, Whitaker made a good percentage (94.2%) of the volume of their small dollar loans in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

2019

Whitaker made 71 small farm loans totaling \$2.9 million to farms of different sizes, and 61 (85.9%) of these loans totaling \$2.4 million (82.8%) were made to farms with revenues of \$1 million or less. This lending is slightly below the percentage of small farms in the assessment area at 98.2%. Therefore, the distribution of small farm loans to farms of different sizes is good.

In addition, during the evaluation period, Whitaker made a good percentage of small dollar loans (94.4%) in amounts of \$100,000 or less, indicating a willingness to lend in smaller amounts which tend to represent amounts typically requested by small businesses.

Community Development Loans

Whitaker originated 27 community development loans totaling \$1,649,997.78 during the evaluation period. Community development lending in this assessment area represented 46.4% of the total dollar volume of community development loans originated during the evaluation period. Overall, Whitaker makes a relatively high level of community development loans in this assessment area.

Of the 27 community development loans originated, 25 loans supported the revitalization and stabilization of the community and two loans supported the efforts in community services. These community development loans resulted in improved outcomes for low- and moderate-income individuals and families. Community contacts also stated that there was a critical need for affordable housing, stabilizing the economy, and providing needed services to distressed and underserved communities.

Investment Test

Whitaker made 259 grants totaling \$134,000.00 in this assessment area during the evaluation period. In addition, Whitaker has 29 investments outstanding as of the previous evaluation totaling \$12,256,531.65. Many of the grants were in the form of donations to schools, located in underserved and/or distressed areas, where a large percentage of the student population received financial assistance. Other grants made by Whitaker supported a variety of organizations and activities such as community services, and revitalization and stabilization efforts for the communities in this assessment area. Therefore, Whitaker made a significant level of investments in the assessment area.

Service Test

Retail services are accessible and Whitaker provides a relatively high level of community development services.

Retail Services

Whitaker did not open or close any offices in this assessment area since the previous evaluation; therefore, Whitaker's record of opening and closing offices has generally not adversely affected the accessibility of its delivery systems, particularly in moderate-income geographies and to low- and moderate-income households.

Business hours and services provided do not vary in a way that inconveniences certain portions of the assessment area, including low- and moderate-income geographies or families and are consistent with the services and hours discussed in the "Institution" assessment.

Whitaker maintains 27 branch offices in this assessment area, including one in a low-, five in moderate-, 19 in middle-, and two in upper-income census tracts. Whitaker's branch offices in this assessment area represent 77.1% of its total branch offices.

The following tables illustrate the percentage of branch offices and ATMs in low-, moderate-, middle-, and upper-income census tracts in comparison to the number and percentage of census tracts and the percentage of households and businesses in those tracts for the lending periods of 2017, 2018, and 2019.

Geographic Distribution of Branches

Exam: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Analysis Year: 2017

2017 Non-metropolitan Kentucky

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	1	3.7%	0	0	0	0	0	2	1.4%	1.3%	0.7%
	DTO	0		0	0	0						
	LS	0		0	0							
Moderate	Total	5	18.5%	0	0	0	0	0	41	28.3%	22.6%	18.4%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	Total	19	70.4%	0	0	0	0	0	76	52.4%	55.9%	58.5%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	Total	2	7.4%	0	0	0	0	0	26	17.9%	20.3%	22.4%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	Total	27	100.0%	0	0	0	0	0	145	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" columns and are not included in any other totals
LPOs not included in totals.

Geographic Distribution of Branches

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Analysis Year: 2018

2018 Non-metropolitan Kentucky

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	1	3.7%	0	0	0	0	0	2	1.4%	1.3%	0.8%
	DTO	0		0	0	0						
	LS	0		0	0							
Moderate	Total	5	18.5%	0	0	0	0	0	41	28.3%	22.6%	17.8%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	Total	19	70.4%	0	0	0	0	0	76	52.4%	55.9%	57.5%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	Total	2	7.4%	0	0	0	0	0	26	17.9%	20.3%	24.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Totals	Total	27	100.0%	0	0	0	0	0	145	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" columns and are not included in any other totals
LPOs not included in totals.

Geographic Distribution of Branches

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Analysis Year: 2018

2018 Non-metropolitan Kentucky

Tract Income Levels	BRANCHES							DEMOGRAPHICS				
	Total Branches		Opened	Closed*	Drive Thru	Extended Hours	Weekend Hours	Census Tracts		Households	Total Businesses	
	#	%	#	#	#	#	#	#	%	%	%	
Low	Total	1	3.7%	0	0	0	0	0	2	1.4%	1.3%	0.8%
	DTO	0		0	0	0						
	LS	0		0	0							
Moderate	Total	5	18.5%	0	0	0	0	0	41	28.3%	22.6%	17.8%
	DTO	0		0	0	0						
	LS	0		0	0							
Middle	Total	19	70.4%	0	0	0	0	0	76	52.4%	55.9%	57.5%
	DTO	0		0	0	0						
	LS	0		0	0							
Upper	Total	2	7.4%	0	0	0	0	0	26	17.9%	20.3%	24.0%
	DTO	0		0	0	0						
	LS	0		0	0							
Unknown	Total	0	0.0%	0	0	0	0	0	0	0.0%	0.0%	0.0%
	DTO	0		0	0	0						
	LS	0		0	0							
<i>Totals</i>	Total	27	100.0%	0	0	0	0	0	145	100.0%	100.0%	100.0%
	DTO	0		0	0	0						
	LS	0		0	0							

DTO - Drive Thru Only
LS - Limited Service
Shaded rows indicate totals; unshaded rows are a subset of shaded rows
*Closed branches are only included in the "Closed" column and are not included in any other totals
LPOs not included in totals.

Branch distribution in low-income tracts reflects an excellent dispersion, as the distribution of branches was above the percentage of low-income census tracts, households, and total businesses in these tracts. Branch distribution in moderate-income tracts is considered adequate. The distribution of branches was less than the percentage of moderate-income census tracts, households, and slightly above total businesses in these tracts.

Community Development Services

Whitaker provides a relatively high level of community development services in this assessment area. Whitaker’s directors, officers and staff members provided 1564 hours of community development services to 31 different organizations, which represents 90.2% of all community development services provided, which is greater than the percentage of total deposits at 71.2% and greater than the 77.8% of branch offices in the assessment area. In addition, the community development service hours provided in this assessment area equate to .782 Annualized Persons (ANP).⁷

The services provided were as follows:

- Employees provided multiple financial literacy training sessions to students at schools in which the majority of students received free or reduced price lunches;
- Employees served as Treasurers, Board Members, committee members and other roles in order to provide financial expertise to local organizations that provided affordable housing and community service; and
- Employees participated in organizations with the intent to encourage economic development and promote revitalization and stabilization within the community;

Due to the impact of the opioid crisis in this assessment area, community contacts emphasized the

⁷ Annualized Persons (ANP): Number CD qualified service hours divided by 2,000 work hours in a year

great need for a multitude of social services, including affordable housing, community outreach, and economic growth. Whitaker provided needed community service to these areas through a multitude of activities.

METROPOLITAN AREAS
(Limited-scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS

As of June 30, 2019, Whitaker operated eight branches in this assessment area, representing 22.9% of its branches. As of June 30, 2019, Whitaker had \$268.5 million in deposits in this assessment area, representing a market share of 2.5% and 28.8% of its deposits.

The assessment area consist of Bourbon, Clark, Fayette, Jessamine, Scott and Woodford Counties. Of the 129 census tracts in the assessment area, 11 are low- (8.5%), 30 are moderate- (23.3%), 53 are middle- (41%), and 35 are upper-income (27.1%).

Between January 1, 2017 and December 31, 2018 Whitaker originated 202 small business loans, 124 small farm loans, 151 HMDA loans and two community development loans in the assessment area. Based on Whitaker's lending volume, a limited scope review was conducted in this assessment area.

Details of Whitaker's small business, HMDA, small farm lending, and lending by peers can be found in Appendices F and H.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN
LEXINGTON-FAYETTE KENTUCKY MSA #30460**

The institution's lending performance in the area is below the institution's lending performance overall; however, it does not change the rating for the institution.

During the evaluation period, Whitaker originated a majority of its loans in the assessment area; however, significant lending gaps were noted. Whitaker has a poor geographic distribution of loans, an adequate distribution of loans based on borrower income levels, and a good distribution of loans to businesses and small farms of different revenue sizes. Whitaker originated two community development loans in this assessment area, which is considered adequate.

The institution's investment performance in the area is below the institution's investment performance overall; however, it does not change the rating for the institution. In the assessment area, Whitaker made two qualified investments.

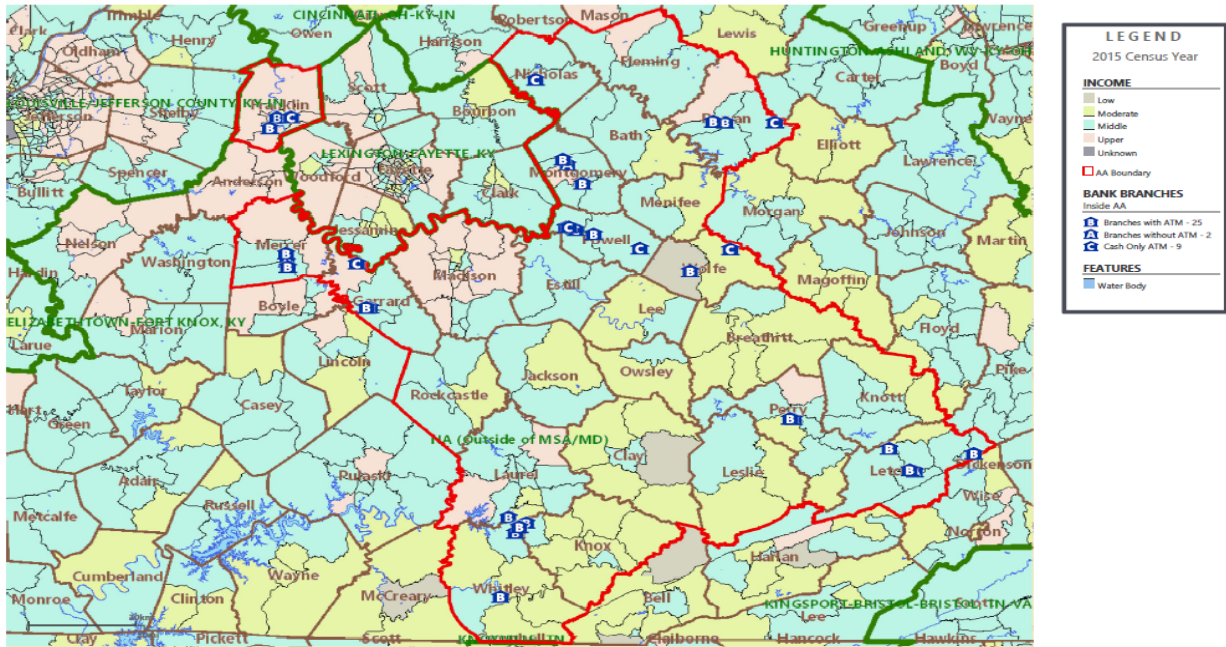
The institution's service performance in the area is below the institution's service performance overall; however, it does not change the rating for the institution. Although retail services were accessible, Whitaker provided only an adequate level of services to the assessment area.

