

PUBLIC DISCLOSURE

March 20, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**First Farmers and Merchants Bank
816 South Garden Street
Columbia, Tennessee 38401**

RSSD ID NUMBER: 150035

**FEDERAL RESERVE BANK OF ATLANTA
1000 Peachtree Street, N.E.
Atlanta, Georgia 30309-4470**

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION RATING

INSTITUTION’S CRA RATING: This institution is rated Satisfactory.

The following table indicates the performance level of First Farmers and Merchants Bank (First Farmers) with respect to the Lending, Investment, and Service Tests.

PERFORMANCE LEVELS	First Farmers and Merchants Bank		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding	X		
High Satisfactory			
Low Satisfactory		X	X
Needs to Improve			
Substantial Noncompliance			

**Note: The Lending Test is weighted more heavily than the Investment or Service Test when arriving at an overall rating.

Major factors contributing to this rating include:

- The bank makes extensive use of innovative and/or flexible lending practices in serving credit needs of its assessment area;
- The geographic distribution of loans reflects excellent penetration throughout the assessment areas;
- Given the product line offerings and weighting, the distribution of borrowers reflects excellent penetration among business of different sizes and customers of different income levels;
- The bank makes a relatively high level of community development loans;
- The bank makes an adequate level of qualified community development investments and grants;
- Retail delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels;
- The bank’s record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems; and
- The bank provides a relatively high level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

First Farmers is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by First Farmers and Merchants Corporation, a one-bank holding company. Both the bank and its holding company are headquartered in Columbia, Tennessee. The bank’s branch network consists of 22 offices and 38 automated teller machines (ATMs) (21 full-service and 17 cash-only) across 3 assessment areas in Tennessee. During the review period, the bank did not open any branches and sold one branch. Based on its branch network and other service delivery systems, the bank is generally positioned to deliver financial services to its assessment areas.

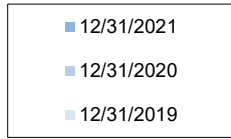
Loan Portfolio

According to the December 31, 2021 Report of Condition, the bank’s assets totaled \$2 billion, an increase of approximately \$600 million since the bank’s last CRA evaluation conducted on February 3, 2020.

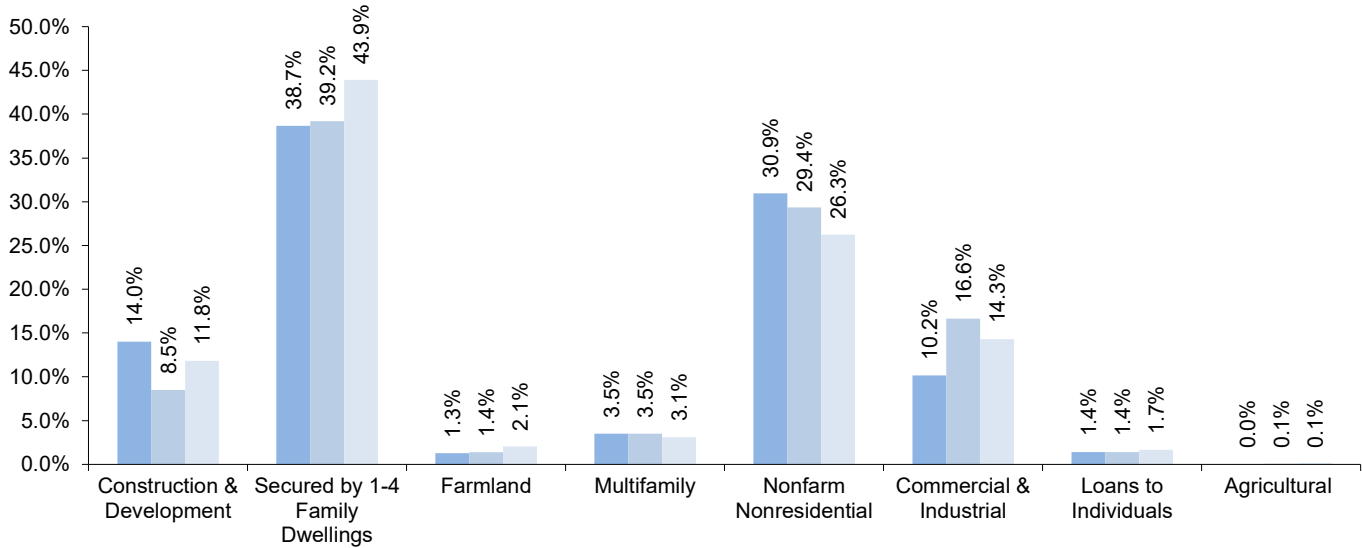
The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (i.e., Call Report). As shown, the bank’s overall lending decreased 3.1 percent throughout the review period. Of particular note, the bank experienced an overall decline in loans secured by 1-4 family dwellings, its largest loan composition category. At the same time, the bank experienced increases in nonfarm nonresidential (or commercial) real estate. Additionally, the bank experienced a significant rise in commercial and industrial loans from 2019 to 2020 and a sharp decline in 2021. This was primarily due to the bank shifting its focus toward Paycheck Protection Program (PPP) loans during the height of the COVID-19 pandemic in 2020, and those loans continuing to pay down throughout 2021 with the sunset of the PPP. These trends point to a bank with a traditional focus on residential real estate that had an increased focus on commercial loans throughout 2019, 2020, and 2021.

COMPOSITION OF LOAN PORTFOLIO						
Loan Type	12/31/2021		12/31/2020		12/31/2019	
	\$ (000s)	Percent	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	118,413	14.0%	77,263	8.5%	99,758	11.8%
Secured by One- to Four- Family Dwellings	326,735	38.7%	357,066	39.2%	371,017	43.9%
Other Real Estate: Farmland	10,778	1.3%	12,390	1.4%	17,357	2.1%
Multifamily	29,630	3.5%	31,847	3.5%	26,337	3.1%
Nonfarm nonresidential	261,373	30.9%	267,498	29.4%	221,824	26.3%
Commercial and Industrial	85,959	10.2%	151,380	16.6%	120,985	14.3%
Loans to Individuals	11,809	1.4%	12,880	1.4%	14,056	1.7%
Agricultural Loans	306	0.0%	497	0.1%	1,099	0.1%
Total	\$845,003	100.00%	\$910,821	100.00%	\$872,433	103.25%

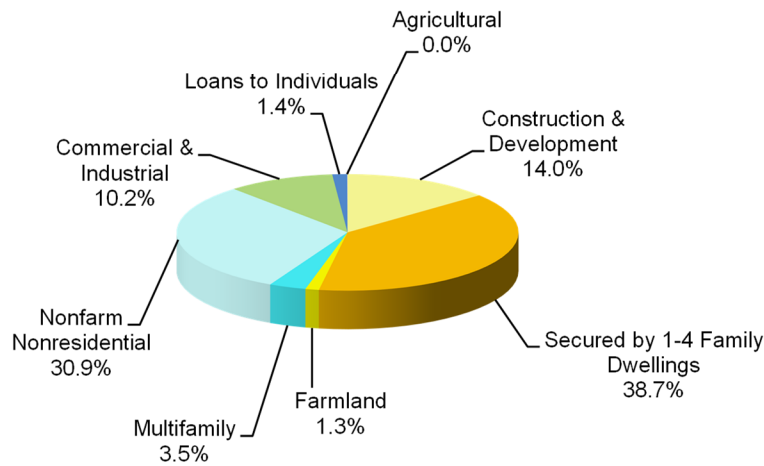
* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included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



Loan Portfolio Trend



**Loan Portfolio
as of
12/31/2021**



Credit Products

First Farmers offers a wide variety of deposit and credit products to meet the credit needs of its community, including residential mortgage loans (single family and multifamily), home equity loans, home improvement loans, construction loans, consumer loans and credit cards, commercial real estate, and small business loan products. As described under the *Product Innovation* section, the bank also offers a variety of innovative and flexible loan products.

Assessment Areas

For purposes of the CRA, First Farmers has defined three assessment areas in Tennessee, which are listed below.

- Partial Nashville; MSA: Davidson, Maury, and Williamson Counties (2020-2021); Davidson, Dickson, Maury, and Williamson Counties (2019).
- Middle Tennessee; non-MSA: Giles, Lawrence, and Marshall Counties
- Hickman County; non-MSA: Hickman County

First Farmers complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a Satisfactory rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated February 3, 2020, under the Large Institution Examination Procedures.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank’s record of meeting the credit needs of its community, including low- and moderate-income (LMI) neighborhoods, within the context of asset size and financial condition of the institution, competitive factors, and economic and demographic characteristics of its defined assessment areas. First Farmers' CRA performance evaluation was based on CRA activities within its assessment areas using the Large Institution Examination Procedures. “Large institutions” have total assets of at least \$1.503 billion as of December 31 of both of the prior two years. Institutions meeting the threshold size are evaluated using three separately rated tests: a Lending Test; an Investment Test, and a Service Test.

A full-scope review was conducted on one of the bank’s three assessment areas – the Nashville assessment area. The remaining two assessment areas were reviewed using limited-scope procedures. When determining the overall rating, the greatest weight was placed on the bank’s performance in the Nashville assessment area as the majority of branches, lending, and deposits occur in this assessment area.

Lending Test

Under the Lending Test, the bank’s performance is evaluated using the following criteria and time frames.

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	<ul style="list-style-type: none"> • Small business loans reported under the CRA • Loans reported under the Home Mortgage Disclosure Act (HMDA) 	January 1, 2019 – December 31, 2021
Assessment Area Concentration		
Geographic Distribution of Loans		
Loan Distribution by Borrower’s Profile		
Responsiveness to Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses		
Community Development Lending Activity		January 1, 2020 – September 30, 2022
Product Innovation ²		

² Unlike other Large Bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not impact the bank’s performance negatively. These activities are used to augment consideration given to an institution’s performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

Performance in the small business loan category carried greater weight in determining the bank’s overall performance conclusions based on loan volume. The bank participated in the PPP in 2020 and 2021 throughout its assessment areas, resulting in a significant increase in small business loan volume throughout the review period. As such, the bank shifted its focus and strategy to small business lending throughout a large part of its review period and as shown later, was oftentimes a market share leader in CRA loans throughout its assessment areas.

Note that small farm loans reported under the CRA were not analyzed or considered during the exam. This was due to an absence of any significant volume and few opportunities for these types of loans throughout the bank’s assessment areas.

Investment Test

All community development investments, including grants and donations, made on or after January 1, 2020 were reviewed. In addition, investments made prior to January 1, 2020, but still outstanding as of this review date, were also considered. Qualified investments and grants were evaluated to determine the bank’s overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and community development needs of the bank’s assessment areas.

Service Test

Under the Service Test, the bank’s performance is evaluated using the following criteria and time frames.

Service Test Performance Criterion	Time Period
Accessibility of Delivery Systems	January 1, 2019 – December 31, 2021
Changes in Branch Locations	
Reasonableness of Business Hours and Services	
Community Development Services	January 1, 2020 – September 30, 2022

Community Contacts

As part of the CRA evaluation, two community contacts were made with local community representatives who are familiar with the economic and demographic characteristics as well as community development opportunities in the Nashville assessment area. Information obtained from these contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank’s performance. Specific information obtained from the community contacts is included in the applicable section of the evaluation for the Nashville assessment area. The contacts did not identify any unmet small business credit needs. However, one contact identified the need for more in-depth financial literacy that also includes creating and maintaining wealth through assets for LMI individuals and families. Opportunities were noted as plentiful throughout the Nashville MSA, with affordable housing in north Nashville and continued financing to, and partnerships with, financial intermediaries being the key opportunities noted by both contacts.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The Lending Test is rated outstanding. As described in the following sections and throughout the *Conclusions with Respect to Performance Tests* in the Nashville assessment area portion of this evaluation, lending levels reflect good responsiveness to the credit needs of the bank’s assessment areas. A substantial majority of the bank’s loans are to businesses and borrowers located in the bank’s assessment areas. The bank’s geographic and borrower distribution of loans each reflect excellent penetration, and the bank makes a relatively high level of community development loans. Further, the bank makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas given its size, structure, and strategy.

For the lending test analysis, lending performance in low-, moderate-, middle-, and upper-income census tracts and to low-, moderate-, middle-, and upper-income borrowers was considered for each product; however, comments for activity in middle- and upper-income tracts and to middle- and upper-income borrowers are only included when they were material to the outcome of the analyses.

Lending Activity

Lending levels reflect good responsiveness to the credit needs of the bank’s assessment areas. As the following table shows, the bank originated 2,140 total small business loans and 836 HMDA-reportable loans during the review period. The total number and dollar amount of loans were considered when arriving at lending activity conclusions, along with competitive factors and the bank’s overall importance to the area. Additional details for the primary driver of the conclusion – the Nashville assessment area – are discussed later.

Summary of Lending Activity

Loan Type	#	%	\$(000s)	%
Total Consumer related	0	0	\$0	0
Home Improvement	34	--	\$4,176	--
Home Purchase	318	--	\$89,126	--
Multi-Family Housing	20	--	\$25,810	--
Refinancing	413	--	\$100,808	--
Other Purpose Closed-End	51	--	\$9,552	--
Total HMDA related	836	28	\$229,472	53
Total Non-HMDA related	0	0	\$0	0
Small Business	2,140	--	\$204,521	--
Total Small Business related	2,140	71	\$204,521	47
Small Farm	29	--	\$2,160	--
Total Small Farm related	29	1	\$2,160	0
TOTAL LOANS	3,005	100	\$436,153	100

Assessment Area Concentration

The bank originated a substantial majority of its loans to businesses and borrowers in its assessment areas. The table below shows, by product type, the number, and percentage of loans reviewed that were located inside and outside of the bank’s assessment areas. As shown, the bank originated 1,929 small business loans (or 90.1 percent) and 745 HMDA-related loans (or 89.1 percent) within its assessment areas during the review period.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	31	91.2	\$3,321	79.5	3	8.8	\$855	20.5
Home Purchase - Conventional	277	87.4	\$77,886	87.5	40	12.6	\$11,157	12.5
Home Purchase - FHA	1	100	\$83	100	0	0	\$0	0
Multi-Family Housing	10	50	\$7,611	29.5	10	50	\$18,199	70.5
Other Purpose Closed-End	47	92.2	\$8,772	91.8	4	7.8	\$780	8.2
Refinancing	379	91.8	\$91,337	90.6	34	8.2	\$9,471	9.4
Total HMDA related	745	89.1	\$189,010	82.4	91	10.9	\$40,462	17.6
Small Business	1,929	90.1	\$175,951	86	211	9.9	\$28,570	14
Total Small Bus. related	1,929	90.1	\$175,951	86	211	9.9	\$28,570	14
Small Farm	29	100	\$2,160	100	0	0	\$0	0
Total Small Farm related	29	100	\$2,160	100	0	0	\$0	0
TOTAL LOANS	2,703	90	\$367,121	84.2	302	10	\$69,032	15.8

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

The geographic distribution of small business and HMDA loans reflects excellent penetration throughout the assessment areas, given the opportunity and competition in these markets. The distribution of lending to borrowers reflects excellent penetration to businesses of different sizes and among customers of different income levels. The analyses of small business and HMDA lending within the Nashville assessment area are discussed in detail later in this report.

Responsiveness to the Credit Needs of Low-Income Individuals and Geographies and Very Small Businesses

Based on the analysis of the geographic distribution of loans, the distribution of loans by borrower income and business revenue, and the variety of loan product offerings available to low-income individuals and small businesses, the bank exhibits an excellent record of serving the credit needs of low-income individuals and geographies and very small businesses.

Community Development Lending Activity

First Farmers makes a relatively high level of community development loans. During the review period, the bank originated 24 qualified community development loans in its assessment areas totaling \$69.0 million. This included 21 community development-eligible PPP loans totaling \$42.2 million and 3 community development loans totaling \$26.8 million originated outside of the PPP. The loans qualified for a variety of purposes, including affordable housing, economic development, and revitalization and stabilization. Additional details can be found within the community development lending section for each applicable assessment area.

Product Innovation

First Farmers makes extensive use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas. In deriving this conclusion, consideration was given to the variety of products offered and the number of new offerings since the previous evaluation. Additionally, many of the offerings were directly

linked to needs noted by community contacts and were developed by the bank in response to needs identified through its partnerships with outside organizations. Descriptions of each innovative and/or flexible lending option offered by the bank during the review period are as follows.

Activities in Response to the COVID-19 Pandemic

In response to the coronavirus, additional consideration was given to the bank's retail lending activities that were responsive to the needs of LMI individuals and/or small businesses that were impacted by the pandemic. These activities were developed and implemented quickly and often despite resource and operational constraints that the bank faced due to disruptions caused by the pandemic. These activities are considered particularly responsive given their impact in alleviating some of the effects of the pandemic on LMI individuals and small businesses, the speed and responsiveness with which they were developed, and the resources and planning required to implement these activities. A summary of each of the bank's retail lending activities taken in response to the pandemic follows.

- *Small Business Administration (SBA) PPP*: PPP loans were available to businesses with fewer than 500 employees or businesses that meet SBA industry size standards. The program provided funds for payroll costs and other operational costs to businesses impacted by the pandemic in 2020 and 2021 and were fully forgivable if employee retention criteria were met and the funds were used for eligible purposes. During the review period, First Farmers originated 1,539 PPP loans totaling \$115.8 million. As previously discussed in the *Community Development Lending Activity* section, a portion of these loans also received credit as qualified community development loans.
- *Loan Payment Deferrals*: Consideration was given to financial institutions offering payment accommodations, such as loan payment deferrals, to consumer and commercial borrowers impacted by the pandemic. These activities had a significant impact in helping borrowers avoid delinquencies or negative credit bureau reporting caused by hardships from pandemic-related issues and eased cash flow pressures on businesses impacted by the pandemic. First Farmers offered loan payment deferrals to 94 consumer loan accounts and 173 commercial loan accounts.