APPENDIX A

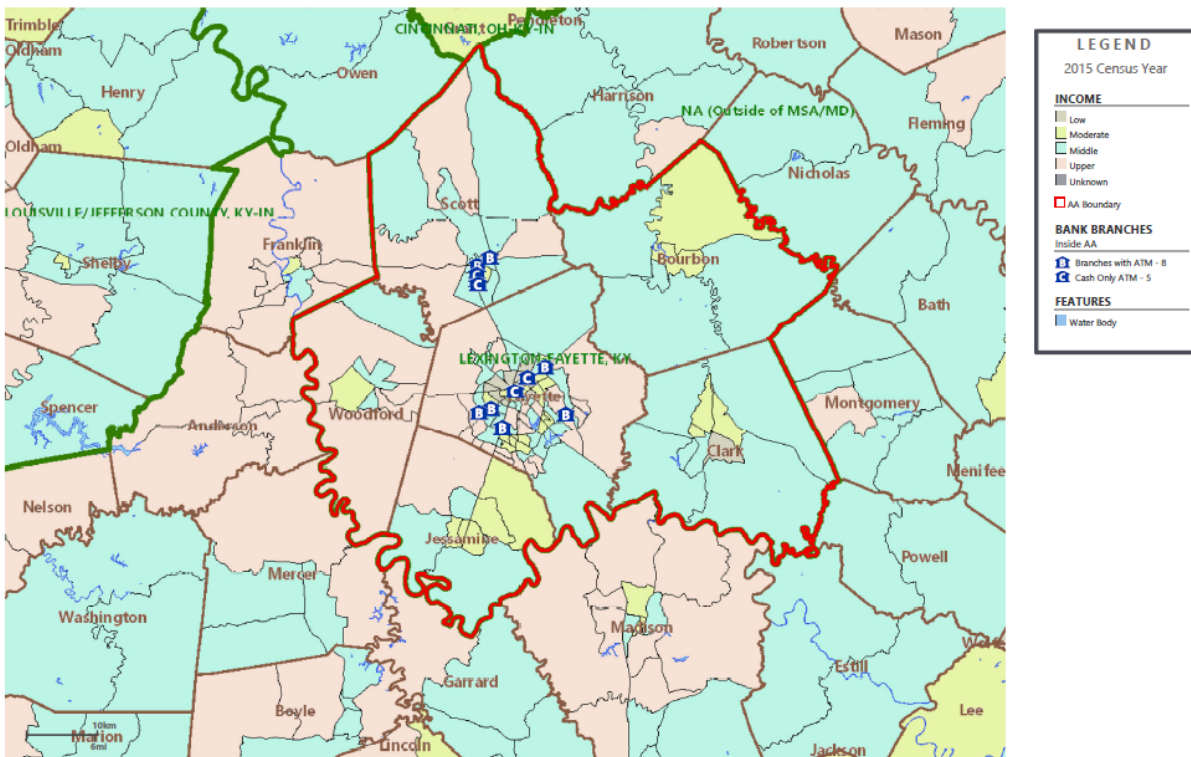
SCOPE OF EVALUATION

TIME PERIOD REVIEWED	January 1, 2017 through June 30, 2019 (Lending) September 12, 2017 through January 6, 2020 (Community Development Activities)		
FINANCIAL INSTITUTION Whitaker Bank, Incorporated Lexington, Kentucky			PRODUCTS REVIEWED HMDA Reportable CRA Reportable
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
None	None	None	
LIST OF ASSESSMENT AREAS AND TYPE OF EVALUATION			
ASSESSMENT AREA	TYPE OF REVIEW	BRANCHES VISITED	OTHER INFORMATION
Non-Metropolitan Kentucky	Full-Scope Review	None	N/A
Lexington-Fayette KY MSA #30460	Limited Scope Review	None	

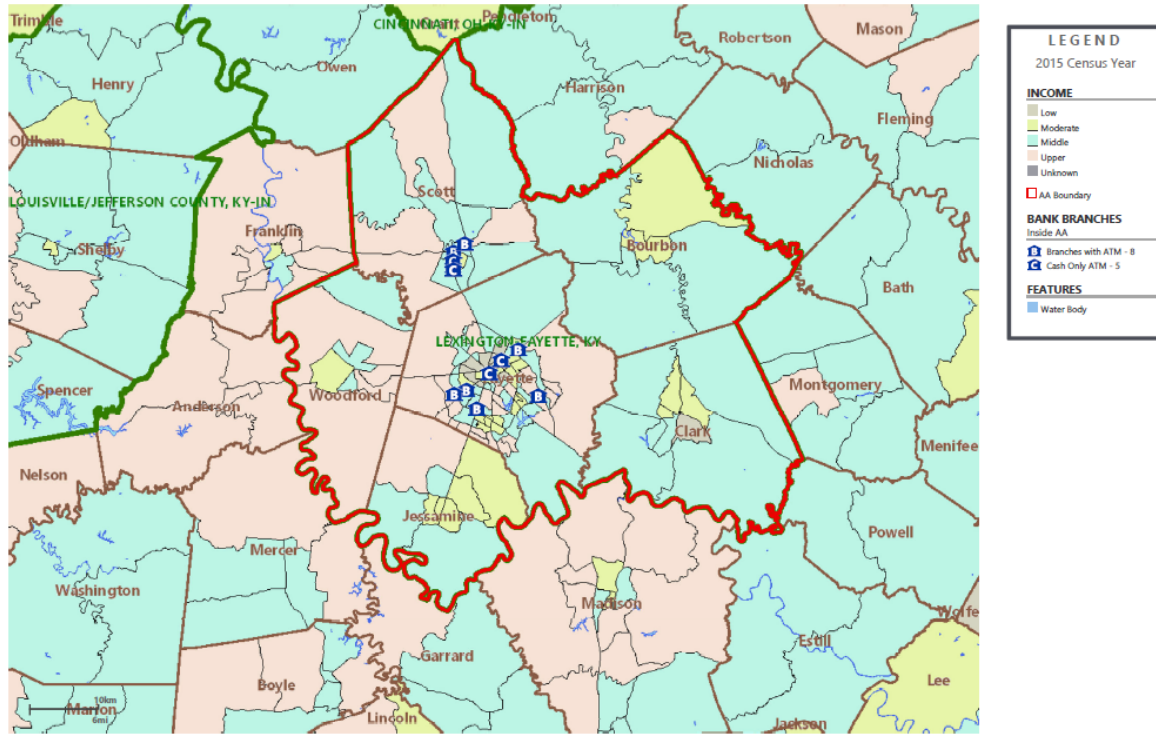
Assessment Area: 2018 Non-metropolitan Kentucky



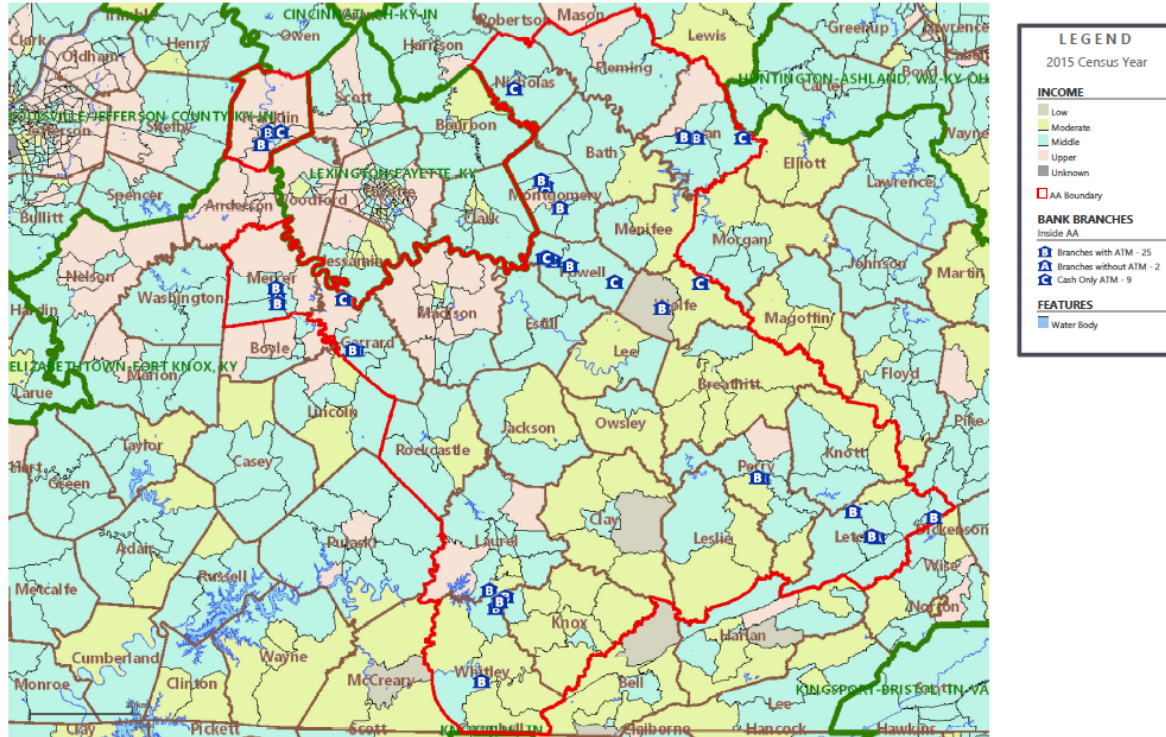
Assessment Area: 2018 Lexington-Fayette, KY MSA



Assessment Area: 2019 Lexington-Fayette, KY MSA



Assessment Area: 2019 Non-metropolitan Kentucky



APPENDIX C
FULL-SCOPE LENDING TABLES

CRA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Income Categories	Assessment Area/Group: 2017 Non-metropolitan Kentucky											
	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	11	2.8%	455	1.7%	9	5.3%	121	1.9%	0	0.0%	0	0.0%
Moderate	34	8.5%	2,065	7.5%	19	11.2%	529	8.3%	0	0.0%	0	0.0%
Low/Moderate Total	45	11.3%	2,520	9.2%	28	16.5%	650	10.2%	0	0.0%	0	0.0%
Middle	276	69.2%	19,355	70.4%	107	62.9%	4,353	68.5%	0	0.0%	0	0.0%
Upper	78	19.5%	5,629	20.5%	35	20.6%	1,350	21.2%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	399	100.0%	27,504	100.0%	170	100.0%	6,353	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	325	81.5%	13,530	49.2%	164	96.5%	6,138	96.6%	0	0.0%	0	0.0%
Over \$1 Million	55	13.8%	12,755	46.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Not Known	19	4.8%	1,219	4.4%	6	3.5%	215	3.4%	0	0.0%	0	0.0%
Total	399	100.0%	27,504	100.0%	170	100.0%	6,353	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	343	86.0%	8,961	32.6%	160	94.1%	4,021	63.3%	0	0.0%	0	0.0%
\$100,001 - \$250,000	29	7.3%	5,030	18.3%	5	2.9%	689	10.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	27	6.8%	13,513	49.1%	5	2.9%	1,643	25.9%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	399	100.0%	27,504	100.0%	170	100.0%	6,353	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	301	92.6%	7,207	53.3%	155	94.5%	3,926	64.0%	0	0.0%	0	0.0%
\$100,001 - \$250,000	15	4.6%	2,648	19.6%	4	2.4%	569	9.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	9	2.8%	3,675	27.2%	5	3.0%	1,643	26.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	325	100.0%	13,530	100.0%	164	100.0%	6,138	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Income Categories	Assessment Area/Group: 2018 Non-metropolitan Kentucky											
	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	12	3.3%	278	1.2%	5	3.2%	403	6.9%	0	0.0%	0	0.0%
Moderate	27	7.3%	1,555	6.5%	10	6.4%	251	4.3%	0	0.0%	0	0.0%
Low/Moderate Total	39	10.6%	1,833	7.7%	15	9.6%	654	11.2%	0	0.0%	0	0.0%
Middle	277	75.1%	19,083	79.7%	111	71.2%	4,199	71.7%	0	0.0%	0	0.0%
Upper	53	14.4%	3,026	12.6%	30	19.2%	1,000	17.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	369	100.0%	23,942	100.0%	156	100.0%	5,853	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	295	79.9%	13,170	55.0%	145	92.9%	5,496	93.9%	0	0.0%	0	0.0%
Over \$1 Million	39	10.6%	9,073	37.9%	2	1.3%	90	1.5%	0	0.0%	0	0.0%
Not Known	35	9.5%	1,699	7.1%	9	5.8%	267	4.6%	0	0.0%	0	0.0%
Total	369	100.0%	23,942	100.0%	156	100.0%	5,853	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	319	86.4%	8,236	34.4%	147	94.2%	4,068	69.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	31	8.4%	5,113	21.4%	6	3.8%	850	14.5%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	19	5.1%	10,593	44.2%	3	1.9%	935	16.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	369	100.0%	23,942	100.0%	156	100.0%	5,853	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	269	91.2%	6,610	50.2%	137	94.5%	3,831	69.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	18	6.1%	2,849	21.6%	5	3.4%	730	13.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	8	2.7%	3,711	28.2%	3	2.1%	935	17.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	295	100.0%	13,170	100.0%	145	100.0%	5,496	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group: 2019 Non-metropolitan Kentucky

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	4	2.0%	67	0.6%	1	1.4%	33	1.1%
Moderate	15	7.6%	558	4.7%	6	8.5%	140	4.8%
<i>Low/Moderate Total</i>	<i>19</i>	<i>9.6%</i>	<i>625</i>	<i>5.3%</i>	<i>7</i>	<i>9.9%</i>	<i>173</i>	<i>5.9%</i>
Middle	141	71.2%	9,139	77.7%	48	67.6%	2,067	70.9%
Upper	38	19.2%	1,991	16.9%	16	22.5%	675	23.2%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>198</i>	<i>100.0%</i>	<i>11,755</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>2,915</i>	<i>100.0%</i>
	By Revenue							
Total \$1 Million or Less	157	79.3%	5,460	46.4%	61	85.9%	2,414	82.8%
Over \$1 Million	26	13.1%	5,010	42.6%	1	1.4%	269	9.2%
Not Known	15	7.6%	1,285	10.9%	9	12.7%	232	8.0%
<i>Total</i>	<i>198</i>	<i>100.0%</i>	<i>11,755</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>2,915</i>	<i>100.0%</i>
	By Loan Size							
\$100,000 or less	172	86.9%	4,839	41.2%	67	94.4%	1,904	65.3%
\$100,001 - \$250,000	16	8.1%	2,605	22.2%	1	1.4%	167	5.7%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	10	5.1%	4,311	36.7%	3	4.2%	844	29.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>198</i>	<i>100.0%</i>	<i>11,755</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>2,915</i>	<i>100.0%</i>
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	146	93.0%	3,499	64.1%	58	95.1%	1,672	69.3%
\$100,001 - \$250,000	9	5.7%	1,306	23.9%	1	1.6%	167	6.9%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	1.3%	655	12.0%	2	3.3%	575	23.8%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>157</i>	<i>100.0%</i>	<i>5,460</i>	<i>100.0%</i>	<i>61</i>	<i>100.0%</i>	<i>2,414</i>	<i>100.0%</i>

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Assessment Area/Group :2017 Non-metropolitan Kentucky

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	7	5.6%	405	3.8%	3	2.4%	90	0.8%
Moderate	9	7.1%	496	4.7%	22	17.5%	1,159	10.9%
Low/Moderate Total	16	12.7%	901	8.5%	25	19.8%	1,249	11.8%
Middle	86	68.3%	7,969	75.3%	24	19.0%	1,389	13.1%
Upper	24	19.0%	1,719	16.2%	62	49.2%	6,519	61.6%
Unknown	0	0.0%	0	0.0%	15	11.9%	1,432	13.5%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	126	100.0%	10,589	100.0%	126	100.0%	10,589	100.0%
Refinance								
Low	6	6.6%	715	6.8%	5	5.5%	182	1.7%
Moderate	5	5.5%	497	4.7%	18	19.8%	1,401	13.2%
Low/Moderate Total	11	12.1%	1,212	11.4%	23	25.3%	1,583	14.9%
Middle	66	72.5%	7,226	68.2%	10	11.0%	864	8.2%
Upper	14	15.4%	2,153	20.3%	41	45.1%	4,189	39.6%
Unknown	0	0.0%	0	0.0%	17	18.7%	3,955	37.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	91	100.0%	10,591	100.0%	91	100.0%	10,591	100.0%
Home Improvement								
Low	17	8.0%	305	6.5%	38	17.8%	335	7.2%
Moderate	17	8.0%	174	3.7%	48	22.5%	465	10.0%
Low/Moderate Total	34	16.0%	479	10.3%	86	40.4%	800	17.2%
Middle	153	71.8%	3,831	82.3%	49	23.0%	783	16.8%
Upper	26	12.2%	347	7.5%	73	34.3%	2,460	52.8%
Unknown	0	0.0%	0	0.0%	5	2.3%	614	13.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	213	100.0%	4,657	100.0%	213	100.0%	4,657	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	1	50.0%	223	60.9%	0	0.0%	0	0.0%
Upper	1	50.0%	143	39.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	366	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	366	100.0%	2	100.0%	366	100.0%
HMDA Totals								
Low	30	6.9%	1,425	5.4%	46	10.6%	607	2.3%
Moderate	31	7.2%	1,167	4.5%	88	20.4%	3,025	11.5%
Low/Moderate Total	61	14.1%	2,592	9.9%	134	31.0%	3,632	13.9%
Middle	306	70.8%	19,249	73.3%	83	19.2%	3,036	11.6%
Upper	65	15.0%	4,362	16.6%	176	40.7%	13,168	50.3%
Unknown	0	0.0%	0	0.0%	39	9.0%	6,367	24.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	432	100.0%	26,203	100.0%	432	100.0%	26,203	100.0%

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2018 Non-metropolitan Kentucky

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	6	5.7%	748	8.9%	7	6.7%	240	2.9%
Moderate	14	13.3%	1,520	18.1%	19	18.1%	799	9.5%
Low/Moderate Total	20	19.0%	2,268	27.0%	26	24.8%	1,039	12.4%
Middle	74	70.5%	5,035	60.0%	17	16.2%	879	10.5%
Upper	11	10.5%	1,095	13.0%	44	41.9%	4,280	51.0%
Unknown	0	0.0%	0	0.0%	18	17.1%	2,200	26.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	105	100.0%	8,398	100.0%	105	100.0%	8,398	100.0%
Refinance								
Low	4	4.3%	142	1.7%	6	6.5%	511	6.3%
Moderate	5	5.4%	205	2.5%	21	22.6%	1,040	12.7%
Low/Moderate Total	9	9.7%	347	4.3%	27	29.0%	1,551	19.0%
Middle	64	68.8%	5,001	61.3%	16	17.2%	921	11.3%
Upper	20	21.5%	2,814	34.5%	43	46.2%	4,899	60.0%
Unknown	0	0.0%	0	0.0%	7	7.5%	791	9.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	93	100.0%	8,162	100.0%	93	100.0%	8,162	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	7.1%	51	8.8%	2	14.3%	46	8.0%
Low/Moderate Total	1	7.1%	51	8.8%	2	14.3%	46	8.0%
Middle	11	78.6%	484	83.9%	4	28.6%	134	23.2%
Upper	2	14.3%	42	7.3%	8	57.1%	397	68.8%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	577	100.0%	14	100.0%	577	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	1	14.3%	350	18.8%	0	0.0%	0	0.0%
Low/Moderate Total	1	14.3%	350	18.8%	0	0.0%	0	0.0%
Middle	4	57.1%	962	51.6%	0	0.0%	0	0.0%
Upper	2	28.6%	553	29.7%	2	28.6%	619	33.2%
Unknown	0	0.0%	0	0.0%	5	71.4%	1,246	66.8%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	1,865	100.0%	7	100.0%	1,865	100.0%
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	4	15.4%	213	20.6%
Moderate	4	15.4%	86	8.3%	4	15.4%	139	13.4%
Low/Moderate Total	4	15.4%	86	8.3%	8	30.8%	352	34.0%
Middle	19	73.1%	794	76.7%	8	30.8%	288	27.8%
Upper	3	11.5%	155	15.0%	9	34.6%	372	35.9%
Unknown	0	0.0%	0	0.0%	1	3.8%	23	2.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	26	100.0%	1,035	100.0%	26	100.0%	1,035	100.0%
Loan Purpose Not Applicable								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group 2018 Non-metropolitan Kentucky

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HMDA Totals							
Low	10	4.1%	890	4.4%	17	6.9%	964	4.8%
Moderate	25	10.2%	2,212	11.0%	46	18.8%	2,024	10.1%
Low/Moderate Total	35	14.3%	3,102	15.5%	63	25.7%	2,988	14.9%
Middle	172	70.2%	12,276	61.3%	45	18.4%	2,222	11.1%
Upper	38	15.5%	4,659	23.3%	106	43.3%	10,567	52.7%
Unknown	0	0.0%	0	0.0%	31	12.7%	4,260	21.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	245	100.0%	20,037	100.0%	245	100.0%	20,037	100.0%

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data
Assessment Area/Group: 2019 Non-metropolitan Kentucky

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	8	15.1%	538	11.9%	4	7.5%	216	4.8%
Moderate	5	9.4%	768	17.0%	7	13.2%	259	5.7%
<i>Low/Moderate Total</i>	<i>13</i>	<i>24.5%</i>	<i>1,306</i>	<i>28.9%</i>	<i>11</i>	<i>20.8%</i>	<i>474</i>	<i>10.5%</i>
Middle	36	67.9%	2,963	65.7%	9	17.0%	514	11.4%
Upper	4	7.5%	244	5.4%	24	45.3%	2,574	57.0%
Unknown	0	0.0%	0	0.0%	9	17.0%	951	21.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>4,513</i>	<i>100.0%</i>	<i>53</i>	<i>100.0%</i>	<i>4,513</i>	<i>100.0%</i>
	Refinance							
Low	2	5.9%	345	9.6%	1	2.9%	100	2.8%
Moderate	2	5.9%	105	2.9%	7	20.6%	455	12.7%
<i>Low/Moderate Total</i>	<i>4</i>	<i>11.8%</i>	<i>451</i>	<i>12.6%</i>	<i>8</i>	<i>23.5%</i>	<i>554</i>	<i>15.5%</i>
Middle	19	55.9%	1,907	53.3%	7	20.6%	418	11.7%
Upper	11	32.4%	1,223	34.1%	15	44.1%	2,015	56.3%
Unknown	0	0.0%	0	0.0%	4	11.8%	594	16.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>34</i>	<i>100.0%</i>	<i>3,581</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>3,581</i>	<i>100.0%</i>
	Home Improvement							
Low	0	0.0%	0	0.0%	2	16.7%	50	9.2%
Moderate	0	0.0%	0	0.0%	2	16.7%	105	19.3%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>4</i>	<i>33.3%</i>	<i>155</i>	<i>28.5%</i>
Middle	10	83.3%	449	82.6%	2	16.7%	135	24.8%
Upper	2	16.7%	95	17.4%	5	41.7%	173	31.8%
Unknown	0	0.0%	0	0.0%	1	8.3%	81	15.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>543</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>543</i>	<i>100.0%</i>
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	3	100.0%	724	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	724	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>724</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>724</i>	<i>100.0%</i>
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group: 2019 Non-metropolitan Kentucky