Consumer Real Estate

- *Affordable Home Purchase Program (AHPP) (New)*: The purpose of the AHPP is to provide financing for LMI individuals to purchase their first residence, which must also be located in an LMI tract. This was a new program originally conceptualized in 2020 as the result of community needs noted through the bank's partnerships with a local Community Development Financial Institution (CDFI); the program was finalized in 2022. The AHPP offers more flexible credit score, loan-to-value (LTV), and down payment requirements as compared to traditional mortgage underwriting. The program also offers mortgages with no origination fee and no private mortgage insurance requirement for an LTV above 80 percent. During the review period, the bank originated two loans through the AHPP totaling \$178,350. In addition, after the program was finalized in the summer of 2022, the bank originated nine additional loans under the AHPP totaling \$2.5 million. While these loans were originated outside the review period for this exam, it provides context related to the impact of this program.
- *Habitat for Humanity/First Farmers Down Payment Program (New)*: First Farmers partnered with Habitat for Humanity (Habitat) in 2022 to develop a no fee savings account for approved Habitat clients that serves as a down payment assistance program. Under the terms of the program, the Habitat client makes scheduled deposits into the savings account as required by Habitat to reach a goal of \$1,000. First

Farmers matches the deposits up to \$1,000 to be used toward down payment or closing costs at the time of home purchase. The program was conceptualized during the review period and finalized in January 2023, and as of the evaluation date, there are three approved applicants in the program.

- *Federal Housing Agency (FHA)/U.S. Department of Veterans Affairs (VA) Insured Loan Programs:* These government-insured loan programs offer flexible, long-term financing to eligible borrowers with low or no down payment requirements. The bank offers these loans to individuals through a broker arrangement, meaning that the bank does not originate the loan. Instead, the bank (as a broker) acts as an intermediary between the customer and another financial institution who underwrites, originates, and services the loan. Through its broker arrangement, First Farmers has referred individuals to financial institutions for these loan types and indirectly assisted in the origination of 92 FHA loans totaling \$16.6 million and 36 VA loans totaling \$10.9 million.
- *U.S. Department of Agriculture Rural Development Loan Program:* This loan program is designed to assist LMI borrowers in purchasing affordable housing in rural areas and features no down payment requirement. During the review period, the bank originated one loan through the program totaling \$83,471.

Consumer Non-Real Estate

- *Pay Grace Forward Loan Program (New):* First Farmers partnered with local nonprofit Pay Grace Forward (PGF) in 2019 to develop a loan product that provides a viable alternative to predatory lending. Under the terms of the program, a client of PGF completes financial counseling and mentoring with PGF and receives a low-interest loan from First Farmers that is used to consolidate high interest payday loans and reestablish credit. PGF and First Farmers create a savings account to serve as collateral for a PGF client's loan and create customized repayment schedules that fit the budget of the PGF client. Loan terms include a maximum loan amount of \$3,500, an interest rate of the savings account rate plus two percent, and there are no loan fees or pre-payment penalties. During the review period, the bank originated 12 loans through the program.

Small Business

- *SBA:* First Farmers offers SBA 7(a) loans that provide small businesses access to capital with more flexible terms than conventional commercial financing. During the review period, the bank originated six SBA loans totaling \$1.5 million.

INVESTMENT TEST

The Investment Test is rated low satisfactory. The bank made an adequate level of qualified community development investments and grants totaling \$5.6 million. This amount includes three current period investments totaling \$3.7 million, three prior period investments still outstanding with a total balance of \$1.8 million, and 41 donations totaling \$125,250. A further breakdown of the bank's \$5.6 million in investments is shown in the following table, as investments benefitted individual assessment areas, multiple assessment areas, and broader statewide areas that include all of the bank's assessment areas.

Assessment Area(s) Benefitted	Investments		Donations (\$)
	Current Period (\$)	Prior Period (\$)	
Nashville	\$3.2 million	\$250,000	\$89,200
Middle Tennessee	-	\$1.1 million	\$2,750
Hickman County	-	-	\$1,000
Nashville MSA and Middle Tennessee	-	-	\$32,150
Broader Statewide Area that Includes All Assessment Areas	\$500,000	\$500,000	\$150
TOTAL	\$3.7 MILLION	\$1.8 MILLION	\$125,250

The investments benefitting the broader statewide area that includes all the bank’s assessment areas are impactful and include two investments to statewide CDFIs for the purpose of creating low-income housing tax credits (LIHTC). Because these investments were not tied to specific projects for the CDFIs, the LIHTC investments have the potential to be used across their entire footprint throughout the state of Tennessee, including any or all of the bank’s assessment areas. Impactful donations noted at the institution level include annual donations totaling \$30,150 to a local nonprofit serving LMI youth throughout both the Nashville and Middle Tennessee assessment areas. The bank’s overall Investment Test was positively impacted by these investments and donations.

Additional details, including impactful investments and donations directly benefiting individual assessment areas, can be found in the *Investment Test* section for each assessment area.

SERVICE TEST

The Service Test is rated low satisfactory. The distribution of the bank’s 22 branch offices was compared to the distribution of households and businesses among the tract categories within each assessment area. Branch locations and alternative delivery systems such as full-service and cash-only ATMs, 24-hour automated telephone banking, mobile banking, and online banking make the bank’s services reasonably accessible to the bank’s geographies and individuals of different income levels.

The bank did not open any branches during the review period but did close one of its branches in a moderate-income census tract. The closure was the result of the sale of the branch to another financial institution, and the branch remains open under the purchasing bank’s name. As such, the bank’s record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Additionally, banking services do not vary in a way that inconveniences its assessment areas, particularly LMI geographies and/or LMI individuals.

First Farmers provides a relatively high level of community development services. Bank employees served in a variety of capacities related to the provision of financial services for an assortment of community development organizations. In total, 13 bank employees provided 45 community development service activities totaling 893 hours to 27 different organizations operating throughout its assessment areas. Overall, this level of community development services exceeds the bank’s performance at the previous evaluation, which is noteworthy given the impact of the pandemic on providing community development service activities in-person. A further breakdown of the bank’s community development service hours is shown below, as services benefitted individual assessment areas, multiple assessment areas, and broader regional or statewide areas that include all of the bank’s assessment areas.

Assessment Area(s) Benefitted	Community Development Service Hours
Nashville	427 Hours
Middle Tennessee	274 Hours
Hickman County	27 Hours
Nashville and Middle Tennessee	115 Hours
Broader Regional/Statewide Area that Includes All Assessment Areas	50 Hours
TOTAL COMMUNITY DEVELOPMENT SERVICE HOURS	893 HOURS

The 50 community development service hours benefitting the broader regional or statewide area that includes the bank’s assessment areas are all impactful. This includes 19 hours of financial literacy to LMI senior citizens throughout south-central Tennessee and 31 hours as a board member for two different affordable housing organizations serving the state of Tennessee. Nearly all of the 115 community development service hours benefitting both the Nashville and Middle Tennessee assessment areas were impactful. Specifically, 114 of the hours were as a finance and budget committee representative on a board of directors at a local nonprofit serving LMI youth in Maury and Giles Counties. The bank’s overall community development service conclusion was enhanced by these activities that spanned across multiple assessment areas of the bank.

Additional details, including impactful community development services directly benefiting individual assessment areas, can be found in the *Service Test* section for each assessment area.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

Neither the bank nor this Reserve Bank has received any CRA-related complaints since the previous evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

**METROPOLITAN AREA – NASHVILLE
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NASHVILLE ASSESSMENT AREA

Overview

The bank’s current Nashville assessment area consists of Davidson, Maury, and Williamson Counties, which are part of the 13-county Nashville-Davidson-Murfreesboro-Franklin MSA³. In 2019, Dickson County was also part of the Nashville assessment area but the county was removed in 2020 due to a branch closure in 2019. As of December 31, 2021, First Farmers operated 15 offices, 14 full-service ATMs, and 10 stand-alone, cash-only ATMs in the assessment area. This assessment area represents 68.2 percent of all the bank’s branches, 66.7 percent of the deposits, and 70.0 percent of the bank’s HMDA-reportable and CRA small business loans (by dollar volume) within its assessment areas.

Nashville has a competitive banking market where national and regional banks have a significant presence, but there are also a number of local community banks. According to the June 30, 2021 FDIC Summary of Deposits report, there were 46 financial institutions operating 329 branch location across the assessment area with \$68.9 billion in total deposits. First Farmers ranked 12th in deposit market share with \$1.1 billion or 1.6 percent of total deposits. Bank of America and Pinnacle Bank held the largest deposit market share with 19.4 percent and 17.5 percent, respectively.

CRA small business and HMDA-reportable lending are similarly competitive; however, the bank experienced an increase in CRA small business lending in the assessment area throughout the review period that resulted in increased market share for the product. Specifically, First Farmers ranked 23rd out of 154 CRA-reporting institutions in 2019, representing 0.5 percent of all CRA small business loans. In 2020, the bank ranked 15th out of 237 CRA-reporting institutions, representing 1.7 percent of all CRA small business loans. In 2021, the bank ranked 17th out of 217 CRA-reporting institutions, representing 1.2 percent of all CRA small business loans. CRA lenders in the market included nontraditional financial institutions American Express National Bank and Capital One Bank and large, multistate institutions JPMorgan Chase Bank, Bank of America, and Pinnacle Bank. These five leading CRA lenders accounted for 53 percent of all small business loans made in this market during the review period. With such dominance in the market by five lenders, the increased market share by First Farmers is important context when discussing small business lending weighting and performance.

In contrast to the increased market share for CRA small business lending, the bank experienced a downward trend in market share for HMDA lending. Specifically, First Farmers ranked 64th out of 714 lenders in 2019, representing only 0.3 percent of all HMDA-reportable loans. In 2020, the bank ranked 90th out of 806 lenders, representing 0.2 percent of all HMDA-reportable loans. In 2021, the bank ranked 93rd out of 827 lenders, representing 0.1 percent of all HMDA-reportable loans. Leading HMDA lenders in the market included online lender Quicken Loans/Rocket Mortgage and large, multistate institutions Wells Fargo, FirstBank, Regions Bank, and U.S. Bank. These five leading HMDA lenders accounted for nearly 20 percent of all HMDA loans made in this market throughout the review period.

³ Dickson County was part of this assessment area for a portion of the review period. However, the bank removed Dickson County from its Nashville assessment area at the end of 2019 due to the sale of its only branch in the county.

Population and Income Characteristics

The Nashville assessment area has grown rapidly over the past decade. Population in the assessment area was approximately 1.1 million as of the 2020 U.S. Census, representing an increase of 19.5 percent since 2010.⁴ For context, populations within the state of Tennessee and the United States grew at 8.9 percent and 7.4 percent over the same time frame, respectively.⁵

According to 2021 census data from the Federal Financial Institutions Examination Council (FFIEC), the assessment area contains 215 census tracts: 30 low-income tracts (14.0 percent); 49 moderate-income tracts (22.8 percent); 64 middle-income tracts (29.8 percent); 69 upper-income tracts (32.1 percent); and 3 unknown-income tracts (1.4 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated 2021 median family income for the Nashville-Davidson-Murfreesboro-Franklin MSA. As the following table shows, the median family income increased from \$73,100 in 2019 to \$79,200 in 2021.

**Borrower Income Levels
Nashville-Davidson-Murfreesboro-Franklin, TN MSA**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	49.99%	50%	79.99%	80%	119.99%	120%	& above
2019	\$73,100	0	\$36,549	\$36,550	\$58,479	\$58,480	\$87,719	\$87,720	& above
2020	\$76,500	0	\$38,249	\$38,250	\$61,199	\$61,200	\$91,799	\$91,800	& above
2021	\$79,200	0	\$39,599	\$39,600	\$63,359	\$63,360	\$95,039	\$95,040	& above

The 2021 FFIEC census data shows that there were 224,458 families in the assessment area. Of those families, 21.6 percent were low-income, 16.0 percent were moderate-income, 18.6 percent were middle-income, and 43.7 percent were upper-income. Of the total families, 25,091 of them (or 11.2 percent) had incomes below the poverty level. While that number is small in comparison to the overall volume of families, it is worth noting that over 65 percent of those families living below the poverty level are located in LMI tracts (30.2 percent in low-income tracts and 35.0 percent in moderate-income tracts). Such a high concentration of families living below the poverty level in LMI tracts likely presents challenges to lending in these tracts.

Economic Conditions

The Nashville MSA has seen strong population and job growth in the past few years and is also a leading national health care hub and a thriving tourism center. Between January 2019 and December 2021, total nonfarm staffing grew 4.9 percent in the MSA,⁶ while total nonfarm staffing in the United States decreased 0.2 percent.⁷ According to the Bureau of Labor Statistics (BLS), the industries with the largest number of employees are health care and social assistance (99,945), accommodation and food services (67,175), retail trade (61,772), and

⁴ “Quickfacts.” *United States Census Bureau*, <https://www.census.gov/quickfacts/fact/table/US.TN,williamsoncountytennessee,maurycountytennessee,davidsoncountytennessee/PST045221>. Accessed 28 Mar 2023.

⁵ *Ibid.*
⁶ “All Employees: Total Nonfarm in Nashville-Davidson-Murfreesboro-Franklin, TN (MSA).” *Federal Reserve Economic Data (FRED)*, *St. Louis Fed*, <https://fred.stlouisfed.org/series/NASH947NA>. Accessed 28 March 2023.

⁷ “All Employees: Total Nonfarm.” *Federal Reserve Economic Data (FRED)*, *St. Louis Fed*, <https://fred.stlouisfed.org/series/PAYEMS>. Accessed 28 March 2023.

administrative and waste services (61,143). These four industries make up 46.0 percent of all private sector industries in the assessment area as of December 2021. The leading private sector employers are Vanderbilt University Medical Center, Nissan North America, Hospital Corporation of America Holdings, Inc., Vanderbilt University, and Saint Thomas Health Services.⁸

Small businesses play an important role in the Nashville economy. According to 2021 Dun & Bradstreet (D&B) data, there were 54,231 businesses in the Nashville assessment area, 90.6 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered small businesses. Additionally, 17.9 percent of small businesses in the assessment area were located in moderate-income tracts, while there were fewer in low-income tracts at 9.9 percent.

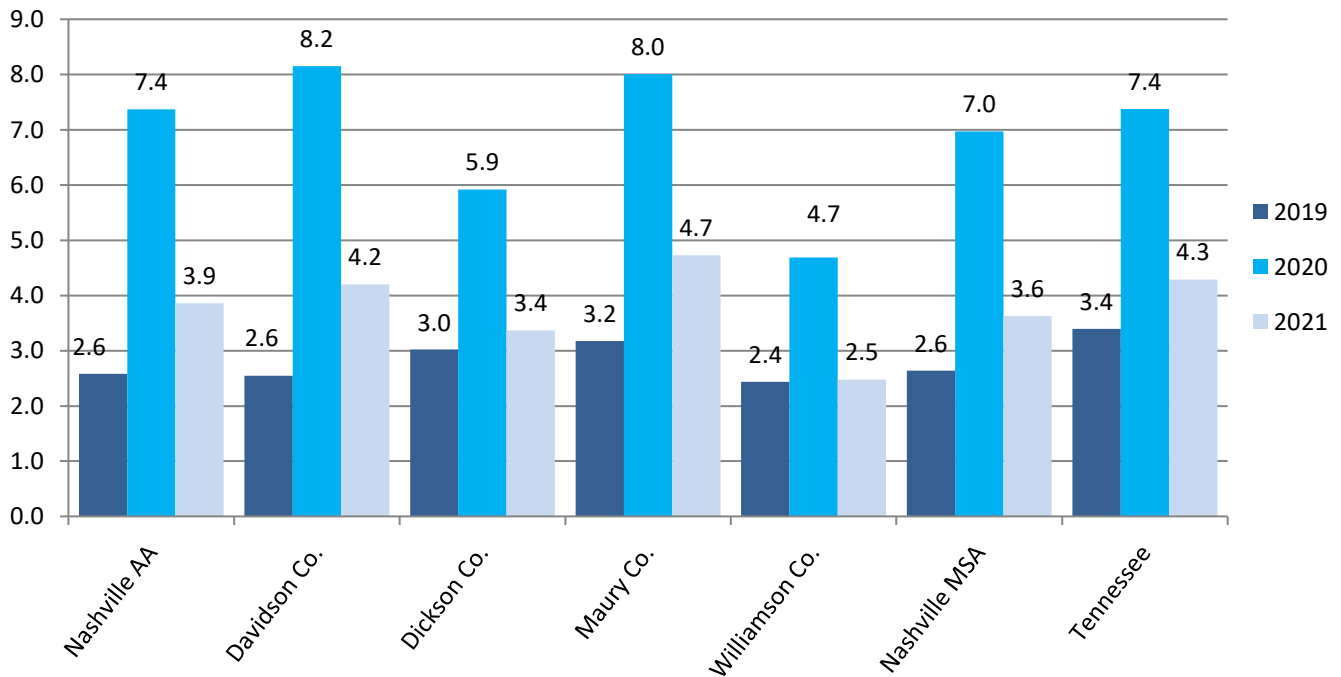
The early stages of the COVID-19 had a crippling effect on economic activity across the U.S., including Nashville's famous entertainment, music, and food industry. Precautionary measures taken by city and state officials along with increased COVID-19 contraction risk and case counts continued to stunt consumer demand for certain services, especially those in the travel, leisure, entertainment, and food industries. To help keep the nation's economy afloat during the crisis, the U.S. Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The CARES Act established the Paycheck Protection Act, which provided fully forgivable loans to small businesses to cover payroll and other costs.⁹ These efforts resulted in increased demand and steep growth in lending to businesses during the review period, particularly in 2020 and 2021. Specifically, the number of small business loans made by all lenders (loans less than or equal to \$1 million) in the assessment area increased by 36.3 percent between 2019 and 2021 with 37,226 loans made in 2021 as compared to 27,321 small business loans made in 2019.