	Other Purpose Closed/Exempt							
Low	1	7.1%	17	3.1%	1	7.1%	17	3.2%
Moderate	1	7.1%	12	2.2%	4	28.6%	119	22.2%
<i>Low/Moderate Total</i>	<i>2</i>	<i>14.3%</i>	<i>29</i>	<i>5.3%</i>	<i>5</i>	<i>35.7%</i>	<i>136</i>	<i>25.4%</i>
Middle	8	57.1%	300	56.0%	2	14.3%	113	21.1%
Upper	4	28.6%	207	38.6%	7	50.0%	287	53.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>14</i>	<i>100.0%</i>	<i>536</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>536</i>	<i>100.0%</i>
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
	HMDA Totals							
Low	11	9.5%	900	9.1%	8	6.9%	382	3.9%
Moderate	8	6.9%	885	8.9%	20	17.2%	937	9.5%
<i>Low/Moderate Total</i>	<i>19</i>	<i>16.4%</i>	<i>1,785</i>	<i>18.0%</i>	<i>28</i>	<i>24.1%</i>	<i>1,319</i>	<i>13.3%</i>
Middle	76	65.5%	6,343	64.1%	20	17.2%	1,179	11.9%
Upper	21	18.1%	1,768	17.9%	51	44.0%	5,048	51.0%
Unknown	0	0.0%	0	0.0%	17	14.7%	2,350	23.7%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>116</i>	<i>100.0%</i>	<i>9,897</i>	<i>100.0%</i>	<i>116</i>	<i>100.0%</i>	<i>9,896</i>	<i>100.0%</i>

APPENDIX D

FULL SCOPE DEMOGRAPHIC TABLES
Combined Demographics Report

Assessment Area(s): 2017 Non-metropolitan Kentucky

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	1.4	1,723	1.1	764	44.3	38,909	25.6
Moderate-income	41	28.3	34,279	22.6	9,354	27.3	24,551	16.2
Middle-income	76	52.4	84,101	55.4	17,301	20.6	26,202	17.2
Upper-income	26	17.9	31,837	21.0	3,133	9.8	62,278	41.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	145	100.0	151,940	100.0	30,552	20.1	151,940	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	3,641	1,988	1.3	54.6	956	26.3	697	19.1
Moderate-income	60,634	35,245	22.9	58.1	15,608	25.7	9,781	16.1
Middle-income	145,659	84,295	54.7	57.9	41,647	28.6	19,717	13.5
Upper-income	50,595	32,704	21.2	64.6	13,028	25.7	4,863	9.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	260,529	154,232	100.0	59.2	71,239	27.3	35,058	13.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	111	0.7	97	0.6	9	0.7	5	1.3
Moderate-income	3,069	18.4	2,713	18.2	259	19.9	97	24.9
Middle-income	9,734	58.5	8,737	58.5	790	60.6	207	53.1
Upper-income	3,727	22.4	3,400	22.7	246	18.9	81	20.8
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	16,641	100.0	14,947	100.0	1,304	100.0	390	100.0
Percentage of Total Businesses:			89.8		7.8		2.3	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.4	3	0.4	0	0.0	0	0.0
Moderate-income	107	15.3	106	15.3	1	12.5	0	0.0
Middle-income	402	57.3	398	57.4	4	50.0	0	0.0
Upper-income	189	27.0	186	26.8	3	37.5	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	701	100.0	693	100.0	8	100.0	0	.0
Percentage of Total Farms:			98.9		1.1		.0	

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): 2018 Non-metropolitan Kentucky

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	2	1.4	1,723	1.1	764	44.3	38,909	25.6	
Moderate-income	41	28.3	34,279	22.6	9,354	27.3	24,551	16.2	
Middle-income	76	52.4	84,101	55.4	17,301	20.6	26,202	17.2	
Upper-income	26	17.9	31,837	21.0	3,133	9.8	62,278	41.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	145	100.0	151,940	100.0	30,552	20.1	151,940	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	3,641	1,988	1.3	54.6	956	26.3	697	19.1	
Moderate-income	60,634	35,245	22.9	58.1	15,608	25.7	9,781	16.1	
Middle-income	145,659	84,295	54.7	57.9	41,647	28.6	19,717	13.5	
Upper-income	50,595	32,704	21.2	64.6	13,028	25.7	4,863	9.6	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	260,529	154,232	100.0	59.2	71,239	27.3	35,058	13.5	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	141	0.8	126	0.7	11	0.9	4	0.9	
Moderate-income	3,342	17.8	2,980	17.5	249	19.3	113	24.6	
Middle-income	10,791	57.5	9,783	57.4	764	59.3	244	53.2	
Upper-income	4,508	24.0	4,145	24.3	265	20.6	98	21.4	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	18,782	100.0	17,034	100.0	1,289	100.0	459	100.0	
Percentage of Total Businesses:				90.7		6.9		2.4	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	3	0.4	3	0.4	0	0.0	0	0.0	
Moderate-income	120	15.1	117	15.0	1	11.1	2	40.0	
Middle-income	457	57.6	449	57.6	5	55.6	3	60.0	
Upper-income	213	26.9	210	27.0	3	33.3	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	793	100.0	779	100.0	9	100.0	5	100.0	
Percentage of Total Farms:				98.2		1.1		.6	

2018 FFIEC Census Data and 2018 D&B Information

Combined Demographics Report

Assessment Area(s): 2019 Non-metropolitan Kentucky

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	1.4	1,723	1.1	764	44.3	38,981	25.7
Moderate-income	41	28.3	34,279	22.6	9,354	27.3	24,561	16.2
Middle-income	76	52.4	84,101	55.4	17,301	20.6	26,220	17.3
Upper-income	26	17.9	31,837	21.0	3,133	9.8	62,178	40.9
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	145	100.0	151,940	100.0	30,552	20.1	151,940	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	3,641	1,988	1.3	54.6	956	26.3	697	19.1
Moderate-income	60,634	35,245	22.9	58.1	15,608	25.7	9,781	16.1
Middle-income	145,659	84,295	54.7	57.9	41,647	28.6	19,717	13.5
Upper-income	50,595	32,704	21.2	64.6	13,028	25.7	4,863	9.6
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	260,529	154,232	100.0	59.2	71,239	27.3	35,058	13.5
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	141	0.8	126	0.7	11	0.9	4	0.9
Moderate-income	3,342	17.8	2,980	17.5	249	19.3	113	24.6
Middle-income	10,791	57.5	9,783	57.4	764	59.3	244	53.2
Upper-income	4,508	24.0	4,145	24.3	265	20.6	98	21.4
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	18,782	100.0	17,034	100.0	1,289	100.0	459	100.0
Percentage of Total Businesses:				90.7		6.9		2.4
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.4	3	0.4	0	0.0	0	0.0
Moderate-income	120	15.1	117	15.0	1	11.1	2	40.0
Middle-income	457	57.6	449	57.6	5	55.6	3	60.0
Upper-income	213	26.9	210	27.0	3	33.3	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	793	100.0	779	100.0	9	100.0	5	100.0
Percentage of Total Farms:				98.2		1.1		.6

2019 FFIEC Census Data and 2018 D&B Information

APPENDIX E

FULL-SCOPE PEER TABLES

Peer Group CRA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Selected Year: 2017

2017 Non-metropolitan Kentucky

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income				By Tract Income			
Low	44	0.8 %	1,830	1.0 %	9	1.5 %	121	0.6 %	0	0.0 %	0	0.0 %
Moderate	876	16.0 %	25,160	13.9 %	51	8.6 %	1,767	8.3 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Income</i>	920	16.8 %	26,990	14.9 %	60	10.2 %	1,888	8.8 %	0	0.0 %	0	0.0 %
Middle	3,052	55.8 %	105,822	58.6 %	389	65.8 %	15,709	73.5 %	0	0.0 %	0	0.0 %
Upper	1,404	25.7 %	45,797	25.4 %	141	23.9 %	3,748	17.5 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Tract Unknown	91	1.7 %	1,984	1.1 %	1	0.2 %	26	0.1 %	0	0.0 %	0	0.0 %
Total	5,407	100%	180,593	100%	591	100%	21,371	100%	0	0.0%	0	0.0%
	By Revenue				By Revenue				By Revenue			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Loan Size				By Loan Size				By Loan Size			
Total \$1 Million or Less	2,737	50.1 %	83,076	46.0 %	389	65.8 %	17,308	81.0 %	0	0.0 %	0	0.0 %
\$100,000 or Less	5,145	94.1 %	75,048	41.6 %	547	92.6 %	11,922	55.8 %	0	0.0 %	0	0.0 %
\$100,001 - \$250,000	178	3.3 %	29,571	16.4 %	31	5.2 %	4,872	22.8 %	0	0.0 %	0	0.0 %
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	144	2.6 %	75,974	42.1 %	13	2.2 %	4,577	21.4 %	0	0.0 %	0	0.0 %
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	5,407	100%	180,593	100%	591	100%	21,371	100%	0	0.0%	0	0.0%

Peer Group CRA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Selected Year: 2018

2018 Non-metropolitan Kentucky

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income			
Low	51	0.9 %	600	0.3 %	6	0.9 %	455	2.0 %
Moderate	869	15.1 %	22,363	12.2 %	73	10.9 %	1,990	8.6 %
<i>Low/Moderate Income</i>	920	16.0 %	22,963	12.5 %	79	11.8 %	2,445	10.6 %
Middle	3,235	56.2 %	110,533	60.3 %	444	66.5 %	15,885	69.0 %
Upper	1,453	25.2 %	47,414	25.9 %	139	20.8 %	4,677	20.3 %
Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Tract Unknown	152	2.6 %	2,335	1.3 %	6	0.9 %	30	0.1 %
Total	5,760	100%	183,245	100%	668	100%	23,037	100%
	By Revenue				By Revenue			
	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Loan Size				By Loan Size			
Total \$1 Million or Less	2,556	44.4 %	71,365	38.9 %	353	52.8 %	17,600	76.4 %
\$100,000 or Less	5,406	93.9 %	74,332	40.6 %	616	92.2 %	12,135	52.7 %
\$100,001 - \$250,000	210	3.6 %	34,864	19.0 %	42	6.3 %	7,060	30.6 %
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	144	2.5 %	74,049	40.4 %	10	1.5 %	3,842	16.7 %
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	5,760	100%	183,245	100%	668	100%	23,037	100%

Peer Group HMDA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Selected Year: 2017

2017 Non-metropolitan Kentucky

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	39	0.6 %	3,787	0.4 %	216	3.3 %	12,704	1.5 %
Moderate	830	12.7 %	83,657	9.7 %	969	14.8 %	83,982	9.7 %
<i>Low/Moderate Total</i>	<i>869</i>	<i>13.3 %</i>	<i>87,444</i>	<i>10.1 %</i>	<i>1,185</i>	<i>18.1 %</i>	<i>96,686</i>	<i>11.2 %</i>
Middle	3,446	52.7 %	419,048	48.6 %	1,443	22.0 %	166,044	19.3 %
Upper	2,226	34.0 %	354,873	41.2 %	2,562	39.1 %	420,268	48.8 %
Unknown	4	0.1 %	172	0.0 %	1,355	20.7 %	178,539	20.7 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	6,545	100.0 %	861,537	100.0 %	6,545	100.0 %	861,537	100.0 %
	Refinance							
Low	20	0.7 %	2,293	0.6 %	114	4.1 %	7,404	1.9 %
Moderate	337	12.0 %	37,644	9.8 %	318	11.3 %	27,132	7.0 %
<i>Low/Moderate Total</i>	<i>357</i>	<i>12.7 %</i>	<i>39,937</i>	<i>10.4 %</i>	<i>432</i>	<i>15.4 %</i>	<i>34,536</i>	<i>9.0 %</i>
Middle	1,421	50.6 %	181,187	47.1 %	476	16.9 %	51,849	13.5 %
Upper	1,030	36.7 %	163,723	42.5 %	1,370	48.8 %	218,759	56.8 %
Unknown	2	0.1 %	176	0.0 %	532	18.9 %	79,879	20.7 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	2,810	100.0 %	385,023	100.0 %	2,810	100.0 %	385,023	100.0 %
	Home Improvement							
Low	22	2.3 %	490	1.1 %	101	10.6 %	1,783	3.9 %
Moderate	161	16.9 %	6,399	14.0 %	169	17.7 %	3,338	7.3 %
<i>Low/Moderate Total</i>	<i>183</i>	<i>19.2 %</i>	<i>6,889</i>	<i>15.0 %</i>	<i>270</i>	<i>28.3 %</i>	<i>5,121</i>	<i>11.2 %</i>
Middle	551	57.8 %	22,511	49.2 %	208	21.8 %	6,543	14.3 %
Upper	218	22.9 %	16,313	35.6 %	424	44.4 %	29,804	65.1 %
Unknown	2	0.2 %	73	0.2 %	52	5.5 %	4,318	9.4 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	954	100.0 %	45,786	100.0 %	954	100.0 %	45,786	100.0 %
	Multi-Family							
Low	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Moderate	9	19.6 %	9,108	26.4 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>9</i>	<i>19.6 %</i>	<i>9,108</i>	<i>26.4 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	23	50.0 %	14,697	42.6 %	0	0.0 %	0	0.0 %
Upper	13	28.3 %	8,634	25.0 %	0	0.0 %	0	0.0 %
Unknown	1	2.2 %	2,050	5.9 %	46	100.0 %	34,489	100.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	46	100.0 %	34,489	100.0 %	46	100.0 %	34,489	100.0 %
	HMDA Totals							
Low	81	0.8 %	6,570	0.5 %	431	4.2 %	21,891	1.6 %
Moderate	1,337	12.9 %	136,808	10.3 %	1,456	14.1 %	114,452	8.6 %
<i>Low/Moderate Total</i>	<i>1,418</i>	<i>13.7 %</i>	<i>143,378</i>	<i>10.8 %</i>	<i>1,887</i>	<i>18.2 %</i>	<i>136,343</i>	<i>10.3 %</i>
Middle	5,441	52.5 %	637,443	48.0 %	2,127	20.5 %	224,436	16.9 %
Upper	3,487	33.7 %	543,543	41.0 %	4,356	42.1 %	668,831	50.4 %
Unknown	9	0.1 %	2,471	0.2 %	1,985	19.2 %	297,225	22.4 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	10,355	100.0 %	1,326,835	100.0 %	10,355	100.0 %	1,326,835	100.0 %

Peer Group HMDA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Selected Year: 2018

2018 Non-metropolitan Kentucky

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	30	0.5 %	3,222	0.4 %	241	3.7 %	16,287	1.8 %
Moderate	827	12.5 %	87,785	9.9 %	1,022	15.5 %	90,550	10.2 %
<i>Low/Moderate Total</i>	<i>857</i>	<i>13.0 %</i>	<i>91,007</i>	<i>10.2 %</i>	<i>1,263</i>	<i>19.2 %</i>	<i>106,837</i>	<i>12.0 %</i>
Middle	3,424	51.9 %	418,463	47.1 %	1,639	24.9 %	193,390	21.8 %
Upper	2,301	34.9 %	377,286	42.5 %	2,502	37.9 %	424,581	47.8 %
Unknown	12	0.2 %	1,326	0.1 %	1,190	18.0 %	163,274	18.4 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	6,594	100.0 %	888,082	100.0 %	6,594	100.0 %	888,082	100.0 %
	Refinance							
Low	11	0.4 %	1,107	0.3 %	154	5.7 %	10,258	3.2 %
Moderate	347	12.9 %	33,608	10.4 %	376	14.0 %	29,626	9.2 %
<i>Low/Moderate Total</i>	<i>358</i>	<i>13.3 %</i>	<i>34,715</i>	<i>10.8 %</i>	<i>530</i>	<i>19.7 %</i>	<i>39,884</i>	<i>12.4 %</i>
Middle	1,375	51.2 %	154,618	47.9 %	537	20.0 %	51,812	16.1 %
Upper	952	35.4 %	132,995	41.2 %	1,328	49.4 %	190,026	58.9 %
Unknown	2	0.1 %	178	0.1 %	292	10.9 %	40,784	12.6 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	2,687	100.0 %	322,506	100.0 %	2,687	100.0 %	322,506	100.0 %
	Home Improvement							
Low	1	0.2 %	206	0.7 %	19	3.4 %	637	2.3 %
Moderate	62	11.1 %	2,527	9.2 %	50	9.0 %	1,947	7.1 %
<i>Low/Moderate Total</i>	<i>63</i>	<i>11.3 %</i>	<i>2,733</i>	<i>9.9 %</i>	<i>69</i>	<i>12.4 %</i>	<i>2,584</i>	<i>9.4 %</i>
Middle	255	45.8 %	11,617	42.2 %	113	20.3 %	4,786	17.4 %
Upper	239	42.9 %	13,180	47.9 %	319	57.3 %	16,495	59.9 %
Unknown	0	0.0 %	0	0.0 %	56	10.1 %	3,665	13.3 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	557	100.0 %	27,530	100.0 %	557	100.0 %	27,530	100.0 %
	Multi-Family							
Low	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Moderate	19	20.9 %	9,926	16.0 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>19</i>	<i>20.9 %</i>	<i>9,926</i>	<i>16.0 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	46	50.5 %	31,324	50.6 %	0	0.0 %	0	0.0 %
Upper	26	28.6 %	20,599	33.3 %	11	12.1 %	3,559	5.8 %
Unknown	0	0.0 %	0	0.0 %	80	87.9 %	58,290	94.2 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	91	100.0 %	61,849	100.0 %	91	100.0 %	61,849	100.0 %
	Other Purpose LOC							
Low	1	0.4 %	20	0.1 %	17	6.0 %	601	3.8 %
Moderate	35	12.3 %	1,873	11.9 %	35	12.3 %	1,460	9.3 %
<i>Low/Moderate Total</i>	<i>36</i>	<i>12.6 %</i>	<i>1,893</i>	<i>12.0 %</i>	<i>52</i>	<i>18.2 %</i>	<i>2,061</i>	<i>13.1 %</i>
Middle	142	49.8 %	7,358	46.8 %	62	21.8 %	2,821	17.9 %
Upper	107	37.5 %	6,469	41.2 %	165	57.9 %	10,375	66.0 %
Unknown	0	0.0 %	0	0.0 %	6	2.1 %	463	2.9 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	285	100.0 %	15,720	100.0 %	285	100.0 %	15,720	100.0 %
	Other Purpose Closed/Exempt							
Low	2	0.9 %	142	1.1 %	15	6.8 %	625	5.0 %
Moderate	32	14.4 %	1,404	11.3 %	24	10.8 %	1,237	9.9 %

<i>Low/Moderate Total</i>	34	15.3 %	1,546	12.4 %	39	17.6 %	1,862	14.9 %
Middle	94	42.3 %	4,821	38.6 %	47	21.2 %	1,875	15.0 %
Upper	94	42.3 %	6,108	49.0 %	115	51.8 %	7,422	59.5 %
Unknown	0	0.0 %	0	0.0 %	21	9.5 %	1,316	10.5 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	222	100.0 %	12,473	100.0 %	222	100.0 %	12,473	100.0 %
NA Purpose								
Low	1	0.4 %	75	0.2 %	1	0.4 %	40	0.1 %
Moderate	46	17.3 %	3,497	11.5 %	4	1.5 %	440	1.5 %
<i>Low/Moderate Total</i>	47	17.7 %	3,572	11.8 %	5	1.9 %	480	1.6 %
Middle	133	50.0 %	11,954	39.4 %	7	2.6 %	573	1.9 %
Upper	85	32.0 %	14,728	48.6 %	6	2.3 %	503	1.7 %
Unknown	1	0.4 %	67	0.2 %	248	93.2 %	28,765	94.9 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	266	100.0 %	30,321	100.0 %	266	100.0 %	30,321	100.0 %
HMDA Totals								
Low	46	0.4 %	4,772	0.4 %	447	4.2 %	28,448	2.1 %
Moderate	1,368	12.8 %	140,620	10.4 %	1,511	14.1 %	125,260	9.2 %
<i>Low/Moderate Total</i>	1,414	13.2 %	145,392	10.7 %	1,958	18.3 %	153,708	11.3 %
Middle	5,469	51.1 %	640,155	47.1 %	2,405	22.5 %	255,257	18.8 %
Upper	3,804	35.5 %	571,365	42.1 %	4,446	41.5 %	652,961	48.1 %
Unknown	15	0.1 %	1,571	0.1 %	1,893	17.7 %	296,557	21.8 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	10,702	100.0 %	1,358,483	100.0 %	10,702	100.0 %	1,358,483	100.0 %