The robust economic climate in this area is evident in the low unemployment rates. As shown in the following chart, the Nashville assessment area continues to have a lower unemployment rate when compared to the state of Tennessee. However, it is worth noting that Maury County (where First Farmers is headquartered and has a strategic focus) has a current unemployment rate that is increasing and is higher than the state of Tennessee. This was further confirmed with discussions with community contacts.

⁸ "Major Employers." *Nashville Area Chamber of Commerce*, <https://www.nashvillechamber.com/explore/work/major-employers>. Accessed 28 March 2023.

⁹ "Paycheck Protection Program." *United States Department of the Treasury*, <https://home.treasury.gov/policy-issues/coronavirus/assistance-for-small-businesses/paycheck-protection-program>. Accessed 28 March 2023.

Unemployment Rates - Nashville



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

Housing Characteristics

According to 2021 FFIEC census data, there were 398,716 housing units located in the assessment area, 55.6 percent of which were owner-occupied, 36.3 percent of which were rental units, and 8.2 percent were vacant. In low-income census tracts, 28.6 percent of housing units were owner-occupied, while 58.7 percent were rental units. In moderate-income census tracts, 40.3 percent of housing units were owner-occupied, while 50.1 percent were rental units, and 9.6 percent were vacant. These figures point to home ownership challenges in LMI tracts, given a limited supply of owner-occupied housing available. Additionally, the median age of the housing stock across the assessment area was 39 years, while the median was 53 years in low-income census tracts and 45 years in moderate-income tracts.

Population and employment growth is driving a hot real estate market in the Nashville MSA. However, home prices vary widely throughout the assessment area, and homeownership in the assessment area is becoming less affordable, particularly for LMI families. Using the assumption that a borrower can obtain a loan for approximately three times their annual income, and using 2021 FFIEC median family income figures, a family at the top of the low-income bracket (\$39,599) can afford a \$118,797 home; a family at the top of the moderate-income bracket (\$63,359) could afford a home priced at \$190,077. To put these prices in context for 2021, Maury County had an average median home sales price of \$287,271; Davidson County had an average median home sales price of \$497,585; and Williamson County had an average median home sales price of \$655,203.¹⁰ Furthermore, the average annual wage for accommodation and food services and retail trade, two of the primary

¹⁰ “Median Sales Price for Single Family Homes in 2020.” *PolicyMap*, www.policymap.com. Based on data from Moody’s Analytics. Accessed 28 March 2023.

industry sectors in the assessment area, is \$22,326 and \$37,144, respectively; these are also two of the lowest paid sectors in the assessment area.¹¹

The median rent price varies within the assessment area, ranging from \$1,032 per month in Maury County to \$1,670 per month in Williamson County; these figures are higher than the Tennessee median rent of \$951.¹² A family at the top of the low-income bracket wanting to cap rental costs at 30.0 percent of income could afford a maximum rent of \$990; this figure is \$1,584 for a moderate-income family at the top of the moderate-income bracket. Over 46.0 percent of all renters in the assessment area are cost-burdened, putting more than 30.0 percent of their annual income toward housing.¹³ Of those renters who are cost-burdened, 83.0 percent make less than \$50,000 annually and are considered LMI.

When considering all of these housing characteristics, the data suggests that low-income families likely struggle to find affordable rental property. Additionally, data suggests that LMI families lack sufficient means to move into homeownership without significant assistance, as they are the most cost-burdened and have little to no money remaining each month to save for down payment and/or closing costs needed to purchase a home.

Assessment Area Demographics

The following tables provide demographic and business information from the FFIEC and D&B used to analyze the bank's CRA performance in the Nashville assessment area. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

¹¹ "Average Annual Wage in 2020." *PolicyMap*, www.policymap.com. Based on data from the BLS Quarterly Census of Employment and Wages. Accessed 28 March 2023.

¹² "Estimated Median Gross Rent, between 2017-2021." *PolicyMap*, www.policymap.com. Based on data from the U.S. Census. Accessed 28 March 2023.

¹³ "Estimated Median Renter Cost Burden, between 2017-2021." *PolicyMap*, www.policymap.com. Based on data from the U.S. Census. Accessed 28 March 2023.

Combined Demographics Report - 2019

Assessment Area: Nashville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	30	13.3%	21,300	9.0%	7,587	35.6%	52,203	22.0%
Moderate-income	55	24.4%	54,586	23.0%	10,098	18.5%	38,778	16.3%
Middle-income	68	30.2%	75,313	31.7%	6,420	8.5%	44,436	18.7%
Upper-income	69	30.7%	86,523	36.4%	2,623	3.0%	102,305	43.0%
Unknown-income	3	1.3%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	225	100.0%	237,722	100.0%	26,728	11.2%	237,722	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	44,669	12,756	5.4%	28.6%	26,231	58.7%	5,682	12.7%
Moderate-income	104,296	44,933	19.1%	43.1%	49,149	47.1%	10,214	9.8%
Middle-income	133,452	79,644	33.9%	59.7%	43,266	32.4%	10,542	7.9%
Upper-income	137,329	97,658	41.6%	71.1%	31,073	22.6%	8,598	6.3%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	419,746	234,991	100.0%	56.0%	149,719	35.7%	35,036	8.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5,160	9.5%	4,455	9.1%	663	13.4%	42	9.2%
Moderate-income	10,270	18.9%	9,163	18.8%	1,049	21.1%	58	12.7%
Middle-income	12,831	23.7%	11,948	24.5%	803	16.2%	80	17.5%
Upper-income	25,342	46.7%	22,801	46.7%	2,269	45.7%	272	59.5%
Unknown-income	637	1.2%	453	0.9%	179	3.6%	5	1.1%
Total Assessment Area	54,240	100.0%	48,820	100.0%	4,963	100.0%	457	100.0%
Percentage of Total Businesses:			90.0%		9.2%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	15	2.5%	15	2.6%	0	0.0%	0	0.0%
Moderate-income	105	17.8%	99	17.1%	3	42.9%	3	75.0%
Middle-income	176	29.9%	173	29.9%	3	42.9%	0	0.0%
Upper-income	290	49.2%	288	49.8%	1	14.3%	1	25.0%
Unknown-income	3	0.5%	3	0.5%	0	0.0%	0	0.0%
Total Assessment Area	589	100.0%	578	100.0%	7	100.0%	4	100.0%
Percentage of Total Farms:			98.1%		1.2%		0.7%	

Based on 2019 FFIEC Census Data and 2019 D&B Information

Combined Demographics Report - 2020, 2021

Assessment Area: Nashville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	30	14.0%	21,300	9.5%	7,587	35.6%	48,593	21.6%	
Moderate-income	49	22.8%	46,197	20.6%	8,776	19.0%	35,920	16.0%	
Middle-income	64	29.8%	70,438	31.4%	6,105	8.7%	41,767	18.6%	
Upper-income	69	32.1%	86,523	38.5%	2,623	3.0%	98,178	43.7%	
Unknown-income	3	1.4%	0	0.0%	0	0.0%	0	0.0%	
Total Assessment Area	215	100.0%	224,458	100.0%	25,091	11.2%	224,458	100.0%	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied		Rental		Vacant			
		#	%	%	#	%	#	%	
Low-income	44,669	12,756	5.8%	28.6%	26,231	58.7%	5,682	12.7%	
Moderate-income	90,876	36,597	16.5%	40.3%	45,566	50.1%	8,713	9.6%	
Middle-income	125,842	74,592	33.7%	59.3%	41,681	33.1%	9,569	7.6%	
Upper-income	137,329	97,658	44.1%	71.1%	31,073	22.6%	8,598	6.3%	
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%	
Total Assessment Area	398,716	221,603	100.0%	55.6%	144,551	36.3%	32,562	8.2%	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	5,367	9.9%	4,682	9.5%	636	13.7%	49	11.1%	
Moderate-income	9,697	17.9%	8,717	17.7%	941	20.3%	39	8.8%	
Middle-income	12,449	23.0%	11,661	23.7%	710	15.3%	78	17.6%	
Upper-income	26,082	48.1%	23,625	48.1%	2,186	47.1%	271	61.2%	
Unknown-income	636	1.2%	466	0.9%	164	3.5%	6	1.4%	
Total Assessment Area	54,231	100.0%	49,151	100.0%	4,637	100.0%	443	100.0%	
		Percentage of Total Businesses:		90.6%		8.6%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported			
		#	%	#	%	#	%	#	%
Low-income	14	2.8%	14	2.8%	0	0.0%	0	0.0%	
Moderate-income	52	10.4%	47	9.5%	3	50.0%	2	100.0%	
Middle-income	160	31.9%	158	32.0%	2	33.3%	0	0.0%	
Upper-income	273	54.4%	272	55.1%	1	16.7%	0	0.0%	
Unknown-income	3	0.6%	3	0.6%	0	0.0%	0	0.0%	
Total Assessment Area	502	100.0%	494	100.0%	6	100.0%	2	100.0%	
		Percentage of Total Farms:		98.4%		1.2%		0.4%	

Based on 2021 FFIEC Census Data and 2021 D&B information

Credit and Community Development Needs

To better understand the local community development and economic landscape, individuals familiar with the community and with community development activities were contacted. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs through lending, investment, and/or service activities. According to these contacts, affordable workforce housing, small business assistance, and predatory lending are concerns for the area.

Contacts indicated that the Nashville area's community development environment is strong, with numerous nonprofits providing financial counseling and community development organizations targeting LMI individuals and families. Additionally, there are several active CDFIs specializing in affordable housing and small business lending. This creates a favorable environment and opportunity for banks to partner with nonprofits, developers, and CDFIs to provide affordable housing, neighborhood revitalization, and small business development. According to the contacts, most banks in the area are active in the community development projects and in lending to LMI communities and individuals, both directly and indirectly through CDFIs and other nonprofits. Contacts also noted that while the economy in the Nashville MSA is strong overall, there are some areas throughout North Nashville that continue to experience significant need and a concentrated level of disinvestment.

One of the community contacts, a specialist engaged in affordable housing initiatives, explained that housing challenges in Nashville are twofold: the area faces a housing shortage in the next few years and the area is losing many of its naturally occurring affordable housing (or NOAH) options. NOAH refers to residential rental properties that are below market rate rent and affordable to LMI households but unsubsidized by any federal program. According to the housing contact, the older apartment complexes that are NOAH are being sold and renovated by investors or cash buyers and converted to luxury apartments with market-rate or above market-rate rents. With increased demand in the area for these properties by outside investors, nonprofit affordable housing developers have struggled to secure the additional funding needed to compete for these units. These issues have led to some existing LMI homeowners or renters being displaced through gentrification and prospective LMI homeowners or renters being priced out of housing within the city centers and forced to live farther away from where they work.

The housing contact also stated that rising housing and land costs have further challenged nonprofits in the area, reducing their ability to construct or rehabilitate affordable homes at a rate comparable to prior years. While land is available for development, affordable residential development is not feasible due to cost. Additionally, private investors are targeting high-end price points to maximize profits. This has created an extremely challenging and competitive environment for LMI individuals seeking affordable housing and has also created additional need for down payment and closing costs assistance programs. The contact explained that banks can collaborate with nonprofit affordable housing organizations to help address these challenges, primarily through providing capital or grants. Additional options include seeking housing tax credits or investment opportunities in loan consortiums targeting affordable housing.

The second community contact, a specialist who works with small businesses, indicated that access to capital is a barrier to launching and growing new businesses. According to the contact, many small business owners in the area do not have the collateral or the personal net worth that would allow them to meet traditional bank underwriting standards. The contact added that many local banks do not extend smaller dollar commercial loans even though many small businesses seek funding in smaller amounts. The contact stated that in some instances, banks that are unable to meet these needs will partner with and refer an applicant to local small business development centers (SBDC) or CDFIs to address the need. This was noted by the contact as an impactful way to address small business needs. The contact encouraged banks to provide educational services to small businesses and to either partner with SBDCs or CDFIs specializing in small business lending or be more flexible on collateral standards and debt-service coverage ratios with small business lending.

Community contacts also expressed concerns over predatory lending and check cashing businesses, particularly in LMI communities. Contacts encourage banks to find alternative solutions to predatory lending and adjust their approach to financial literacy to also include wealth building and retention for LMI individuals. Both contacts stated that First Farmers was active in addressing needs in the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

As previously noted in the *Scope of Examination* section, small business lending received greater weight in determining the bank's overall Lending Test ratings. During the review period, the bank reported 1,167 small business loans and 374 HMDA-reportable loans in the Nashville assessment area. Also, as previously stated, this assessment area accounts for 66.7 percent of the bank's deposits and 70.0 percent of the bank's HMDA-reportable and CRA small business loans (by dollar volume) within all assessment areas.

Within the Nashville assessment area, First Farmers' lending levels reflect good responsiveness to the credit needs. The geographic distribution of loans reflects excellent penetration, and the distribution of borrowers reflects excellent penetration among business of different revenue sizes and borrowers of different income levels. Similarly, the bank exhibits an excellent record of serving the credit needs of very small businesses and low-income individuals and areas. In addition, the bank makes a relatively high level of community development loans.

Lending Activity

Lending levels reflect good responsiveness to the credit needs of the Nashville assessment area. Of the 1,167 small business loans in this assessment area, 812 were PPP loans. Additionally, of the 374 HMDA-reportable loans, 186 (49.7 percent) were home refinance loans; 144 (38.5 percent) were home purchase loans; 24 (6.4 percent) were other purpose closed/exempt; 11 (2.9 percent) were home improvement loans; and 9 (2.4 percent) were multifamily loans.

The bank's lending activity in the Nashville assessment area represents 57.6 percent (by number) and 70.0 percent (by dollar) of total 2019, 2020, and 2021 small business and HMDA loans made in the bank's combined assessment areas. These figures are in line with the share of total bank branches in the assessment area (68.2 percent) and total bank deposits held in the assessment area (68.1 percent). Additionally, the bank ranked in the top 20 CRA lenders and top 100 HMDA lenders within the assessment area, which is highly competitive. As such, lending levels are good.

Geographic Distribution of Loans

For this analysis, the bank's geographic distribution of small business and HMDA-reportable lending was compared to available demographic information and aggregate performance. Loans originated in 2019, 2020, and 2021 were analyzed using FFIEC census data and D&B data for each year and 2011-2015 American Community Survey (ACS) 5-year estimates. Performance context issues were taken into consideration as well. Considering all of these factors, the bank's geographic distribution of loans reflects excellent penetration throughout the assessment area and does not reveal any conspicuous lending gaps.

Small Business Lending

Overall, the bank's small business lending reflects an excellent geographic distribution when compared to assessment area demographics and aggregate lending.

The following table shows the geographic distribution of small business loans within the Nashville assessment area for 2019, 2020, and 2021. It also includes a comparison of the bank's small business lending to D&B and to the aggregate lenders within the assessment area. The CRA aggregate lenders' data are the combined total of lending activity reported by all lenders subject to CRA loan data reporting requirements in the assessment area.

**Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Nashville**

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending, Demographic Data							Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2019							2020, 2021					2020					2021						
		Count		Bank		Dollar		Agg	Total	Count		Bank		Dollar		Total	Count		Bank		Dollar		Agg	Total	
		#	%	Agg %	\$ (000s)	\$ %	\$ %	%	#	%	\$ (000s)	\$ %	%	#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %
SMALL BUSINESSES	Low	22	16.1%	9.9%	4,591	14.5%	12.2%	9.5%	148	14.4%	13,673	14.7%	9.9%	101	16.9%	9.9%	9,671	16.9%	12.3%	47	10.9%	9.8%	4,002	11.0%	13.2%
	Moderate	30	21.9%	18.4%	9,113	28.8%	19.1%	18.9%	212	20.6%	31,722	34.0%	17.9%	121	20.2%	16.8%	17,939	31.4%	18.6%	91	21.1%	17.5%	13,783	38.1%	19.1%
	Middle	37	27.0%	21.2%	5,974	18.9%	17.3%	23.7%	300	29.1%	23,438	25.1%	23.0%	156	26.0%	21.2%	14,119	24.7%	16.5%	144	33.4%	22.6%	9,319	25.7%	15.9%
	Upper	43	31.4%	48.3%	11,259	35.6%	48.9%	46.7%	363	35.2%	22,984	24.6%	48.1%	219	36.6%	50.9%	15,306	26.8%	49.9%	144	33.4%	48.7%	7,678	21.2%	49.3%
	Unknown	5	3.6%	1.0%	672	2.1%	2.2%	1.2%	7	0.7%	1,486	1.6%	1.2%	2	0.3%	1.1%	49	0.1%	2.6%	5	1.2%	1.1%	1,437	4.0%	2.5%
	Tr Unknown	0	0.0%	1.2%	0	0.0%	0.3%	1.2%	0	0.0%	0	0.0%	0.2%	0	0.0%	0.2%	0	0.0%	0.1%	0	0.0%	0.3%	0	0.0%	0.0%
	Total	137	100%	100%	31,609	100%	100%	1,030	100%	93,303	100%	100%	599	100%	100%	57,084	100%	100%	431	100%	100%	36,219	100%	100%	

As shown, First Farmers originated 137 small business loans in 2019; 599 small business loans in 2020; and 431 small business loans in 2021. In all three years, the bank’s performance exceeded the percentage of total businesses and aggregate performance in LMI tracts. Therefore, the geographic distribution of the bank’s small business lending is deemed excellent for LMI tracts, and for the assessment area overall.