APPENDIX F

LIMITED-SCOPE LENDING TABLES

CRA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2017 Lending Data

Income Categories	Assessment Area/Group: 2017 Lexington-Fayette, KY MSA #30460											
	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	4	4.2%	830	12.6%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	13	13.5%	1,151	17.5%	1	1.7%	45	1.9%	0	0.0%	0	0.0%
Low/Moderate Total	17	17.7%	1,981	30.0%	1	1.7%	45	1.9%	0	0.0%	0	0.0%
Middle	47	49.0%	3,369	51.1%	40	67.8%	1,238	51.8%	0	0.0%	0	0.0%
Upper	32	33.3%	1,244	18.9%	18	30.5%	1,108	46.3%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	96	100.0%	6,594	100.0%	59	100.0%	2,391	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	81	84.4%	4,064	61.6%	51	86.4%	1,749	73.1%	0	0.0%	0	0.0%
Over \$1 Million	10	10.4%	2,100	31.8%	5	8.5%	598	25.0%	0	0.0%	0	0.0%
Not Known	5	5.2%	430	6.5%	3	5.1%	44	1.8%	0	0.0%	0	0.0%
Total	96	100.0%	6,594	100.0%	59	100.0%	2,391	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	77	80.2%	1,998	30.3%	55	93.2%	1,792	74.9%	0	0.0%	0	0.0%
\$100,001 - \$250,000	12	12.5%	2,102	31.9%	4	6.8%	599	25.1%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	7	7.3%	2,494	37.8%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	96	100.0%	6,594	100.0%	59	100.0%	2,391	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	70	86.4%	1,557	38.3%	49	96.1%	1,499	85.7%	0	0.0%	0	0.0%
\$100,001 - \$250,000	7	8.6%	1,272	31.3%	2	3.9%	250	14.3%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	4	4.9%	1,235	30.4%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	81	100.0%	4,064	100.0%	51	100.0%	1,749	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Income Categories	Assessment Area/Group: 2018 Lexington-Fayette, KY MSA #30460											
	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000s)	%	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income											
Low	2	1.9%	259	2.9%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	16	15.1%	1,507	16.7%	3	4.6%	131	3.8%	0	0.0%	0	0.0%
Low/Moderate Total	18	17.0%	1,766	19.6%	3	4.6%	131	3.8%	0	0.0%	0	0.0%
Middle	34	50.9%	5,158	57.3%	30	46.2%	1,207	34.6%	0	0.0%	0	0.0%
Upper	34	32.1%	2,084	23.1%	32	49.2%	2,149	61.6%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	106	100.0%	9,008	100.0%	65	100.0%	3,487	100.0%	0	0.0%	0	0.0%
	By Revenue											
Total \$1 Million or Less	74	69.8%	3,237	35.9%	53	81.5%	2,150	61.7%	0	0.0%	0	0.0%
Over \$1 Million	21	19.8%	4,418	49.0%	3	4.6%	375	10.8%	0	0.0%	0	0.0%
Not Known	11	10.4%	1,353	15.0%	9	13.8%	962	27.6%	0	0.0%	0	0.0%
Total	106	100.0%	9,008	100.0%	65	100.0%	3,487	100.0%	0	0.0%	0	0.0%
	By Loan Size											
\$100,000 or less	85	80.2%	2,428	27.0%	59	90.8%	1,617	46.4%	0	0.0%	0	0.0%
\$100,001 - \$250,000	12	11.3%	1,829	20.3%	3	4.6%	620	17.8%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	9	8.5%	4,751	52.7%	3	4.6%	1,250	35.8%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	106	100.0%	9,008	100.0%	65	100.0%	3,487	100.0%	0	0.0%	0	0.0%
	By Loan Size and Revenue \$1 Million or Less											
\$100,000 or less	66	89.2%	1,535	47.4%	51	96.2%	1,300	60.5%	0	0.0%	0	0.0%
\$100,001 - \$250,000	6	8.1%	1,012	31.3%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	2	2.7%	690	21.3%	2	3.8%	850	39.5%	0	0.0%	0	0.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	74	100.0%	3,237	100.0%	53	100.0%	2,150	100.0%	0	0.0%	0	0.0%

CRA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group: 2019 Lexington-Fayette, KY MSA #30460

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	By Tract Income							
Low	2	4.3%	1,130	20.4%	0	0.0%	0	0.0%
Moderate	9	19.6%	1,353	24.4%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>11</i>	<i>23.9%</i>	<i>2,483</i>	<i>44.8%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	23	50.0%	1,479	26.7%	18	52.9%	209	20.5%
Upper	12	26.1%	1,581	28.5%	16	47.1%	813	79.5%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>46</i>	<i>100.0%</i>	<i>5,543</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>1,022</i>	<i>100.0%</i>
	By Revenue							
Total \$1 Million or Less	35	76.1%	3,612	65.2%	27	79.4%	847	82.9%
Over \$1 Million	7	15.2%	949	17.1%	2	5.9%	125	12.2%
Not Known	4	8.7%	982	17.7%	5	14.7%	50	4.9%
<i>Total</i>	<i>46</i>	<i>100.0%</i>	<i>5,543</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>1,022</i>	<i>100.0%</i>
	By Loan Size							
\$100,000 or less	34	73.9%	1,114	20.1%	32	94.1%	551	53.9%
\$100,001 - \$250,000	7	15.2%	1,364	24.6%	1	2.9%	200	19.6%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	5	10.9%	3,065	55.3%	1	2.9%	271	26.5%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>46</i>	<i>100.0%</i>	<i>5,543</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>1,022</i>	<i>100.0%</i>
	By Loan Size and Revenue \$1 Million or Less							
\$100,000 or less	27	77.1%	783	21.7%	25	92.6%	376	44.4%
\$100,001 - \$250,000	5	14.3%	949	26.3%	1	3.7%	200	23.6%
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	3	8.6%	1,880	52.0%	1	3.7%	271	32.0%
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Total</i>	<i>35</i>	<i>100.0%</i>	<i>3,612</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>847</i>	<i>100.0%</i>

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Assessment Area/Group :2017 Lexington-Fayette, KY MSA #30460

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Purchase								
Low	1	3.0%	31	0.7%	2	6.1%	165	3.6%
Moderate	7	21.2%	721	15.8%	2	6.1%	166	3.6%
Low/Moderate Total	8	24.2%	752	16.5%	4	12.1%	331	7.3%
Middle	11	33.3%	1,048	23.0%	4	12.1%	363	8.0%
Upper	14	42.4%	2,753	60.5%	18	54.5%	2,705	59.4%
Unknown	0	0.0%	0	0.0%	7	21.2%	1,154	25.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	33	100.0%	4,553	100.0%	33	100.0%	4,553	100.0%
Refinance								
Low	0	0.0%	0	0.0%	5	17.9%	266	8.5%
Moderate	5	17.9%	384	12.3%	2	7.1%	62	2.0%
Low/Moderate Total	5	17.9%	384	12.3%	7	25.0%	328	10.5%
Middle	17	60.7%	2,161	69.1%	6	21.4%	420	13.4%
Upper	6	21.4%	584	18.7%	10	35.7%	1,563	50.0%
Unknown	0	0.0%	0	0.0%	5	17.9%	818	26.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	28	100.0%	3,129	100.0%	28	100.0%	3,129	100.0%
Home Improvement								
Low	0	0.0%	0	0.0%	4	21.1%	26	4.3%
Moderate	0	0.0%	0	0.0%	6	31.6%	289	47.4%
Low/Moderate Total	0	0.0%	0	0.0%	10	52.6%	315	51.6%
Middle	14	73.7%	564	92.5%	4	21.1%	161	26.4%
Upper	5	26.3%	46	7.5%	5	26.3%	134	22.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	19	100.0%	610	100.0%	19	100.0%	610	100.0%
Multi-Family								
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	2	100.0%	2,907	100.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	2	100.0%	2,907	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	2,907	100.0%	2	100.0%	2,907	100.0%
HMDA Totals								
Low	1	1.2%	31	0.3%	11	13.4%	457	4.1%
Moderate	12	14.6%	1,105	9.9%	10	12.2%	517	4.6%
Low/Moderate Total	13	15.9%	1,136	10.1%	21	25.6%	974	8.7%
Middle	44	53.7%	6,680	59.6%	14	17.1%	944	8.4%
Upper	25	30.5%	3,383	30.2%	33	40.2%	4,402	39.3%
Unknown	0	0.0%	0	0.0%	14	17.1%	4,879	43.6%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	82	100.0%	11,199	100.0%	82	100.0%	11,199	100.0%

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2018 Lexington-Fayette, KY MSA #30460

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	2	5.7%	111	2.2%	1	2.9%	51	1.0%
Moderate	11	31.4%	797	15.6%	8	22.9%	609	11.9%
Low/Moderate Total	13	37.1%	908	17.7%	9	25.7%	660	12.9%
Middle	12	34.3%	1,962	38.3%	5	14.3%	941	18.4%
Upper	10	28.6%	2,251	44.0%	16	45.7%	2,943	57.5%
Unknown	0	0.0%	0	0.0%	5	14.3%	577	11.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	35	100.0%	5,121	100.0%	35	100.0%	5,121	100.0%
	Refinance							
Low	1	3.1%	43	0.8%	1	3.1%	66	1.3%
Moderate	3	9.4%	407	8.0%	7	21.9%	697	13.6%
Low/Moderate Total	4	12.5%	450	8.8%	8	25.0%	763	14.9%
Middle	14	43.8%	1,964	38.4%	2	6.3%	404	7.9%
Upper	14	43.8%	2,699	52.8%	14	43.8%	2,366	46.3%
Unknown	0	0.0%	0	0.0%	8	25.0%	1,580	30.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	32	100.0%	5,113	100.0%	32	100.0%	5,113	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Multi-Family							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	4	57.1%	4,924	70.3%	0	0.0%	0	0.0%
Upper	3	42.9%	2,077	29.7%	2	28.6%	1,246	17.8%
Unknown	0	0.0%	0	0.0%	5	71.4%	5,755	82.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	7,001	100.0%	7	100.0%	7,001	100.0%
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	2	50.0%	109	46.2%
Low/Moderate Total	0	0.0%	0	0.0%	2	50.0%	109	46.2%
Middle	2	50.0%	139	58.8%	2	50.0%	127	53.8%
Upper	2	50.0%	97	41.1%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4	100.0%	236	100.0%	4	100.0%	236	100.0%
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Low/Moderate Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group :2018 Lexington-Fayette, KY MSA #30460

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	HMDA Totals:							
Low	3	3.8%	154	0.9%	2	2.6%	117	0.7%
Moderate	14	17.9%	1,204	6.9%	17	21.8%	1,415	8.1%
Low/Moderate Total	17	21.8%	1,358	7.8%	19	24.4%	1,532	8.8%
Middle	32	41.0%	8,989	51.5%	9	11.5%	1,472	8.4%
Upper	29	37.2%	7,124	40.8%	32	41.0%	6,555	37.5%
Unknown	0	0.0%	0	0.0%	18	23.1%	7,912	45.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	78	100.0%	17,471	100.0%	78	100.0%	17,471	100.0%

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group: 2019 Lexington-Fayette, KY MSA #30460

Income Categories	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	1	7.1%	92	4.5%	2	14.3%	203	10.0%
Moderate	2	14.3%	328	16.2%	1	7.1%	69	3.4%
<i>Low/Moderate Total</i>	<i>3</i>	<i>21.4%</i>	<i>420</i>	<i>20.8%</i>	<i>3</i>	<i>21.4%</i>	<i>272</i>	<i>13.5%</i>
Middle	8	57.1%	864	42.7%	2	14.3%	275	13.6%
Upper	3	21.4%	738	36.5%	8	57.1%	1,414	69.9%
Unknown	0	0.0%	0	0.0%	1	7.1%	61	3.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	14	100.0%	2,023	100.0%	14	100.0%	2,023	100.0%
	Refinance							
Low	0	0.0%	0	0.0%	1	14.3%	66	5.6%
Moderate	0	0.0%	0	0.0%	2	28.6%	173	14.7%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>3</i>	<i>42.9%</i>	<i>239</i>	<i>20.3%</i>
Middle	3	42.9%	223	18.9%	0	0.0%	0	0.0%
Upper	4	57.1%	959	81.1%	3	42.9%	728	61.6%
Unknown	0	0.0%	0	0.0%	1	14.3%	214	18.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	7	100.0%	1,182	100.0%	7	100.0%	1,182	100.0%
	Home Improvement							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	100.0%	50	100.0%	1	100.0%	50	100.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	1	100.0%	50	100.0%	1	100.0%	50	100.0%
	Multi-Family							
Low	1	33.3%	40	1.6%	0	0.0%	0	0.0%
Moderate	1	33.3%	1,736	68.1%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>2</i>	<i>66.7%</i>	<i>1,776</i>	<i>69.6%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	1	33.3%	775	30.4%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	3	100.0%	2,551	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	3	100.0%	2,551	100.0%	3	100.0%	2,551	100.0%
	Other Purpose LOC							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%

HMDA Loan Distribution Table

Exam: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Assessment Area/Group: 2019 Lexington-Fayette, KY MSA #30460

	Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	1	50.0%	95	76.9%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>1</i>	<i>50.0%</i>	<i>95</i>	<i>76.9%</i>
Middle	1	50.0%	28	23.1%	0	0.0%	0	0.0%
Upper	1	50.0%	95	76.9%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	1	50.0%	28	23.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	2	100.0%	123	100.0%	2	100.0%	123	100.0%
	Loan Purpose Not Applicable							
Low	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Upper	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	HMDA Totals							
Low	2	7.4%	132	2.2%	3	11.1%	269	4.5%
Moderate	3	11.1%	2,064	34.8%	4	14.8%	337	5.7%
<i>Low/Moderate Total</i>	<i>5</i>	<i>18.5%</i>	<i>2,196</i>	<i>37.0%</i>	<i>7</i>	<i>25.9%</i>	<i>606</i>	<i>10.2%</i>
Middle	14	51.9%	1,941	32.7%	3	11.1%	325	5.5%
Upper	8	29.6%	1,792	30.2%	11	40.7%	2,143	36.1%
Unknown	0	0.0%	0	0.0%	6	22.2%	2,855	48.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	27	100.0%	5,929	100.0%	27	100.0%	5,929	100.0%

APPENDIX G

LIMITED SCOPE DEMOGRAPHICS TABLES

Combined Demographics Report

Assessment Area(s): 2017 Lexington-Fayette, KY MSA #30460

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	11	8.5	7,713	6.3	2,897	37.6	28,548	23.5
Moderate-income	30	23.3	27,937	23.0	5,613	20.1	19,788	16.3
Middle-income	53	41.1	49,242	40.5	4,408	9.0	23,344	19.2
Upper-income	35	27.1	36,766	30.2	1,434	3.9	49,978	41.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	129	100.0	121,658	100.0	14,352	11.8	121,658	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	17,619	5,008	4.4	28.4	10,365	58.8	2,246	12.7
Moderate-income	55,418	22,137	19.5	39.9	27,852	50.3	5,429	9.8
Middle-income	85,461	47,772	42.0	55.9	30,005	35.1	7,684	9.0
Upper-income	54,933	38,694	34.1	70.4	12,494	22.7	3,745	6.8
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0
Total Assessment Area	213,431	113,611	100.0	53.2	80,716	37.8	19,104	9.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	1,107	5.4	944	5.2	154	8.2	9	5.4
Moderate-income	4,168	20.5	3,720	20.3	420	22.2	28	16.8
Middle-income	8,796	43.2	7,843	42.9	890	47.1	63	37.7
Upper-income	6,269	30.8	5,778	31.6	424	22.5	67	40.1
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	20,340	100.0	18,285	100.0	1,888	100.0	167	100.0
Percentage of Total Businesses:				89.9		9.3		.8
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	14	1.7	14	1.8	0	0.0	0	0.0
Moderate-income	93	11.2	93	11.8	0	0.0	0	0.0
Middle-income	409	49.5	391	49.4	18	50.0	0	0.0
Upper-income	311	37.6	293	37.0	18	50.0	0	0.0
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0
Total Assessment Area	827	100.0	791	100.0	36	100.0	0	.0
Percentage of Total Farms:				95.6		4.4		.0

2017 FFIEC Census Data and 2017 D&B Information

Combined Demographics Report

Assessment Area(s): 2018 Lexington-Fayette, KY MSA #30460

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	11	8.5	7,713	6.3	2,897	37.6	28,548	23.5	
Moderate-income	30	23.3	27,937	23.0	5,613	20.1	19,788	16.3	
Middle-income	53	41.1	49,242	40.5	4,408	9.0	23,344	19.2	
Upper-income	35	27.1	36,766	30.2	1,434	3.9	49,978	41.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	129	100.0	121,658	100.0	14,352	11.8	121,658	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	17,619	5,008	4.4	28.4	10,365	58.8	2,246	12.7	
Moderate-income	55,418	22,137	19.5	39.9	27,852	50.3	5,429	9.8	
Middle-income	85,461	47,772	42.0	55.9	30,005	35.1	7,684	9.0	
Upper-income	54,933	38,694	34.1	70.4	12,494	22.7	3,745	6.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	213,431	113,611	100.0	53.2	80,716	37.8	19,104	9.0	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	1,305	5.4	1,134	5.1	159	8.2	12	4.8	
Moderate-income	4,899	20.1	4,443	20.0	420	21.7	36	14.5	
Middle-income	10,504	43.1	9,507	42.9	895	46.3	102	41.0	
Upper-income	7,646	31.4	7,089	32.0	458	23.7	99	39.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	24,354	100.0	22,173	100.0	1,932	100.0	249	100.0	
Percentage of Total Businesses:				91.0		7.9		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	17	1.8	16	1.8	1	2.9	0	0.0	
Moderate-income	90	9.6	89	9.8	1	2.9	0	0.0	
Middle-income	472	50.2	454	50.2	17	48.6	1	100.0	
Upper-income	361	38.4	345	38.2	16	45.7	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	940	100.0	904	100.0	35	100.0	1	100.0	
Percentage of Total Farms:				96.2		3.7		.1	

2018 FFIEC Census Data and 2018 D&B Information

Combined Demographics Report

Assessment Area(s): 2019 Lexington-Fayette, KY MSA #30460

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	11	8.5	7,713	6.3	2,897	37.6	28,548	23.5	
Moderate-income	30	23.3	27,937	23.0	5,613	20.1	19,788	16.3	
Middle-income	53	41.1	49,242	40.5	4,408	9.0	23,344	19.2	
Upper-income	35	27.1	36,766	30.2	1,434	3.9	49,978	41.1	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	129	100.0	121,658	100.0	14,352	11.8	121,658	100.0	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	17,619	5,008	4.4	28.4	10,365	58.8	2,246	12.7	
Moderate-income	55,418	22,137	19.5	39.9	27,852	50.3	5,429	9.8	
Middle-income	85,461	47,772	42.0	55.9	30,005	35.1	7,684	9.0	
Upper-income	54,933	38,694	34.1	70.4	12,494	22.7	3,745	6.8	
Unknown-income	0	0	0.0	0.0	0	0.0	0	0.0	
Total Assessment Area	213,431	113,611	100.0	53.2	80,716	37.8	19,104	9.0	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	1,305	5.4	1,134	5.1	159	8.2	12	4.8	
Moderate-income	4,899	20.1	4,443	20.0	420	21.7	36	14.5	
Middle-income	10,504	43.1	9,507	42.9	895	46.3	102	41.0	
Upper-income	7,646	31.4	7,089	32.0	458	23.7	99	39.8	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	24,354	100.0	22,173	100.0	1,932	100.0	249	100.0	
Percentage of Total Businesses:				91.0		7.9		1.0	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	17	1.8	16	1.8	1	2.9	0	0.0	
Moderate-income	90	9.6	89	9.8	1	2.9	0	0.0	
Middle-income	472	50.2	454	50.2	17	48.6	1	100.0	
Upper-income	361	38.4	345	38.2	16	45.7	0	0.0	
Unknown-income	0	0.0	0	0.0	0	0.0	0	0.0	
Total Assessment Area	940	100.0	904	100.0	35	100.0	1	100.0	
Percentage of Total Farms:				96.2		3.7		.1	

2019 FFIEC Census Data and 2018 D&B Information

APPENDIX H

LIMITED-SCOPE PEER TABLES

Peer Group CRA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Selected Year: 2017

2017 Lexington-Fayette, KY MSA #30460

	SMALL BUSINESS				SMALL FARM				SMALL BUS. SECURED BY REAL ESTATE			
	#	%	\$(000S)	%	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income				By Tract Income			
Low	471	5.0 %	34,174	7.3 %	5	1.0 %	449	1.6 %	0	0.0 %	0	0.0 %
Moderate	1,857	19.6 %	84,286	18.0 %	55	10.9 %	2,893	10.3 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Income</i>	2,328	24.6 %	118,460	25.2 %	60	11.9 %	3,342	11.9 %	0	0.0 %	0	0.0 %
Middle	4,016	42.4 %	210,266	44.8 %	306	60.8 %	17,023	60.7 %	0	0.0 %	0	0.0 %
Upper	3,049	32.2 %	140,065	29.8 %	132	26.2 %	7,656	27.3 %	0	0.0 %	0	0.0 %
Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Tract Unknown	84	0.9 %	666	0.1 %	5	1.0 %	24	0.1 %	0	0.0 %	0	0.0 %
Total	9,477	100%	469,457	100%	503	100%	28,045	100%	0	0.0%	0	0.0%
	By Revenue				By Revenue				By Revenue			
Total \$1 Million or Less	4,821	50.9 %	176,603	37.6 %	259	51.5 %	15,762	56.2 %	0	0.0 %	0	0.0 %
	By Loan Size				By Loan Size				By Loan Size			
\$100,000 or Less	8,495	89.6 %	141,303	30.1 %	433	86.1 %	9,629	34.3 %	0	0.0 %	0	0.0 %
\$100,001 - \$250,000	522	5.5 %	91,226	19.4 %	40	8.0 %	6,905	24.6 %	0	0.0 %	0	0.0 %
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	460	4.9 %	236,928	50.5 %	30	6.0 %	11,511	41.0 %	0	0.0 %	0	0.0 %
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	9,477	100%	469,457	100%	503	100%	28,045	100%	0	0.0%	0	0.0%

Peer Group CRA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Selected Year: 2018

2018 Lexington-Fayette, KY MSA #30460

	SMALL BUSINESS				SMALL FARM			
	#	%	\$(000S)	%	#	%	\$(000S)	%
	By Tract Income				By Tract Income			
Low	536	5.1 %	36,214	7.3 %	7	1.4 %	538	2.1 %
Moderate	2,108	20.1 %	89,875	18.2 %	52	10.4 %	2,457	9.4 %
<i>Low/Moderate Income</i>	2,644	25.3 %	126,089	25.6 %	59	11.8 %	2,995	11.4 %
Middle	4,465	42.7 %	225,130	45.7 %	296	59.0 %	16,260	62.0 %
Upper	3,256	31.1 %	140,557	28.5 %	138	27.5 %	6,908	26.3 %
Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Tract Unknown	100	1.0 %	1,234	0.3 %	9	1.8 %	64	0.2 %
Total	10,465	100%	493,010	100%	502	100%	26,227	100%
	By Revenue				By Revenue			
Total \$1 Million or Less	4,577	43.7 %	176,823	35.9 %	274	54.6 %	18,120	69.1 %
	By Loan Size				By Loan Size			
\$100,000 or Less	9,480	90.6 %	148,116	30.0 %	444	88.4 %	9,972	38.0 %
\$100,001 - \$250,000	497	4.7 %	86,971	17.6 %	27	5.4 %	5,130	19.6 %
\$250,001 - \$1 Million (Bus)-\$500k (Farm)	488	4.7 %	257,923	52.3 %	31	6.2 %	11,125	42.4 %
Over \$1 Million (Bus)-\$500k (Farm)	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	10,465	100%	493,010	100%	502	100%	26,227	100%

Peer Group HMDA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2017 Lending Data