Residential Real Estate (HMDA) Lending

Overall, the bank’s HMDA-reportable lending reflects an excellent geographic distribution when compared to assessment area demographics and aggregate lending. The tables and performance context discussed in this section provide details supporting this conclusion.

The following tables show the geographic distribution of First Farmers’ HMDA-reportable loans in 2019, 2020, and 2021 in the Nashville assessment area. It also includes a comparison of the bank’s HMDA-reportable lending to the FFIEC and ACS data as well as to aggregate HMDA lenders within the assessment area. The HMDA aggregate lenders’ data are the combined total of lending activity reported by all lenders subject to the HMDA in the assessment area.

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Nashville

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending, Demographic Data							Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2019							2020, 2021					2020				2021							
		Count		Dollar		Owner Occupied Units	%	%	Count		Dollar		Owner Occupied Units	%	Count		Dollar		Agg \$ %	Count		Dollar			
		#	%	\$ (000s)	\$ %				#	%	\$ (000s)	\$ %			#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	#	%
HOME PURCHASE	Low	4	6.8%	8.5%	1,272	7.7%	7.7%	5.4%	18	21.2%	6,663	19.0%	5.8%	11	28.2%	9.2%	4,786	29.0%	8.1%	7	15.2%	9.5%	1,877	10.1%	8.4%
	Moderate	19	32.2%	17.8%	4,279	25.9%	12.6%	19.1%	15	17.6%	2,887	8.2%	16.5%	8	20.5%	15.6%	1,183	7.2%	11.6%	7	15.2%	16.8%	1,704	9.2%	12.4%
	Middle	19	32.2%	32.9%	5,220	31.6%	25.9%	33.9%	31	36.5%	11,145	31.8%	33.7%	9	23.1%	33.6%	3,259	19.8%	26.7%	22	47.8%	33.6%	7,886	42.6%	26.4%
	Upper	17	28.8%	40.9%	5,765	34.9%	53.7%	41.6%	21	24.7%	14,309	40.9%	44.1%	11	28.2%	41.5%	7,269	44.1%	53.5%	10	21.7%	40.0%	7,040	38.0%	52.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%
Total	59	100%	100%	16,536	100%	100%	100%	85	100%	35,004	100%	100%	39	100%	100%	16,497	100%	100%	46	100%	100%	18,507	100%	100%	
REFINANCE	Low	5	6.8%	6.2%	1,074	3.8%	5.1%	5.4%	8	7.1%	1,630	4.6%	5.8%	3	4.3%	6.1%	390	1.8%	5.3%	5	11.6%	6.2%	1,240	9.3%	5.2%
	Moderate	13	17.6%	15.7%	2,283	8.0%	10.1%	19.1%	25	22.3%	4,847	13.7%	16.5%	15	21.7%	11.5%	2,324	10.5%	8.0%	10	23.3%	13.3%	2,523	18.9%	8.9%
	Middle	18	24.3%	31.7%	5,366	18.8%	24.5%	33.9%	39	34.8%	9,736	27.5%	33.7%	21	30.4%	28.0%	6,071	27.5%	21.4%	18	41.9%	30.3%	3,665	27.4%	22.8%
	Upper	38	51.4%	46.4%	19,781	69.4%	60.4%	41.6%	40	35.7%	19,220	54.2%	44.1%	30	43.5%	54.5%	13,286	60.2%	65.2%	10	23.3%	50.3%	5,934	44.4%	63.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	74	100%	100%	28,504	100%	100%	100%	112	100%	35,433	100%	100%	69	100%	100%	22,071	100%	100%	43	100%	100%	13,362	100%	100%	
HOME IMPROVEMENT	Low	0	0.0%	4.9%	0	0.0%	3.9%	5.4%	1	16.7%	41	5.5%	5.8%	1	25.0%	4.1%	41	12.2%	3.8%	0	0.0%	4.1%	0	0.0%	3.5%
	Moderate	3	60.0%	15.1%	226	55.8%	10.6%	19.1%	0	0.0%	0	0.0%	16.5%	0	0.0%	9.3%	0	0.0%	5.6%	0	0.0%	10.5%	0	0.0%	6.8%
	Middle	2	40.0%	29.9%	179	44.2%	24.5%	33.9%	1	16.7%	108	14.5%	33.7%	0	0.0%	28.5%	0	0.0%	22.0%	1	50.0%	26.6%	108	26.5%	19.5%
	Upper	0	0.0%	50.1%	0	0.0%	60.9%	41.6%	4	66.7%	594	79.9%	44.1%	3	75.0%	58.0%	294	87.8%	68.5%	1	50.0%	58.8%	300	73.5%	70.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	5	100%	100%	405	100%	100%	100%	6	100%	743	100%	100%	4	100%	100%	335	100%	100%	2	100%	100%	408	100%	100%	
MULTIFAMILY	Low	0	0.0%	26.1%	0	0.0%	19.3%	15.3%	1	12.5%	2,000	29.1%	15.6%	1	16.7%	29.4%	2,000	42.8%	14.2%	0	0.0%	25.0%	0	0.0%	21.3%
	Moderate	1	100.0%	30.4%	370	100.0%	18.8%	32.4%	2	25.0%	2,268	33.0%	31.9%	1	16.7%	28.6%	568	12.2%	10.2%	1	50.0%	32.4%	1,700	77.4%	36.0%
	Middle	0	0.0%	29.0%	0	0.0%	40.7%	26.9%	3	37.5%	1,031	15.0%	26.8%	2	33.3%	32.8%	534	11.4%	69.6%	1	50.0%	29.4%	497	22.6%	34.1%
	Upper	0	0.0%	14.5%	0	0.0%	21.1%	25.3%	2	25.0%	1,570	22.9%	25.8%	2	33.3%	9.2%	1,570	33.6%	6.0%	0	0.0%	13.2%	0	0.0%	8.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	1	100%	100%	370	100%	100%	100%	8	100%	6,869	100%	100%	6	100%	100%	4,672	100%	100%	2	100%	100%	2,197	100%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	3.6%	0	0.0%	2.0%	5.4%	0	0.0%	0	0.0%	5.8%	0	0.0%	3.4%	0	0.0%	2.0%	0	0.0%	3.5%	0	0.0%	2.1%
	Moderate	0	0.0%	10.5%	0	0.0%	6.0%	19.1%	0	0.0%	0	0.0%	16.5%	0	0.0%	7.5%	0	0.0%	4.0%	0	0.0%	7.5%	0	0.0%	4.2%
	Middle	0	0.0%	29.3%	0	0.0%	21.2%	33.9%	0	0.0%	0	0.0%	33.7%	0	0.0%	24.8%	0	0.0%	17.2%	0	0.0%	22.7%	0	0.0%	15.8%
	Upper	0	0.0%	56.6%	0	0.0%	70.8%	41.6%	0	0.0%	0	0.0%	44.1%	0	0.0%	64.3%	0	0.0%	76.8%	0	0.0%	66.2%	0	0.0%	77.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	

Originations & Purchases
Based on 2019 & 2021 FFIEC Census Data; 2011-2015 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Nashville

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending, Demographic Data							Bank Lending & Demographic Data					Bank & Aggregate Lending											
		2019							2020, 2021					2020				2021							
		Count		Dollar		Owner Occupied Units	%	%	Count		Dollar		Owner Occupied Units	%	Count		Dollar		Agg \$ %	Count		Dollar			
		#	%	\$ (000s)	\$ %				#	%	\$ (000s)	\$ %			#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	#	%
OTHER PURPOSE CLOSED/EXEMPT	Low	1	8.3%	7.9%	205	9.4%	4.9%	5.4%	0	0.0%	0	0.0%	5.8%	0	0.0%	6.7%	0	0.0%	4.1%	0	0.0%	6.3%	0	0.0%	3.7%
	Moderate	1	8.3%	19.1%	20	0.9%	10.1%	19.1%	2	16.7%	273	6.3%	16.5%	0	0.0%	13.1%	0	0.0%	5.8%	2	33.3%	11.1%	273	10.7%	4.2%
	Middle	2	16.7%	30.5%	518	23.7%	15.9%	33.9%	6	50.0%	1,967	45.2%	33.7%	3	50.0%	24.7%	1,648	91.4%	13.0%	3	50.0%	24.6%	319	12.5%	10.9%
	Upper	8	66.7%	42.5%	1,441	66.0%	69.0%	41.6%	4	33.3%	2,110	48.5%	44.1%	3	50.0%	55.5%	155	8.6%	77.1%	1	16.7%	58.0%	1,955	76.8%	81.2%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	12	100%	100%	2,184	100%	100%	100%	12	100%	4,350	100%	100%	6	100%	100%	1,803	100%	100%	6	100%	100%	2,547	100%	100%	
PURPOSE NOT APPLICABLE	Low	0	0.0%	10.5%	0	0.0%	6.5%	5.4%	0	0.0%	0	0.0%	5.8%	0	0.0%	6.8%	0	0.0%	5.5%	0	0.0%	7.7%	0	0.0%	5.0%
	Moderate	0	0.0%	27.9%	0	0.0%	18.6%	19.1%	0	0.0%	0	0.0%	16.5%	0	0.0%	24.2%	0	0.0%	15.2%	0	0.0%	24.6%	0	0.0%	16.9%
	Middle	0	0.0%	40.3%	0	0.0%	34.7%	33.9%	0	0.0%	0	0.0%	33.7%	0	0.0%	44.1%	0	0.0%	37.9%	0	0.0%	49.2%	0	0.0%	43.3%
	Upper	0	0.0%	21.4%	0	0.0%	40.2%	41.6%	0	0.0%	0	0.0%	44.1%	0	0.0%	24.9%	0	0.0%	41.4%	0	0.0%	18.5%	0	0.0%	34.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
HMDA TOTALS	Low	10	6.6%	7.3%	2,551	5.3%	7.5%	5.4%	28	12.6%	10,334	12.5%	5.8%	16	12.9%	7.1%	7,217	15.9%	6.6%	12	12.1%	7.3%	3,117	8.4%	7.2%
	Moderate	37	24.5%	16.7%	7,178	15.0%	12.1%	19.1%	44	19.7%	10,275	12.5%	16.5%	24	19.4%	13.0%	4,075	9.0%	9.4%	20	20.2%	14.3%	6,200	16.7%	11.5%
	Middle	41	27.2%	32.2%	11,283	23.5%	26.4%	33.9%	80	35.9%	23,987	29.1%	33.7%	35	28.2%	30.1%	11,								

reported a low volume of home improvement loans that were not sufficient for analysis. Thus, consideration was given only to home refinance and home purchase loans in this assessment area.

In 2019, the bank originated 151 HMDA-reportable loans with 10 loans (6.6 percent) in low-income tracts and 37 loans (24.5 percent) in moderate-income tracts. In low-income tracts, the percentage of bank loans exceeded the percentage of owner-occupied units (5.4 percent) and was slightly below aggregate performance (7.3 percent). This reflected good performance in low-income tracts. In moderate-income census tracts, the percentage of bank loans exceeded both the percentage of owner-occupied units (19.1 percent) and aggregate performance (16.7 percent). This reflected excellent performance in moderate-income tracts.

In 2020, the bank originated 124 HMDA-reportable loans with 16 loans (12.9 percent) in low-income tracts and 24 loans (19.4 percent) in moderate-income tracts. Overall, the percentage of bank loans in both low- and moderate-income geographies exceeded the percentage of owner-occupied units (5.8 percent in low-income tracts and 16.5 percent in moderate-income tracts) and aggregate lending (7.1 percent in low-income tracts and 13.0 percent in moderate-income tracts). This reflected excellent performance in LMI tracts.

In 2021, the bank originated 99 HMDA-reportable loans with 12 loans (12.1 percent) in low-income tracts and 20 loans (20.2 percent) in moderate-income tracts. Similar to bank performance in 2020, the bank's percentage of loans in both low- and moderate-income geographies exceeded the percentage of owner-occupied units (5.8 percent in low-income tracts and 16.5 percent in moderate-income tracts) and aggregate lending (7.3 percent in low-income tracts and 14.3 percent in moderate-income tracts). This reflected excellent performance in LMI tracts.

When reviewed by HMDA product types, the bank performed better than the demographic for both the home refinance and home purchase category in LMI tracts for all three years. For the home refinance category, bank performance exceeded aggregate performance in LMI tracts for all years except for performance in low-income tracts in 2020, where the bank's performance was slightly less than aggregate performance. For the home purchase category, bank performance in low-income tracts slightly less than the 2019 aggregate lender performance but significantly exceeded 2020 and 2021 aggregate performance. Similarly, bank performance in moderate-income tracts for the same product was slightly below the 2021 aggregate performance but significantly exceeded 2019 and 2020 aggregate lender performance.

Lending to Businesses of Different Sizes and Borrowers of Different Incomes

For this analysis, the distribution of small business lending across business revenue sizes and HMDA-reportable lending across borrower income levels was compared to available demographic information and aggregate performance. Performance context issues were also considered. Considering all these factors and the greater weight placed on small business lending, the bank's distribution of loans reflects excellent penetration among businesses of different sizes and customers of different income levels in the Nashville assessment area.

Small Business Lending

Overall, the bank's small business lending reflects an excellent borrower distribution when compared to assessment area demographics and aggregate lending.

The following table shows, by business revenue and loan size, the number and dollar volume of small business loans originated by First Farmers in 2019, 2020, and 2021.

**Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: Nashville**

PRODUCT TYPE		Bank & Aggregate Lending, Demographic Data							Bank Lending & Demographic Data							Bank & Aggregate Lending													
		2019							2020, 2021							2020							2021						
		Count		Dollar			Total Businesses	Count	Dollar		Total Businesses	Count			Dollar			Count		Dollar									
		Bank	Agg	\$ (000s)	\$ %	Agg			Bank	\$ (000s)		\$ %	#	%	Agg	\$ (000s)	\$ %	Agg	#	%	Agg	\$ (000s)	\$ %	Agg					
SMALL BUSINESS	Revenue	\$1 Million or Less	89	65.0%	48.5%	17,280	54.7%	36.9%	90.0%	140	13.6%	20,669	22.2%	90.6%	70	11.7%	41.7%	8,399	14.7%	27.0%	70	16.2%	47.0%	12,270	33.9%	31.9%			
		Over \$1 Million	47	34.3%		14,243	45.1%		9.2%	66	6.4%	23,360	25.0%	8.6%	32	5.3%					34	7.9%							
		Total Rev. available	136	99.3%		31,523	99.7%		99.2%	206	20.0%	44,029	47.2%	99.2%	102	17.0%						104	24.1%						
		Rev. Not Known	1	0.7%		86	0.3%		0.8%	824	80.0%	49,274	52.8%	0.8%	497	83.0%						327	75.9%						
		Total	137	100%		31,609	100%		100.0%	1,030	100%	93,303	100%	100%	599	100%						431	100%						
	Loan Size	\$100,000 or Less	67	48.9%	90.8%	2,681	8.5%	27.5%		824	80.0%	21,513	23.1%		471	78.6%	84.5%	13,366	23.4%	26.2%	353	81.9%	89.3%	8,147	22.5%	28.9%			
		\$100,001 - \$250,000	26	19.0%	4.3%	4,532	14.3%	15.4%		104	10.1%	16,393	17.6%		69	11.5%	8.5%	11,116	19.5%	20.3%	35	8.1%	5.5%	5,277	14.6%	17.4%			
		\$250,001 - \$1 Million	44	32.1%	5.0%	24,396	77.2%	57.1%		102	9.9%	55,397	59.4%		59	9.8%	7.0%	32,602	57.1%	53.5%	43	10.0%	5.2%	22,795	62.9%	53.6%			
		Total	137	100%	100.0%	31,609	100%	100.0%		1,030	100%	93,303	100%		599	100%	100%	57,084	100%	100%	431	100%	100%	36,219	100%	100%			
		Loan Size & Rev \$1 Mill or Less	47	52.8%		1,579	9.1%			91	65.0%	3,643	17.6%																
Loan Size & Rev \$1 Mill or Less	\$100,001 - \$250,000	15	16.9%		2,569	14.9%			21	15.0%	3,550	17.2%																	
	\$250,001 - \$1 Million	27	30.3%		13,132	76.0%			28	20.0%	13,476	65.2%																	
	Total	89	100%		17,280	100%			140	100%	20,669	100%																	

In 2019, First Farmers originated 89 of its small business loans (65.0 percent) to businesses with gross annual revenues of \$1 million or less, while small businesses represented 90.0 percent of total businesses in the assessment area. This was an improvement from previous exams and continued to show an upward trend in the bank’s lending performance to small businesses. Additionally, bank performance significantly exceeded that of aggregate lenders in the assessment area (48.5 percent). This performance was deemed good in 2019.

In 2020 and 2021, bank originations to businesses with gross annual revenues of \$1 million or less fell significantly for the bank. However, these volumes do not fully reflect bank performance to small businesses. Specifically, because the PPP did not require banks to collect revenue information for businesses obtaining PPP loans, banks were not required to report revenue information on those loan types. Additionally, PPP loans were considered responsive to the credit needs of small businesses. As a result, those banks with significant volumes of PPP loans in an assessment area (including First Farmers) have correlated high volumes of small business loans with Revenues Not Known. As shown in the previous table, First Farmers had 497 (or 83.0 percent) of its small business loans in 2020 and 327 (or 75.9 percent) of its small business loans in 2021 with Revenues Not Known. In order to fully analyze and form a conclusion for small business lending during these years, a deeper dive into the PPP loans was necessary.

Using loan size as a proxy for a small business in the assessment area, the table shows that 471 (or 78.6 percent) of the small business loans originated in 2020 were for a loan amount less than or equal to \$100,000. Further supporting this is PPP loan data from the SBA website¹⁴, which shows that 412 of those 471 loans were PPP loans. A similar outcome is noted in 2021, where the table shows 353 (or 81.9 percent) of the small business loans originated in 2021 were for a loan amount less than or equal to \$100,000. The SBA website¹⁵ shows that 300 of these 353 loans were PPP loans. The data from 2020 and 2021 is an indicator that very small businesses were the largest recipients of the bank’s PPP loan efforts. As such, distribution of small business lending in 2020 and 2021 was deemed excellent. Further supporting these conclusions is performance context gleaned from community contacts. The small business contact specifically noted the need for smaller dollar loans and more flexible ways to address small business needs in times of crisis. The data indicates that First Farmers, in participating in the PPP, provided a large percentage of its loans for small dollar amounts and helped address a core small business need in the assessment area.

¹⁴ “PPP Loan Data.” *Small Business Administration*, <https://www.sba.gov/funding-programs/loans/covid-19-relief-options/paycheck-protection-program/ppp-data>. Accessed 9 March 2023.

¹⁵ Ibid.

Residential Real Estate (HMDA) Lending

Overall, the bank’s HMDA-reportable lending reflects good penetration across borrowers of different income levels when compared to assessment area demographics, aggregate lending, and performance context. The tables and performance context discussed in this section provide details supporting this conclusion.

The following tables show the distribution of the bank’s HMDA-reportable loans by the income level of the borrowers along with demographic and aggregate information.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Nashville

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending, Demographic Data							Bank Lending & Demographic Data					Bank & Aggregate Lending													
		2019							2020, 2021					2020				2021									
		Bank			Families by Family Income %	Bank		Families by Family Income %	Bank		Families by Family Income %	Count		Dollar		Agg \$ %	Count		Dollar								
		Count	Agg %	Dollar \$ (000s)		Dollar \$ %	Count		Dollar \$ (000s)	Dollar \$ %		Count	Agg %	Count	Agg %		Count	Agg %	Count	Agg %	Count	Agg %					
#	%	%	\$	%	%	#	%	\$	%	%	#	%	%	\$	%	\$	%	\$	%	%	#	%	%	\$	%	\$	%
HOME PURCHASE	Low	1	1.7%	3.7%	102	0.6%	1.8%	22.0%	2	2.4%	235	0.7%	21.6%	1	2.6%	4.1%	110	0.7%	2.0%	1	2.2%	3.4%	125	0.7%	1.6%		
	Moderate	2	3.4%	16.6%	403	2.4%	10.3%	16.3%	4	4.7%	688	2.0%	16.0%	2	5.1%	17.8%	217	1.3%	11.5%	2	4.3%	14.7%	471	2.5%	8.9%		
	Middle	10	16.9%	19.6%	2,249	13.6%	15.5%	18.7%	9	10.6%	2,474	7.1%	18.6%	4	10.3%	19.7%	1,052	6.4%	16.1%	5	10.9%	17.8%	1,422	7.7%	13.7%		
	Upper	36	61.0%	47.9%	11,255	68.1%	60.2%	43.0%	48	56.5%	23,942	68.4%	43.7%	22	56.4%	47.6%	11,535	69.9%	59.5%	26	56.5%	47.1%	12,407	67.0%	58.6%		
	Unknown	10	16.9%	12.3%	2,527	15.3%	12.2%	0.0%	22	25.9%	7,665	21.9%	0.0%	10	25.6%	10.9%	3,583	21.7%	10.8%	12	26.1%	17.1%	4,082	22.1%	17.2%		
	Total	59	100%	100%	16,536	100%	100%	100%	85	100%	35,004	100%	100%	39	100%	100%	16,497	100%	100%	46	100%	100%	18,507	100%	100%		
REFINANCE	Low	5	6.8%	5.7%	489	1.7%	2.5%	22.0%	10	8.9%	930	2.6%	21.6%	5	7.2%	3.8%	330	1.5%	1.7%	5	11.6%	5.1%	600	4.5%	2.4%		
	Moderate	6	8.1%	13.8%	734	2.6%	8.1%	16.3%	17	15.2%	1,941	5.5%	16.0%	11	15.9%	11.9%	1,285	5.8%	7.3%	6	14.0%	13.9%	656	4.9%	8.5%		
	Middle	9	12.2%	17.8%	1,662	5.8%	13.4%	18.7%	15	13.4%	3,129	8.8%	18.6%	4	5.8%	17.6%	673	3.0%	13.9%	11	25.6%	18.0%	2,456	18.4%	14.0%		
	Upper	50	67.6%	45.6%	24,109	84.6%	58.5%	43.0%	59	52.7%	26,381	74.5%	43.7%	45	65.2%	50.7%	19,064	86.4%	61.0%	14	32.6%	44.7%	7,317	54.8%	56.9%		
	Unknown	4	5.4%	17.0%	1,510	5.3%	17.5%	0.0%	11	9.8%	3,052	8.6%	0.0%	4	5.8%	15.9%	719	3.3%	16.2%	7	16.3%	18.2%	2,333	17.5%	18.3%		
	Total	74	100%	100%	28,504	100%	100%	100%	112	100%	35,433	100%	100%	69	100%	100%	22,071	100%	100%	43	100%	100%	13,362	100%	100%		
HOME IMPROVEMENT	Low	1	20.0%	5.0%	29	7.2%	2.7%	22.0%	1	16.7%	41	5.5%	21.6%	1	25.0%	3.8%	41	12.2%	1.9%	0	0.0%	4.4%	0	0.0%	2.1%		
	Moderate	2	40.0%	13.3%	159	39.3%	8.6%	16.3%	2	33.3%	190	25.6%	16.0%	1	25.0%	12.4%	82	24.5%	7.2%	1	50.0%	10.9%	108	26.5%	6.1%		
	Middle	0	0.0%	19.6%	0	0.0%	15.2%	18.7%	1	16.7%	300	40.4%	18.6%	0	0.0%	16.4%	0	0.0%	12.6%	1	50.0%	16.0%	300	73.5%	11.3%		
	Upper	1	20.0%	59.3%	85	21.0%	68.5%	43.0%	2	33.3%	212	28.5%	43.7%	2	50.0%	61.7%	212	63.3%	68.9%	0	0.0%	65.0%	0	0.0%	75.1%		
	Unknown	1	20.0%	2.9%	132	32.6%	5.0%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	5.7%	0	0.0%	9.4%	0	0.0%	3.7%	0	0.0%	5.4%		
	Total	5	100%	100%	405	100%	100%	100%	6	100%	743	100%	100%	4	100%	100%	335	100%	100%	2	100%	100%	408	100%	100%		
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.0%	0	0.0%	0	0.0%	21.6%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%		
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.3%	0	0.0%	0	0.0%	16.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%		
	Middle	0	0.0%	2.2%	0	0.0%	0.1%	18.7%	0	0.0%	0	0.0%	18.6%	0	0.0%	0.8%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%		
	Upper	0	0.0%	10.1%	0	0.0%	0.6%	43.0%	1	12.5%	568	8.3%	43.7%	1	16.7%	12.6%	568	12.2%	1.6%	0	0.0%	9.6%	0	0.0%	1.2%		
	Unknown	1	100.0%	87.7%	370	100.0%	99.3%	0.0%	7	87.5%	6,301	91.7%	0.0%	5	83.3%	85.7%	4,104	87.8%	98.3%	2	100.0%	90.4%	2,197	100.0%	98.8%		
	Total	1	100%	100%	370	100%	100%	100%	8	100%	6,869	100%	100%	6	100%	100%	4,672	100%	100%	2	100%	100%	2,197	100%	100%		
OTHER PURPOSE LOC	Low	0	0.0%	4.6%	0	0.0%	2.0%	22.0%	0	0.0%	0	0.0%	21.6%	0	0.0%	4.0%	0	0.0%	1.8%	0	0.0%	2.6%	0	0.0%	1.2%		
	Moderate	0	0.0%	11.7%	0	0.0%	6.2%	16.3%	0	0.0%	0	0.0%	16.0%	0	0.0%	9.3%	0	0.0%	4.4%	0	0.0%	8.6%	0	0.0%	4.1%		
	Middle	0	0.0%	19.1%	0	0.0%	11.8%	18.7%	0	0.0%	0	0.0%	18.6%	0	0.0%	16.3%	0	0.0%	9.8%	0	0.0%	13.5%	0	0.0%	8.0%		
	Upper	0	0.0%	63.1%	0	0.0%	78.2%	43.0%	0	0.0%	0	0.0%	43.7%	0	0.0%	66.9%	0	0.0%	79.7%	0	0.0%	72.9%	0	0.0%	83.4%		
	Unknown	0	0.0%	1.6%	0	0.0%	1.7%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	3.5%	0	0.0%	4.3%	0	0.0%	2.5%	0	0.0%	3.3%		
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%		

Originations & Purchases
Based on 2019 & 2021 FFIEC Census Data; 2011-2015 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Nashville

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending, Demographic Data										Bank Lending & Demographic Data										Bank & Aggregate Lending									
		2019										2020, 2021					2020					2021									
		Bank		Dollar		Families by Family Income %	Bank		Dollar		Families by Family Income %	Count		Dollar		Count		Dollar													
		#	%	\$ (000s)	%		#	%	\$ (000s)	%		#	%	\$ (000s)	%	#	%	\$ (000s)	%	#	%	\$ (000s)	%								
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	5.8%	0	0.0%	2.4%	22.0%	1	8.3%	35	0.8%	21.6%	0	0.0%	7.1%	0	0.0%	2.0%	1	16.7%	7.3%	35	1.4%	2.4%						
	Moderate	1	8.3%	13.8%	107	4.9%	5.3%	16.3%	3	25.0%	221	5.1%	16.0%	1	16.7%	12.5%	73	4.0%	4.0%	2	33.3%	12.4%	148	5.8%	4.7%						
	Middle	4	33.3%	20.4%	459	21.0%	11.6%	18.7%	1	8.3%	248	5.7%	18.6%	1	16.7%	11.6%	248	13.8%	5.5%	0	0.0%	14.2%	0	0.0%	6.0%						
	Upper	6	50.0%	52.9%	1,418	64.9%	69.3%	43.0%	7	58.3%	3,846	88.4%	43.7%	4	66.7%	53.5%	1,482	82.2%	73.8%	3	50.0%	56.0%	2,364	92.8%	75.5%						
	Unknown	1	8.3%	7.1%	200	9.2%	11.3%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	15.3%	0	0.0%	14.7%	0	0.0%	10.1%	0	0.0%	11.4%						
	Total	12	100%	100%	2,184	100%	100%	100%	12	100%	4,350	100%	100%	6	100%	100%	1,803	100%	100%	6	100%	100%	2,547	100%	100%						
PURPOSE NOT APPLICABLE	Low	0	0.0%	3.5%	0	0.0%	1.5%	22.0%	0	0.0%	0	0.0%	21.6%	0	0.0%	2.2%	0	0.0%	1.2%	0	0.0%	4.8%	0	0.0%	2.3%						
	Moderate	0	0.0%	2.8%	0	0.0%	2.2%	16.3%	0	0.0%	0	0.0%	16.0%	0	0.0%	2.0%	0	0.0%	1.8%	0	0.0%	2.2%	0	0.0%	1.6%						
	Middle	0	0.0%	2.4%	0	0.0%	3.0%	18.7%	0	0.0%	0	0.0%	18.6%	0	0.0%	1.4%	0	0.0%	1.3%	0	0.0%	1.0%	0	0.0%	0.9%						
	Upper	0	0.0%	2.4%	0	0.0%	5.4%	43.0%	0	0.0%	0	0.0%	43.7%	0	0.0%	1.3%	0	0.0%	1.8%	0	0.0%	1.0%	0	0.0%	2.7%						
	Unknown	0	0.0%	88.9%	0	0.0%	87.9%	0.0%	0	0.0%	0	0.0%	0.0%	0	0.0%	93.1%	0	0.0%	93.9%	0	0.0%	91.1%	0	0.0%	92.4%						
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%						
HMDA TOTALS	Low	7	4.6%	4.5%	620	1.3%	1.9%	22.0%	14	6.3%	1,241	1.5%	21.6%	7	5.6%	3.9%	481	1.1%	1.8%	7	7.1%	4.4%	760	2.1%	1.9%						
	Moderate	11	7.3%	15.0%	1,403	2.9%	8.6%	16.3%	26	11.7%	3,040	3.7%	16.0%	15	12.1%	13.8%	1,657	3.7%	8.6%	11	11.1%	13.9%	1,383	3.7%	8.1%						
	Middle	23	15.2%	18.7%	4,370	9.1%	13.5%	18.7%	26	11.7%	6,151	7.5%	18.6%	9	7.3%	18.0%	1,973	4.3%	14.1%	17	17.2%	17.6%	4,178	11.3%	12.9%						
	Upper	93	61.6%	47.9%	36,867	76.8%	55.4%	43.0%	117	52.5%	54,949	66.7%	43.7%	74	59.7%	49.7%	32,861	72.4%	58.5%	43	43.4%	47.0%	22,088	59.7%	55.7%						
	Unknown	17	11.3%	13.8%	4,739	9.9%	20.6%	0.0%	40	17.9%	17,018	20.7%	0.0%	19	15.3%	14.6%	8,406	18.5%	17.0%	21	21.2%	17.2%	8,612	23.3%	21.4%						
	Total	151	0.0%	100%	47,999	0.0%	100%	100%	223	0.0%	82,399	0.0%	100%	124	0.0%	100%	45,378	0.0%	100%	99	0.0%	100%	37,021	0.0%	100%						

Originations & Purchases
Based on 2019 & 2021 FFIEC Census Data; 2011-2015 ACS data

As previously described, performance in the home refinance product was given more weight when deriving overall HMDA conclusions, followed by performance in the home purchase product. The bank reported a low volume of home improvement loans that were not sufficient for analysis. Thus, consideration was given only to home refinance and home purchase loans in this assessment area.

In 2019, the bank originated 7 loans (4.6 percent) to low-income borrowers and 11 loans (7.3 percent) to moderate-income borrowers. Bank performance to low-income borrowers was significantly less than the percentage of families considered low-income (22.0 percent) but is in line with aggregate lending performance (4.5 percent). This reflects adequate performance to low-income borrowers. In contrast, the bank's performance to moderate-income borrowers is significantly less than both the percentage of families considered moderate-income (16.3 percent) and aggregate lending performance (15.0 percent). This reflects poor performance to moderate-income borrowers.

In 2020, the bank originated 7 loans (5.6 percent) to low-income borrowers and 15 loans (12.1 percent) to moderate-income borrowers. Bank performance to low-income borrowers was significantly less than the percentage of families considered low-income (21.6 percent) but exceeds aggregate lending performance (3.9 percent). This reflects good performance to low-income borrowers. Bank performance to moderate-income borrowers is slightly below both the percentage of families considered moderate-income (16.0 percent) and aggregate lending performance (13.8 percent). This reflects adequate performance to moderate-income borrowers.

In 2021, the bank originated 7 loans (7.1 percent) to low-income borrowers and 11 loans (11.1 percent) to moderate-income borrowers. Bank performance to low-income borrowers was significantly less than the percentage of families considered low-income (21.6 percent) but greatly exceeds aggregate lending performance (4.4 percent). This reflects good performance to low-income borrowers. Bank performance to moderate-income borrowers is slightly below both the percentage of families considered moderate-income (16.0 percent) and aggregate lending performance (13.9 percent). This reflects adequate performance to moderate-income borrowers.

When reviewed by product type, the bank performed less than the demographic for refinance lending to moderate-income borrowers in 2020 and 2021. The bank performed better than the aggregate for refinance lending to low-income borrowers in all three years and to moderate-income borrowers in 2020 and 2021. In contrast, for home purchase lending, the bank performed below demographic and aggregate comparisons for both low- and moderate-income borrowers across all three years.