Selected Year: 2017

2017 Lexington-Fayette, KY MSA #30460

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	333	3.0%	42,029	2.0%	717	6.4%	74,134	3.5%
Moderate	2,115	18.8%	287,262	13.7%	2,199	19.6%	296,776	14.2%
<i>Low/Moderate Total</i>	<i>2,448</i>	<i>21.8%</i>	<i>329,291</i>	<i>15.7%</i>	<i>2,916</i>	<i>25.9%</i>	<i>370,910</i>	<i>17.7%</i>
Middle	4,761	42.3%	806,043	38.5%	2,180	19.4%	369,874	17.7%
Upper	4,038	35.9%	960,063	45.8%	3,896	34.6%	956,955	45.7%
Unknown	0	0.0%	0	0.0%	2,255	20.0%	397,658	19.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	11,247	100.0%	2,095,397	100.0%	11,247	100.0%	2,095,397	100.0%
	Refinance							
Low	208	4.4%	32,808	3.6%	333	7.0%	29,648	3.3%
Moderate	831	17.4%	118,062	13.0%	690	14.4%	81,882	9.0%
<i>Low/Moderate Total</i>	<i>1,039</i>	<i>21.7%</i>	<i>150,870</i>	<i>16.6%</i>	<i>1,023</i>	<i>21.4%</i>	<i>111,530</i>	<i>12.3%</i>
Middle	2,036	42.6%	354,880	39.0%	932	19.5%	134,526	14.8%
Upper	1,703	35.6%	403,475	44.4%	1,784	37.3%	441,429	48.6%
Unknown	0	0.0%	0	0.0%	1,039	21.7%	221,740	24.4%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	4,778	100.0%	909,225	100.0%	4,778	100.0%	909,225	100.0%
	Home Improvement							
Low	30	3.9%	2,178	3.1%	72	9.3%	2,485	3.6%
Moderate	169	21.8%	10,347	14.9%	138	17.8%	7,364	10.6%
<i>Low/Moderate Total</i>	<i>199</i>	<i>25.6%</i>	<i>12,525</i>	<i>18.0%</i>	<i>210</i>	<i>27.1%</i>	<i>9,849</i>	<i>14.2%</i>
Middle	336	43.3%	26,074	37.5%	154	19.8%	12,200	17.6%
Upper	241	31.1%	30,877	44.4%	336	43.3%	39,656	57.1%
Unknown	0	0.0%	0	0.0%	76	9.8%	7,771	11.2%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	776	100.0%	69,476	100.0%	776	100.0%	69,476	100.0%
	Multi-Family							
Low	8	8.8%	25,211	7.8%	0	0.0%	0	0.0%
Moderate	38	41.8%	137,442	42.8%	0	0.0%	0	0.0%
<i>Low/Moderate Total</i>	<i>46</i>	<i>50.5%</i>	<i>162,653</i>	<i>50.6%</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>
Middle	35	38.5%	78,461	24.4%	0	0.0%	0	0.0%
Upper	10	11.0%	80,181	25.0%	0	0.0%	0	0.0%
Unknown	0	0.0%	0	0.0%	91	100.0%	321,295	100.0%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	91	100.0%	321,295	100.0%	91	100.0%	321,295	100.0%
	HMDA Totals							
Low	579	3.4%	102,226	3.0%	1,122	6.6%	106,267	3.1%
Moderate	3,153	18.7%	553,113	16.3%	3,027	17.9%	386,022	11.4%
<i>Low/Moderate Total</i>	<i>3,732</i>	<i>22.1%</i>	<i>655,339</i>	<i>19.3%</i>	<i>4,149</i>	<i>24.6%</i>	<i>492,289</i>	<i>14.5%</i>
Middle	7,168	42.4%	1,265,458	37.3%	3,266	19.3%	516,600	15.2%
Upper	5,992	35.5%	1,474,596	43.4%	6,016	35.6%	1,438,040	42.4%
Unknown	0	0.0%	0	0.0%	3,461	20.5%	948,464	27.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	16,892	100.0%	3,395,393	100.0%	16,892	100.0%	3,395,393	100.0%

Peer Group HMDA Loan Distribution Table

Exam ID: Whitaker Bank, Inc. 2020 - 2018 & 2019 Lending Data

Selected Year: 2018

2018 Lexington-Fayette, KY MSA #30460

	HMDA							
	By Tract Income				By Borrower Income			
	#	%	\$(000s)	%	#	%	\$(000s)	%
	Home Purchase							
Low	325	3.2 %	40,119	2.1 %	732	7.3 %	79,886	4.1 %
Moderate	1,903	18.9 %	266,059	13.8 %	2,124	21.1 %	299,920	15.5 %
<i>Low/Moderate Total</i>	<i>2,228</i>	<i>22.1 %</i>	<i>306,178</i>	<i>15.8 %</i>	<i>2,856</i>	<i>28.3 %</i>	<i>379,806</i>	<i>19.6 %</i>
Middle	4,211	41.8 %	734,571	38.0 %	2,124	21.1 %	371,863	19.2 %
Upper	3,636	36.1 %	893,481	46.2 %	3,512	34.9 %	902,672	46.7 %
Unknown	2	0.0 %	379	0.0 %	1,585	15.7 %	280,268	14.5 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	10,077	100.0 %	1,934,609	100.0 %	10,077	100.0 %	1,934,609	100.0 %
	Refinance							
Low	160	3.7 %	19,031	2.6 %	423	9.9 %	38,947	5.3 %
Moderate	767	17.9 %	93,407	12.8 %	666	15.6 %	77,530	10.6 %
<i>Low/Moderate Total</i>	<i>927</i>	<i>21.7 %</i>	<i>112,438</i>	<i>15.4 %</i>	<i>1,089</i>	<i>25.4 %</i>	<i>116,477</i>	<i>15.9 %</i>
Middle	1,752	40.9 %	272,277	37.2 %	780	18.2 %	113,532	15.5 %
Upper	1,602	37.4 %	347,045	47.4 %	1,713	40.0 %	388,613	53.1 %
Unknown	0	0.0 %	0	0.0 %	699	16.3 %	113,138	15.5 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	4,281	100.0 %	731,760	100.0 %	4,281	100.0 %	731,760	100.0 %
	Home Improvement							
Low	42	3.2 %	2,222	2.6 %	75	5.7 %	3,150	3.7 %
Moderate	172	13.0 %	8,282	9.7 %	158	11.9 %	6,999	8.2 %
<i>Low/Moderate Total</i>	<i>214</i>	<i>16.2 %</i>	<i>10,504</i>	<i>12.3 %</i>	<i>233</i>	<i>17.6 %</i>	<i>10,149</i>	<i>11.9 %</i>
Middle	512	38.7 %	28,945	33.9 %	193	14.6 %	9,713	11.4 %
Upper	597	45.1 %	45,883	53.8 %	503	38.0 %	36,819	43.1 %
Unknown	0	0.0 %	0	0.0 %	394	29.8 %	28,651	33.6 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	1,323	100.0 %	83,332	100.0 %	1,323	100.0 %	83,332	100.0 %
	Multi-Family							
Low	28	17.6 %	21,259	6.7 %	0	0.0 %	0	0.0 %
Moderate	48	30.2 %	121,461	38.5 %	0	0.0 %	0	0.0 %
<i>Low/Moderate Total</i>	<i>76</i>	<i>47.8 %</i>	<i>142,720</i>	<i>45.2 %</i>	<i>0</i>	<i>0.0 %</i>	<i>0</i>	<i>0.0 %</i>
Middle	52	32.7 %	114,182	36.2 %	2	1.3 %	871	0.3 %
Upper	31	19.5 %	58,516	18.6 %	14	8.8 %	14,793	4.7 %
Unknown	0	0.0 %	0	0.0 %	143	89.9 %	299,754	95.0 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	159	100.0 %	315,418	100.0 %	159	100.0 %	315,418	100.0 %
	Other Purpose LOC							
Low	10	1.9 %	273	0.8 %	53	10.3 %	2,210	6.3 %
Moderate	72	14.0 %	2,806	8.0 %	87	16.9 %	4,191	12.0 %
<i>Low/Moderate Total</i>	<i>82</i>	<i>15.9 %</i>	<i>3,079</i>	<i>8.8 %</i>	<i>140</i>	<i>27.2 %</i>	<i>6,401</i>	<i>18.3 %</i>
Middle	201	39.0 %	12,292	35.2 %	125	24.3 %	6,230	17.8 %
Upper	232	45.0 %	19,563	56.0 %	236	45.8 %	21,701	62.1 %
Unknown	0	0.0 %	0	0.0 %	14	2.7 %	602	1.7 %
Tract Unknown	0	0.0 %	0	0.0 %	0	0.0 %	0	0.0 %
Total	515	100.0 %	34,934	100.0 %	515	100.0 %	34,934	100.0 %
	Other Purpose Closed/Exempt							
Low	9	2.2 %	824	2.2 %	16	3.9 %	1,041	2.8 %
Moderate	44	10.6 %	4,022	10.7 %	44	10.6 %	2,135	5.7 %

<i>Low/Moderate Total</i>	53	12.8%	4,846	12.9%	00	14.5%	3,176	8.5%
Middle	168	40.5%	14,477	38.5%	92	22.2%	6,761	18.0%
Upper	194	46.7%	18,250	48.6%	144	34.7%	18,873	50.2%
Unknown	0	0.0%	0	0.0%	119	28.7%	8,763	23.3%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	415	100.0%	37,573	100.0%	415	100.0%	37,573	100.0%
	NA Purpose							
Low	17	6.3%	2,628	7.3%	3	1.1%	121	0.3%
Moderate	64	23.6%	6,800	18.8%	3	1.1%	258	0.7%
<i>Low/Moderate Total</i>	<i>81</i>	<i>29.9%</i>	<i>9,428</i>	<i>26.0%</i>	<i>6</i>	<i>2.2%</i>	<i>379</i>	<i>1.0%</i>
Middle	114	42.1%	13,512	37.3%	2	0.7%	257	0.7%
Upper	76	28.0%	13,257	36.6%	3	1.1%	138	0.4%
Unknown	0	0.0%	0	0.0%	260	95.9%	35,423	97.9%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	271	100.0%	36,197	100.0%	271	100.0%	36,197	100.0%
	HMDA Totals							
Low	591	3.5%	86,356	2.7%	1,302	7.6%	125,355	3.9%
Moderate	3,070	18.0%	502,837	15.8%	3,082	18.1%	391,033	12.3%
<i>Low/Moderate Total</i>	<i>3,661</i>	<i>21.5%</i>	<i>589,193</i>	<i>18.6%</i>	<i>4,384</i>	<i>25.7%</i>	<i>516,388</i>	<i>16.3%</i>
Middle	7,010	41.1%	1,190,256	37.5%	3,318	19.5%	509,227	16.0%
Upper	6,368	37.4%	1,395,995	44.0%	6,125	35.9%	1,383,609	43.6%
Unknown	2	0.0%	379	0.0%	3,214	18.9%	766,599	24.1%
Tract Unknown	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total	17,041	100.0%	3,175,823	100.0%	17,041	100.0%	3,175,823	100.0%

APPENDIX I

GLOSSARY OF TERMS

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

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. 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 the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize:

- (i) Low-or moderate-income geographies;
- (ii) Designated disaster areas; or,
- (iii) Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, based on:
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

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 (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA evaluation. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

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.

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

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) and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial 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.

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