While performance to individual income categories varied, the bank's HMDA-reportable lending reflects a good penetration across borrowers of different income levels when considering performance context. Specifically, the bank acts as a broker in offering FHA loans, as previously described under the *Product Innovation* section. In its arrangement, First Farmers offers the product but does not originate the loan, which results in none of the FHA loans offered and referred by First Farmers being included on its HMDA LAR, and thus, not included in any of the previous volumes discussed. According to the FHA handbook website, while there are no rules that specifically limit FHA-insured mortgage loans to low-income borrowers, the program has long been popular among this audience. Most people who use FHA loans to buy a house fall into the LMI brackets.¹⁶ First Farmers provided volumes of referrals made in this assessment area through the broker arrangement, which provided additional context as to the bank's impact to LMI individuals. Specifically, the bank's referrals resulted in 23 FHA loans originated by other financial institutions throughout the review period. Of those 23 FHA loans, 18 were purchase and the remaining 5 were refinance loan types. While income details were not available for individual loans referred, the implication is that many of these would benefit LMI borrowers, given the historical use of the FHA product.¹⁷

Community Development Lending

First Farmers makes a relatively high level of community development loans in its Nashville assessment area. During the review period, the bank originated 3 community development loans totaling \$26.8 million and 14 community development PPP loans totaling \$33.1 million. Specifically, the bank originated \$38.3 million towards revitalization and stabilization efforts both through the PPP and outside of the PPP; \$12.8 million in affordable housing initiatives; and \$8.8 million to support economic development through the PPP.

The bank's current lending by number of loans and dollar volume is in line with peer performance in this area. Additionally, two of the qualified loans were particularly impactful and responsive to assessment area needs. Impactful and responsive loans include:

- A \$14.0 million loan to construct a mixed-income housing development in a low-income census tract. Part of the area has been identified for revitalization through a formal revitalization plan called the Nashville Promise¹⁸. This loan was part of a participation pool between several financial institutions, and First Farmers was the lead lender of the pool.
- A \$12.3 million loan to construct townhomes in a moderate-income census tract in Nashville. The property is made up of income-restricted units, with income maximums set below 80 percent of the median family income. This loan was part of a participation pool between several financial institutions, and First Farmers was the lead lender of the pool.

¹⁶ Brandon Cornett. "Are FHA Loans Only for Borrowers with Low Income?" *FHA Handbook Blog*, <http://www.fhahandbook.com/blog/fha-for-low-income-borrowers/>. Accessed 29 March 2023.

¹⁷ Ibid.

¹⁸ "Nashville Promise Zone." *U.S. Department of Housing and Urban Development*, June 2016, https://www.hud.gov/sites/documents/NASHVILLE_ZONE_3RD.PDF. Accessed 30 March 2023.

Use of Innovative or Flexible Lending Practices

As previously mentioned, the bank offers a variety of lending-related products for consumers and small businesses. This includes FHA, VA, and USDA loans, down payment assistance programs, a consumer non-real estate loan program to combat predatory lending, and SBA loan programs for small businesses. The bank also participated in the PPP and offered loan payment deferrals as a result of the COVID-19 pandemic. All aforementioned practices are available to individuals and businesses in the Nashville assessment area.

INVESTMENT TEST

First Farmers makes an adequate level of qualified community development investments and grants relative to its asset size, capacity, and service area. During the review period, the bank made investments (excluding contributions) totaling \$3.2 million and had one prior period investment with a current balance of \$250,000. The bank's investments supported affordable housing efforts through two mortgage-backed securities and a certificate of deposit in a minority-owned financial institution. First Farmers also contributed \$89,200 to nonprofit organizations benefitting or primarily serving the Nashville assessment area. Several of the donations were noted as responsive, including:

- Three donations totaling \$22,500 to a local affordable housing nonprofit. These donations were earmarked to specific programs offered by the nonprofit, including a home building program for new LMI homeowners and a critical repair program for existing LMI homeowners.
- Two donations totaling \$20,000 to a local community nonprofit. The donations provided funding to help LMI individuals escape predatory lending practices, a need noted by the community contacts in the area.
- Four donations totaling \$25,000 to a local homeless shelter.

As previously described under the Investment Test write up in the *Institution* section, all assessment areas benefit from \$1.0 million broader statewide investments to local CDFIs. Additionally, the Nashville assessment area also benefits from \$32,150 in donations to nonprofit organizations serving both the Nashville and Middle Tennessee assessment areas.

SERVICE TEST

Retail Services

First Farmers' service delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the Nashville assessment area. The distribution of the bank's 15 branch offices as of December 31, 2021, was compared to the distribution of households and businesses among the tract categories within the assessment area. All but one branch office offer full-service automated teller machines (ATMs), and the bank has ten cash-only ATMs in the assessment area.

During the review period, the bank closed a branch in a moderate-income census tract within Dickson County and sold the branch to another financial institution; the branch remains open under the new financial institution's name. As such, the bank's record of opening and closing branches has generally not adversely affected the accessibility of these delivery systems, particularly to LMI geographies or individuals. Additionally, business hours and banking services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and individuals. Hours are relatively standard, with all but one of the bank's lobby offices open 8:30 a.m. to 4 p.m. Monday through Thursday and 8:30 a.m. to 5 p.m. on Friday. Drive-thru hours begin at 7:30 a.m. One office offers weekend lobby hours, and three other offices offer weekend drive-thru hours.

The following tables display the bank’s branch and ATM distribution in 2019, 2020, and 2021 based on FFIEC Census Data and 2015 ACS Data.

Geographic Distribution of Branches & ATMS - 2019

Assessment Area: Nashville

Tract Category	Branches								ATMs								Demographics					
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	1	6.7%	0	0	0	1	1	Total	2	8.0%	1	7.1%	0	0	1	9.1%	0	0	30	13.3%	10.1%	9.5%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				
Moderate	4	26.7%	0	1	3	4	1	Total	9	36.0%	3	21.4%	0	1	6	54.5%	0	0	55	24.4%	24.5%	18.9%
DTO	1		0	0	1			SA	6		0		0	0	6		0	0				
Middle	3	20.0%	0	0	3	3	0	Total	6	24.0%	3	21.4%	0	0	3	27.3%	0	1	68	30.2%	31.9%	23.7%
DTO	0		0	0	0			SA	3		0		0	0	3		0	1				
Upper	7	46.7%	0	0	6	7	0	Total	8	32.0%	7	50.0%	0	0	1	9.1%	0	0	69	30.7%	33.5%	46.7%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	3	1.3%	0.0%	1.2%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	15	100%	0	1	12	15	2	Total	25	100%	14	100%	0	1	11	100%	0	1	225	100%	100%	100%
DTO	1		0	0	1			SA	11		0		0	0	11		0	1				

Based on 2019 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Geographic Distribution of Branches & ATMS - 2020 - 2021

Assessment Area: Nashville

Tract Category	Branches								ATMs								Demographics					
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	1	6.7%	0	0	0	1	1	Total	2	8.3%	1	7.1%	0	0	1	10.0%	0	0	30	14.0%	10.6%	9.9%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				
Moderate	4	26.7%	0	0	4	4	1	Total	9	37.5%	3	21.4%	0	0	6	60.0%	0	0	49	22.8%	22.4%	17.9%
DTO	1		0	0	1			SA	6		0		0	0	6		0	0				
Middle	3	20.0%	0	0	3	3	0	Total	6	25.0%	3	21.4%	0	0	3	30.0%	0	0	64	29.8%	31.8%	23.0%
DTO	0		0	0	0			SA	3		0		0	0	3		0	0				
Upper	7	46.7%	0	0	6	7	0	Total	7	29.2%	7	50.0%	0	0	0	0.0%	0	1	69	32.1%	35.2%	48.1%
DTO	0		0	0	0			SA	0		0		0	0	0		0	1				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	3	1.4%	0.0%	1.2%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	15	100%	0	0	13	15	2	Total	24	100%	14	100%	0	0	10	100%	0	1	215	100%	100%	100%
DTO	1		0	0	1			SA	10		0		0	0	10		0	1				

Based on 2021 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

The bank provides a relatively high level of community development services in the Nashville assessment area given its size and scope. During the review period, 9 bank employees provided 21 community development service activities totaling 427 hours to 14 different organizations operating throughout the Nashville assessment area. Bank staff served on the board for several organizations that provide affordable housing and community services targeted to LMI individuals. Bank employees also engaged in financial education in schools and throughout local community organizations, including small business intermediaries. The hours of community development services exceed the bank’s hours at its previous examination, which is noteworthy given the challenges associated with providing in-person services during the pandemic.

As previously described under the Service Test write up in the *Institution* section, all assessment areas benefit from 50 hours of community development service to statewide organizations serving the broader regional area. Additionally, the Nashville assessment area also benefits from 115 hours of community development services impacting both the Nashville and Middle Tennessee assessment areas.

**NONMETROPOLITAN AREAS
LIMITED-SCOPE REVIEWS**

The following assessment areas were reviewed using limited-scope examination procedures.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NONMETROPOLITAN ASSESSMENT AREAS

- Middle Tennessee Assessment Area (*Giles, Lawrence, and Marshall Counties*)
 - As of December 31, 2021, First Farmers operated five branches in the assessment area, representing 22.7 percent of its total branches.
 - As of June 30, 2021, First Farmers had \$461.3 million in deposits in this assessment area, representing a market share of 18.1 percent and 27.2 percent of the bank’s total deposits.
- Hickman County Assessment Area
 - As of December 31, 2021, First Farmers operated two branches in the assessment area, representing 9.1 percent of its total branches.
 - As of June 30, 2021, First Farmers had \$103.5 million in deposits in this assessment area, representing a market share of 36.7 percent and 6.1 percent of the bank’s total deposits.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, each assessment area’s performance was evaluated and compared with the bank’s overall performance. The conclusions regarding performance are provided in the table below. Please refer to the tables in Appendices D and E for additional information regarding these areas.

Performance in the Limited-Scope Review Nonmetropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Middle Tennessee	Not Consistent (Below)	Consistent	Consistent
Hickman County	Not Consistent (Below)	Not Consistent (Below)	Consistent

For the overall Lending Test, First Farmers received a rating of outstanding. Performance in both of these limited-scope assessment areas was below the overall Lending Test performance. For the geographic distribution of loans, lending was good in Middle Tennessee and not applicable in Hickman County, which had only middle-income census tracts. Borrower distribution was good in both Middle Tennessee and Hickman County assessment areas. Community development lending performance in these assessment areas was as follows: the bank made a low level in Middle Tennessee (\$9.1 million) and made no community development loans in Hickman County.

For the overall Investment Test, First Farmers received a rating of low satisfactory. The bank had an adequate level of investments in Middle Tennessee (\$1.1 million), which was consistent with the bank’s overall investment performance. The bank had a poor level of investments in Hickman County (\$1,000), which was below the bank’s overall investment performance.

For the overall Service Test, First Farmers received a rating of low satisfactory. Performance for both limited-scope assessment areas was consistent with the overall Service Test performance. The bank's offices in the Middle Tennessee and Hickman County assessment areas are reasonably accessible and the bank did not open or close any branches in these assessment areas during the review period. Business hours and service offerings are the same in these two limited-scope areas as in the Nashville assessment area. Given the bank's size and staffing in these assessment areas, bank representatives provided a relatively high level of community development services in both Middle Tennessee (274 hours) and Hickman County (27 hours).

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED			
HMDA and Small Business Lending: January 1, 2019 to December 31, 2021			
Community Development Lending, Investments, and Services: January 1, 2020 to September 30, 2022			
FINANCIAL INSTITUTION		PRODUCTS REVIEWED	
First Farmers and Merchants Bank – Columbia, Tennessee		HMDA and Small Business Loans	
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED	
N/A	N/A	N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREA</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Nashville-Davidson-Murfreesboro-Franklin MSA - Davidson County - Maury County - Williamson County	Full-scope review	None	
Middle Tennessee Non-MSA - Giles County - Lawrence County - Marshall County	Limited-scope review	None	
Hickman County Non-MSA - Hickman County	Limited-scope review	None	

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM	Automated Teller Machine
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LMI	Low-and Moderate-Income
LTD	Loan-to-Deposit
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention

Because the percentages presented in tables were rounded to the nearest tenth in most cases, some columns may not total exactly 100 percent.

General Information

The CRA requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of First Farmers and Merchants Bank prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of March 20, 2023. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – GLOSSARY

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

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 MSAs. 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 multi-family 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 (Board), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) 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, FDIC, and OCC, 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 nonrelatives 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).

APPENDIX C – GLOSSARY (Continued)

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 MSA 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 multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings 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 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.

Multi-family: 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 examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

APPENDIX C – GLOSSARY (Continued)

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 MA. 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 MA, the institution will receive a rating for the multistate MA.

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the 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 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 at least 120 percent of the area median income, or a median family income at least 120 percent, in the case of a geography.

**APPENDIX D – DEMOGRAPHIC AND LENDING TABLES FOR
LIMITED-SCOPE ASSESSMENT AREAS**

Combined Demographics Report

Assessment Area: Middle TN

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income		
	#	%	#	%	#	%	#	%	
Low-income	0	0.0%	0	0.0%	0	0.0%	4,955	17.9%	
Moderate-income	2	8.0%	1,997	7.2%	578	28.9%	4,821	17.4%	
Middle-income	19	76.0%	18,988	68.6%	2,439	12.8%	5,719	20.7%	
Upper-income	4	16.0%	6,709	24.2%	606	9.0%	12,199	44.0%	
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total Assessment Area	25	100.0%	27,694	100.0%	3,623	13.1%	27,694	100.0%	
	Housing Units by Tract	Housing Types by Tract							
		Owner-Occupied				Rental		Vacant	
		#	%	%	#	%	#	%	
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%	
Moderate-income	3,589	1,365	4.7%	38.0%	1,946	54.2%	278	7.7%	
Middle-income	31,683	20,433	70.5%	64.5%	6,937	21.9%	4,313	13.6%	
Upper-income	9,938	7,186	24.8%	72.3%	1,502	15.1%	1,250	12.6%	
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%	
Total Assessment Area	45,210	28,984	100.0%	64.1%	10,385	23.0%	5,841	12.9%	
	Total Businesses by Tract	Businesses by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate-income	312	10.2%	261	9.5%	45	18.4%	6	11.3%	
Middle-income	2,164	71.0%	1,950	70.9%	173	70.9%	41	77.4%	
Upper-income	573	18.8%	541	19.7%	26	10.7%	6	11.3%	
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total Assessment Area	3,049	100.0%	2,752	100.0%	244	100.0%	53	100.0%	
Percentage of Total Businesses:				90.3%		8.0%		1.7%	
	Total Farms by Tract	Farms by Tract & Revenue Size							
		Less Than or = \$1 Million				Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Moderate-income	3	1.3%	3	1.3%	0	0.0%	0	0.0%	
Middle-income	162	70.4%	156	70.0%	2	100.0%	4	80.0%	
Upper-income	65	28.3%	64	28.7%	0	0.0%	1	20.0%	
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%	
Total Assessment Area	230	100.0%	223	100.0%	2	100.0%	5	100.0%	
Percentage of Total Farms:				97.0%		0.9%		2.2%	

Based on 2021 FFIEC Census Data and 2021 D&B Information

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: Middle TN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison																	
		2019, 2020, 2021					2019					2020					2021							
		Bank				Total Businesses	Count			Dollar			Count			Dollar			Count			Dollar		
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	64	9.4%	6,472	14.4%	10.2%	6	13.6%	9.4%	874	14.8%	17.2%	33	12.1%	10.4%	3,920	16.6%	12.0%	25	6.9%	6.7%	1,678	10.8%	8.2%
	Middle	566	83.2%	36,660	81.3%	71.0%	37	84.1%	67.2%	5,033	85.1%	70.8%	213	78.3%	69.4%	18,330	77.6%	75.9%	316	86.8%	73.7%	13,297	85.6%	81.3%
	Upper	50	7.4%	1,950	4.3%	18.8%	1	2.3%	20.1%	10	0.2%	11.1%	26	9.6%	19.6%	1,384	5.9%	12.1%	23	6.3%	18.9%	556	3.6%	10.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.3%	0	0.0%	0.9%	0	0.0%	0.6%	0	0.0%	0.1%	0	0.0%	0.7%	0	0.0%	0.2%
Total	680	100%	45,082	100%	100.0%	44	100%	100%	5,917	100%	100%	272	100%	100%	23,634	100%	100%	364	100%	100%	15,531	100%	100%	
SMALL FARM	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	5.3%	31	5.1%	1.3%	1	8.3%	2.3%	31	8.0%	2.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.6%	0	0.0%	0.2%
	Middle	18	94.7%	582	94.9%	70.4%	11	91.7%	67.0%	358	92.0%	59.4%	2	100.0%	89.3%	20	100.0%	90.1%	5	100.0%	78.6%	204	100.0%	67.3%
	Upper	0	0.0%	0	0.0%	28.3%	0	0.0%	29.5%	0	0.0%	37.8%	0	0.0%	10.7%	0	0.0%	9.9%	0	0.0%	19.8%	0	0.0%	32.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.1%	0	0.0%	0.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	19	100%	613	100%	100.0%	12	100%	100%	389	100%	100%	2	100%	100%	20	100%	100%	5	100%	100%	204	100%	100%	

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: Middle TN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison																	
		2019, 2020, 2021					2019					2020					2021							
		Bank				Owner Occupied Units	Count			Dollar			Count			Dollar			Count			Dollar		
		#	%	\$ (000s)	\$ %		%	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	9	7.4%	1,058	4.3%	4.7%	2	4.3%	5.5%	55	0.7%	3.7%	4	11.1%	5.4%	586	10.6%	4.0%	3	7.5%	6.2%	417	3.9%	4.4%
	Middle	95	77.9%	19,837	81.5%	70.5%	35	76.1%	60.9%	5,792	71.1%	56.4%	28	77.8%	61.1%	4,533	81.7%	56.8%	32	80.0%	60.6%	9,512	89.4%	56.9%
	Upper	18	14.8%	3,440	14.1%	24.8%	9	19.6%	33.5%	2,297	28.2%	39.8%	4	11.1%	33.5%	430	7.7%	39.2%	5	12.5%	33.2%	713	6.7%	38.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	122	100%	24,335	100%	100.0%	46	100%	100%	8,144	100%	100%	36	100%	100%	5,549	100%	100%	40	100%	100%	10,642	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	5	3.0%	615	2.6%	4.7%	3	4.5%	3.2%	313	3.2%	2.1%	2	3.6%	2.6%	302	4.0%	1.8%	0	0.0%	3.4%	0	0.0%	2.5%
	Middle	130	77.8%	17,770	73.8%	70.5%	55	82.1%	57.6%	7,664	78.1%	54.1%	42	75.0%	54.6%	5,537	74.2%	52.0%	33	75.0%	57.2%	4,569	67.1%	54.3%
	Upper	32	19.2%	5,700	23.7%	24.8%	9	13.4%	39.2%	1,838	18.7%	43.9%	12	21.4%	42.8%	1,625	21.8%	46.1%	11	25.0%	39.4%	2,237	32.9%	43.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	167	100%	24,085	100%	100.0%	67	100%	100%	9,815	100%	100%	56	100%	100%	7,464	100%	100%	44	100%	100%	6,806	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	4.7%	0	0.0%	4.2%	0	0.0%	3.7%	0	0.0%	1.8%	0	0.0%	0.4%	0	0.0%	6.8%	0	0.0%	3.6%
	Middle	14	82.4%	1,437	72.1%	70.5%	7	77.8%	62.5%	715	87.3%	62.4%	3	75.0%	60.7%	419	48.1%	50.0%	4	100.0%	57.5%	303	100.0%	52.8%
	Upper	3	17.6%	556	27.9%	24.8%	2	22.2%	33.3%	104	12.7%	33.9%	1	25.0%	37.5%	452	51.9%	49.7%	0	0.0%	35.6%	0	0.0%	43.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	17	100%	1,993	100%	100.0%	9	100%	100%	819	100%	100%	4	100%	100%	871	100%	100%	4	100%	100%	303	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	25.2%	0	0.0%	50.0%	0	0.0%	97.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	33.3%	0	0.0%	49.0%
	Middle	1	5.9%	372	100.0%	71.8%	0	0.0%	50.0%	0	0.0%	2.2%	1	100.0%	100.0%	372	100.0%	100.0%	0	0.0%	50.0%	0	0.0%	43.0%
	Upper	0	0.0%	0	0.0%	3.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	16.7%	0	0.0%	8.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	6%	372	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	100%	372	100%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	4.7%	0	0.0%	1.6%	0	0.0%	0.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	70.5%	0	0.0%	53.1%	0	0.0%	62.0%	0	0.0%	64.6%	0	0.0%	40.5%	0	0.0%	61.8%	0	0.0%	70.2%
	Upper	0	0.0%	0	0.0%	24.8%	0	0.0%	45.3%	0	0.0%	37.7%	0	0.0%	35.4%	0	0.0%	59.5%	0	0.0%	38.2%	0	0.0%	29.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Middle TN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020, 2021					Bank & Aggregate Lending Comparison																	
							2019					2020					2021							
		Bank		Owner Occupied Units %	Count		Dollar		Count		Dollar		Count		Dollar		Count		Dollar					
		#	%		\$ (000s)	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	4.5%	125	5.8%	4.7%	1	10.0%	3.8%	125	13.1%	6.1%	0	0.0%	3.6%	0	0.0%	4.6%	0	0.0%	3.1%	0	0.0%	1.1%
	Middle	18	81.8%	1,750	80.9%	70.5%	7	70.0%	73.1%	583	61.2%	70.2%	7	87.5%	53.6%	760	94.5%	54.7%	4	100.0%	65.6%	407	100.0%	53.4%
	Upper	3	13.6%	288	13.3%	24.8%	2	20.0%	23.1%	244	25.6%	23.7%	1	12.5%	42.9%	44	5.5%	40.8%	0	0.0%	31.3%	0	0.0%	45.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	22	100%	2,163	100%	100.0%	10	100%	100%	952	100%	100%	8	100%	100%	804	100%	100%	4	100%	100%	407	100%	100%	
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	4.7%	0	0.0%	3.0%	0	0.0%	1.0%	0	0.0%	2.9%	0	0.0%	2.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	70.5%	0	0.0%	72.7%	0	0.0%	65.1%	0	0.0%	73.5%	0	0.0%	64.0%	0	0.0%	59.4%	0	0.0%	48.3%
	Upper	0	0.0%	0	0.0%	24.8%	0	0.0%	24.2%	0	0.0%	33.9%	0	0.0%	23.5%	0	0.0%	33.7%	0	0.0%	40.6%	0	0.0%	51.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	15	4.6%	1,798	3.4%	4.7%	6	4.5%	4.6%	493	2.5%	5.2%	6	5.7%	3.9%	888	5.9%	2.9%	3	3.3%	4.8%	417	2.3%	4.1%
	Middle	258	78.4%	41,166	77.7%	70.5%	104	78.8%	59.9%	14,754	74.8%	54.7%	81	77.1%	58.2%	11,621	77.2%	54.5%	73	79.3%	58.8%	14,791	81.5%	55.5%
	Upper	56	17.0%	9,984	18.9%	24.8%	22	16.7%	35.4%	4,483	22.7%	40.1%	18	17.1%	37.9%	2,551	16.9%	42.6%	16	17.4%	36.4%	2,950	16.2%	40.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	329	100%	52,948	100%	100.0%	132	100%	100%	19,730	100%	100%	105	100%	100%	15,060	100%	100%	92	100%	100%	18,158	100%	100%	

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: Middle TN

PRODUCT TYPE		Bank Lending & Demographic Data Comparison 2019, 2020, 2021					Bank & Aggregate Lending Comparison																		
							2019					2020					2021								
		Bank		Total Businesses %	Count		Dollar		Count		Dollar		Count		Dollar		Count		Dollar						
		#	%		\$ (000s)	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	
SMALL BUSINESS	Revenue	\$1 Million or Less	84	12.4%	8,510	18.9%	90.3%	28	63.6%	45.1%	2,245	37.9%	27.9%	36	13.2%	28.8%	3,774	16.0%	27.8%	20	5.5%	38.7%	2,491	16.0%	35.1%
		Over \$1 Million	44	6.5%	10,924	24.2%	8.0%	16	36.4%					17	6.3%					11	3.0%				
		Total Rev. available	128	18.8%	19,434	43.1%	98.3%	44	100.0%					53	19.5%					31	8.5%				
		Rev. Not Known	552	81.2%	25,648	56.9%	1.7%	0	0.0%					219	80.5%					333	91.5%				
		Total	680	100%	45,082	100%	100%	44	100%					272	100%					364	100%				
	Loan Size	\$100,000 or Less	577	84.9%	13,656	30.3%	8.0%	26	59.1%	94.0%	1,119	18.9%	35.0%	213	78.3%	87.6%	6,734	28.5%	32.3%	338	92.9%	93.0%	5,803	37.4%	35.6%
		\$100,001 - \$250,000	58	8.5%	9,640	21.4%		12	27.3%	2.9%	2,155	36.4%	15.1%	32	11.8%	6.9%	4,927	20.8%	19.5%	14	3.8%	3.6%	2,558	16.5%	14.9%
		\$250,001 - \$1 Million	44	6.5%	20,452	45.4%		6	13.6%	3.1%	2,643	44.7%	49.9%	27	9.9%	5.5%	11,973	50.7%	48.2%	11	3.0%	3.4%	5,836	37.6%	49.4%
		Total	680	100%	45,082	100%		44	100%	100%	5,917	100%	100%	272	100%	100%	23,634	100%	100%	364	100%	100%	15,531	100%	100%
		Total Farms																							
SMALL FARM	Revenue	\$1 Million or Less	19	100.0%	613	100.0%	97.0%	12	100%	40.9%	389	100%	50.1%	2	100%	30.4%	20	100%	55.6%	5	100%	46.8%	204	100%	78.7%
		Over \$1 Million	0	0.0%	0	0.0%	0.9%	0	0.0%					0	0.0%					0	0.0%				
		Total Rev. available	19	100.0%	613	100.0%	97.8%	12	100.0%					2	100.0%					5	100.0%				
		Not Known	0	0.0%	0	0.0%	2.2%	0	0.0%					0	0.0%						0	0.0%			
		Total	19	100%	613	100%	100%	12	100%					2	100%					5	100%				
	Loan Size	\$100,000 or Less	18	94.7%	363	59.2%		11	25.0%	96.6%	139	2.3%	49.2%	2	0.7%	96.4%	20	0.1%	66.9%	5	1.4%	93.7%	204	1.3%	55.3%
		\$100,001 - \$250,000	1	5.3%	250	40.8%		1	2.3%	2.3%	250	4.2%	25.8%	0	0.0%	3.6%	0	0.0%	33.1%	0	0.0%	4.8%	0	0.0%	27.6%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	1.1%	0	0.0%	25.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.6%	0	0.0%	17.1%
		Total	19	100%	613	100%		12	27.3%	100%	389	6.6%	100%	2	0.7%	100%	20	0.1%	100%	5	1.4%	100%	204	1.3%	100%
		Total Farms																							
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	18	94.7%	363	59.2%																				
	\$100,001 - \$250,000	1	5.3%	250	40.8%																				
	\$250,001 - \$500,000	0	0.0%	0	0.0%																				
	Total	19	100%	613	100%																				
	Total Farms																								

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Middle TN

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020, 2021				Bank & Aggregate Lending Comparison																		
						2019					2020					2021								
		Bank		Families by Family Income %	Count		Bank		Dollar			Bank		Dollar			Bank		Dollar					
		#	%		\$ (000s)	%	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %
HOME PURCHASE	Low	3	2.5%	166	0.7%	17.9%	1	2.2%	2.7%	65	0.8%	1.4%	2	5.6%	2.6%	101	1.8%	1.3%	0	0.0%	1.4%	0	0.0%	0.6%
	Moderate	10	8.2%	1,163	4.8%	17.4%	5	10.9%	14.4%	397	4.9%	9.6%	2	5.6%	16.7%	273	4.9%	11.8%	3	7.5%	14.7%	493	4.6%	9.8%
	Middle	20	16.4%	2,425	10.0%	20.7%	9	19.6%	27.3%	1,113	13.7%	24.3%	4	11.1%	27.7%	344	6.2%	25.2%	7	17.5%	21.7%	968	9.1%	18.4%
	Upper	77	63.1%	18,733	77.0%	44.0%	30	65.2%	38.1%	6,427	78.9%	47.2%	25	69.4%	34.6%	4,321	77.9%	43.3%	22	55.0%	40.1%	7,985	75.0%	49.8%
	Unknown	12	9.8%	1,848	7.6%	0.0%	1	2.2%	17.4%	142	1.7%	17.5%	3	8.3%	18.4%	510	9.2%	18.4%	8	20.0%	22.0%	1,196	11.2%	21.3%
	Total	122	100%	24,335	100%	100.0%	46	100%	100%	8,144	100%	100%	36	100%	100%	5,549	100%	100%	40	100%	100%	10,642	100%	100%
REFINANCE	Low	8	4.8%	359	1.5%	17.9%	3	4.5%	5.1%	133	1.4%	2.6%	1	1.8%	2.9%	31	0.4%	1.4%	4	9.1%	2.7%	195	2.9%	1.2%
	Moderate	22	13.2%	1,807	7.5%	17.4%	8	11.9%	9.9%	783	8.0%	6.3%	7	12.5%	9.2%	491	6.6%	5.9%	7	15.9%	11.4%	533	7.8%	7.4%
	Middle	47	28.1%	5,571	23.1%	20.7%	20	29.9%	21.0%	2,148	21.9%	16.4%	18	32.1%	18.4%	1,966	26.3%	15.0%	9	20.5%	21.2%	1,457	21.4%	18.3%
	Upper	88	52.7%	15,997	66.4%	44.0%	35	52.2%	42.5%	6,523	66.5%	49.8%	29	51.8%	44.1%	4,853	65.0%	50.9%	24	54.5%	42.3%	4,621	67.9%	49.5%
	Unknown	2	1.2%	351	1.5%	0.0%	1	1.5%	21.5%	228	2.3%	24.8%	1	1.8%	25.4%	123	1.6%	26.7%	0	0.0%	22.3%	0	0.0%	23.5%
	Total	167	100%	24,085	100%	100.0%	67	100%	100%	9,815	100%	100%	56	100%	100%	7,464	100%	100%	44	100%	100%	6,806	100%	100%
HOME IMPROVEMENT	Low	1	5.9%	100	5.0%	17.9%	0	0.0%	4.2%	0	0.0%	4.3%	1	25.0%	5.4%	100	11.5%	2.7%	0	0.0%	6.8%	0	0.0%	4.2%
	Moderate	4	23.5%	270	13.5%	17.4%	3	33.3%	13.9%	190	23.2%	14.4%	0	0.0%	8.9%	0	0.0%	9.2%	1	25.0%	8.2%	80	26.4%	9.3%
	Middle	4	23.5%	279	14.0%	20.7%	2	22.2%	23.6%	130	15.9%	20.8%	1	25.0%	32.1%	89	10.2%	22.9%	1	25.0%	21.9%	60	19.8%	18.0%
	Upper	8	47.1%	1,344	67.4%	44.0%	4	44.4%	58.3%	499	60.9%	60.5%	2	50.0%	51.8%	682	78.3%	64.4%	2	50.0%	58.9%	163	53.8%	64.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.8%	0	0.0%	0.8%	0	0.0%	4.1%	0	0.0%	3.7%
	Total	17	100%	1,993	100%	100.0%	9	100%	100%	819	100%	100%	4	100%	100%	871	100%	100%	4	100%	100%	303	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	17.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.7%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	33.3%	0	0.0%	21.0%	0	0.0%	33.3%	0	0.0%	12.7%
	Unknown	1	100.0%	372	100.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	1	100.0%	66.7%	372	100.0%	79.0%	0	0.0%	66.7%	0	0.0%	87.3%
	Total	1	100%	372	100%	100.0%	0	0.0%	100%	0	0.0%	100%	1	100%	100%	372	100%	100%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	17.9%	0	0.0%	7.8%	0	0.0%	4.2%	0	0.0%	12.5%	0	0.0%	5.4%	0	0.0%	1.8%	0	0.0%	1.5%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	7.8%	0	0.0%	4.3%	0	0.0%	12.5%	0	0.0%	7.5%	0	0.0%	9.1%	0	0.0%	4.2%
	Middle	0	0.0%	0	0.0%	20.7%	0	0.0%	17.2%	0	0.0%	10.3%	0	0.0%	33.3%	0	0.0%	18.3%	0	0.0%	25.5%	0	0.0%	15.8%
	Upper	0	0.0%	0	0.0%	44.0%	0	0.0%	67.2%	0	0.0%	81.2%	0	0.0%	39.6%	0	0.0%	65.8%	0	0.0%	58.2%	0	0.0%	73.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	2.1%	0	0.0%	2.9%	0	0.0%	5.5%	0	0.0%	5.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Middle TN

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020, 2021				Bank & Aggregate Lending Comparison																		
						2019					2020					2021								
		Bank		Families by Family Income %	Count		Bank		Dollar			Bank		Dollar			Bank		Dollar					
		#	%		\$ (000s)	%	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %
OTHER PURPOSE CLOSED/EXEMPT	Low	3	13.6%	147	6.8%	17.9%	0	0.0%	3.8%	0	0.0%	6.0%	2	25.0%	17.9%	114	14.2%	11.8%	1	25.0%	6.3%	33	8.1%	2.0%
	Moderate	4	18.2%	401	18.5%	17.4%	1	10.0%	26.9%	55	5.8%	17.5%	2	25.0%	28.6%	262	32.6%	32.3%	1	25.0%	21.9%	84	20.6%	7.3%
	Middle	2	9.1%	145	6.7%	20.7%	2	20.0%	7.7%	145	15.2%	7.1%	0	0.0%	17.9%	0	0.0%	20.2%	0	0.0%	15.6%	0	0.0%	8.6%
	Upper	13	59.1%	1,470	68.0%	44.0%	7	70.0%	57.7%	752	79.0%	66.7%	4	50.0%	32.1%	428	53.2%	31.2%	2	50.0%	53.1%	290	71.3%	76.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.8%	0	0.0%	2.7%	0	0.0%	3.6%	0	0.0%	4.6%	0	0.0%	3.1%	0	0.0%	5.5%
	Total	22	100%	2,163	100%	100.0%	10	100%	100%	952	100%	100%	8	100%	100%	804	100%	100%	4	100%	100%	407	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	17.9%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.5%	0	0.0%	0.8%	0	0.0%	3.1%	0	0.0%	3.4%
	Middle	0	0.0%	0	0.0%	20.7%	0	0.0%	3.0%	0	0.0%	7.5%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	1.5%	0	0.0%	4.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	97.0%	0	0.0%	92.5%	0	0.0%	97.1%	0	0.0%	94.7%	0	0.0%	96.9%	0	0.0%	96.6%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	15	4.6%	772	1.5%	17.9%	4	3.0%	3.6%	198	1.0%	1.8%	6	5.7%	2.9%	346	2.3%	1.4%	5	5.4%	2.2%	228	1.3%	0.9%
	Moderate	40	12.2%	3,641	6.9%	17.4%	17	12.9%	12.7%	1,425	7.2%	8.3%	11	10.5%	12.7%	1,026	6.8%	8.9%	12	13.0%	12.8%	1,190	6.6%	8.5%
	Middle	73	22.2%	8,420	15.9%	20.7%	33	25.0%	24.5%	3,536	17.9%	20.9%	23	21.9%	22.9%	2,399	15.9%	20.0%	17	18.5%	21.3%	2,485	13.7%	18.0%
	Upper	186	56.5%	37,544	70.9%	44.0%	76	57.6%	40.4%	14,201	72.0%	47.1%	60	57.1%	38.9%	10,284	68.3%	46.8%	50	54.3%	41.5%	13,059	71.9%	49.3%
	Unknown	15	4.6%	2,571	4.9%	0.0%	2	1.5%	18.8%	370	1.9%	21.8%	5	4.8%	22.5%	1,005	6.7%	22.9%	8	8.7%	22.2%	1,196	6.6%	23.3%
	Total	329	100%	52,948	100%	100.0%																		

Combined Demographics Report

Assessment Area: Hickman

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	1,198	19.6%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	1,138	18.6%
Middle-income	6	100.0%	6,119	100.0%	899	14.7%	1,324	21.6%
Upper-income	0	0.0%	0	0.0%	0	0.0%	2,459	40.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	6	100.0%	6,119	100.0%	899	14.7%	6,119	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Middle-income	10,281	6,793	100.0%	66.1%	1,976	19.2%	1,512	14.7%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	10,281	6,793	100.0%	66.1%	1,976	19.2%	1,512	14.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	591	100.0%	542	100.0%	37	100.0%	12	100.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	591	100.0%	542	100.0%	37	100.0%	12	100.0%
Percentage of Total Businesses:				91.7%		6.3%		2.0%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Middle-income	35	100.0%	35	100.0%	0	0.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	35	100.0%	35	100.0%	0	0.0%	0	0.0%
Percentage of Total Farms:				100.0%		0.0%		0.0%

Based on 2021 FFIEC Census Data and 2021 D&B Information

Geographic Distribution of Small Business & Small Farm Loans
Assessment Area: Hickman

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison																	
		2019, 2020, 2021					2019					2020					2021							
		Bank				Total Businesses %	Count			Dollar		Agg %	Count			Dollar		Agg %	Count			Dollar		Agg %
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	82	100.0%	5,957	100.0%	100.0%	7	100.0%	99.0%	1,010	100.0%	99.9%	42	100.0%	100.0%	3,989	100.0%	100.0%	33	100.0%	99.6%	958	100.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.0%	0	0.0%	0.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.4%	0	0.0%	0.0%
	Total	82	100%	5,957	100%	100.0%	7	100%	100%	1,010	100%	100%	42	100%	100%	3,989	100%	100%	33	100%	100%	958	100%	100%
SMALL FARM	Total Farms					0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Hickman

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison																	
		2019, 2020, 2021					2019					2020					2021							
		Bank				Owner Occupied Units %	Count			Dollar		Agg %	Count			Dollar		Agg %	Count			Dollar		Agg %
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	12	100.0%	2,094	100.0%	100.0%	7	100.0%	100.0%	1,388	100.0%	100.0%	1	100.0%	100.0%	171	100.0%	100.0%	4	100.0%	100.0%	535	100.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	12	100%	2,094	100%	100.0%	7	100%	100%	1,388	100%	100%	1	100%	100%	171	100%	100%	4	100%	100%	535	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	26	100.0%	3,315	100.0%	100.0%	12	100.0%	100.0%	1,256	100.0%	100.0%	7	100.0%	100.0%	853	100.0%	100.0%	7	100.0%	100.0%	1,206	100.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	26	100%	3,315	100%	100.0%	12	100%	100%	1,256	100%	100%	7	100%	100%	853	100%	100%	7	100%	100%	1,206	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	3	100.0%	180	100.0%	100.0%	2	100.0%	100.0%	135	100.0%	100.0%	1	100.0%	100.0%	45	100.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	3	100%	180	100%	100.0%	2	100%	100%	135	100%	100%	1	100%	100%	45	100%	100%	0	0.0%	100%	0	0.0%	100%
MULTI-FAMILY	Multi-Family Units					0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Hickman

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020, 2021					Bank & Aggregate Lending Comparison																	
		2019, 2020, 2021				Owner Occupied Units %	2019					2020					2021							
		Bank		Dollar			Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	1	100.0%	75	100.0%	100.0%	1	100.0%	100.0%	75	100.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	1	100%	75	100%	100.0%	1	100%	100%	75	100%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	42	100.0%	5,664	100.0%	100.0%	22	100.0%	100.0%	2,854	100.0%	100.0%	9	100.0%	100.0%	1,069	100.0%	100.0%	11	100.0%	100.0%	1,741	100.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	42	100%	5,664	100%	100.0%	22	100%	100%	2,854	100%	100%	9	100%	100%	1,069	100%	100%	11	100%	100%	1,741	100%	100%	

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Small Business & Small Farm Lending By Revenue & Loan Size
Assessment Area: Hickman

PRODUCT TYPE		Bank Lending & Demographic Data Comparison 2019, 2020, 2021					Bank & Aggregate Lending Comparison																			
		2019, 2020, 2021				Total Businesses %	2019					2020					2021									
		Bank		Dollar			Count		Dollar			Count		Dollar			Count		Dollar							
		#	%	\$ (000s)	\$ %		#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %		
SMALL BUSINESS	Revenue	\$1 Million or Less	10	12.2%	501	8.4%	91.7%	5	71.4%	52.7%	161	15.9%	65.8%	3	7.1%	36.3%	316	7.9%	35.5%	2	6.1%	52.3%	24	2.5%	41.5%	
		Over \$1 Million	4	4.9%	1,656	27.8%	6.3%	2	28.6%					2	4.8%					0	0.0%					
		Total Rev. available	14	17.1%	2,157	36.2%	98.0%	7	100.0%					5	11.9%					2	6.1%					
		Rev. Not Known	68	82.9%	3,800	63.8%	2.0%	0	0.0%					37	88.1%						31	93.9%				
		Total	82	100%	5,957	100%	100%	7	100%					42	100%					33	100%					
SMALL BUSINESS	Loan Size	\$100,000 or Less	73	89.0%	1,793	30.1%		6	85.7%	94.0%	210	20.8%	27.1%	35	83.3%	91.5%	1,035	25.9%	33.1%	32	97.0%	93.1%	548	57.2%	35.7%	
		\$100,001 - \$250,000	2	2.4%	268	4.5%		0	0.0%	2.5%	0	0.0%	11.0%	2	4.8%	3.5%	268	6.7%	11.5%	0	0.0%	2.9%	0	0.0%	9.9%	
		\$250,001 - \$1 Million	7	8.5%	3,896	65.4%		1	14.3%	3.5%	800	79.2%	61.9%	5	11.9%	4.9%	2,686	67.3%	55.3%	1	3.0%	4.0%	410	42.8%	54.4%	
		Total	82	100%	5,957	100%		7	100%	100%	1,010	100%	100%	42	100%	100%	3,989	100%	100%	33	100%	100%	958	100%	100%	
		Total	10	100%	501	100%																				
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	100.0%	0	0.0%	63.6%	0	0.0%	94.6%	0	0.0%	57.1%	0	0.0%	82.4%	0	0.0%	54.5%	0	0.0%	88.0%	
		Over \$1 Million	0	0.0%	0	0.0%	0.0%	0	0.0%					0	0.0%					0	0.0%					
		Total Rev. available	0	0.0%	0	0.0%	100.0%	0	0.0%					0	0.0%					0	0.0%					
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%					0	0.0%						0	0.0%				
		Total	0	0.0%	0	0.0%	100%	0	0.0%					0	0.0%					0	0.0%					
SMALL FARM	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	72.7%	0	0.0%	11.9%	0	0.0%	78.6%	0	0.0%	24.9%	0	0.0%	81.8%	0	0.0%	29.4%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	18.2%	0	0.0%	39.5%	0	0.0%	7.1%	0	0.0%	15.2%	0	0.0%	13.6%	0	0.0%	39.9%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	9.1%	0	0.0%	48.6%	0	0.0%	14.3%	0	0.0%	59.9%	0	0.0%	4.5%	0	0.0%	30.7%	
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	
		Total	0	0.0%	0	0.0%		0	0.0%					0	0.0%					0	0.0%					
SMALL FARM	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%																				
		\$100,001 - \$250,000	0	0.0%	0	0.0%																				
		\$250,001 - \$500,000	0	0.0%	0	0.0%																				
		Total	0	0.0%	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%					0	0.0%					

Originations & Purchases
Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue.
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Borrower Distribution of HMDA Loans - Table 1 of 2
Assessment Area: Hickman

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020, 2021					Bank & Aggregate Lending Comparison																	
		Bank				Families by Family Income %	2019					2020					2021							
		Count		Dollar			Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	
HOME PURCHASE	Low	0	0.0%	0	0.0%	19.6%	0	0.0%	1.7%	0	0.0%	0.8%	0	0.0%	2.4%	0	0.0%	1.2%	0	0.0%	3.0%	0	0.0%	1.3%
	Moderate	1	8.3%	51	2.4%	18.6%	1	14.3%	15.8%	51	3.7%	10.9%	0	0.0%	19.2%	0	0.0%	14.2%	0	0.0%	16.8%	0	0.0%	13.0%
	Middle	4	33.3%	381	18.2%	21.6%	2	28.6%	25.5%	127	9.1%	22.5%	1	100.0%	24.4%	171	100.0%	21.9%	1	25.0%	23.3%	83	15.5%	20.9%
	Upper	7	58.3%	1,662	79.4%	40.2%	4	57.1%	39.4%	1,210	87.2%	48.7%	0	0.0%	38.2%	0	0.0%	48.5%	3	75.0%	38.6%	452	84.5%	46.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	17.6%	0	0.0%	17.1%	0	0.0%	15.7%	0	0.0%	14.3%	0	0.0%	18.3%	0	0.0%	18.4%
	Total	12	100%	2,094	100%	100.0%	7	100%	100%	1,388	100%	100%	1	100%	100%	171	100%	100%	4	100%	100%	535	100%	100%
REFINANCE	Low	1	3.8%	90	2.7%	19.6%	0	0.0%	4.9%	0	0.0%	2.5%	1	14.3%	3.5%	90	10.6%	1.6%	0	0.0%	3.7%	0	0.0%	1.8%
	Moderate	5	19.2%	496	15.0%	18.6%	4	33.3%	13.2%	360	28.7%	8.6%	1	14.3%	10.6%	136	15.9%	6.7%	0	0.0%	12.7%	0	0.0%	9.6%
	Middle	9	34.6%	1,200	36.2%	21.6%	4	33.3%	21.1%	330	26.3%	16.6%	1	14.3%	19.3%	165	19.3%	15.0%	4	57.1%	22.7%	705	58.5%	20.6%
	Upper	11	42.3%	1,529	46.1%	40.2%	4	33.3%	36.2%	566	45.1%	43.4%	4	57.1%	41.0%	462	54.2%	46.7%	3	42.9%	35.3%	501	41.5%	42.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	24.5%	0	0.0%	28.9%	0	0.0%	25.6%	0	0.0%	30.1%	0	0.0%	25.7%	0	0.0%	25.6%
	Total	26	100%	3,315	100%	100.0%	12	100%	100%	1,256	100%	100%	7	100%	100%	853	100%	100%	7	100%	100%	1,206	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	19.6%	0	0.0%	5.6%	0	0.0%	3.1%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	11.1%	0	0.0%	12.0%
	Moderate	1	33.3%	45	25.0%	18.6%	0	0.0%	16.7%	0	0.0%	15.1%	1	100.0%	18.8%	45	100.0%	13.1%	0	0.0%	5.6%	0	0.0%	5.3%
	Middle	0	0.0%	0	0.0%	21.6%	0	0.0%	22.2%	0	0.0%	22.5%	0	0.0%	25.0%	0	0.0%	16.1%	0	0.0%	22.2%	0	0.0%	10.6%
	Upper	2	66.7%	135	75.0%	40.2%	2	100.0%	55.6%	135	100.0%	59.3%	0	0.0%	37.5%	0	0.0%	59.3%	0	0.0%	61.1%	0	0.0%	72.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	18.8%	0	0.0%	11.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	3	100%	180	100%	100.0%	2	100%	100%	135	100%	100%	1	100%	100%	45	100%	100%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	19.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.2%	0	0.0%	50.0%	0	0.0%	34.8%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	50.0%	0	0.0%	20.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	50.0%	0	0.0%	65.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	50.0%	0	0.0%	79.6%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	19.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	4.8%	0	0.0%	2.8%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	14.3%	0	0.0%	9.4%	0	0.0%	10.3%	0	0.0%	7.0%	0	0.0%	23.8%	0	0.0%	24.9%
	Middle	0	0.0%	0	0.0%	21.6%	0	0.0%	21.4%	0	0.0%	23.2%	0	0.0%	41.4%	0	0.0%	26.3%	0	0.0%	4.8%	0	0.0%	10.7%
	Upper	0	0.0%	0	0.0%	40.2%	0	0.0%	64.3%	0	0.0%	67.4%	0	0.0%	44.8%	0	0.0%	63.1%	0	0.0%	57.1%	0	0.0%	54.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	3.4%	0	0.0%	3.6%	0	0.0%	9.5%	0	0.0%	7.4%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases
Based on 2021 FFIEC Census Data; 2011-2015 ACS data; 2021 D&B information

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: Hickman

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020, 2021					Bank & Aggregate Lending Comparison																	
		Bank				Families by Family Income %	2019					2020					2021							
		Count		Dollar			Count		Dollar			Count		Dollar			Count		Dollar					
		#	%	\$ (000s)	\$ %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	19.6%	0	0.0%	5.3%	0	0.0%	1.5%	0	0.0%	7.1%	0	0.0%	5.4%	0	0.0%	8.3%	0	0.0%	1.3%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	15.8%	0	0.0%	7.0%	0	0.0%	21.4%	0	0.0%	13.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	1	100.0%	75	100.0%	21.6%	1	100.0%	31.6%	75	100.0%	27.8%	0	0.0%	14.3%	0	0.0%	10.7%	0	0.0%	25.0%	0	0.0%	13.5%
	Upper	0	0.0%	0	0.0%	40.2%	0	0.0%	47.4%	0	0.0%	63.6%	0	0.0%	35.7%	0	0.0%	21.7%	0	0.0%	66.7%	0	0.0%	85.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	21.4%	0	0.0%	49.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	75	100%	100.0%	1	100%	100%	75	100%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	19.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	5.6%	0	0.0%	2.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.6%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	40.2%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	94.4%	0	0.0%	97.5%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	1	2.4%	90	1.6%	19.6%	0	0.0%	3.0%	0	0.0%	1.5%	1	11.1%	3.0%	90	8.4%	1.4%	0	0.0%	3.6%	0	0.0%	1.6%
	Moderate	7	16.7%	592	10.5%	18.6%	5	22.7%	14.7%	411	14.4%	9.9%	2	22.2%	14.5%	181	16.9%	10.2%	0	0.0%	14.2%	0	0.0%	11.2%
	Middle	14	33.3%	1,656	29.2%	21.6%	7	31.8%	23.6%	532	18.6%	20.1%	2	22.2%	21.9%	336	31.4%	18.2%	5	45.5%	22.3%	788	45.3%	20.2%
	Upper	20	47.6%	3,326	58.7%	40.2%	10	45.5%	38.9%	1,911	67.0%	46.8%	4	44.4%	38.9%	462	43.2%	47.1%	6	54.5%	37.8%	953	54.7%	44.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	19.9%	0	0.0%	21.8%	0	0.0%	21.8%	0	0.0%	23.1%	0	0.0%	22.2%	0	0.0%	22.2%
	Total	42	100%	5,664	100%	100.0%	22	100%	100%	2,854	100%	100%	9	100%	100%	1,069	100%	100%	11	100%	100%	1,741	100%	

APPENDIX E – BRANCH TABLE FOR LIMITED-SCOPE ASSESSMENT AREAS

**Geographic Distribution of Branches & ATMS
Assessment Area: Middle TN**

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru #	Extend-ed Hours #	Week-end Hours #	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds %	Total Businesses %
	#	%	Open #	Closed #				#	%	#	%	Open #	Closed #	#	%	Open #	Closed #	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0	0		0	
Moderate	1	20.0%	0	0	1	1	0	Total	4	33.3%	1	20.0%	0	0	3	42.9%	1	0	2	8.0%	8.4%	10.2%
DTO	0		0	0				SA	3		0		0	0	3		1	0				
Middle	4	80.0%	0	0	4	4	2	Total	8	66.7%	4	80.0%	0	0	4	57.1%	1	2	19	76.0%	69.5%	71.0%
DTO	0		0	0				SA	4		0		0	0	4		1	2				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	16.0%	22.1%	18.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	5	100%	0	0	5	5	2	Total	12	100%	5	100%	0	0	7	100%	2	2	25	100%	100%	100%
DTO	0		0	0				SA	7		0		0	0	7		2	2				

Based on 2021 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

**Geographic Distribution of Branches & ATMS
Assessment Area: Hickman**

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru #	Extend-ed Hours #	Week-end Hours #	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds %	Total Businesses %
	#	%	Open #	Closed #				#	%	#	%	Open #	Closed #	#	%	Open #	Closed #	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	2	100.0%	0	0	2	2	0	Total	2	100.0%	2	100.0%	0	0	0	0.0%	0	0	6	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	2	100%	0	0	2	2	0	Total	2	100%	2	100%	0	0	0	0.0%	0	0	6	100%	100%	100%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

Based on 2021 FFIEC Census Data

Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs