

PUBLIC DISCLOSURE

April 3, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Centennial Bank
RSSD #456045**

**620 Chestnut Street
Conway, Arkansas 72032**

Federal Reserve Bank of St. Louis

**P.O. Box 442
St. Louis, Missouri 63166-0442**

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 the institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

TABLE OF CONTENTS

I.	Institution Rating	
	a. Overall Rating.....	1
	b. Performance Test Rating Table	1
	c. Summary of Major Factors Supporting Rating.....	1
II.	Institution	
	a. Description of Institution	3
	b. Scope of Examination	4
	c. Conclusions with Respect to Performance Tests	8
III.	Florida	
	a. Summary	
	i. State Rating.....	14
	ii. Scope of Examination	14
	iii. Description of Institution’s Operations.....	15
	iv. Conclusions with Respect to Performance Tests	16
	b. Miami-Fort Lauderdale-Pompano Beach, Florida Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution’s Operations in the Assessment Area	23
	ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	27
	c. Tampa-St. Petersburg-Clearwater, Florida Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution’s Operations in the Assessment Area	33
	ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	37
	d. Orlando-Kissimmee-Sanford, Florida Metropolitan Statistical Area (full-scope review)	
	i. Description of Institution’s Operations in the Assessment Area	42
	ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	46
	e. North Florida Nonmetropolitan Assessment Area	
	i. Description of Institution’s Operations in the North Florida Assessment Area (full-scope review)	51
	ii. Conclusions with Respect to Performance Tests in the North Florida Assessment Area (full-scope review)	55

f. Cape Coral-Fort Myers-Naples, Consolidated Statistical Area (full-scope review)	
i. Description of Institution’s Operations in the Assessment Area	59
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	63
g. North Port-Sarasota, Florida Consolidated Statistical Area (limited-scope review)	
i. Description of Institution’s Operations in the Assessment Area	68
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	69
h. Key West, Florida Nonmetropolitan Statistical Area (limited-scope review)	
i. Description of Institution’s Operations in the Assessment Area	70
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	71
i. Panama City, Florida Metropolitan Statistical Area (limited-scope review)	
i. Description of Institution’s Operations in the Assessment Area	72
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	73
j. Crestview-Fort Walton Beach-Destin, Florida Metropolitan Statistical Area (limited-scope review)	
i. Description of Institution’s Operations in the Assessment Area	74
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	75
k. Tallahassee, Florida Metropolitan Statistical Area (limited-scope review)	
i. Description of Institution’s Operations in the Assessment Area	76
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	77
l. Pensacola-Ferry Pass-Brent, Florida Metropolitan Statistical Area (limited-scope review)	
i. Description of Institution’s Operations in the Assessment Area	78
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	79
m. Lakeland-Winter Haven, Florida Metropolitan Statistical Area (limited-scope review)	
i. Description of Institution’s Operations in the Assessment Area	80
ii. Conclusions with Respect to Performance Tests in the Assessment Area.....	81

IV.	Arkansas	
	a.	Summary
		i. State Rating.....82
		ii. Scope of Examination.....82
		iii. Description of Institution’s Operations.....83
		iv. Conclusions with Respect to Performance Tests84
	b.	Little Rock-North Little Rock-Conway, Arkansas Metropolitan Statistical Area (full-scope review)
		i. Description of Institution’s Operations in the Assessment Area89
		ii. Conclusions with Respect to Performance Tests in the Assessment Area.....93
	c.	North Central Arkansas Nonmetropolitan Assessment Area
		i. Description of Institution’s Operations in the North Central Arkansas Assessment Area (full-scope review)100
		ii. Conclusions with Respect to Performance Tests in the North Central Arkansas Assessment Area (full-scope review)104
	d.	Fayetteville-Springdale-Rogers, Arkansas Metropolitan Statistical Area (full-scope review)
		i. Description of Institution’s Operations in the Assessment Area110
		ii. Conclusions with Respect to Performance Tests in the Assessment Area.....114
	e.	Fort Smith, Arkansas-Oklahoma Metropolitan Statistical Area (limited-scope review)
		i. Description of Institution’s Operations in the Assessment Area120
		ii. Conclusions with Respect to Performance Tests in the Assessment Area.....121
	f.	Jonesboro, Arkansas Metropolitan Statistical Area (limited-scope review)
		i. Description of Institution’s Operations in the Assessment Area122
		ii. Conclusions with Respect to Performance Tests in the Assessment Area.....123
	g.	Northeast Arkansas Nonmetropolitan Assessment Area (limited-scope review)
		i. Description of Institutions Operations in the Assessment Area125
		ii. Conclusions with respect to Performance Tests in the Assessment Area.....126

V.	Alabama	
	a. Summary	
	i. State Rating.....	128
	ii. Scope of Examination.....	128
	iii. Description of Institution’s Operations in the Assessment Area.....	129
	iv. Conclusions with Respect to Performance Tests in the Assessment Area.....	133
VI.	New York	
	a. Summary	
	i. State Rating.....	138
	ii. Scope of Examination.....	138
	iii. Description of Institution’s Operations in the Assessment Area.....	139
	iv. Conclusions with Respect to Performance Tests in the Assessment Area.....	143
VII.	Appendices	
	a. Scope of Examination Tables.....	146
	b. Summary of State and Multistate Metropolitan Area Ratings.....	147
	c. Lending Performance Tables.....	148
	d. Glossary.....	318

INSTITUTION’S CRA RATING

INSTITUTION’S CRA RATING: Centennial Bank is rated SATISFACTORY.

The following table indicates the performance level of Centennial Bank with respect to the lending, investment, and service tests.

Centennial Bank			
Performance Levels	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

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

The major factors supporting the institution’s rating include the following:

- The bank’s lending levels reflect good responsiveness to the credit needs of its assessment areas.
- A substantial majority of loans are made within the bank’s assessment areas.
- The distribution of loans by borrower’s income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes.
- The geographic distribution of loans reflects good penetration throughout the bank’s assessment areas.
- The bank makes an adequate level of community development loans.
- The bank makes use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.
- The bank makes a significant level of community development investments and grants.

- Service delivery systems are reasonably accessible to the geographies and individuals of different income levels in the assessment areas. The bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to low- and moderate-income (LMI) geographies and/or LMI individuals. Reasonableness of business hours and services do not vary in a way that inconveniences assessment areas, particularly LMI geographies and/or LMI individuals.
- The bank provides an adequate level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Centennial Bank is a large, interstate retail bank headquartered in Conway, Arkansas. The bank is a wholly owned subsidiary of Home BancShares, Inc., a one-bank holding company also headquartered in Conway, Arkansas. The bank has four consumer insurance-related subsidiaries: Centennial Insurance Agency, Inc., Cabot, Arkansas; Cook Insurance Agency, Inc., Apalachicola, Florida; Happy Insurance Services, Inc., Amarillo, Texas; and Freedom Insurance Group, Inc., Jonesboro, Arkansas. The bank is a full-service financial institution offering a variety of commercial and consumer loan and deposit products throughout its branch network, which for this performance evaluation includes 159 offices in 20 different assessment areas across four states.

Since its previous CRA evaluation dated September 10, 2018, Centennial Bank has expanded its operations and geographic footprint, primarily through acquisition activity. The bank was involved in one acquisition, located in Texas, expanding the bank's operations into a fifth state.

- April 2022 – Happy State Bank, Happy, Texas; this acquisition added 61 branches and one commercial loan production office (LPO) to the bank's network, all of which are located in Texas. These are the bank's first branch locations in Texas, and, consequently, the bank delineated 11 new assessment areas, all of which are located in Texas. However, as this relatively recent acquisition activity occurred outside of the retail lending test CRA review period, the Texas assessment areas will not be included in this evaluation.

During the review period, the bank opened four new branch offices and closed four offices within the rated assessment areas. In addition to the branch offices, the bank operates nine LPOs in the following cities: Chesapeake, Virginia; Los Angeles, California; New York, New York; Niceville, Florida; Fort Lauderdale, Florida; Dallas, Texas; Fort Worth, Texas; Baltimore, Maryland; and Miami, Florida. Lastly, the bank also operates two mobile branches.

For the review period (and excluding the new Texas markets), the bank's most significant presence is in the state of Florida, which contains the largest share of the bank's branches, deposits, and loan volume of the four states containing the bank's rated assessment areas. Though not as extensive as in Florida, the bank also maintains significant operations throughout Arkansas, which includes the bank's headquarters, as well as its most important individual assessment area, Little Rock. Though not nearly as extensive as in Florida and Arkansas, Centennial Bank also maintains operations in Alabama and New York. In total, the bank has designated 20 separate assessment areas for the purposes of this evaluation. The composition of each assessment area is detailed in the *General Demographics* section for each separate assessment area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank is considered capable of meeting the credit needs of its assessment areas based on its available resources and financial products. As of December 31, 2022, the bank reported total assets of \$22.8 billion. As of the same date, loans and leases outstanding were \$14.4 billion (63.2 percent of total assets), and deposits totaled \$18.3 billion. The bank's loan portfolio composition by credit category is displayed in the following table:

Distribution of Total Loans as of December 31, 2022		
Credit Category	Amount \$(000s)	Percentage of Total Loans
Construction and Development	\$2,135,266	14.8%
Commercial Real Estate	\$5,632,063	39.1%
Multifamily Residential	\$578,052	4.0%
1–4 Family Residential	\$1,748,551	12.1%
Farmland	\$346,811	2.4%
Farm Loans	\$285,235	2.0%
Commercial and Industrial	\$2,349,263	16.3%
Loans to Individuals	\$1,149,897	8.0%
Total Other Loans	\$184,343	1.3%
TOTAL	\$14,409,481	100%

As indicated by the above table, a significant portion of the bank’s lending resources is directed to commercial real estate loans, commercial and industrial loans, construction and development loans, and loans secured by 1–4 family residential properties. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table. The bank originated and sold 2,816 loans totaling \$592.7 million in 2020 and 2,788 loans totaling \$622.6 million in 2021.

While farmland and farm loans do not represent a significant portion of the bank’s loan portfolio by dollar volume, these products are nevertheless an important product line in some of the bank’s assessment areas and are thus evaluated by assessment area where appropriate.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on September 10, 2018.

SCOPE OF EXAMINATION

The bank’s CRA performance was reviewed using the Federal Financial Institutions Examination Council’s (FFIEC’s) Interagency Large Institution CRA Examination Procedures. The large bank performance standards entail three performance tests: Lending, Investment, and Service. The bank’s performance under these tests is rated at both the institution level and the state level. For purposes of this evaluation, the bank maintains operations in four states—Alabama, Arkansas, Florida, and New York—and received a rating for each of these areas, as well as an overall institution rating. The following table details the number of branch offices, breakdown of deposit dollars, and the CRA review procedures applicable to each rated area completed as part of this evaluation. The rated areas are listed in order of significance toward the overall institution rating. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2022, except where otherwise noted.

Rated Area	Branches		Deposits		Assessment Area Reviews		
	#	%	\$000s	%	Full-Scope	Limited-Scope	TOTAL
Florida	78	35.3%	\$8,200,576	41.1%	5	7	12
Arkansas	75	33.9%	\$5,651,674	28.3%	3	3	6
Alabama	5	2.3%	\$682,461	3.4%	1	0	1
New York	1	0.5%	\$122,990	0.6%	1	0	1
TOTAL*	221	100%	19,936,684	100%	10	10	20

*The total shown includes all current branches, including those added through acquisition of Happy State Bank.

The bank receives an overall CRA rating and individual ratings for the Lending, Investment, and Service Tests at the institution level, as well as for each state in which the bank maintains a branch presence. The bank’s overall institution rating is a composite of the four rated areas, which are weighted based on the significance of the bank’s operations in each area. Based on the bank’s branch structure and loan and deposit activity, primary emphasis (in order of significance) was placed on performance in Florida and Arkansas, with the other rated areas receiving less weight toward the overall institution rating. As shown above, Florida and Arkansas account for a combined 69.2 percent of the bank’s total branches and 69.4 percent of total deposits.

To augment this evaluation, 12 community contact interviews were utilized. These interviews helped to ascertain certain economic and demographic conditions, as well as credit needs and opportunities, in the bank’s assessment areas, and provided context with which to evaluate the bank’s responsiveness to these credit needs. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the assessment area for which they were utilized.

Lending Test

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

Lending Test Performance Criterion	Products Selected for Review¹	Time Period
Level of Lending Activity	Loans reported under the Home Mortgage Disclosure Act (HMDA). Small business and small farm loans reported under the CRA.	January 1, 2020 – December 31, 2021
Assessment Area Concentration		
Geographic Distribution of Loans		
Loan Distribution by Borrower’s Profile		
Community Development Lending Activities		September 10, 2018 – December 31, 2022
Product Innovation		

As detailed in the preceding table, HMDA, small business, and small farm loans (in some markets) were used to evaluate the bank’s lending performance, as these loans are considered the bank’s core business lines based on lending volume and the bank’s business strategy. The weighting given to each product when evaluating the bank’s overall lending performance varied based on loan demand, credit needs, and the bank’s business strategy and is discussed at the individual rated area and assessment area level, and, as a general rule, equal emphasis is placed on lending performance from both years in the review period.

Under the Lending Test, the bank’s performance is evaluated using the following criteria, as applicable:

- Level of lending activity.
- Assessment areas concentration.²
- Geographic distribution of loans.
- Distribution of loans by borrower’s income/revenue profile.
- Community development lending activities.
- Product innovation.³

Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders, based on HMDA and CRA aggregate lending data. Such data is selectively referenced in the body of this document; however, all data considered as part of lending test analyses is included in *Appendix D: Lending Performance Tables*. Unless otherwise noted, assessment area demographics are based on 2015 American Community Survey (ACS) data; certain business and farm demographics are based on Dun & Bradstreet data

¹ Small farm loans only accounted for a very small portion of the total lending activity included in this evaluation. Consequently, small farm lending levels were not supportive of meaningful analyses in Alabama, Florida, or New York, and the report does not reference small farm lending activity for these rated areas.

² This criterion is applicable at the institution level only.

³ Unlike other large bank CRA performance criteria, a lack of innovative or flexible lending practices does not necessarily impact the bank’s performance negatively, as these activities are largely used to augment consideration given to an institution’s performance under the quantitative criteria, potentially resulting in a higher rating.

applicable to the year of bank lending activity being considered. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons.

Investment Test

All community development investments made since the bank's previous CRA evaluation through December 31, 2022, were reviewed, including grants and donations. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of December 31, 2022, were also considered. Community development investments can include various debt and equity instruments, such as bonds, individual equities, and mutual fund shares, as well as monetary donations and gifts in kind. 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

The review period for retail and community development services includes activity from the date of the bank's previous CRA evaluation through December 31, 2022. The Service Test considers the following criteria:

- Distribution and accessibility of bank branches and alternative delivery systems.
- Changes in branch locations.
- Reasonableness of business hours and retail services.
- Community development services.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank’s performance under the Lending Test is rated High Satisfactory. The rating reflects an aggregation of the ratings for each rated area shown in the table below, with Florida and Arkansas carrying the most weight toward the overall rating. The following table reflects the bank’s Lending Test ratings by state performance. The bank’s performance under each of the criteria of the Lending Test is shown in the tables that follow.

Rated Area	Lending Test Rating
Florida	High Satisfactory
Arkansas	High Satisfactory
Alabama	High Satisfactory
New York	Low Satisfactory
OVERALL	HIGH SATISFACTORY

Lending Activity

Overall, the bank’s lending levels reflect good responsiveness to credit needs of its combined assessment areas, based on the lending activity analyzed under the Lending Test (see the *Lending Inside and Outside of Assessment Areas* table in the next section for a break-down of lending activity by product type). Additional lending activity details are discussed later for each assessment area reviewed under full-scope procedures.

Rated Area	Lending Activity
Florida	Adequate
Arkansas	Excellent
Alabama	Adequate
New York	Poor
OVERALL	GOOD

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans originated inside and outside the bank’s assessment areas for 2020 and 2021, combined.

Lending Inside and Outside of Assessment Areas January 1, 2020 through December 31, 2021						
Loan Type	Inside Assessment Areas		Outside Assessment Areas		TOTAL	
HMDA	7,564	94.4%	448	5.6%	8,012	100%
	\$1,940,011	94.8%	\$107,341	5.2%	\$2,047,352	100%
Small Business	14,718	93.5%	1,030	6.5%	15,748	100%
	\$1,316,726	89.7%	\$150,651	10.3%	\$1,467,377	100%
Small Farm	406	83.7%	79	16.3%	485	100%
	\$35,578	77.3%	\$10,467	22.7%	\$46,045	100%
TOTAL LOANS	22,688	93.6%	1,557	6.4%	24,245	100%
	\$3,292,315	92.5%	\$268,459	7.5%	\$3,560,774	100%

As shown above, 93.6 percent of the bank’s total HMDA, small business, and small farm loans were made inside the bank’s combined assessment areas, representing 92.5 percent of loans by dollar volume. Therefore, a substantial majority of loans were made inside the bank’s assessment areas.

Borrower and Geographic Distribution

Overall, performance by borrower’s income or revenue profile is good, as shown in the following table. Due to a lack of HMDA, small business, and small farm loan activity during the review period, geographic and borrower’s profile distribution analyses were not able to be completed in the New York assessment area.

Rated Area	Loan Distribution by Borrower’s Profile
Florida	Good
Arkansas	Good
Alabama	Good
New York	N/A
OVERALL	GOOD

The overall geographic distribution of loans reflects good penetration throughout the assessment areas, as displayed below.

Rated Area	Geographic Distribution of Loans
Florida	Good
Arkansas	Good
Alabama	Excellent
New York	N/A
OVERALL	GOOD

Community Development Lending Activities

Overall, the bank makes an adequate level of community development loans, as noted in the following table.

Rated Area	Community Development Lending
Florida	Adequate Level
Arkansas	Adequate Level
Alabama	Adequate Level
New York	Leader in Making
OVERALL	ADEQUATE LEVEL

As shown in the table above, the bank’s level of community development lending varied slightly by state, but within the three most significant rated areas, it was determined that the bank provided an adequate level of community development lending. Conversely, the bank was a leader in originating community development lending in New York, despite operating only one branch in that state. In the bank’s rated areas, including broader regional areas within the aforementioned states, the bank originated 100 community development loans totaling \$434.7 million.

As the bank met the community development lending needs of its own assessment areas, consideration was also given to community development loans made outside of the bank’s rated areas.⁴ The vast majority of these loans by dollar amount were originated in the state of Texas, where the bank has recently established a significant presence, as described above. As a result, the bank also received credit for seven community development loans totaling \$33.5 million originated outside of any assessment or rated area. A brief description of two of these loans is detailed below:

- One loan totaling \$21.0 million financed multifamily housing in Dallas, Texas. This multifamily building provides income-restricted housing to LMI individuals within an LMI tract.
- One loan totaling \$5.1 million in Bonham, Texas, to a local hospital that focuses its operations on individuals in the local area who are on Medicaid.

⁴ Community development loans made outside of the bank’s assessment areas but within one of the bank’s rated areas are discussed under the *Community Development Lending* write-up for each applicable rated area.

Product Innovation

Overall, Centennial Bank makes use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas. Detailed below are descriptions of each of the innovative and/or flexible lending options offered by the bank during the review period.

Consumer Real Estate

- Centennial Bank's Dream Loan Program – This loan program, which was introduced during the previous review period, is designed to assist first-time homebuyers who would not otherwise qualify for traditional mortgage loan products; it offers the benefits of a fully amortizing fixed rate loan with flexible features such as no down payment or mortgage insurance requirements. From 2019 through 2022, the bank originated \$44.1 million worth of loans through this program, helping to purchase 300 housing units.
- Homebuyer Equity Leverage Partnership (HELP) – This program, which is administered by the bank and funded by the Federal Home Loan Bank of Dallas, provides funds that assist LMI first-time homebuyers with down payment assistance and closing costs. Between 2019 and 2022, the bank awarded 53 grants totaling \$6.9 million to LMI home loan applicants.
- Federal Housing Administration (FHA) and Veterans Affairs (VA) Insured Loan Programs – These government-insured loan programs offer long-term financing with flexible down payment options to eligible borrowers. Between 2019 and 2022, the bank originated 1,390 FHA loans and 811 VA loans totaling \$104.8 million.
- Farm Service Agency and Rural Housing Service Loan Program – These loans are provided through the United States Department of Agriculture and are targeted toward low-income rural residents and help them qualify for a conventional mortgage. Between 2019 and 2022, the bank originated 471 of these loans worth \$7.9 million.

Small Business Lending

- Small Business Administration (SBA) Lending – The bank offers SBA products that provide small business access to capital with more flexible terms than conventional commercial financing. Through various different SBA loan programs, Centennial Bank originated 102 different loans from 2019 through 2022 to businesses within its assessment areas.

Paycheck Protection Program (PPP) Lending

- PPP loans were made available to businesses with fewer than 500 employees or businesses that meet SBA industry size standards. The program provides funds for payroll costs and other operational costs to businesses impacted by the pandemic and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. Centennial Bank dedicated significant resources during the COVID-19 pandemic in order to put new systems and processes in place to offer these loans. From 2020 through 2021, the bank originated a significant number of these loans in its assessment areas, including a total of 34 loans that qualified for community development activity credit totaling \$51.2 million.

Loan Deferrals

- COVID-19 Pandemic – During the pandemic, Centennial Bank made loan payment deferrals readily available to its customers, both individuals and businesses. This deferral program was available up to three separate times for customers and was utilized widely by individuals and businesses throughout the bank’s assessment areas, as well as those outside of its assessment areas.
- Hurricane Ian – In the aftermath of Hurricane Ian, which struck Florida in September of 2022, Centennial Bank offered loan deferrals to impacted customers. A total of 36 separate individuals or business entities received deferrals, with some loans receiving up to 3 separate payment deferrals.

INVESTMENT TEST

Overall, the bank’s performance under the Investment Test is rated high satisfactory. The bank made a significant level of qualified community development investments and grants given the opportunity for such investments and grants within the assessment areas. Furthermore, these investment activities exhibit adequate responsiveness to credit and community development needs throughout the combined assessment areas. The following table reflects the bank’s Investment Test ratings by state performance.

Rated Area	Community Development Investments (#)	Community Development Investments (\$)	Community Development Grants/Donations (\$)	Investment Test Rating
Florida	222	\$122.5 million	\$751,473	High Satisfactory
Arkansas	118	\$58.0 million	\$1,305,829	Low Satisfactory
Alabama	16	\$10.6 million	\$62,009	High Satisfactory
New York	17	\$21.1 million	\$444,240	Outstanding
OVERALL	373	\$212.2 million	\$2.6 million	HIGH SATISFACTORY

During the review period, the bank made total investment and grants of \$212.2 million and total donations of \$2.6 million within its assessment areas. Of the bank’s total qualified investments in the bank’s assessment areas, \$195.4 million were made during the current review period, while \$16.8 million were made prior to this review period but were still outstanding as of the start date of this evaluation. The bank’s investment and grant activity consisted of mortgage-backed securities (MBS), which are investments in pools of loans made up of affordable housing loans to LMI borrowers, and municipal bonds, which benefitted schools or municipal infrastructure projects in LMI areas in the bank’s assessment areas.

The bank also made \$58.2 million in investments benefitting a broader nationwide footprint. All these investments were made in small business investment companies (SBICs) or in Community

Development Financial Institutions promoting affordable housing. Of this total, \$23.1 million were investments in SBICs from prior period, while the bank also received credit for \$35.1 million in prior-period investments in SBICs that were still outstanding.

SERVICE TEST

The bank's performance is rated low satisfactory under the Service Test. The bank's delivery systems are reasonably accessible to geographies and individuals of different income levels throughout the combined assessment areas. In addition, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Furthermore, services do not vary in a way that inconveniences the needs of its assessment area, particularly LMI geographies and/or LMI individuals. Lastly, the bank provides an adequate level of community development services within the combined assessment areas. The following table reflects the bank's Service Test ratings by state performance.

Rated Area	Service Test Rating
Florida	Low Satisfactory
Arkansas	Low Satisfactory
Alabama	High Satisfactory
New York	Low Satisfactory
OVERALL	LOW SATISFACTORY

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Based on findings from the Consumer Affairs examination, including a fair lending analysis performed under the Fair Housing Act requirements, conducted concurrently with this CRA evaluation, no evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

FLORIDA

CRA RATING FOR FLORIDA: SATISFACTORY

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **Low Satisfactory**

Factors supporting the institution's ratings for the state of Florida include:

- The bank's lending levels reflect adequate responsiveness to assessment area credit needs in the state.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The bank's overall geographic distribution of loans reflects good penetration throughout the Florida assessment areas.
- The bank makes an adequate level of community development loans in its Florida assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position in Florida.
- Service delivery systems are reasonably accessible to the geographies and individuals of different income levels in Florida assessment areas. Changes in branch locations have not adversely affected the delivery systems, and services do not vary in a way that inconveniences the needs of its assessment areas, particularly in LMI geographies and/or LMI individuals.
- The bank provides an adequate level of community development services in Florida assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Florida assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. However, as the bank has minimal small farm loan activity in Florida, this lending category did not play a material role in the evaluation of Florida lending performance, and it is not detailed in the Florida assessment area analyses.

The bank operates in 12 separate assessment areas in the state of Florida, and the bank's state rating reflects a composite of performance in these assessment areas. As detailed in the table in the next section, five of the assessment areas in the state of Florida were evaluated using full-scope review procedures. Based on the branch structure, loan and deposit activity, and the importance of

the institution in serving different areas, CRA performance in the Miami, Tampa, and Orlando assessment areas received primary consideration when determining statewide performance conclusions, with the Cape Coral and North Florida nonmetropolitan statistical area (nonMSA) full-scope assessment areas given less weight.

To augment the evaluation of the five full-scope assessment areas, five community contact interviews were referenced. These interviews were used to ascertain specific credit and community development needs and provided context with which to evaluate the bank’s responsiveness to these needs. Key details from the interviews are included in the *Description of Institution’s Operations* sections applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN FLORIDA

The bank operates 78 branches throughout the 12 CRA assessment areas in Florida. Each of the MSAs below contain one assessment area (typically comprised of the entire MSA). The following table gives additional detail regarding the bank’s Florida operations.

Review Area	Branches #	Branches %	Deposits \$000s (as of 6/30/22)	Deposits %	CRA Review Procedures
Miami MSA	17	21.8%	\$2,872,839	35.0%	Full-Scope
Tampa MSA	10	12.8%	\$798,719	9.7%	Full-Scope
Orlando MSA	5	6.4%	\$209,084	2.5%	Full-Scope
North Florida nonMSA	8	10.3%	\$658,217	8.0%	Full-Scope
Cape Coral MSA	4	5.1%	\$425,590	5.2%	Full-Scope
North Port Consolidated Statistical Area (CSA)	5	6.4%	\$759,655	9.3%	Limited-Scope
Key West nonMSA	8	10.3%	\$876,400	10.7%	Limited-Scope
Panama City MSA	5	6.4%	\$310,625	3.8%	Limited-Scope
Crestview MSA	3	3.8%	\$195,839	2.4%	Limited-Scope
Tallahassee MSA	8	10.3%	\$839,310	10.2%	Limited-Scope
Pensacola MSA	3	3.8%	\$211,932	2.6%	Limited-Scope
Lakeland MSA	2	2.6%	\$42,366	0.5%	Limited-Scope
OVERALL	78	100%	\$8,200,576	100%	5 Full-Scope/ 7 Limited-Scope

As displayed in the previous table, bank deposits in Florida as of June 30, 2022, total \$8.2 billion, or 41.1 percent of total bank deposits. Furthermore, the number of bank branches detailed in the previous table represents a slight increase since the previous CRA evaluation when the bank operated 76 branches in the state of Florida. The four new branches opened by Centennial Bank are located in the full-scope assessment areas of Miami and Orlando, as well as the limited-scope assessment area of Crestview. During the review period, the bank closed one branch in Miami and one in Crestview.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The bank’s Lending Test rating for the state of Florida is high satisfactory. The test considers the bank’s performance under the following criteria.

Lending Activity

The bank’s Florida lending levels reflect adequate responsiveness to assessment area credit needs based on loan activity analyzed under the Lending Test. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank’s overall importance to each assessment area. Lending activity performance by review area is displayed in the following table.

Full-Scope Review Areas	Lending Activity
Miami MSA	Adequate
Tampa MSA	Adequate
Orlando MSA	Good
North Florida nonMSA	Good
Cape Coral MSA	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Lending Activity
North Port CSA	Consistent
Key West nonMSA	Consistent
Panama City MSA	Consistent
Crestview MSA	Exceeds
Tallahassee MSA	Consistent
Pensacola MSA	Consistent
Lakeland MSA	Consistent

Borrower and Geographic Distribution

Overall, performance by borrower’s income or revenue profile is good in the state of Florida, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution by Borrower's Profile
Miami MSA	Good
Tampa MSA	Good
Orlando MSA	Adequate
North Florida nonMSA	Excellent
Cape Coral MSA	Good
OVERALL	GOOD

Limited-Scope Review Areas	Loan Distribution by Borrower's Profile
North Port CSA	Consistent
Key West nonMSA	Consistent
Panama City MSA	Consistent
Crestview MSA	Consistent
Tallahassee MSA	Exceeds
Pensacola MSA	Consistent
Lakeland MSA	Consistent

The bank's overall geographic distribution of loans reflects good penetration throughout the Florida assessment areas, as shown below. Additionally, no conspicuous lending gaps were noted in any of the bank's Florida assessment areas.

Full-Scope Review Areas	Geographic Distribution of Loans
Miami MSA	Good
Tampa MSA	Good
Orlando MSA	Adequate
North Florida nonMSA	Adequate
Cape Coral MSA	Adequate
OVERALL	GOOD

Limited-Scope Review Areas	Geographic Distribution of Loans
North Port CSA	Consistent
Key West nonMSA	Consistent
Panama City MSA	Consistent
Crestview MSA	Consistent
Tallahassee MSA	Consistent
Pensacola MSA	Consistent
Lakeland MSA	Consistent

Community Development Lending Activities

Overall, the bank makes an adequate level of community development loans in the state of Florida, as displayed below.

Full-Scope Review Areas	Community Development Lending
Miami MSA	Relatively High
Tampa MSA	Adequate
Orlando MSA	Low
North Florida nonMSA	Adequate
Cape Coral MSA	Low
OVERALL	ADEQUATE

Limited-Scope Review Areas	Community Development Lending
North Port CSA	Exceeds
Key West nonMSA	Exceeds
Panama City MSA	Exceeds
Crestview MSA	Below
Tallahassee MSA	Below
Pensacola MSA	Below
Lakeland MSA	Consistent

During the review period, the bank made 55 community development loans totaling \$163.3 million throughout the Florida assessment areas. An additional four loans with a community development purpose were made in the greater statewide area totaling \$25.7 million.

INVESTMENT TEST

Overall, the bank’s performance in Florida is rated high satisfactory under the Investment Test. The following tables display investment and grant activity performance for the Florida assessment areas.

Full-Scope Review Areas	Investment and Grant Activity
Miami MSA	Significant
Tampa MSA	Significant
Orlando MSA	Significant
North Florida nonMSA	Adequate
Cape Coral MSA	Adequate
OVERALL	SIGNIFICANT
Limited-Scope Review Areas	Investment and Grant Activity
North Port CSA	Exceeds
Key West nonMSA	Consistent
Panama City MSA	Consistent
Crestview MSA	Exceeds
Tallahassee MSA	Exceeds
Pensacola MSA	Consistent
Lakeland MSA	Consistent

The bank made a total of \$122.6 million in qualified community development investments and \$740,473 in donations and grants in the Florida assessment areas. Of the total statewide investments, \$111.4 million were made in the current review period, while \$11.2 million were made prior to the review period but were still outstanding. All these investments were in MBS supporting affordable housing loans to LMI borrowers. Lastly, the bank had \$11,000 in donations in the broader statewide area.

SERVICE TEST

The bank’s performance in Florida is rated low satisfactory under the Service Test.

Accessibility of Delivery Systems

As displayed in the following tables, the bank’s service delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in Florida.

Full-Scope Review Areas	Accessibility of Delivery Systems
Miami MSA	Accessible
Tampa MSA	Reasonably Accessible
Orlando MSA	Reasonably Accessible
North Florida nonMSA	Accessible
Cape Coral MSA	Reasonably Accessible
OVERALL	REASONABLY ACCESSIBLE

Limited-Scope Review Areas	Accessibility of Delivery Systems
North Port CSA	Consistent
Key West nonMSA	Exceeds
Panama City MSA	Consistent
Crestview MSA	Below
Tallahassee MSA	Consistent
Pensacola MSA	Consistent
Lakeland MSA	Consistent

Changes in Branch Locations

Overall, the bank’s record of opening and closing branches in the Florida assessment areas has not adversely affected the accessibility of its service delivery systems.

Full-Scope Review Areas	Changes in Branch Locations
Miami MSA	Not Adversely Affected
Tampa MSA	Not Adversely Affected
Orlando MSA	Not Adversely Affected
North Florida nonMSA	Not Adversely Affected
Cape Coral MSA	Not Adversely Affected
OVERALL	NOT ADVERSELY AFFECTED

Limited-Scope Review Areas	Changes in Branch Locations
North Port CSA	Consistent
Key West nonMSA	Consistent
Panama City MSA	Consistent
Crestview MSA	Consistent
Tallahassee MSA	Consistent
Pensacola MSA	Consistent
Lakeland MSA	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the bank’s Florida assessment areas, particularly LMI geographies and/or LMI individuals.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Miami MSA	Varies/Inconveniences
Tampa MSA	Do Not Vary/Inconvenience
Orlando MSA	Do Not Vary/Inconvenience
North Florida nonMSA	Do Not Vary/Inconvenience
Cape Coral MSA	Do Not Vary/Inconvenience
OVERALL	DO NOT VARY/INCONVENIENCE

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
North Port CSA	Consistent
Key West nonMSA	Consistent
Panama City MSA	Consistent
Crestview MSA	Consistent
Tallahassee MSA	Consistent
Pensacola MSA	Consistent
Lakeland MSA	Consistent

Community Development Services

Overall, the bank provides an adequate level of community development services throughout the Florida assessment areas, as displayed in the following tables.

Full-Scope Review Areas	Community Development Services
Miami MSA	Adequate
Tampa MSA	Adequate
Orlando MSA	Limited
North Florida nonMSA	Adequate
Cape Coral MSA	Relatively High
OVERALL	ADEQUATE

Limited-Scope Review Areas	Community Development Services
North Port CSA	Exceeds
Key West nonMSA	Below
Panama City MSA	Consistent
Crestview MSA	Consistent
Tallahassee MSA	Consistent
Pensacola MSA	Exceeds
Lakeland MSA	Below

During the review period, bank employees provided community development services totaling 3,489 service hours to different organizations across the bank’s Florida assessment areas.

MIAMI-FORT LAUDERDALE-POMPANO BEACH, FLORIDA MSA (Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MIAMI ASSESSMENT AREA

Bank Structure

The bank operates 17 branches within this assessment area, representing 7.7 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
2	4	4	7

During the review period, the bank opened two branches, including one in a low-income census tract, and closed another branch. The bank also operates two commercial LPOs in the assessment area, one in Miami and another in Fort Lauderdale. Based on this branch network, which is primarily located along the eastern coastal portions of the tri-county area, and other service delivery systems, the bank is positioned to deliver financial services to the most populous geographies of its assessment area, which are similarly concentrated in the eastern portions of the three counties.

General Demographics

The assessment area is comprised of three counties in their entirety: Broward County, Miami-Dade County, and Palm Beach County, which together comprise the Miami-Fort Lauderdale-West Palm Beach, Florida MSA (Miami MSA). As this MSA is large and densely populated, it is further subdivided by county into three metropolitan divisions (MDs): Broward County comprises the Fort Lauderdale-Pompano Beach-Deerfield Beach MD (Fort Lauderdale MD), Miami-Dade County comprises the Miami-Miami Beach-Kendall MD (Miami MD), and Palm Beach County comprises the West Palm Beach-Boca Raton-Delray Beach MD (West Palm Beach MD). These three MDs combine for a total population of 5,861,000, and, based on the FDIC Deposit Market Share Report data as of June 30, 2022, there were 83 FDIC-insured depository institutions operating 1,374 offices in the assessment area. Centennial Bank ranked 21st in terms of deposit market share, with 0.8 percent of the total deposit dollars. Competition for HMDA and CRA loans in the market is very high. An analysis of 2021 HMDA-reportable loans shows that 1,149 institutions had loan activity in the assessment area, of which Centennial Bank ranked 178th with less than 1.0 percent of total HMDA loans. Out of 366 institutions with CRA loan activity, Centennial Bank ranked 29th with less than 1.0 percent of CRA loan activity.

As the assessment area covers coastal, suburban, and some relatively rural portions of a large and highly populated metropolitan area, credit needs in the area are diverse and include a blend of consumer, business, and, to a lesser degree, agricultural credit products. Other particular credit needs in the assessment area, noted primarily from community contacts, include greater levels of

financial literacy training and outreach, specifically for LMI individuals in the assessment area. This need presents opportunity for local banks who employ numerous individuals with financial expertise in that area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	76	6.2%	66,251	5.0%
Moderate	344	28.2%	362,887	27.3%
Middle	359	29.5%	420,721	31.6%
Upper	409	33.6%	478,696	36.0%
Unknown	31	2.5%	2,238	0.2%
TOTAL	1,219	100%	1,330,793	100%

As shown in the previous table, 34.4 percent of the census tracts in the assessment area are LMI geographies, and 32.3 percent of assessment area families live in these LMI census tracts.

Based on 2015 ACS data, the median family income for the assessment area is \$57,239, which is similar to the median family income for the state of Florida as a whole (\$57,504). More recently, the FFIEC estimates the 2021 median family income figures for the MDs within this MSA to be: Fort Lauderdale MD, \$73,400; Miami MD, \$61,000; and West Palm Beach MD, \$80,200. The following table compares the population of assessment area families by income level to the state of Florida.

Family Population by Income Level				
	Assessment Area		Florida	
Low	308,004	23.1%	1,010,745	21.5%
Moderate	226,177	17.0%	839,152	17.9%
Middle	235,608	17.7%	910,313	19.4%
Upper	561,004	42.2%	1,939,678	41.3%
TOTAL	1,330,793	100%	4,699,888	100%

As shown in the previous table, 40.1 percent of families in the assessment area are considered LMI, which is slightly higher than the figure for the state of Florida (39.4 percent). Additionally, the percentage of assessment area families below the poverty level (13.5 percent) is slightly above the statewide figure (12.0 percent). Overall, when considering income and poverty levels, the Miami assessment area is slightly less affluent than the state of Florida as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Florida.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$197,902	24.6%	\$1,149
Florida	\$159,000	29.9%	\$1,002

Based on housing values, income levels, and rental costs, housing in the assessment area appears to be considerably less affordable than in the state of Florida overall. While median family income levels in the assessment area are comparable to the statewide levels, median housing values in the assessment area are well above the state figure. The housing affordability ratio, which calculates the extent to which a family earning the median assessment area household income can afford a median-priced home, is lower in the assessment area (24.6 percent) than the state of Florida figure (29.9 percent), indicating that housing is less affordable in the assessment area. Lastly, renters are also impacted by this lack of affordability, as the median gross rent for the assessment area of \$1,149 per month is above that of the state, which is \$1,002 per month.

Industry and Employment Demographics

According to the Bureau of Labor Statistics (BLS), there are 2,340,168 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (14.5 percent), retail trade (13.5 percent), and accommodation and food services (11.5 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for each county in the assessment area, the assessment area as a whole, and the state of Florida.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	8.3%	4.9%
Florida	8.2%	4.6%

As shown in the above table, the unemployment rate for the assessment area is slightly higher than the statewide unemployment rate over the period. Additionally, unemployment levels have experienced a significant decrease in both the assessment area and the state as a whole, as these areas recovered from the effects of the pandemic. Broward County experienced the most significant drop, 4.7 percent, while Miami-Dade County experienced a more modest decrease of 2.2 percent. While the overall assessment area unemployment average was higher than the state of Florida for both years, Miami-Dade experienced lower unemployment than the state in 2020, whereas Palm Beach County experienced lower unemployment than the state during 2021.

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank's activities in the assessment area were evaluated. The interview was with an individual specializing in affordable housing and community outreach and advocacy. Information gathered from the interview highlighted numerous challenges affecting LMI populations. The contact stated that a significant portion of the residents in the assessment area are underprivileged, underserved, and have limited opportunities for economic growth. The contact explained that during the pandemic, financial barriers worsened and that many businesses in the assessment area were forced to close due to the financial hardships presented by the pandemic. The contact also noted that LMI populations continue to face diminished job opportunities and food insecurity.

Within the assessment area, the community contact noted several opportunities for financial institutions to meet the needs of LMI residents. Due to limited financial education services available to residents of the assessment area, the contact noted a need for financial education and literacy. According to the contact, additional education is needed to teach LMI populations about existing resources and how to utilize them. The contact explained that most people in LMI communities are intimidated by banking organizations and often resort to alternative check cashing and ATM services, which often come with higher fees.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MIAMI ASSESSMENT AREA

LENDING TEST

Lending levels reflect adequate responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects good penetration among customers of different income levels and businesses of various sizes, and the overall geographic distribution of loans reflects good penetration throughout the assessment area. Finally, the bank makes an adequate level of community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	3	0.1%	1,239	0.2%
Home Purchase	107	3.7%	79,089	15.8%
Multifamily Housing	10	0.3%	76,150	15.2%
Refinancing	182	6.4%	65,249	13.1%
Total HMDA	305	10.6%	222,590	44.6%
Small Business	2,559	89.3%	276,683	55.4%
Small Farm	1	< 0.1%	146	< 0.1%
TOTAL LOANS	2,865	100%	499,419	100%

By number of loans, the level of lending activity in this assessment area represents 12.6 percent of total 2020, and 2021 HMDA and CRA loans made inside the bank’s combined assessment areas. By comparison, the bank operates 7.7 percent of its total branches and, as of June 30, 2021, holds 20.5 percent of total bank deposits in the assessment area. Considering the level of loans originated in the assessment area relative to the percentage of deposits held, and the level of lending compared to other banks operating in the market, the bank’s lending activity reflects adequate responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good. Within the assessment area, primary emphasis is placed on small business lending.

Small Business Lending

The bank's distribution of small business loans by business revenue profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 3.2 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is well below the aggregate lending level (39.7 percent) and the demographic figure used for comparison, 93.5 percent. Similarly, in 2021, the bank originated 16.5 percent of its small business loans to businesses with annual revenues of \$1 million or less, which was again well below aggregate performance (42.9 percent) and the demographic figure (93.6 percent). However, additional analysis indicated that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for these loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 90.1 percent of 2020 small business loans and 72.3 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria, this revealed that 74.1 percent of 2020 small business loans with unknown revenue and 68.3 percent of small business loans with unknown revenue had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses of different revenue sizes in 2020 and 2021 is good.

HMDA Lending

The bank's overall distribution of HMDA loans by borrower's profile is adequate.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (2.3 percent) exceeded but was comparable to the aggregate lending level to low-income borrowers (2.2 percent), but it was below the demographic estimate of low-income families in the assessment area (23.1 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (9.4 percent) was comparable to aggregate lending (10.1 percent) and below the demographic figure (17.0 percent), reflecting adequate performance.

In 2021, the bank did not make any HMDA loans to low-income borrowers, reflecting poor performance compared to both the aggregate (2.3 percent) and demographic levels (23.1 percent). The bank's distribution of HMDA loans to moderate-income borrowers (10.4 percent) was slightly above the aggregate lending level (9.6 percent), but below the demographic figure for moderate-income families in the assessment area (17.0 percent), reflecting adequate performance.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the Miami assessment area is good.

Small Business Lending

The bank's overall geographic distribution of small business loans is good.

In 2020, the bank's distribution of small business loans in low-income census tracts (8.4 percent) was well above both the aggregate (4.6 percent) and the demographic levels (4.5 percent), reflecting excellent bank performance. The distribution of small business loans in moderate-income census tracts (20.8 percent) is comparable to aggregate lending levels in moderate-income geographies (22.2 percent) and the demographic figure (22.8 percent), reflecting adequate performance.

Similarly, in 2021, the bank's distribution of small business loans in low-income census tracts (8.6 percent) was well above the aggregate lending level in low-income geographies (4.4 percent) and the demographic figure (4.5 percent), reflecting excellent bank performance. The distribution of small business loans in moderate-income census tracts (21.8 percent) was comparable to the aggregate lending level in moderate-income geographies (23.4 percent) and the demographic estimate of businesses operating in moderate-income geographies (22.9 percent), reflecting adequate performance.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is adequate.

In 2020, the bank's distribution of HMDA loans in low-income geographies (3.0 percent) was above both the aggregate lending level in low-income census tracts (1.9 percent) and the demographic estimate of owner-occupied housing units in low-income census tracts (2.6 percent), reflecting excellent bank performance. The distribution of HMDA loans in moderate-income geographies (15.4 percent) was similar to the aggregate lending level in moderate-income geographies (18.0 percent) but below demographic estimate of owner-occupied housing units in moderate-income census tracts (23.2 percent), reflecting adequate performance.

In 2021, the bank's distribution of HMDA loans in low-income geographies (0.8 percent) was below both the aggregate lending level in low-income census tracts (2.1 percent) and the demographic estimate of owner-occupied housing units in low-income census tracts (2.6 percent), reflecting poor bank performance. The distribution of HMDA loans in moderate-income geographies (16.5 percent) approached the aggregate lending level (19.1 percent) and was below the demographic estimate of owner-occupied housing units in moderate-income census tracts (23.2 percent), reflecting adequate performance.

Lastly, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020, the bank had loan activity in 38.8 percent of LMI census tracts in the assessment area; in 2021, there was loan activity in 28.8 percent of LMI geographies. However, the analysis reflects performance consistent with the bank's limited branch presence in this large, densely populated assessment area, which has a high level of banking competition. Additionally, geographically plotting small business and HMDA lending activity revealed adequate loan dispersion throughout the assessment area, consistent with demographics and the bank's branch network.

Community Development Lending Activities

The bank makes a relatively high level of community development loans in the Miami assessment area. During the review period, the bank originated 25 community development loans totaling \$70.0 million, including 11 PPP loans originated for \$17.0 million. Some noteworthy community development loan activity includes:

- A very large loan of which a pro rata amount equaling \$11.7 million qualified as community development lending activity, as the financing supported the development of a multifamily housing development. Within the development, 35 percent of the units are income-restricted affordable housing units for LMI families.
- One loan worth \$8.0 million that will revitalize and stabilize a moderate-income census tract in coordination with a city redevelopment plan by creating and retaining LMI jobs through the construction of a multi-use property.
- One \$7.3 million loan that will provide financing for a local housing authority to construct a multifamily affordable housing complex.

INVESTMENT TEST

The bank makes a significant level of community development investments in the assessment area and is occasionally in a leadership position. During the review period, the bank made 16 investments totaling \$35.6 million in newly qualified investments and received credit for seven investments totaling \$2.8 million that were made prior to the review period but are still outstanding. All investments were in MBS supporting affordable housing. Additionally, the bank made 148 donations to community development organizations serving the assessment area totaling \$213,244.

SERVICE TEST

The bank's service delivery systems are accessible to the bank's geographies and individuals of different income levels in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. However, business hours and services vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals. Lastly, the bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 17 branches in the Miami assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	2	4	4	7	0	17
	11.8%	23.5%	23.5%	41.2%	0.0%	100%
Census Tracts	6.2%	28.2%	29.5%	33.6%	2.5%	100%
Household Population	5.5%	28.3%	31.8%	34.1%	0.3%	100%

The bank operates six, or 35.3 percent, of its branches in the Miami assessment area in LMI geographies. By comparison, 34.4 percent of geographies in the assessment area are LMI, and 33.8 percent of households reside in LMI geographies. Based on its branch structure and additional delivery systems, such as online and mobile banking, the bank’s service delivery systems are accessible to geographies and individuals of different income levels throughout the assessment area.

Changes in Branch Locations

As previously mentioned, the bank opened two new branches in the Miami assessment area during the review period and closed another. One branch that was opened is located in a low-income census tract, while the other was opened in an upper-income census tract. The branch closure occurred in a middle-income census tract. Therefore, the bank’s record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank’s business hours and services vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. The hours of operations for the bank’s branches within the assessment area are generally uniform, with standard hours Monday through Friday and no hours of operation on Saturdays. However, the bank does not employ loan personnel at any of its branches located in LMI census tracts. Additionally, one of the two branches located in low-income census tracts is drive-through only. Therefore, although the bank’s products and services can be accessed by means outside of traditional in-person branch visits, individuals living in LMI geographies are impacted to an extent greater than for those in middle- and upper-income census tracts.

Community Development Services

Bank employees provide an adequate level of community development services in this assessment area. During the review period, Centennial Bank employees provided community development services to 19 different organizations in the assessment area, totaling 685 hours. Numerous employees provided their financial expertise in their roles as board members for various

organizations within the assessment area. These organizations provided community services benefitting LMI children in the assessment area, worked to increase the accessibility of affordable housing for LMI individuals, and worked toward improving education opportunities for students in need.

**TAMPA-ST. PETERSBURG-CLEARWATER,
FLORIDA MSA**
(Full-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TAMPA ASSESSMENT AREA

Bank Structure

The bank operates ten branches in the Tampa assessment area, representing 4.5 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
1	1	4	4

During this review period there have been no structural changes to the bank’s branching. Based on this branch network and other service delivery systems, the bank is positioned to deliver financial services to substantially all of the Tampa assessment area.

General Demographics

The bank’s Tampa assessment area is comprised of four counties in their entirety, Hernando County, Hillsborough County, Pasco County, and Pinellas County, which together comprise the Tampa-St. Petersburg-Clearwater, Florida MSA (Tampa MSA). The assessment area is located on the west coast of central Florida, near the Gulf of Mexico, with a total population of 2,888,458. The individual counties within the assessment area vary greatly in size, with Hillsborough County containing a significant portion of the population (1,302,884 residents), whereas Hernando County (174,908 residents) is considerably smaller than the other two counties. The more heavily populated areas of the assessment area include the bay and coastal areas to the south and southwest, while the eastern and northern areas are more rural and much less populated.

According to the FDIC Deposit Market Share Report data as of June 30, 2022, there were 54 FDIC-insured depository institutions operating 615 offices within the assessment area, and the bank ranked 18th in terms of deposit market share, with 0.6 percent of the total deposit dollars. Competition for HMDA and CRA loans is very high. An analysis of 2021 HMDA-reportable loans shows that 1,175 institutions had loan activity in the assessment area, of which Centennial Bank ranked 168th with less than 1.0 percent of total HMDA loans. Out of 266 institutions with CRA loan activity, Centennial bank ranked 30th, with less than 1.0 percent of total CRA loans.

As the assessment area’s demographics cover coastal, urban/suburban, and relatively rural portions of a metropolitan area, credit needs in the area are diverse and include various consumer, business, and, to a much lesser degree, agricultural credit products. Other particular credit needs in the assessment area, noted by community contacts, include greater partnerships between financial institutions and local community development organizations. The contact also noted indicated that

ample opportunities are available for bank employees to utilize their financial expertise in providing services for local organizations.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	41	5.5%	25,578	3.6%
Moderate	195	26.1%	163,714	23.3%
Middle	271	36.3%	268,231	38.2%
Upper	222	29.8%	243,900	34.7%
Unknown	17	2.3%	821	0.1%
TOTAL	746	100%	702,244	100%

As shown above, 31.6 percent of the census tracts in the assessment area are LMI geographies, while a slightly lower percentage (26.9 percent) of assessment area families reside in these LMI census tracts. While the moderate-income geographies are not concentrated in any particular part of the assessment area, most low-income census tracts are within close proximity of the city of Tampa, which is the primary urban core of the assessment area.

Based on 2015 ACS data, the median family income for the assessment area is \$58,907, which is slightly above the median family income for the state of Florida as a whole (\$57,504). More recently, the FFIEC estimates the 2021 median family income figure for the Tampa assessment area to be \$72,700. The following table compares the population of assessment area families by income level to the state of Florida as a whole.

Family Population by Income Level				
	Assessment Area		Florida	
Low	151,617	21.6%	1,010,745	21.5%
Moderate	125,667	17.9%	839,152	17.9%
Middle	134,728	19.1%	910,313	19.4%
Upper	290,682	41.4%	1,939,678	41.3%
TOTAL	702,244	100%	4,699,888	100%

As shown in the previous table, 39.5 percent of families in the assessment area are considered LMI, which is in line with the LMI family percentage of 39.4 percent for the entire state. Additionally, the percentage of assessment area families below the poverty level (11.2 percent) is just below the state figure (12.0 percent). Therefore, when considering income and poverty levels, the assessment area is similarly affluent to the state of Florida as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Florida.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$144,603	32.6%	\$953
Florida	\$159,000	29.9%	\$1,002

Based on housing values, income levels, and rental costs, housing in the assessment area appears to be more affordable than in the state of Florida overall. The median housing value for the assessment area was \$144,603, which is significantly below the state figure of \$159,000. Additionally, the assessment area housing affordability ratio of 32.6 percent is above the state figure of 29.9 percent. This affordability reaches each of the four assessment area counties, as all four have an affordability ratio higher than the statewide figure. Moreover, the median gross rent for the assessment area of \$953 per month is below that of the comparable statewide figure of \$1,002 per month.

Industry and Employment Demographics

According to the BLS, there are 1,231,692 paid employees in the assessment area, and by percentage of employees, the largest job category is healthcare and social assistance (15.3 percent). The next largest categories are retail trade (12.9 percent) and accommodation and food services (11.1 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for each county in the assessment area, the assessment area as a whole, and the state of Florida.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	7.8%	4.2%
Florida	8.2%	4.6%

As shown in the table above, the unemployment rate for the assessment area was slightly below the level for the state of Florida. Hernando County had the highest levels of unemployment in the assessment area at 8.7 percent and 5.1 percent for 2020 and 2021, respectively. These figures were higher than both the assessment area overall and the state of Florida as a whole. The remaining counties in the assessment area had an unemployment rate below the state’s unemployment rate during both years.

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank's activities in the assessment area were evaluated. The interview was with an individual specializing in affordable housing. The contact categorized the local economy and recent population growth as strong. Additionally, as the area has come out of the pandemic, demand across industries has surged, which has helped small businesses thrive and expand. While the overall economic growth was described as favorable, the contact also described growing pains felt by existing residents related to increased costs for food, amenities, and housing. The contact also indicated that residents have had limited wage growth, while costs are increasingly exponentially. This has its most pronounced effect on LMI individuals. Furthermore, the contact explained that there are several areas and people within the assessment area that are underbanked and underserved by financial institutions, specifically citing low- and moderate-income individuals as those who have been impacted most. When discussing opportunities to meet the needs of LMI residents in the area, the contact cited additional funding for projects benefiting the underserved, additional loan products with flexible underwriting standards for low- and moderate-income borrowers, and additional outreach to the area residents and local community development organizations by financial institutions.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TAMPA ASSESSMENT AREA

LENDING TEST

Lending levels reflect adequate responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects good penetration among customers of different income levels and businesses of various sizes, and the overall geographic distribution of loans reflects good penetration throughout the assessment area. Finally, the bank makes an adequate level community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	4	0.3%	1,225	0.7%
Home Purchase	96	7.2%	32,923	18.3%
Multifamily Housing	5	0.4%	4,172	2.3%
Refinancing	126	9.5%	36,925	20.5%
Total HMDA	234	17.6%	76,170	42.3%
Small Business	1,092	82.1%	103,179	57.3%
Small Farm	4	0.3%	738	0.4%
TOTAL LOANS	1,330	100%	180,087	100%

By number of loans, the level of lending activity in this assessment area represents 5.5 percent of total 2020 and 2021 HMDA and CRA loans made inside the bank’s combined assessment areas. By comparison, the bank operates 4.5 percent of its total branches and, as of June 30, 2021, holds 5.8 percent of total bank deposits in the assessment area. In light of these factors, the bank’s lending levels reflect adequate responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good.

Small Business Lending

The bank’s overall distribution of small business loans by borrowers’ profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank’s participation in the PPP, the bank’s distribution of small business loans

by borrower's profile is good. In 2020, the bank made 9.1 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is well below the aggregate lending level (42.4 percent) and the demographic figure used for comparison (93.9 percent). Similarly, in 2021, the bank originated 24.7 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is also well below aggregate performance (46.7 percent) and the demographic figure (94.0 percent). However, additional analysis indicates that a significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 82.3 percent of 2020 small business loans and 64.5 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 81.7 percent of 2020 small business loans with unknown revenue and 73.9 percent of 2021 small business loans with unknown revenue had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses of different revenue sizes in 2020 and 2021 is good.

HMDA Lending

The bank's overall distribution of HMDA loans by borrower's profile is adequate.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (4.7 percent) was above the aggregate lending level to low-income borrowers (3.8 percent), but was below the demographic figure of low-income families in the assessment area (21.6 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (12.4 percent) is comparable to aggregate lending levels to moderate-income borrowers (14.5 percent) but was below the demographic figure (17.9 percent), also reflecting adequate performance.

In 2021, the bank's distribution of HMDA loans to low-income borrowers (3.8 percent) approached the aggregate lending level to low-income borrowers (4.5 percent), while trailing the demographic figure of low-income families in the assessment area (21.6 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (13.5 percent) improved from the previous year but was still slightly below the aggregate lending level to moderate-income borrowers (15.2 percent) and the demographic figure of moderate-income families in the assessment area (17.9 percent), also reflecting adequate performance.

Geographic Distribution of Loans

The bank's geographic distribution in the Tampa assessment area is good.

Small Business Lending

The bank's overall geographic distribution of small business loans is excellent.

In 2020, the bank's distribution of small business loans in low-income census tracts (4.0 percent) was comparable to both the aggregate lending level in low-income geographies (4.7 percent) and

the demographic figure of business operating in low-income geographies (4.1 percent), reflecting adequate bank performance. The distribution of small business loans in moderate-income census tracts (22.5 percent) was slightly above both the aggregate lending level (20.3 percent) and the demographic figure (21.7 percent), reflecting good performance.

In 2021, the bank's distribution of small business loans improved, as its performance in low-income census tracts (5.7 percent) was above both aggregate lending (4.5 percent) and the demographic figure (4.1 percent), reflecting excellent bank performance. Similarly, the distribution of small business loans in moderate-income census tracts (25.5 percent) was above the aggregate lending level in moderate-income geographies (20.4 percent) and the demographic estimate (21.7 percent), reflecting excellent performance.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is poor.

In 2020, the bank's distribution of HMDA loans in low-income geographies (2.4 percent) was above both the aggregate lending level in low-income census tracts (1.6 percent) and the demographic figure of owner-occupied housing units in low-income census tracts (1.9 percent), reflecting good bank performance. The distribution of HMDA loans in moderate-income geographies (11.8 percent) was below both the aggregate lending level in moderate-income geographies (16.0 percent) and the demographic figure of owner-occupied housing units in moderate-income census tracts (21.9 percent), reflecting poor performance.

In 2021, the bank did not originate any HMDA loans in low-income geographies, which is below both the aggregate lending level in low-income census tracts (1.8 percent) and the demographic figure of owner-occupied housing units in low-income census tracts (1.9 percent), reflecting poor bank performance. The distribution of HMDA loans in moderate-income geographies (12.5 percent) improved and approached the aggregate lending level in moderate-income geographies (17.5 percent) but was still well below demographic figure of owner-occupied housing units in moderate-income census tracts (21.9 percent), reflecting adequate performance.

Lastly, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020, the bank had loan activity in 45.3 percent of LMI census tracts in the assessment area; in 2021 there was loan activity in 31.8 percent of LMI geographies. These lending patterns are consistent with the bank's limited branch presence in this large, densely populated assessment area with a very high level of banking competition. Furthermore, geographically plotting small business and HMDA lending activity indicated adequate dispersion throughout the assessment area, consistent with demographics and the bank's branch network.

Community Development Lending Activities

The bank makes an adequate level of community development loans in this assessment area. During the review period, the bank made seven community development loans in this assessment area totaling \$12.9 million. The largest of the community development loans was for \$4.0 million

and provided financing for the construction of a gas station in an LMI census tract, which aligned with the local county’s economic development plan. Additionally, it will help to revitalize and stabilize the census tract through job creation. Similarly, another large dollar loan originated through the PPP helped to retain jobs in an LMI census tract during the COVID-19 pandemic.

INVESTMENT TEST

The bank makes a significant level of community development investments in this assessment area and is occasionally in a leadership position. During the review period, the bank made 21 investments totaling \$18.7 million in MBS supporting affordable housing. Also, from the prior period of review, the bank maintained nine investments in MBS for \$2.7 million. Additionally, the bank made 30 donations to community development organizations serving this assessment area totaling \$50,383. The vast majority of these donations provided community services targeting LMI individuals in the assessment area.

SERVICE TEST

The bank’s service delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment area, and the bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Business hours and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals. Lastly, the bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates ten branches in the assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	1 10.0%	1 10.0%	4 40.0%	4 40.0%	0 0.0%	10 100%
Census Tracts	5.5%	26.1%	36.3%	29.8%	2.3%	100%
Household Population	4.3%	24.5%	39.3%	31.8%	0.2%	100%

The bank operates two of ten branches (20.0 percent) in LMI geographies. By comparison, 31.6 percent of geographies in the assessment area are LMI, and 28.8 percent of households reside in LMI geographies. However, the remaining branches located in middle- and upper-income census tracts are in close proximity to several moderate-income census tracts. Based on its branch

structure and additional delivery systems, such as online and mobile banking, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank has not opened or closed any branches in the Tampa MSA assessment area during the review period. Therefore, the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of this assessment area, particularly LMI geographies and LMI individuals. The bank's branches in the assessment area operate during standard business hours, Monday through Thursday, and all offer extended hours on Friday. Additionally, all branches have drive-up facilities and ATMs. The majority of branches also offer lending services on site.

Community Development Services

Bank employees provided an adequate level of community development services in this assessment area. During the review period, three bank employees provided 258 hours of service to various community development organizations within the assessment area. One provided their financial expertise through volunteering as a board member for a community development financial institution (CDFI) that offers affordable housing financing options for LMI individuals in the area. This type of bank involvement was specifically mentioned as needed by the community contact and therefore suggests the bank's service activity was responsive to the local area. Additionally, employees of the bank provided financial literacy training through a homebuyer education course, which was also described as a local need by the community contact.

ORLANDO-KISSIMMEE-SANFORD, FLORIDA MSA (Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ORLANDO ASSESSMENT AREA

Bank Structure

The bank operates five branches in the Orlando assessment area, representing 2.3 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	1	2	2

During the review period, the bank opened one branch in an upper-income census tract. Based on this branch network and other service delivery systems, the bank is generally well positioned to deliver financial services to the majority of the Orlando assessment area. However, the bank may experience difficulties serving the residents of Lake County, where the bank does not have a branch presence.

General Demographics

The bank's Orlando assessment area is comprised of four counties in their entirety, Lake, Orange, Osceola, and Seminole County, which together comprise the Orlando-Kissimmee-Sanford, Florida MSA (Orlando MSA). The assessment area is located near the center of Florida, with a total population of 2,277,816. The majority of the population resides in Orange County (1,229,039), followed by Seminole County (437,346), Lake County (310,561), and Osceola County (300,870). The more heavily populated Orange County includes the city of Orlando, while the less populated Osceola County is considerably more rural. According to the FDIC Deposit Market Share Report data as of June 30, 2022, there were 42 FDIC-insured depository institutions operating 469 offices within the assessment area, and the bank ranked 28th in terms of deposit market share, with 0.3 percent of the total deposit dollars. Competition for HMDA and CRA loans is high. An analysis of 2021 HMDA-reportable loans shows that 1,071 institutions had loan activity in the assessment area, of which Centennial Bank ranked 133rd with less than 1.0 percent of total HMDA loans. Out of 247 institutions with CRA loan activity, Centennial bank ranked 50th with less than 1.0 percent of total CRA loans.

As the assessment area's demographics cover urban/suburban and somewhat rural portions of a metropolitan area, credit needs in the area are diverse and include various consumer and business products. Other particular credit needs in the assessment area, noted by community contacts, include greater access of both loan and deposit products for LMI individuals in the assessment area. The contact cited the need to lower the cost of banking, specifically by offering accounts with no minimum balance requirements, free debit cards, and access to check cashing and limited

transaction fees. Lastly, greater outreach by financial institutions in the area would be beneficial to community development organizations in the area.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	14	3.6%	11,824	2.2%
Moderate	116	29.7%	140,320	26.4%
Middle	140	35.9%	199,442	37.5%
Upper	118	30.3%	180,699	33.9%
Unknown	2	0.5%	131	0.0%
TOTAL	390	100%	532,416	100%

As shown in the previous table, 33.3 percent of the census tracts in the assessment area are LMI geographies, while a slightly lower percentage (28.6 percent) of assessment area families reside in these LMI census tracts. The majority of low-income census tracts (64.3 percent) and moderate-income census tracts (58.6 percent) are located in Orange County.

Based on 2015 ACS data, the median family income for the assessment area is \$57,347, which is in line with the median family income for the state of Florida as a whole (\$57,504). More recently, the FFIEC estimates the 2021 median family income figure for the Orlando MSA to be \$70,800. The following table compares the population of assessment area families by income level to the state of Florida as a whole.

Family Population by Income Level				
	Assessment Area		Florida	
Low	114,610	21.5%	1,010,745	21.5%
Moderate	96,121	18.1%	839,152	17.9%
Middle	102,366	19.2%	910,313	19.4%
Upper	219,319	41.2%	1,939,678	41.3%
TOTAL	532,416	100%	4,699,888	100%

As shown in the previous table, 39.6 percent of families in the assessment area are considered LMI, which is similar to the LMI family percentage of 39.4 percent for the entire state. Similarly, the percentage of assessment area families below the poverty level (12.4 percent) is in line with the state figure (12.0 percent). Therefore, when considering income and poverty levels, the assessment area is similarly affluent when compared to the state as a whole.

Housing Demographics

The following table displays housing demographics the assessment area and the state of Florida.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$157,865	30.9%	\$1,034
Florida	\$159,000	29.9%	\$1,002

Based on housing values and income levels, housing in the assessment area appears to be similar, but slightly more affordable than in the state of Florida overall. While median gross rent is slightly higher in the assessment area (\$1,034) than in the state (\$1,002), the median housing value for the assessment area (\$157,865) is slightly below the statewide figure of (\$159,000). Additionally, the assessment area housing affordability ratio of 30.9 percent is slightly above the state figure of 29.9 percent. The one county where this data is inversed is Orange County, where the affordability ratio (29.3 percent) is slightly lower than the state, and the median housing value (\$163,800) is slightly higher than the state.

Industry and Employment Demographics

According to the BLS, there are 1,187,855 paid employees in the assessment area, and by percentage of employees, the largest job category is accommodation and food services (14.8 percent), retail trade (12.2 percent), and healthcare and social assistance (12.0 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for the assessment area compared to the state of Florida.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	11.0%	5.1%
Florida	8.2%	4.6%

As shown in the table above, the unemployment level for the assessment area remained above the level for the state of Florida during the period. Osceola County had the highest unemployment rate in 2020 (14.4 percent) and 2021 (6.3 percent), which was significantly above state levels. All counties in the assessment area experienced significant decreases in their unemployment levels across the review period. This might be partially due to the fact that the accommodation and food services industry employs the largest percentage of workers in the assessment area, and this was a sector that experienced significant hardships during the COVID-19 pandemic before rebounding in 2021.

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank's activities in the assessment area were evaluated. The interview was with an individual working for a community development organization that specializes in providing community services. The contact stated the assessment area's economy has largely returned to pre-pandemic levels. They also explained that many businesses and tourist attractions were forced to close due to the economic shutdown that occurred during the COVID-19 pandemic. The contact cited the assessment area's reliance on tourism intensified the impact on the area and resulted in a higher number of layoffs than other areas in the state. While most businesses have recovered and tourism levels have returned to normal, many employees were never rehired and remain jobless. Furthermore, the contact stated the cost of housing in the area has gone up dramatically as well, especially when compared to the stagnant wage growth. The contact explained the variation in wages and housing costs has continued to make affordable housing harder to find. Regarding other changes in the economy over the last several years, the contact noted several hurricanes in the area, such as Ian and Irma, have resulted in more housing displacements and created greater difficulty in obtaining housing, especially for LMI residents in the area.

Within the assessment area, the community contact noted several opportunities for financial institutions to help meet the needs of LMI residents. The contact cited a need for better access to traditional banking products and services for LMI individuals. Current access to financial institutions is limited, and many of the area's LMI residents rely on alternative financing for check cashing, pre-paid debit cards, and payday loan services, which charge high fees and rates. In addition to better access, the contact cited additional lower-cost products, such as bank accounts with no minimum balance, free debit cards, and access to checking with no fees, to better attract and service LMI populations in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ORLANDO ASSESSMENT AREA

LENDING TEST

Lending levels reflect good responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects adequate penetration among customers of different income levels and businesses of various sizes, and the overall geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank makes a low level community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	0	0.0%	0	0.0%
Home Purchase	292	41.2%	94,250	41.4%
Multifamily Housing	2	0.2%	71,590	31.4%
Refinancing	80	11.3%	25,248	11.1%
Total HMDA	374	52.8%	191,088	83.9%
Small Business	334	47.2%	36,607	16.1%
Small Farm	0	0.0%	0	0.0%
TOTAL LOANS	708	100%	227,695	100%

By number of loans, the level of lending activity in this assessment area represents 3.1 percent of total 2020 and 2021 HMDA and CRA loans made inside the bank’s combined assessment areas. By comparison, the bank operates 2.3 percent of its total branches and, as of June 30, 2021, holds 1.5 percent of total bank deposits in the assessment area. Furthermore, the lending figures in the table above reflect an increase from the previous examination, when in 2017 the bank made a total of 161 HMDA and CRA loans in this assessment area. In light of these factors, the bank’s lending levels reflect good responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment adequate, with primary emphasis placed on HMDA lending.

HMDA Lending

The bank’s overall distribution of HMDA loans by borrower’s profile is poor.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (1.2 percent) was below both the aggregate lending level to low-income borrowers (3.1 percent) and the demographic figure of low-income families in the assessment area (21.5 percent), reflecting poor bank performance. The distribution of HMDA loans to moderate-income borrowers (7.0 percent) was again below both the aggregate lending level to moderate-income borrowers (12.8 percent) and the demographic figure of moderate-income families in the assessment area (18.1 percent), reflecting poor performance.

In 2021, the bank's overall distribution of HMDA loans to low-income borrowers (1.5 percent) was again below aggregate lending (3.6 percent) and the demographic figure (21.5 percent), reflecting poor performance. The distribution of HMDA loans to moderate-income borrowers increased from the prior year (12.9 percent) and was comparable to aggregate lending levels to moderate-income borrowers (13.4 percent) but remained below the demographic comparator (18.1 percent), reflecting adequate performance.

Small Business Lending

The bank's overall distribution of small business loans by borrowers' profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 10.2 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is well below the aggregate lending level (41.9 percent) and the demographic figure used for comparison (94.5 percent). Similarly, in 2021, the bank originated 21.8 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is also well below aggregate performance (45.3 percent) and the demographic figure (94.6 percent). However, additional analysis indicates that a considerable portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 80.9 percent of 2020 small business loans and 59.7 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 81.6 percent of 2020 small business loans with unknown revenue and 64.8 percent of 2021 small business loans with unknown revenue had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses in 2020 and 2021 of different revenue sizes is good.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the Orlando assessment area is adequate.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is adequate.

In 2020, the bank's distribution of HMDA loans in low-income geographies (0.8 percent) matched the aggregate lending level in low-income census tracts (0.8 percent) and was comparable to the demographic figure of owner-occupied housing units (1.0 percent), reflecting adequate performance. The distribution of HMDA loans in moderate-income geographies (13.2 percent) was similar to the aggregate lending level (15.4 percent) but below demographic comparator (21.1 percent), reflecting adequate performance.

In 2021, the bank did not originate any loans in low-income geographies; however, the low level of aggregate lending in low-income census tracts (0.9 percent) and the demographic figure of owner-occupied housing units in low-income census tracts (1.0 percent) evidences limited lending opportunities for financial institutions within the low-income census tracts in the area. Therefore, this is reflective of adequate bank performance. The distribution of HMDA loans in moderate-income geographies (17.4 percent) exceeded but was comparable to the aggregate lending level in moderate-income geographies (16.6 percent) but trailed the demographic figure (21.1 percent), reflecting adequate performance.

Small Business Lending

The bank's overall geographic distribution of small business loans is good.

In 2020, the bank's distribution of small business loans in low-income census tracts (1.4 percent) was comparable to both the aggregate lending level in low-income geographies (1.4 percent) and the demographic figure of business operating in low-income geographies (1.6 percent), reflecting adequate bank performance. The distribution of small business loans in moderate-income census tracts (36.7 percent) exceeded both the aggregate lending level (24.8 percent) and the demographic figure of businesses operating in moderate-income geographies (26.2 percent), reflecting excellent performance.

In 2021, the bank did not originate any small business loans in low-income census tracts, which was below the aggregate lending level in low-income geographies (1.8 percent) and the demographic figure of business operating in low-income geographies (1.6 percent), reflecting poor bank performance. The distribution of small business loans in moderate-income census tracts (37.0 percent) was much greater than the aggregate lending level in moderate-income geographies (24.8 percent) and the demographic figure of businesses operating in moderate-income geographies (26.5 percent), reflecting excellent performance.

Lastly, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020, the bank had loan activity in 30.8 percent of LMI census tracts in the assessment area; in 2021, there was loan activity in 31.8 percent of LMI geographies. These lending patterns are consistent with the bank's limited branch presence in this large, densely populated assessment area with a high level of banking competition. Furthermore, geographically plotting small business and HMDA lending activity indicated adequate dispersion throughout the assessment area, consistent with demographics and the bank's branch network.

Community Development Lending Activities

The bank makes a low level of community development loans in this assessment area. During the review period, the bank made three community development loans in this assessment area totaling \$5.2 million. Of the three, two loans equaling about \$3.2 million dollars financed multifamily housing construction deemed physically or financially accessible to LMI families.

INVESTMENT TEST

The bank makes a significant level of community development investments in this assessment area and is occasionally in a leadership position. During the review period, the bank made 12 investments totaling \$8.5 million in MBS supporting affordable housing. The bank also had five qualified community development investments from the prior examination period still outstanding totaling \$514,435 in MBS. These investments are particularly noteworthy, as the aforementioned community contact mentioned financing affordable housing was a local need. Additionally, the bank made ten donations to community development organizations serving this assessment area totaling \$8,950.

SERVICE TEST

The bank’s service delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment area, and the bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Business hours and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals. Lastly, the bank provides a limited level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates five branches in the assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	1	2	2	0	5
	0.0%	20.0%	40.0%	40.0%	0.0%	100%
Census Tracts	3.6%	29.7%	35.9%	30.3%	0.5%	100%
Household Population	2.6%	27.6%	37.7%	32.0%	0.0%	100%

The bank operates one of five branches (20.0 percent) in LMI geographies, which is below the percentage of LMI census tracts (33.3 percent) and the percentage of households within LMI census tracts (30.2 percent). However, given the limited number of branches within the assessment area, and the various other means through which customers can access bank services, including online banking, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank opened one branch in an upper-income census tract and did not close any branches in the Orlando assessment area during the review period. Therefore, the bank's record of opening and closing branches has not adversely impacted the accessibility of its service delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Within the Orlando assessment area, business hours and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals. The five branches in the assessment area operate during the same standard hours, Monday through Friday, each with extended hours on Friday. Additionally, four of the five branches have lending personnel on site, including the branch in the moderate-income census tract. Lastly, all branches have ATM and drive-through accessibility.

Community Development Services

Bank employees provide a limited level of community development services in this assessment area. During the review period, two bank employees provided community development services to two different organizations, totaling 62 hours of service. This was a noticeable decline from the previous review period when bank employees provided 334 hours of community development services to various organizations in the assessment area. The two organizations in which employees provided their financial expertise to during this review period provided affordable housing to LMI individuals in the assessment area, as well as job training.

NORTH FLORIDA NONMETROPOLITAN ASSESSMENT AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTH FLORIDA ASSESSMENT AREA

Bank Structure

The bank operates eight branches within this assessment area, representing 3.6 percent of all bank branches. In addition, the bank operates one mobile branch. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	0	6	2

No branching activity occurred during the review period. The bank's branches are spread throughout the assessment area's four delineated counties with a significant presence near the coast. Based on this branch network and other service delivery systems, the bank is positioned to deliver financial services to the majority of the assessment area.

General Demographics

The North Florida assessment area is comprised of four counties in their entirety: Calhoun, Franklin, Gulf, and Liberty. These four contiguous counties are located in the Florida Panhandle, with Franklin and Gulf County being located on the Gulf of Mexico and Calhoun and Liberty counties being located inland. The assessment area population is relatively evenly spread throughout the four counties, with Gulf County being the most populous, with 15,785, whereas Liberty County is the least populous, with 8,259. The total assessment area population is 50,323. Based on the FDIC Deposit Market Share Report data as of June 30, 2022, there were five FDIC-insured depository institutions operating 15 offices in the assessment area. Centennial Bank ranked first in terms of deposit market share, with 63.2 percent of the total deposit dollars. While only five institutions have a branch presence in the assessment area, a much higher number of financial institutions reported loan activity in the assessment area, pointing to a competitive banking market. An analysis of 2021 HMDA-reportable loans shows that 312 institutions had loan activity in the assessment area, of which Centennial Bank ranked second with 5.9 percent of total HMDA loans. Out of 67 institutions with CRA loan activity, Centennial Bank ranked second with 15.9 percent of total CRA loans.

The assessment area's demographics cover coastal and somewhat rural portions of a large and sparsely populated area. Credit needs in the area include a blend of standard consumer, business, and, to a lesser degree, agricultural credit products. These needs are generally being met by the financial institutions operating in the assessment area according to discussions with a community contact.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	0	0.0%	0	0.0%
Middle	9	60.0%	9,169	80.2%
Upper	3	20.0%	2,260	19.8%
Unknown	3	20.0%	0	0.0%
TOTAL	15	100%	11,429	100%

As shown, the assessment area does not contain any LMI geographies. The assessment area is predominantly comprised of middle-income census tracts (60.0 percent), with an even greater percentage of assessment area families concentrated in those tracts (80.2 percent).

Based on 2015 ACS data, the median family income for the assessment area is \$47,717, which is slightly above the median family income for the nonMSA portion of the state of Florida at that time, \$46,899. More recently, the FFIEC estimates the 2021 median family income figures for the nonMSA portions of the state of Florida to be \$53,600. The following table compares the population of assessment area families by income level to nonMSA Florida as a whole.

Family Population by Income Level				
	Assessment Area		NonMSA Florida	
Low	2,240	19.7%	34,324	22.6%
Moderate	2,131	18.6%	26,298	17.3%
Middle	2,176	19.0%	29,100	19.1%
Upper	4,882	42.7%	62,412	41.0%
TOTAL	11,429	100%	152,134	100%

As shown in the previous table, 38.3 percent of families in the assessment area were considered LMI, which is slightly below the LMI family percentage of 39.9 percent for nonMSA Florida as a whole. Similarly, the percentage of assessment area families below the poverty level (13.3 percent) is below the figure for nonMSA Florida (17.4 percent). Therefore, considering these factors, as well as the median family income data for the assessment area, it is slightly more affluent than the nonMSA portion of the state as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Florida.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$101,483	38.5%	\$726
nonMSA Florida	\$99,337	38.0%	\$733

Based on housing values, income levels, and rental costs, housing in the assessment area appears to be similarly affordable when compared to the nonMSA portions of state of Florida overall. The median housing value for the assessment area affordability ratio, and median gross rents are nearly all identical to the nonMSA portions of the state. There is significant variability within the assessment area, however, with Gulf County having significantly higher comparator figures, whereas Liberty County has significantly lower comparator figures.

Industry and Employment Demographics

According to the BLS, there are 9,279 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are retail trade (16.7 percent), accommodation and food services (15.1 percent), and construction (10.9 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for the assessment area compared to the nonMSA portions of the state of Florida.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	5.8%	4.0%
nonMSA Florida	7.0%	4.4%

As shown in the above table, the unemployment levels in the assessment area were consistently lower than the state of Florida. All counties within the assessment area experienced significant decreases across the two-year review period. Gulf County experienced the largest drop amongst the counties in the assessment area (from 6.3 percent in 2020 to 3.6 percent in 2021), whereas the drop in unemployment for Liberty County was much more modest (5.2 percent in 2020 to 4.2 percent in 2021).

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank’s activities in the assessment area were evaluated. The interview was with an individual on behalf of a community service organization. The contact stated that the area is primarily rural and described the economy as stagnant. The contact explained that much of the assessment area has not seen any major changes in population or local industry in several years and is supported by primarily blue-collar industries and jobs. Moreover, areas along the coast do fare more favorably in attracting residents and businesses, as well as economically, due to the allure of the coast and beaches, but still does not attract residents or businesses as rapidly as some of the neighboring coastal areas.

When discussing the accessibility and distribution of financial institutions in the area, the contact noted there are usually two or three financial institutions in the more urban areas. Conversely the banking options in rural areas are more limited, and residents usually must drive to a more urban part of the region to access banking products and services. Despite the limited number and dispersion of banks, the contact believes, based on the population, banks are fairly accessible to everyone and reasonably dispersed. Regarding affordable housing options in the area, the contact stated that housing is limited and expensive. The contact explained the area has always had limited affordable housing options, but the 2018 hurricane exacerbated the problem. Additionally, the contact noted that rising interest rates have priced many LMI out of existing housing options. Other barriers faced by the community, specifically regarding economic development, are a limited skilled workforce, limited land, and the rural disposition of the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTH FLORIDA ASSESSMENT AREA

LENDING TEST

Lending levels reflect good responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects excellent penetration among customers of different income levels and businesses of various sizes, and the overall geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank makes an adequate level community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	8	1.0%	940	0.9%
Home Purchase	181	21.7%	48,106	48.1%
Multifamily Housing	0	0.0%	0	0.0%
Refinancing	83	10.0%	18,349	18.3%
Total HMDA	274	32.9%	68,045	68.0%
Small Business	554	66.5%	31,609	31.6%
Small Farm	5	0.6%	452	0.5%
TOTAL LOANS	833	100%	100,106	100%

By number of loans, the level of lending activity in this assessment area represents 3.7 percent of total 2020 and 2021 HMDA and CRA loans made inside the bank’s combined assessment areas. By comparison, the bank operates 3.6 percent of its total branches and, as of June 30, 2021, holds 4.1 percent of total bank deposits in the assessment area. Moreover, the bank ranked first in 2020 in percentage of total CRA loans compared to all lenders with CRA loans in the assessment area and second in 2021. Similarly, the bank ranked first and second in HMDA lending in the assessment area for both 2020 and 2021. Considering these factors, the bank’s lending activity in the assessment area reflects good responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good, with primary emphasis placed on small business lending.

Small Business Lending

The bank's overall distribution of small business loans by borrowers' profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 16.8 percent of its small business loans to business with annual revenues of \$1 million or less, which is below both the aggregate lending level (24.6 percent) and the demographic figure (94.6 percent). In 2021, the bank made 49.7 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is above the aggregate lending level (40.4 percent) but well below the demographic figure used for comparison (94.5 percent). However, additional analysis indicates that a considerable portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 74.6 percent of 2020 small business loans and 37.3 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 91.1 percent of 2020 small business loans with unknown revenue and 93.3 percent of 2021 small business loans with unknown revenue had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses in 2020 and 2021 of different revenue sizes is good.

HMDA Lending

The bank's overall distribution of HMDA loans by borrower's profile is adequate.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (1.3 percent) slightly exceeded the aggregate lending level to low-income borrowers (1.2 percent), but was below the demographic figure of low-income families in the assessment area (19.6 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (17.6 percent) more than doubled the aggregate lending level to moderate-income borrowers (8.7 percent) and was comparable to the demographic figure (18.6 percent), reflecting good performance.

In 2021, bank's distribution of HMDA loans to low-income borrowers increased (1.7 percent) and was above the aggregate lending level (1.3 percent), but remained below the demographic figure (19.6 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (5.9 percent) was in line with aggregate lending level to moderate-income borrowers (5.8 percent), but it was well below the demographic figure of moderate-income families in the assessment area (18.6 percent), again reflecting adequate performance.

Geographic Distribution of Loans

The bank's overall performance by geographic distribution of loans in the assessment is adequate.

Since the assessment area has no low- or moderate-income census tracts, a review of the bank’s lending dispersion throughout the assessment area was conducted. Based on the analysis, no conspicuous lending gaps were noted. The bank had loan activity in all 12 middle- and upper-income census tract, and the bank’s lending activity was consistent with local demographics and the bank’s branch network.

Community Development Lending Activities

The bank makes an adequate level of community development loans in this assessment area. During the review period, the bank made five community development loans in this assessment area totaling \$11.4 million. Of the five total loans, three totaling \$8.9 million provided bridge financing to a city that had been impacted by hurricanes in the area. This financing was part of a disaster recovery plan to rebuild local infrastructure, which will ultimately help to attract and retain both citizens and businesses in the area.

INVESTMENT TEST

The bank makes an adequate level of community development investments in this assessment area and is rarely in a leadership position. During the review period, the bank made three investments totaling \$329,885 in MBS supporting affordable housing and maintained two investments totaling \$31,282 from prior review periods. Additionally, the bank made 29 donations to community development organizations serving this assessment area totaling \$53,254.

SERVICE TEST

The bank’s service delivery systems are accessible to the bank’s geographies and individuals of different income levels in the assessment area, and the bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Business hours and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals. Lastly, the bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates eight branches in the assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	0	6	2	0	8
	0.0%	0%	75.0%	25.0%	0.0%	100%
Census Tracts	0.0%	0.0%	60.0%	20.0%	20.0%	100%
Household Population	0.0%	0.0%	80.9%	19.1%	0.0%	100%

The bank's branches are dispersed throughout the assessment area, with a presence in each of the counties comprising the assessment area. Considering there are no LMI census tracts within the assessment area, the bank's service delivery systems are accessible to the remaining middle- and upper-income geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank has not opened or closed any branches in the assessment area during the review period. Therefore, the bank's record of opening and closing branches has not adversely impacted the accessibility of its service delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The hours and services provided by the bank's branches located in the assessment area are nearly identical and have not changed since the previous examination. Lobby hours at the branches are available from 9:00 a.m. until 5:00 p.m. or 4:00 p.m. depending on the branch, with limited Saturday hours. Therefore, hours and services do not vary in a way that inconveniences the assessment area, particularly LMI individuals.

Community Development Services

Bank employees provided an adequate level of community development services in this assessment area. During the review period, bank personnel provided community development services to six different organizations, totaling 481 hours of service. These bank employees provided their financial expertise through participation on various boards and committees for local organizations. These organizations provide community development services ranging from providing financial literacy education for LMI students, coordinating local resources to improve housing for the LMI elderly in the area, as well as working to revitalize areas designated as disaster areas.

CAPE CORAL-FORT MYERS-NAPLES, FLORIDA CSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NAPLES ASSESSMENT AREA

Bank Structure

The bank operates four branches within this assessment area, representing 1.8 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	0	2	2

No branching activity occurred during the review period. While the bank is positioned to deliver financial services to the majority of its assessment area via its branch network and other service delivery systems, the dispersion of its branches may make it difficult to reach portions of the assessment area as all of the bank's physical locations are located along or near the western coast, bordering the Gulf of Mexico.

General Demographics

The bank's Naples CSA assessment area includes two counties in their entirety: Collier County and Lee County. These counties make up the entire Cape Coral-Fort Myers-Naples, Florida CSA (Naples CSA). Located on the southeastern side of Florida, the assessment area has a population of 1,004,766, with the substantial majority (663,675) residing in Lee County, which includes the two largest populations centers: the cities of Cape Coral and Fort Myers. The area is predominantly urban, albeit with areas in the interior of the counties that are more rural.

According to the FDIC Deposit Market Share Report data as of June 30, 2022, there were 41 FDIC-insured depository institutions operating 298 offices within the assessment area, and Centennial Bank ranked 19th in terms of deposit market share, with 0.9 percent of the total deposit dollars. Competition for HMDA and CRA loans is very high. An analysis of 2021 HMDA-reportable loans shows that 1,262 institutions had loan activity in the assessment area, of which Centennial Bank ranked 153rd with less than 1.0 percent of total HMDA loans. Out of 255 institutions with CRA activity, Centennial Bank ranked 33rd, with less than 1 percent of total CRA loan activity.

As the assessment area's demographics cover coastal, urban/suburban, and rural portions of a metropolitan area, credit needs in the area are varied and include a blend of consumer, business, and agricultural credit products. Other particular credit needs in the assessment area, as noted by the community contact, include increased outreach, education, and financial products/services tailored to meeting the needs of the local LMI population.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	13	5.4%	10,016	4.0%
Moderate	57	23.7%	55,044	21.7%
Middle	86	35.7%	106,716	42.1%
Upper	82	34.0%	81,524	32.2%
Unknown	3	1.2%	0	0.0%
TOTAL	241	100%	253,300	100%

As shown, 29.1 percent of the census tracts in the assessment area are LMI geographies, while a lower percentage of the family population (25.7 percent) resides in those census tracts. Nine of the 13 low-income census tracts are located in Collier County, with the remaining four in Lee County. Similarly, the majority of moderate-income census tracts (66.7 percent) are located in Collier County.

Based on 2015 ACS data, the median family income for the assessment area was \$60,503, which was above the median family income for the state of Florida as a whole, \$57,504. However, median family income levels varied significantly at the county level. The figure for Lee County (\$57,627) was in line with the state, while the median family income for Collier County (\$66,264) was significantly higher than the state. More recently, the FFIEC estimates the 2021 median family income figure for Lee County to be \$71,900, and for Collier County to be \$84,300. The following table compares the population of assessment area families by income level to the state of Florida as a whole.

Family Population by Income Level				
	Assessment Area		Florida	
Low	52,649	20.8%	1,010,745	21.5%
Moderate	46,099	18.2%	839,152	17.9%
Middle	49,464	19.5%	910,313	19.4%
Upper	105,088	41.5%	1,939,678	41.3%
TOTAL	253,300	100%	4,699,888	100%

The overall LMI family population income levels of the assessment area (39.0 percent) is slightly below the distribution at the state level (39.4 percent). Additionally, the percentage of families in the state of Florida below the poverty level (12.0 percent) is slightly higher than the percentage of assessment area families below the poverty level (10.4 percent). Therefore, when considering income and poverty levels, the assessment area is slightly more affluent to the state of Florida as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Florida.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$186,956	27.6%	\$980
Florida	\$159,000	29.9%	\$1,002

Based on housing values and income levels, housing in the assessment area appears to be less affordable than in the state of Florida overall. This is driven primarily by the housing values and affordability ratio in Collier County. The median housing value in Collier County (\$272,800) is significantly higher than Lee County (\$157,400), as well as the state of Florida. Conversely, rental housing is more similar across both counties in the assessment area and similar when compared to the state overall, based on the median gross rent.

Industry and Employment Demographics

According to the BLS, there are 389,032 paid employees in the assessment area. By percentage of employees, the largest job category is retail trade (16.4 percent), accommodation and food services (14.7 percent), and construction (14.3 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for the assessment area compared to the state of Florida.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area Average	7.8%	4.0%
Florida	8.2%	4.6%

As shown in the table above, the unemployment level for the assessment area was slightly below the statewide figure. Unemployment rates for both counties were lower than the state level for both years, and both counties also experienced a more rapid decrease in the unemployment levels over the two years.

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank’s activities in the assessment area were evaluated. The interview was with an individual specializing in affordable housing. The contact stated the local economy is still recovering from Hurricane Ian that hit the area in September 2022. The contact cited the economy as struggling to recover due to a lack of funding and the significant number of businesses and individuals that have been impacted by the hurricane. The area’s large service and retail industry

have also been greatly impacted by the effects of the hurricane, primarily through increased difficulty in hiring and retaining workers. The contact explained that since the hurricane, many people have moved out of the area and have yet to return. Additionally, the high housing prices within the area have exacerbated the issue for small businesses, as many of their employees are unable to afford housing in the cities most concentrated with employment and industries. This causes their employees to live inland and commute significant distances. The contact further elaborated that affordable housing has always been difficult to obtain in the area, but since the hurricane, it has been even more challenging. When discussing the opportunities to meet the needs of LMI residents in the area, the contact stated additional home loans and assistance obtaining affordable housing through lower interest rate programs would significantly help the areas LMI.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NAPLES ASSESSMENT AREA

LENDING TEST

Lending levels reflect adequate responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects good penetration among customers of different income levels and businesses of various sizes, and the overall geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank makes a low level of community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	0	0.0%	0	0.0%
Home Purchase	60	11.9%	33,536	40.8%
Multifamily Housing	0	0.0%	0	0.0%
Refinancing	40	7.9%	13,005	20.9%
Total HMDA	100	19.8%	46,541	55.5%
Small Business	404	80.2%	37,325	44.5%
Small Farm	0	0.0%	0	0.0%
TOTAL LOANS	504	100%	83,866	100%

By number of loans, the level of lending activity in this assessment area represents 2.2 percent of total 2020 and 2021 HMDA and CRA loans made inside the bank’s combined assessment areas. By comparison, the bank operates 1.8 percent of its total branches and, as of June 30, 2021, holds 3.4 percent of total bank deposits in the assessment area. In light of these factors, the bank’s lending levels reflect adequate responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good, with primary emphasis placed on small business lending.

Small Business Lending

The bank’s overall distribution of small business loans by borrowers’ profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 6.4 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is well below the aggregate lending level (40.4 percent) and the demographic figure used for comparison (94.6 percent). Similarly, in 2021, the bank originated 28.2 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is also well below aggregate performance (46.3 percent) and the demographic figure (94.6 percent). However, additional analysis indicates that a very significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 87.9 percent of 2020 small business loans and 63.7 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 79.3 percent of 2020 small business loans with unknown revenue and 70.9 percent of 2021 small business loans with unknown revenue had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses of different revenue sizes in 2020 and 2021 is good.

HMDA Lending

The bank's overall distribution of HMDA loans by borrower's profile is poor.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (3.2 percent) was in line with the aggregate lending level to low-income borrowers (3.5 percent) and below the demographic figure of low-income families in the assessment area (20.8 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (4.8 percent) significantly trailed below both the aggregate lending level (14.4 percent) and the demographic figure of moderate-income families in the assessment area (18.2 percent), reflecting poor performance.

In 2021, the bank's distribution of HMDA loans to low-income borrowers (2.6 percent) was comparable to the aggregate lending level (3.5 percent) but below the demographic estimate of low-income families in the assessment area (20.8 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (5.3 percent), however, was again below the aggregate lending level to moderate-income borrowers (14.5 percent) and the demographic estimate (18.2 percent), reflecting poor performance.

Geographic Distribution of Loans

The bank's geographic distribution in the Naples assessment area is poor.

Small Business Lending

The bank's overall geographic distribution of small business loans is poor.

In 2020, the bank's distribution of small business loans in low-income census tracts (2.5 percent) was comparable to both the aggregate lending level (2.6 percent) and the demographic figure (2.9 percent), reflecting adequate bank performance. The distribution of small business loans in moderate-income census tracts (10.4 percent) was below the aggregate lending level in moderate-income geographies (18.1 percent) and the demographic figure of businesses operating in moderate-income geographies (19.1 percent), reflecting poor performance.

In 2021, the bank's distribution of small business loans in low-income census tracts (4.8 percent) improved and was above both the aggregate lending level in low-income geographies (2.7 percent) and the demographic figure of businesses operating in low-income geographies (2.9 percent), reflecting excellent bank performance. The distribution of small business loans in moderate-income census tracts (8.9 percent) was below the aggregate lending level in moderate-income geographies (19.4 percent) and the demographic figure of businesses operating in moderate-income geographies (19.2 percent), reflecting poor performance.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is poor.

In 2020, the bank's distribution of HMDA loans in low-income geographies (1.6 percent) was comparable to both the aggregate lending level (1.3 percent) and the demographic figure (2.1 percent), reflecting adequate bank performance. However, the bank did not originate any HMDA loans in moderate-income geographies, which was significantly below both the aggregate lending level in moderate-income geographies (16.5 percent) and the demographic estimate of owner-occupied housing units in moderate-income census tracts (17.8 percent), reflecting very poor performance.

In 2021, the bank's distribution of HMDA loans in low-income geographies (2.6 percent) was comparable to both the aggregate lending level in low-income census tracts (1.4 percent) and the demographic figure of owner-occupied housing units in low-income census tracts (2.1 percent), reflecting adequate bank performance. The distribution of HMDA loans in moderate-income geographies (2.6 percent) was well below both the aggregate lending level in moderate-income geographies (17.8 percent) and the demographic figure of owner-occupied housing units in moderate-income census tracts (17.8 percent), reflecting poor performance.

Lastly, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020, the bank had loan activity in 32.9 percent of LMI census tracts in the assessment area; in 2021 there was loan activity in 14.3 percent of LMI geographies. Nevertheless, the bank's lending dispersion throughout the assessment area is consistent with area demographics and the bank's limited branch network.

Community Development Lending Activities

The bank makes a low level of community development loans in this assessment area. During the review period, the bank made one PPP loan that qualified for community development in this assessment area totaling \$1.1 million.

INVESTMENT TEST

The bank makes an adequate level of community development investments in this assessment area and is rarely in a leadership position. During the review period, the bank made seven investments totaling \$4.1 million in MBS supporting affordable housing. From the prior review period, the bank maintained two community development investments in the assessment area in MBS totaling \$249,295. Additionally, the bank made two donations to community development organizations serving this assessment area totaling \$3,000.

SERVICE TEST

The bank’s service delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment area, and the bank’s record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Business hours and services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates eight branch offices in the assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	0	2	2	0	4
	0.0%	0.0%	50.0%	50.0%	0.0%	100%
Census Tracts	5.4%	23.7%	35.7%	34.0%	1.2%	100%
Household Population	4.2%	21.9%	41.6%	32.4%	0.0%	100%

As displayed in the previous table, the bank does not operate any of its four branches in LMI geographies; however, two of the bank’s branches are located near LMI census tracts and the population of individuals living within those tracts, allowing for relatively available access to these locations. Therefore, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank has not opened or closed any branches in the Naples assessment area during the review period. One branch was relocated; however, the branch moved less than half of a mile within the same upper-income census tract. Therefore, the bank’s record of opening and closing branches has not adversely impacted the accessibility of its service delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies or individuals. The hours of operations at the bank's branches are fairly standardized throughout the assessment area, with typical business hours Monday through Friday. All branches have loan personnel, and three of the four branches have drive-through access.

Community Development Services

Bank employees provide a relatively high level of community development services in this assessment area. During the review period, bank personnel provided community development services to four different organizations, totaling 267 hours of service. One organization received the bulk of the community development services, 247 hours, during the review period. This organization provides community services targeted to LMI individuals, specifically offering literacy classes, transportation, and utility payment assistance.

NORTH PORT-SARASOTA, FLORIDA CSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SARASOTA ASSESSMENT AREA

The bank has delineated the partial North Port-Sarasota CSA assessment area to include Charlotte, Manatee, and Sarasota counties in their entireties, which are located on the Gulf side of southern Florida. Furthermore, Charlotte County is designated as an individual MSA, the Punta Gorda, Florida MSA, while Manatee and Sarasota counties comprise the North Port-Sarasota-Bradenton, Florida MSA. Both of these MSAs are within the North Port-Sarasota, Florida CSA (Sarasota CSA), which also contains DeSoto County. The assessment area is located on the central west side of the state bordering the Gulf of Mexico.

The bank operates five branches within the assessment area. There have been no structural changes in the branching structure within the assessment area during the review period, with three of the branches located in Sarasota County and two located in Charlotte County. The tables below detail key demographics relating to the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	4	49	102	55	3	213
	1.9%	23.0%	47.9%	25.8%	1.4%	100%
Family Population	3,985	45,515	127,331	64,919	0	241,750
	1.6%	18.8%	52.7%	26.9%	0.0%	100%
Household Population	6,243	80,139	201,089	94,295	0	381,766
	1.6%	21.0%	52.7%	24.7%	0.0%	100%
Business Institutions	868	14,481	37,459	23,134	0	75,942
	1.1%	19.1%	49.3%	30.5%	0.0%	100%
Agricultural Institutions	2	127	213	316	0	658
	0.3%	19.3%	32.4%	48.0%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	45,933	46,898	51,139	97,780	241,750
	19.0%	19.4%	21.2%	40.4%	100%
Household Population	87,140	65,766	69,868	158,992	381,766
	22.8%	17.2%	18.3%	41.7%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SARASOTA ASSESSMENT AREA

LENDING TEST

The bank’s Lending Test performance in this assessment area is consistent with the bank’s Lending Test performance for the state of Florida, as detailed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Exceeds
OVERALL	CONSISTENT

During the review period, the bank made two community development loans in this assessment area totaling \$26.6 million.

INVESTMENT TEST

The bank’s investment performance in the assessment area exceeded the bank’s investment performance in the state of Florida. The bank made 17 new investments in MBS totaling \$8.2 million in addition to 10 other investments in MBS totaling \$1.1 million that were made prior to this review but are still outstanding. Additionally, the bank made 25 donations to community development organizations serving this assessment area totaling \$41,750.

SERVICE TEST

The bank’s service performance in the assessment area is consistent with the bank’s service performance in the state of Florida, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	CONSISTENT

During the review period, bank personnel provided community development services to nine different organizations, totaling 399 hours of service.

KEY WEST, FLORIDA NONMSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE KEY WEST ASSESSMENT AREA

The Key West nonMSA assessment area consists of one county in its entirety, Monroe County, which is located at the southernmost tip of the state and includes the islands of the Florida Keys. The bank operates eight branches in this assessment area, and there were no branch structure changes in the assessment area during the review period. The tables below detail key demographics relating to the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	1	4	23	3	31
	0.0%	3.2%	12.9%	74.2%	9.7%	100%
Family Population	0	293	2,634	13,549	4	16,480
	0.0%	1.8%	16.0%	82.2%	0.0%	100%
Household Population	0	502	4,973	23,431	4	28,910
	0.0%	1.7%	17.2%	81.1%	0.0%	100%
Business Institutions	0	220	1,455	6,768	6	8,849
	0.0%	2.6%	17.2%	80.1%	0.1%	100%
Agricultural Institutions	0	2	10	43	0	55
	0.0%	3.6%	18.2%	78.2%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	1,923	1,819	2,709	10,029	16,480
	11.7%	11.0%	16.4%	60.9%	100%
Household Population	4,624	3,177	3,781	17,328	28,910
	16.0%	11.0%	13.1%	60.0%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KEY WEST ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank’s lending performance in this assessment area is consistent with the bank’s lending performance in the full-scope review, North Florida nonMSA assessment area. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Exceeds
OVERALL	CONSISTENT

During the review period, the bank made three community development loans in this assessment area totaling \$14.2 million.

INVESTMENT TEST

The bank’s investing performance in this assessment area exceeds the bank’s investing performance in the full-scope review, North Florida nonMSA assessment area. During the review period, the bank made two investments totaling \$5.9 million in MBS supporting affordable housing. Additionally, the bank made 58 donations to community development organizations serving the assessment area totaling \$129,794.

SERVICE TEST

The bank’s performance in this assessment area is consistent with the bank’s Service Test performance in the full-scope review, North Florida nonMSA assessment area, as displayed in the table below.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	CONSISTENT

During the review period, bank personnel did not provide any community development services to organizations in the assessment area.

PANAMA CITY, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PANAMA CITY ASSESSMENT AREA

The assessment area consists solely of Bay County, Florida, which makes up the entirety of the Panama City MSA. The bank operates five branches within this assessment area, which are situated on the coastal portions of the assessment area near the Gulf of Mexico. The bank did not open or close any branches in the assessment area during the review period. The tables below detail key demographics relating to the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	2	9	22	10	1	44
	4.5%	20.5%	50.0%	22.7%	2.3%	100%
Family Population	1,602	6,552	22,624	12,707	0	43,485
	3.7%	15.1%	52.0%	29.2%	0.0%	100%
Household Population	2,425	11,505	35,094	18,898	0	67,922
	3.6%	16.9%	51.7%	27.8%	0.0%	100%
Business Institutions	374	2,291	6,399	2,969	0	12,033
	3.1%	19.0%	53.2%	24.7%	0.0%	100%
Agricultural Institutions	2	8	44	18	0	72
	2.8%	11.1%	61.1%	25.0%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	9,302	7,779	8,699	17,705	43,485
	21.4%	17.9%	20.0%	40.7%	100%
Household Population	15,359	11,440	13,012	28,111	67,922
	22.6%	16.8%	19.2%	41.4%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PANAMA CITY ASSESSMENT AREA

LENDING TEST

The bank’s lending performance in this assessment area is consistent with the bank’s Lending Test performance for the state of Florida, as detailed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Exceeds
OVERALL	CONSISTENT

During the review period, the bank made six community development loans in this assessment area totaling \$17.2 million.

INVESTMENT TEST

The bank’s performance in this assessment area is consistent with Investment Test performance in the state of Florida. The bank made 12 new investments totaling \$2.8 million in addition to 6 investments totaling \$297,758 that were made prior to this review but were still outstanding. All investments were in MBS supporting affordable housing. The bank also made 41 donations to community development organizations serving the assessment area totaling \$78,048; these funds primarily went to community service organizations supporting the basic needs of LMI families in the assessment area.

SERVICE TEST

The bank’s performance in this assessment area is consistent with the bank’s service performance in the state of Florida, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	CONSISTENT

During the review period, bank personnel provided community development services to five different organizations, totaling 259 hours of service.

CRESTVIEW-FORT WALTON BEACH-DESTIN, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE DESTIN ASSESSMENT AREA

The assessment area consists of Okaloosa and Walton counties, which comprise the entirety of the Crestview MSA. The bank operates three branches and one LPO in this assessment area. During the review period, one branch was closed in an upper-income census tract, and one branch was opened in an upper-income census tract. All three branches are located along the Gulf Coast in the southernmost portion of the assessment area. The tables below detail key demographic information relating to the Destin assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	9	31	12	3	55
	0.0%	16.4%	56.4%	21.8%	5.5%	100%
Family Population	0	8,404	40,733	15,580	0	64,717
	0.0%	13.0%	62.9%	24.1%	0.0%	100%
Household Population	0	13,777	61,612	22,985	0	98,374
	0.0%	14.0%	62.6%	23.4%	0.0%	100%
Business Institutions	0	2,263	11,491	7,162	0	20,916
	0.0%	10.8%	54.9%	34.2%	0.0%	100%
Agricultural Institutions	0	48	100	38	0	186
	0.0%	25.8%	53.8%	20.4%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	13,124	11,557	13,944	26,092	64,717
	20.3%	17.9%	21.5%	40.3%	100%
Household Population	22,389	17,220	17,820	40,945	98,374
	22.8%	17.5%	18.1%	41.6%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DESTIN ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank’s lending performance in this assessment area is consistent with the bank’s lending performance in the state of Florida. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Exceeds
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Below
OVERALL	CONSISTENT

During the review period, the bank did not originate any community development loans in this assessment area.

INVESTMENT TEST

The bank’s Investment Test performance in this assessment area exceeds the performance in the state of Florida. During the review period, the bank made 17 investments totaling \$5.4 million in MBS supporting affordable housing. The bank also had five prior-period investments still outstanding in affordable housing MBS that totaled \$716,988. Additionally, the bank made 12 donations totaling \$47,200 to six different organizations providing community services for the benefit of the LMI population in the assessment area.

SERVICE TEST

The bank’s performance in the assessment area is consistent with the bank’s service performance in the state of Florida, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Below
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	CONSISTENT

During the review period, bank personnel provided community development services to one organization, totaling 115 hours of service.

TALLAHASSEE, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TALLAHASSEE ASSESSMENT AREA

Bank Structure

The Tallahassee MSA assessment area consists of the entirety of Gadsden, Jefferson, Leon, and Wakulla counties, which comprise the entirety of the MSA. The bank operates eight branches within this assessment area and did not have any branch structure changes during the review period. Bank branches are primarily located in the northern half of the assessment area, with the majority of the eight branches in the city of Tallahassee, in Leon County. The tables below detail key demographics relating to the Tallahassee MSA.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	14	21	28	19	4	86
	16.3%	24.4%	32.6%	22.1%	4.7%	100%
Family Population	6,735	17,599	33,076	25,430	650	83,490
	8.1%	21.1%	39.6%	30.5%	0.8%	100%
Household Population	20,469	31,134	53,946	34,908	3,443	143,900
	14.2%	21.6%	37.5%	24.3%	2.4%	100%
Business Institutions	1,793	5,052	10,441	7,110	213	24,609
	7.3%	20.5%	42.4%	28.9%	0.9%	100%
Agricultural Institutions	12	62	176	82	0	332
	3.6%	18.7%	53.0%	24.7%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	19,550	13,975	16,386	33,579	83,490
	23.4%	16.7%	19.6%	40.2%	100%
Household Population	36,779	21,759	24,025	61,337	143,900
	25.6%	15.1%	16.7%	42.6%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TALLAHASSEE ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank’s lending performance in this assessment area is consistent with the bank’s Lending Test performance in the state of Florida. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Exceeds
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Below
OVERALL	CONSISTENT

During the review period, the bank originated one community development loan in this assessment area totaling \$1.1 million.

INVESTMENT TEST

The bank’s Investment Test performance in this assessment area exceeds the performance in the state of Florida. The bank made 17 new investments in MBS totaling \$9.8 million in addition to seven investments totaling \$269,779 that were made prior to this review period but still outstanding. All investments were made in MBS supporting affordable housing. Additionally, the bank made 58 donations totaling \$72,550 to different organizations providing community services for the benefit of the LMI population in the assessment area.

SERVICE TEST

The bank’s performance in the assessment area is consistent with the Service Test performance in the state of Florida, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	CONSISTENT

During the review period, bank personnel provided community development services to five organizations, totaling 302 hours of service.

PENSACOLA-FERRY PASS-BRENT, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE PENSACOLA ASSESSMENT AREA

The bank operates three branches within this assessment area, which consists of Escambia and Santa Rosa counties in their entireties. Centennial Bank’s three branches are located on the southern edge of the assessment area, near the Gulf of Mexico. The bank did not open or close any branches during the review period. The tables below detail key demographics relating to the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	4	21	51	20	2	98
	4.1%	21.4%	52.0%	20.4%	2.0%	100%
Family Population	2,016	18,181	60,191	30,844	0	111,232
	1.8%	16.3%	54.1%	27.7%	0.0%	100%
Household Population	4,054	34,424	91,305	42,531	0	172,314
	2.4%	20.0%	53.0%	24.7%	0.0%	100%
Business Institutions	682	6,062	15,189	7,979	0	29,912
	2.3%	20.3%	50.8%	26.7%	0.0%	100%
Agricultural Institutions	1	19	213	57	0	290
	0.3%	6.6%	73.6%	19.7%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	20,642	21,247	25,237	44,106	111,232
	18.6%	19.1%	22.7%	39.7%	100%
Household Population	38,680	30,004	33,349	70,101	172,314
	22.6%	17.4%	19.4%	40.7%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PENSACOLA ASSESSMENT AREA

LENDING TEST

The bank’s lending performance in this assessment area is consistent with the bank’s Lending Test performance in the state of Florida, as detailed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Below
OVERALL	CONSISTENT

During the review period, the bank did not originate any community development loans.

INVESTMENT TEST

The bank’s Investment Test performance in the assessment area is consistent with the performance in the state of Florida. During the review period, the bank made 17 investments totaling \$5.5 million in MBS supporting affordable housing. The bank also had six prior-period investments still outstanding that totaled \$2.1 million. Additionally, the bank made 22 donations to community development organizations serving the assessment area totaling \$28,550.

SERVICE TEST

The bank’s performance in this assessment area is consistent with the Service Test performance in the state of Florida, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Exceeds
OVERALL	CONSISTENT

During the review period, bank personnel provided 592 hours of community development services to four different organizations.

LAKELAND-WINTER HAVEN, FLORIDA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LAKELAND ASSESSMENT AREA

The Lakeland MSA assessment area consists of one county in its entirety, Polk County, which is located in central Florida and comprises the entire Lakeland-Winter Haven, Florida MSA (Lakeland MSA). The bank operates two branches in this assessment area, and there were no branch structure changes in the assessment area during the review period. The tables below detail key demographics relating to the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	7	35	79	32	1	154
	4.5%	22.7%	51.3%	20.8%	0.6%	100%
Family Population	3,072	29,960	87,388	32,683	12	153,115
	2.0%	19.6%	57.1%	21.3%	0.0%	100%
Household Population	5,382	47,212	125,190	43,585	12	221,381
	2.4%	21.3%	56.5%	19.7%	0.0%	100%
Business Institutions	1,365	7,109	17,440	7,926	0	33,840
	4.0%	21.0%	51.5%	23.4%	0.0%	100%
Agricultural Institutions	17	95	297	107	0	516
	3.3%	18.4%	57.6%	20.7%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	31,271	28,084	32,830	60,930	153,115
	20.4%	18.3%	21.4%	39.8%	100%
Household Population	48,866	37,862	41,618	93,035	221,381
	22.1%	17.1%	18.8%	42.0%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LAKELAND ASSESSMENT AREA

LENDING TEST

As displayed in the table below, the bank’s lending performance in this assessment area is consistent with the bank’s lending performance in the state of Florida. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Consistent
OVERALL	CONSISTENT

During the review period, the bank made two community development loans in the assessment area totaling \$3.6 million.

INVESTMENT TEST

The bank’s investment performance in the assessment area is consistent with the bank’s investment performance in the state of Florida. The bank made 17 new investments totaling \$6.6 million in addition to five investments totaling \$370,948 that were made prior to this review period but still outstanding. All investments were made in MBS supporting affordable housing. Additionally, the bank made 11 donations to community development organizations serving the assessment area totaling \$13,750.

SERVICE TEST

The bank’s performance in this assessment area is consistent with the bank’s Service Test performance in the state of Florida, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	CONSISTENT

During the review period, bank personnel provided community development services to 2 different organizations, totaling 70 hours of service.

ARKANSAS

CRA RATING FOR ARKANSAS: SATISFACTORY

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Low Satisfactory**
The Service Test is rated: **Low Satisfactory**

Factors supporting the institution's ratings for the state of Arkansas include:

- The bank's lending levels reflect excellent responsiveness to credit needs of the assessment areas in the state.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes.
- The bank's overall geographic distribution of loans reflects good penetration throughout the bank's Arkansas assessment areas.
- The bank makes an adequate level of community development loans in its Arkansas assessment areas.
- The bank makes an adequate level of qualified community development investments and grants throughout its Arkansas assessment areas and is rarely in a leadership position.
- Service delivery systems are accessible to the geographies and individuals of different income levels in Arkansas assessment areas. Changes in branch locations have generally not adversely affected the delivery systems, and services do not vary in a way that inconveniences the needs of its assessment areas, particularly in LMI geographies.
- The bank provides an adequate level of community development services in its Arkansas assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Arkansas assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Additionally, the bank's small farm lending activity is analyzed in two of the full-scope Arkansas assessment areas that contained sufficient volume for meaningful analysis, the Little Rock MSA and the North Central nonMSA, although this analysis carried less weight than the small business and HMDA lending categories.

Centennial Bank operates in six assessment areas throughout the state of Arkansas, four of which are located in different MSAs, while the remaining two are located in the nonMSA portion of the state. Three of the bank's assessment areas in Arkansas were assessed using full-scope review procedures. In light of the bank's branch structure and loan and deposit activity, performance in

the Little Rock-North Little Rock-Conway MSA (Little Rock MSA) assessment area received primary consideration when determining statewide performance conclusions.

To augment the evaluation of the full-scope review assessment areas in Arkansas, four community contact interviews were referenced to ascertain specific community credit needs, community development opportunities, and local economic conditions. The community contacts represented a variety of organizations in the bank’s assessment areas involved in small business and economic development, as well as agricultural financing. Key details from these interviews are included in the *Description of Institution’s Operations* sections applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN ARKANSAS

The bank operates 75 branches throughout the six CRA assessment areas in Arkansas. The following table gives additional detail regarding the bank’s Arkansas operations.

Review Area	Branches #	Branches %	Deposits \$000s (as of 6/30/2022)	Deposits %	CRA Review Procedures
Little Rock MSA	32	42.7%	\$3,020,452	53.4%	Full-Scope
North Central Arkansas nonMSA	21	28.0%	\$1,071,235	19.0%	Full-Scope
Fayetteville MSA	8	10.7%	\$459,965	8.1%	Full-Scope
Fort Smith MSA	3	4.0%	\$56,970	1.0%	Limited-Scope
Jonesboro MSA	7	9.3%	\$921,981	16.3%	Limited-Scope
Northeast Arkansas nonMSA	4	5.3%	\$121,071	2.1%	Limited-Scope
OVERALL	75	100%	\$5,651,674	100%	3 Full-Scope/ 3 Limited-Scope

As shown in the table above, the bank’s deposits in Arkansas total \$5.7 billion, which represents 28.3 percent of total bank deposits. In addition to the offices shown in the table above, the bank operates nine stand-alone ATMs throughout the state and one mobile branch. The majority of the bank’s branches and deposits in Arkansas are concentrated in the Little Rock and North Central nonMSA Arkansas assessment areas, both of which were reviewed under full-scope procedures. During the review period, the bank did not open any branches and closed two branches in Arkansas.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

The bank’s performance under the Lending Test is rated high satisfactory. The test considers the bank’s performance under the following criteria.

Lending Activity

The bank’s lending levels in Arkansas reflect excellent responsiveness to assessment areas’ credit needs based on loan activity analyzed under the Lending Test. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank’s overall importance to each area. Lending activity performance by review area is displayed in the following table.

Full-Scope Review Areas	Lending Activity
Little Rock MSA	Excellent
North Central Arkansas NonMSA	Excellent
Fayetteville MSA	Good
OVERALL	EXCELLENT

Limited-Scope Review Areas	Lending Activity
Fort Smith MSA	Below
Jonesboro MSA	Consistent
Northeast Arkansas NonMSA	Consistent

Borrower and Geographic Distribution

Overall, performance by borrower’s income or revenue profile is good in the state of Arkansas, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution by Borrower’s Profile
Little Rock MSA	Good
North Central Arkansas NonMSA	Good
Fayetteville MSA	Good
OVERALL	GOOD

Limited-Scope Review Areas	Loan Distribution by Borrower's Profile
Fort Smith MSA	Exceeds
Jonesboro MSA	Consistent
Northeast Arkansas NonMSA	Consistent

As displayed in the following tables, the bank's overall geographic distribution of loans reflects good penetration throughout the Arkansas assessment areas.

Full-Scope Review Areas	Geographic Distribution of Loans
Little Rock MSA	Adequate
North Central Arkansas NonMSA	Excellent
Fayetteville MSA	Good
OVERALL	GOOD

Limited-Scope Review Areas	Geographic Distribution of Loans
Fort Smith MSA	Exceeds
Jonesboro MSA	Consistent
Northeast Arkansas NonMSA	Consistent

Community Development Lending Activities

Overall, the bank made an adequate level of community development loans in the state of Arkansas, as displayed below.

Full-Scope Review Areas	Community Development Lending
Little Rock MSA	Adequate
North Central Arkansas NonMSA	Adequate
Fayetteville MSA	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Community Development Lending
Fort Smith MSA	Below
Jonesboro MSA	Consistent
Northeast Arkansas NonMSA	Consistent

During the review period, the bank originated or renewed 25 community development loans totaling \$45.7 million. In addition, the bank originated one community development loan totaling \$6.5 million within the state of Arkansas, but outside of the bank’s assessment areas.

INVESTMENT TEST

Overall, the bank’s performance in Arkansas is rated low satisfactory under the Investment Test. The following tables display investment and grant activity performance in the Arkansas assessment areas.

Full-Scope Review Areas	Investment and Grant Activity
Little Rock MSA	Adequate
North Central Arkansas NonMSA	Adequate
Fayetteville MSA	Excellent
OVERALL	ADEQUATE

Limited-Scope Review Areas	Investment and Grant Activity
Fort Smith MSA	Exceeds
Jonesboro MSA	Exceeds
Northeast Arkansas NonMSA	Exceeds

The bank made 90 community development investments during this review period totaling \$53.1 million (not including donations) within the bank’s assessment areas in Arkansas. In addition, the bank made 28 investments prior to this review period in Arkansas assessment areas that were still outstanding and totaled \$4.8 million. The vast majority of these investments were in MBS supporting affordable housing loans to LMI borrowers, and the remaining were in bonds supporting school districts with a majority of students from LMI families. The bank also made 733 community development grants and donations totaling \$1.3 million throughout the state to various organizations participating in community development activities, the majority of which provide community services to LMI individuals and families.

SERVICE TEST

The bank’s Service Test rating in Arkansas is rated low satisfactory, based on the performance under the following criteria.

Accessibility of Delivery Systems

As displayed in the following tables, the bank’s delivery systems in Arkansas are accessible to geographies and individuals of different income levels.

Full-Scope Review Areas	Accessibility of Delivery Systems
Little Rock MSA	Accessible
North Central Arkansas NonMSA	Accessible
Fayetteville MSA	Reasonably Accessible
OVERALL	ACCESSIBLE

Limited-Scope Review Areas	Accessibility of Delivery Systems
Fort Smith MSA	Consistent
Jonesboro MSA	Exceeds
Northeast Arkansas NonMSA	Consistent

Changes in Branch Locations

The bank’s record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals, in the state of Arkansas. The bank’s performance under this criterion is displayed by Arkansas assessment area in the following tables.

Full-Scope Review Areas	Changes in Branch Locations
Little Rock MSA	Not Adversely Affected
North Central Arkansas NonMSA	Not Adversely Affected
Fayetteville MSA	Not Adversely Affected
OVERALL	NOT ADVERSELY AFFECTED

Limited-Scope Review Areas	Changes in Branch Locations
Fort Smith MSA	Consistent
Jonesboro MSA	Consistent
Northeast Arkansas NonMSA	Consistent

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank’s services and business hours do not vary in a way that inconveniences certain portions of the bank’s assessment areas in Arkansas, particularly LMI geographies and individuals. The bank’s performance under this criterion is displayed by Arkansas assessment area in the following tables.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Little Rock MSA	Vary in a Way that Inconveniences
North Central Arkansas NonMSA	Do Not Vary/Inconveniences
Fayetteville MSA	Do Not Vary/Inconveniences
OVERALL	DO NOT VARY/INCONVENIENCES

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Fort Smith MSA	Consistent
Jonesboro MSA	Consistent
Northeast Arkansas NonMSA	Consistent

Community Development Services

Throughout the Arkansas assessment areas, the bank provides an adequate level of community development services. The bank’s performance under this Service Test criterion is displayed by Arkansas assessment area in the following tables.

Full-Scope Review Areas	Community Development Services
Little Rock MSA	Adequate
North Central Arkansas NonMSA	Adequate
Fayetteville MSA	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Community Development Services
Fort Smith MSA	Below
Jonesboro MSA	Consistent
Northeast Arkansas NonMSA	Consistent

During the review period, bank employees provided community development services totaling 2,017 service hours to community development organizations throughout the state. The number of community development services provided by bank employees during the current review period was less than that of the previous CRA evaluation in the state of Arkansas; however, this was significantly impacted by the COVID-19 pandemic.

LITTLE ROCK-NORTH LITTLE ROCK-CONWAY, ARKANSAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LITTLE ROCK ASSESSMENT AREA

Bank Structure

The Little Rock assessment area is the bank's largest assessment area when measured by number of branches, loan origination, and dollar volume, and is home to the bank's headquarters. The bank operates 32 branches in the assessment area, representing 14.5 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	9	13	10

In addition to these locations, the bank operates two stand-alone ATMs and one mobile branch. During the review period the bank closed one branch in the assessment area. Based on the current branch network and service delivery systems, the bank is adequately positioned to deliver financial services to the assessment area.

General Demographics

The Little Rock assessment area is comprised of six counties in central Arkansas, including the state's capital and largest city, Little Rock, which is in Pulaski County. The bank has designated all six counties in the Little Rock MSA as its assessment area, with the total population of the assessment area being 722,684. The largest of these counties, Pulaski County, makes up over half of the total assessment area population, with 390,463 residents.

This assessment area is a competitive banking market, with 40 financial institutions operating 293 branches in the assessment area, according to the FDIC Deposit Market Share Report as of June 30, 2022. Of these financial institutions, Centennial Bank ranks third in terms of deposit market share, with 10.2 percent of total assessment area deposit dollars. Competition for HMDA and CRA loans is high. An analysis of 2021 HMDA-reportable loans shows that 444 institutions had loan activity in the assessment area, of which Centennial Bank ranked 14th with 2.4 percent of total HMDA loans. Out of 129 institutions with CRA loan activity, Centennial Bank ranked third with 6.6 percent of total CRA loan activity.

This assessment area covers a geographically large metropolitan area, with a population and demographics to match the diverse area. As such, credit needs vary throughout the six different counties and include needs for various consumer, business, and agricultural credit products. Other particular credit-related needs in the assessment area, as noted by the community contact, include greater outreach to certain segments of the population that have some distrust in the financial community, as well as greater technical assistance for small businesses. The community contact

also noted strong involvement within the area by local community banks, indicating an availability of opportunities for financial institution participation in development activities.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	11	6.7%	6,383	3.6%
Moderate	39	23.8%	33,362	18.6%
Middle	64	39.0%	77,012	43.0%
Upper	48	29.3%	61,640	34.4%
Unknown	2	1.2%	698	0.4%
TOTAL	164	100%	179,095	100%

As shown above, 30.5 percent of the census tracts in the assessment area are LMI geographies, but only 22.2 percent of family population resides in these tracts. These LMI areas are primarily concentrated in Pulaski County, near the city of Little Rock.

Based on 2015 ACS data, the median family income for the assessment area is \$61,236, which exceeds the state of Arkansas figure of \$51,782. More recently, the FFIEC estimates the 2021 median family income for the Little Rock MSA to be \$70,600. The following table compares the population of assessment area families by income level to the state of Arkansas.

Family Population by Income Level				
	Assessment Area		Arkansas	
Low	38,206	21.3%	164,346	21.6%
Moderate	31,447	17.6%	134,818	17.7%
Middle	35,717	19.9%	149,580	19.7%
Upper	73,725	41.2%	311,180	41.0%
TOTAL	179,095	100%	759,924	100%

When compared to the previous table, the information in the table above shows that a much larger percentage of families in the assessment area are LMI (38.9 percent) than reside in LMI geographies (22.2 percent). As shown in the preceding table, the assessment area family population by income level closely mirrors the state of Arkansas as a whole in each income category. However, the percentage of assessment area families below the poverty line (10.4 percent) is well below the statewide level (14.3 percent). Therefore, when considering income and poverty levels, the Little Rock assessment area is slightly more affluent than the state of Arkansas as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Arkansas.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$138,983	35.4%	\$766
Arkansas	\$111,400	37.1%	\$677

Based on the information in the table above, housing costs in the assessment area are slightly less affordable than the state of Arkansas as a whole. Although income figures for the assessment area exceed statewide levels, the higher median housing values and gross rents in the assessment area keep housing costs in line with statewide levels, as demonstrated by comparable affordability ratios. However, costs vary in the assessment area, with Perry County being the most affordable (50.3 percent) and Pulaski County being the least affordable (32.4 percent).

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. There are 274,506 paid employees in the assessment area, according to the BLS. The largest industries by number of paid employees are health care and social assistance (18.4 percent), retail trade (13.9 percent), and accommodation and food services (11.0 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for the assessment area and the state of Arkansas.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	6.5%	4.2%
Arkansas	6.1%	4.0%

As shown in the table above, unemployment levels for the assessment area are similar to the state of Arkansas. However, unemployment rates varied amongst assessment area counties. Pulaski County was most heavily affected by the pandemic and experienced the highest levels of unemployment (7.4 percent in 2020), while Saline County experienced the lowest unemployment levels during the review period (3.1 percent in 2021).

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank’s activities in the assessment area were evaluated. The interview was with an individual representing an economic development organization. The contact characterized the area economy as very strong and growing. The contact stated that the area has seen large increases in population and job gains, which have been driven from organic growth and

construction, as well as large businesses moving to the area. Some of the major entrances have been seen in distribution, higher education, and manufacturing industries. The strong economic growth has caused recent unemployment numbers to be low and job opportunities to be plentiful. Regarding the area's agriculture economy, the contact stated there is a significant agriculture presence in the eastern Little Rock area and that this has had a considerable impact on Little Rock's overall economy.

When discussing the accessibility and distribution of financial institutions in the area, the contact noted there has been a lot of growth from community banks in the area, while some larger banking organizations have left the market. The contact feels that the smaller regional banks have been filling the void left by larger banks well, because they are active participants in community endeavors. Furthermore, competition in the market is healthy, with branches and ATMs well dispersed and accessible to all areas, markets, and businesses. While overall the economic outlook and accessibility of financial institutions is strong, the contact noted several barriers facing the community. Specifically, due to the number of jobs available, some businesses are having trouble filling all roles and must compete for available labor. Additionally, the contact noted technical assistance for small business owners as a need within the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LITTLE ROCK ASSESSMENT AREA

LENDING TEST

Lending levels reflect excellent responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects good penetration among customers of different income levels and businesses/farms of various sizes, and the overall geographic distribution of loans reflects adequate penetration throughout the assessment area. Finally, the bank makes an adequate level community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	25	0.5%	2,972	0.4%
Home Purchase	1,368	27.0%	251,784	36.7%
Multifamily Housing	29	0.6%	23,076	3.4%
Refinancing	706	13.9%	142,161	20.7%
Total HMDA	2,136	42.2%	420,807	61.4%
Small Business	2,869	56.6%	257,194	37.5%
Small Farm	61	1.2%	7,401	1.1%
TOTAL LOANS	5,066	100%	685,402	100%

The bank’s lending activity in the assessment area represents 22.3 percent of total 2020 and 2021 HMDA and CRA loans in the bank’s combined assessment areas. By comparison, the bank operates 14.5 percent of its total branches and, as of June 30, 2021, holds 19.4 percent of total bank deposits in the assessment area. In addition, the bank ranks fourth out of 147 lenders in total CRA loans originated in the assessment area in 2020 and third out of 129 lenders in 2021. In light of these factors, the bank’s lending activity in the assessment area reflects excellent responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good, with primary emphasis placed on small business lending.

Small Business Lending

The bank's overall distribution of small business loans by borrowers' profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 26.5 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is below the aggregate lending level (33.4 percent) and the demographic figure used for comparison (90.7 percent). In 2021, the bank originated 46.7 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is slightly above aggregate performance (42.1 percent) but again well below the demographic figure (91.1 percent). Additional analysis, however, indicates that a very significant portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 58.3 percent of 2020 small business loans and 35.2 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 85.2 percent of 2020 small business loans with unknown revenue and 80.5 percent of 2021 small business loans with unknown revenue had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses of different revenue sizes in 2020 and 2021 is good.

HMDA Lending

The bank's overall distribution of HMDA loans by borrower's profile is adequate.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (8.9 percent) was above the aggregate lending level to low-income borrowers (5.6 percent) but was below the demographic figure of low-income families in the assessment area (21.3 percent), reflecting adequate performance. The distribution of HMDA loans to moderate-income borrowers (16.0 percent) was above the aggregate lending level to moderate-income borrowers (14.9 percent) and was comparable to the demographic figure (17.6 percent), reflecting adequate performance.

In 2021, the bank's performance improved, with the distribution of HMDA loans to low-income borrowers (10.2 percent) exceeding the aggregate lending level (5.3 percent) but well below the demographic estimate of low-income families in the assessment area (21.3 percent), reflecting adequate performance. However, the distribution of HMDA loans to moderate-income borrowers (22.3 percent) was above both the aggregate lending level to moderate-income borrowers (15.5 percent) and the demographic figure of moderate-income families in the assessment area (17.6 percent), reflecting excellent performance.

Small Farm Lending

The bank's overall distribution of small farm loans by borrowers' profile is good.

In 2020, the bank originated a greater percentage (85.0 percent) of its small farm loans to farms with revenues of less than \$1 million than the aggregate (54.3 percent), while being near the demographic data also used as a comparison point (97.6 percent). This reflected good performance in 2020.

In 2021, the bank's percentage of small farm loans (65.9 percent) was again greater than the aggregate (53.7 percent), while being below the demographic figure (97.6 percent), demonstrating adequate performance.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the Little Rock assessment area is adequate.

Small Business Lending

The bank's overall geographic distribution of small business loans is good.

In 2020, the bank's distribution of small business loans in low-income census tracts (5.9 percent) was above but comparable to both the aggregate lending level in low-income geographies (4.8 percent) and the demographic figure (4.8 percent), reflecting good performance. Similarly, the distribution of small business loans in moderate-income census tracts (21.4 percent) was above yet comparable to the aggregate lending level (18.6 percent) and the demographic figure of businesses operating in moderate-income geographies (20.7 percent), reflecting good performance.

In 2021, the bank's distribution of small business loans in low-income census tracts (4.6 percent) matched the aggregate lending level in low-income geographies (4.6 percent) and was in line with the demographic figure (4.9 percent), reflecting adequate bank performance. The distribution of small business loans in moderate-income census tracts (22.2 percent) was above yet comparable to the aggregate lending level in moderate-income geographies (18.5 percent) and the demographic figure of businesses operating in moderate-income geographies (21.0 percent), reflecting good performance.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is adequate.

In 2020, the bank's distribution of HMDA loans in low-income geographies (1.1 percent) was in line with the aggregate lending level in low-income census tracts (1.0 percent) but below the demographic figure of owner-occupied housing units in low-income census tracts (2.4 percent), reflecting adequate performance. The distribution of HMDA loans in moderate-income geographies (10.5 percent) was slightly above the aggregate lending level (9.7 percent) but below demographic figure of owner-occupied housing units in moderate-income census tracts (17.1 percent), reflecting adequate performance.

In 2021, the bank's distribution of HMDA loans in low-income geographies (1.5 percent) was in line with the aggregate lending level in low-income census tracts (1.3 percent) and below the

demographic figure (2.4 percent), reflecting adequate performance. The distribution of HMDA loans in moderate-income geographies (11.3 percent) was also in line with the aggregate lending level (11.1 percent) yet below the demographic figure of owner-occupied housing units in moderate-income census tracts (17.1 percent), reflecting adequate performance.

Small Farm Lending

The bank's overall geographic distribution of small farm loans is adequate.

In 2020, the bank's distribution of small farm loans in low-income census tracts (5.0 percent) was well above the aggregate lending level in low-income geographies (0.5 percent) and the demographic figure of farms operating in low-income geographies (1.0 percent), reflecting good performance. The distribution of small farm loans in moderate-income census tracts (10.0 percent) approached the aggregate lending level in moderate-income geographies (14.1 percent) and was below the demographic figure of farms operating in moderate-income geographies (17.2 percent), reflecting adequate performance.

In 2021, the bank did not originate any small farm loans in low-income census tracts. However, aggregate lending levels in low-income census geographies (0.8 percent) and the comparable demographic figure (1.0 percent) suggested limited opportunities for small farm loans in these census tracts. Therefore, this is reflective of adequate bank performance. The distribution of small farm loans in moderate-income census tracts (14.6 percent) was above the aggregate lending level in moderate-income geographies (9.4 percent) and approached the demographic figure of farms operating in moderate-income geographies (17.4 percent), reflecting good performance.

Lastly, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020, the bank had loan activity in 98.4 percent of LMI census tracts in the assessment area; in 2021, there was loan activity in 94.0 percent of LMI geographies. All low-income geographies had loan activity in each year, and between both years, all moderate-income census tracts had loan activity.

Community Development Lending Activities

The bank makes an adequate level of community development loans in this assessment area. During the review period, the bank originated or renewed 12 community development loans totaling \$14.8 million within the assessment area. A considerable portion of these loans were originated as part of the PPP, specifically nine loans for \$14.1 million. The community development loans originated by the bank during the review period were qualified under four separate community development purposes, including economic development, revitalization and stabilization, affordable housing, and community services. Three impactful loans are described below.

- One PPP loan originated during the COVID-19 pandemic totaling \$2.0 million allowed for the retention of 328 jobs in a moderate-income census tract.

- Another PPP loan, also for \$2.0 million, allowed for the retention of 157 jobs within the assessment area in the badly hit hospitality industry.
- Two community development loans totaling \$660,230 were originated providing affordable housing to LMI individuals through multifamily housing.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants within the assessment area and is rarely in a leadership position. Qualified investments made during the current review period and those that were made previously, but are still outstanding, totaled \$18.6 million and are described below.

- During the review period, the bank made 24 investments totaling \$18.0 million in the assessment area. The majority of these investments (66.7 percent) were in MBS pools secured by affordable housing for LMI borrowers, totaling \$7.3 million, which directly benefited the assessment area. While not particularly innovative, investments in affordable housing for LMI borrowers are responsive to a credit need identified by the community contact.
- The bank also made eight investments for \$10.7 million in bonds for schools with a majority of LMI students.
- Investments made prior to the current review period but still outstanding totaled \$525,622. All six of these were prior investments in MBS pools secured by affordable housing for LMI borrowers.

In addition to the investments listed above, the bank made 352 donations totaling \$797,917 to various organizations in the assessment area. These organizations provide a variety of community development services though predominantly are geared toward services targeting LMI individuals. Some large dollar donations include a \$20,000 donation to an organization providing housing for children in foster care, \$15,000 donated to a community health organization during the COVID-19 pandemic, and another \$15,000 donation to a school district educating a majority of students receiving free or reduced-price lunches.

SERVICE TEST

The bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the assessment area. Furthermore, the bank's record of opening and closing branch offices has not adversely affected accessibility of its delivery systems. However, business hours and services vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and LMI individuals. Finally, Centennial Bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 32 branches with full-service ATMs within the assessment area. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	9	13	10	0	32
	0.0%	28.1%	40.6%	31.3%	0.0%	100%
Census Tracts	6.7%	23.8%	39.0%	29.2%	1.2%	100%
Household Population	4.4%	20.5%	41.1%	33.5%	0.4%	100%

As shown in the table above, the bank does not operate any branches within low-income census tracts, but it does operate 28.1 percent of assessment area bank branches in moderate-income census tracts. Therefore, the bank’s overall branch presence in combined LMI tracts is only slightly below the percentage of LMI geographies (30.5 percent) and is higher than the household population within those geographies (24.9 percent). Given the bank’s percentage of branches in LMI tracts and the bank’s mobile branch in the area, the bank’s service delivery systems are accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank’s record of opening and closing branches in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and individuals. During the review period, one branch was closed and one branch relocated; however, both of these changes occurred in upper-income census tracts, limiting the impact to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank’s business hours and banking services vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. This primarily stems from branches located in moderate-income census tracts that do not house lending personnel. Of the nine branches located in moderate-income census tracts, only one contains loan officers (11.1 percent), compared to 43.8 percent of overall branches. Similarly, 12 of the 32 branches (37.5 percent) offer interactive teller machines (ITMs); however, only 22.2 percent of moderate-income branches contain ITMs. The bank does offer lending appointments to be made at branches in LMI census tracts; however, the presence of lending personnel is not guaranteed on any given day, as they are more likely to be at other locations in middle- or upper-income census tracts. The hours

of operation, however, are generally uniform throughout the assessment area, regardless of the income designation where a branch is located.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. During the review period, bank employees provided their financial expertise to different community development organizations, totaling 910 hours of community service. The financial expertise provided was often in the form of membership on the board or committees of different organizations. These organizations include, but not are limited to, a nonprofit that provides short-term housing to LMI individuals in need, an organization that provides financial literacy education to LMI children, and an organization providing community services to LMI individuals.

NORTH CENTRAL ARKANSAS NONMETROPOLITAN ASSESSMENT AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTH CENTRAL ARKANSAS ASSESSMENT AREA

Bank Structure

The bank operates 21 of its branches in this assessment area, representing 9.5 percent of all bank branches. All branches include drive-up and ATM facilities. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	2	13	6

During the review period, the bank did not close any branches in the assessment area and relocated one branch. Based on the current branch network and service delivery systems, the bank remains positioned to deliver financial services to the entire North Central Arkansas assessment area.

General Demographics

The North Central Arkansas assessment area is comprised of 13 contiguous counties: Baxter, Cleburne, Conway, Fulton, Independence, Izard, Johnson, Pope, Sharp, Stone, Van Buren, White, and Yell Counties. The counties are largely rural and located in the nonMSA portions of central and northern Arkansas. According to 2015 ACS data, the largest counties in the assessment area are White County and Pope County with a population 78,660 and 62,830, respectively. The smallest county in the assessment area is Fulton County whose population is 12,224.

While rural, the assessment area hosts a relatively competitive banking market. According to the FDIC Deposit Market Share Report as of June 30, 2022, 34 FDIC-insured depository institutions operate a total of 182 branches in the assessment area. Of these institutions, Centennial Bank ranks second, with 10.4 percent of total assessment area deposit dollars. Additionally, the bank plays an important role in meeting the credit needs of the nonMSA Arkansas assessment area. An analysis of 2021 HMDA-reportable loans shows that 358 institutions had loan activity in the assessment area, of which Centennial Bank ranked 10th, with 2.8 percent of total HMDA loans. Out of 104 institutions with CRA loan activity, Centennial Bank ranked second, with 10.8 percent of total CRA loan activity.

This assessment area covers a wide nonmetropolitan area with relatively homogenous population and demographics. As a result, credit needs in the area include a standard blend of consumer, business, and farm credit products. Particular needs in the assessment area, as noted during one community contact interview, include greater access to transportation services for LMI individuals. One contact also stated the need for greater down payment assistance or flexibility from financial

institutions, stating that significant upfront costs can be a significant barrier for LMI individuals becoming homeowners.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	9	10.7%	8,471	8.2%
Middle	60	71.4%	72,278	70.3%
Upper	15	17.9%	22,012	21.4%
Unknown	0	0.0%	0	0.0%
TOTAL	84	100%	102,761	100%

As shown in the table above, there are no low-income tracts in the assessment area. The assessment area does contain nine moderate-income census tracts (10.7 percent), with a smaller percentage of families (8.2 percent) residing in those tracts. The moderate-income census tracts are widely dispersed throughout and are not concentrated within any specific county.

Based on 2015 ACS data, the median family income in the assessment area was \$47,361, which is slightly above the figure for nonMSA Arkansas of \$45,047. As of 2021, the FFIEC estimates the median family income for nonMSA Arkansas was \$52,200. The following table displays the percentages of assessment area families by income level compared to nonMSA Arkansas as a whole.

Family Population by Income Level				
	Assessment Area		NonMSA Arkansas	
Low	19,484	19.0%	63,831	21.4%
Moderate	17,901	17.4%	53,700	18.0%
Middle	20,541	20.0%	58,267	19.5%
Upper	44,835	43.6%	123,066	41.2%
TOTAL	102,761	100%	298,864	100%

When compared to the first table in this section, a much larger portion of assessment area families are LMI (36.4 percent) than resides in LMI census tracts (8.2 percent). The percentage of assessment area families that are LMI is slightly below the percentage of LMI families in nonMSA Arkansas as a whole (39.4 percent). Similarly, the percentage of families in the assessment area below the poverty line (14.6 percent) is slightly below the statewide nonMSA figure (16.6 percent). There is considerable variation amongst the differing counties within the assessment area as it relates to the percentage of families below the poverty line, with Cleburne County having the

lowest percentage (9.7 percent) compared to Sharp County, which has the highest (17.2 percent). Overall, however, the assessment area is slightly more affluent than nonMSA Arkansas as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Arkansas.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$103,529	36.0%	\$608
nonMSA Arkansas	\$85,869	41.0%	\$588

Based on the information in the table above, housing is less affordable in the assessment area than in nonMSA Arkansas as a whole. Both the median housing value and median gross monthly rent for the assessment area exceed the statewide nonMSA Arkansas levels. Additionally, the housing affordability ratio for the assessment area is lower than the statewide nonMSA Arkansas figure.

Industry and Employment Demographics

According to the BLS, there are 106,248 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are manufacturing (19.2 percent), retail trade (16.2 percent), and accommodation and food services (9.8 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for the assessment area and the state of Arkansas as a whole.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	6.3%	4.2%
nonMSA Arkansas	6.4%	4.5%

As shown in the table above, the assessment area’s unemployment rate remained near the statewide Arkansas levels throughout the review period. Unemployment levels varied somewhat by county in the assessment area, with the highest levels in Izard County (including a high of 8.5 percent in 2020) and the lowest level in Fulton County (3.6 percent in 2021).

Community Contact Information

Information from two community contact interviews was used to help shape the performance context in which the bank’s activities in the assessment area were evaluated. One interview was with an individual representing an organization that specializes in agricultural financing, and the other was with an individual representing an organization that specializes in economic development. The contacts both stated the local economy has strengthened over the past several

years and continues to grow at a gradual pace, with one contact noting an influx of residents moving to counties within the assessment area from larger cities. The economy is supported primarily by strong agricultural and manufacturing industries.

The housing stock in the assessment area was described as insufficient in multiple ways by one community contact. To start, the contact indicated that there is more housing demand than there is supply in most communities. The aforementioned migration of residents to some assessment area counties has also increased demand for an already limited supply of housing. Of the housing that is available, it is primarily older and in need of renovation and/or repair, according to the contact. Lastly, a significant portion of the region's housing inventory was purchased by investors, leading to a lack of affordable housing for new families or first-time homebuyers.

Both contacts described the area as having a sufficient number of financial institutions, but that there were still areas of opportunity for these financial institutions to participate in the community. Specifically, they mentioned outreach by financial institutions is needed, as there are numerous LMI individuals, as well as those that live in the most rural portions of the assessment area, that are unaware of the various financial products and services that they could be benefiting from.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTH CENTRAL ARKANSAS ASSESSMENT AREA

LENDING TEST

Lending levels reflect excellent responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects good penetration among customers of different income levels and businesses/farms of various sizes, and the overall geographic distribution of loans reflects excellent penetration throughout the assessment area. Finally, the bank makes an adequate level community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	27	0.9%	1,655	0.6%
Home Purchase	581	18.6%	78,522	28.5%
Multifamily Housing	18	0.6%	6,747	2.4%
Refinancing	314	10.0%	48,202	17.5%
Total HMDA	946	30.3%	135,863	49.3%
Small Business	1,904	60.9%	118,584	43.0%
Small Farm	275	8.8%	21,032	7.6%
TOTAL LOANS	3,125	100%	275,479	100%

Lending activity by dollar in the assessment area represents 13.8 percent of total 2020 and 2021 HMDA and CRA loans made within the bank’s combined assessment areas. In comparison, this lending activity exceeds the percentage of total bank branches in the assessment area (9.5 percent) and the percentage of total bank deposits as of June 30, 2021, held in the assessment area (7.5 percent). As previously noted, the bank plays an important role in meeting the credit needs of this assessment area based on an analysis of HMDA and CRA loan activity. The bank ranked sixth and tenth in total HMDA originations for 2020 and 2021, respectively. Additionally, the bank ranked in the top three for CRA loan originations in both 2020 and 2021. In light of these factors, the bank’s lending activity in the assessment area reflects excellent responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good, with primary emphasis placed on small business lending.

Small Business Lending

The bank's overall distribution of small business loans by borrowers' profile is good.

Although bank performance might appear adequate for both years, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 52.7 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is above the aggregate lending level (44.8 percent) but well below the demographic figure used for comparison (90.7 percent). Similarly, in 2021, the bank originated 58.0 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is slightly above the aggregate lending level (52.2 percent) but again well below the demographic figure (90.6 percent). However, additional analysis indicates that a considerable portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 38.5 percent of 2020 small business loans and 33.2 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 92.0 percent of 2020 small business loans with unknown revenue and 88.1 percent of 2021 small business loans with unknown revenue had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses of different revenue sizes in 2020 and 2021 is good.

HMDA Lending

The bank's overall distribution of HMDA loans by borrower's profile is adequate.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (7.9 percent) was above the aggregate lending level to low-income borrowers (4.2 percent), but it was below the demographic figure of low-income families in the assessment area (19.0 percent), reflecting adequate performance. The distribution of HMDA loans to moderate-income borrowers (14.5 percent) was above but comparable to the aggregate lending level to moderate-income borrowers (12.2 percent) and trailed the demographic figure of moderate-income families in the assessment area (17.4 percent), reflecting adequate performance.

In 2021, the bank's performance with HMDA loan originations to low-income borrowers (6.3 percent) was above the aggregate lending level to low-income borrowers (4.8 percent) but well below the demographic figure (19.0 percent), reflecting adequate performance. The distribution of HMDA loans to moderate-income borrowers (17.3 percent) was above the aggregate lending level (13.1 percent) and comparable to the demographic figure of moderate-income families in the assessment area (17.4 percent), reflecting good performance.

Small Farm Lending

The bank's overall distribution of small farm loans by borrowers' profile is good.

In 2020, the bank originated a greater percentage (95.7 percent) of its small farm loans to farms with revenues of less than \$1 million than the aggregate (77.5 percent) while being near the demographic figure (97.7 percent). This reflected excellent performance in 2020.

Bank performance declined in 2021, as the bank's percentage of small farm loans (51.1 percent) was less than the aggregate (65.9 percent) and the demographic figure (97.9 percent), demonstrating adequate performance.

Geographic Distribution of Loans

The bank's geographic distribution of loans in the assessment area is excellent. As was noted in the *Income and Wealth Demographics* section, the assessment area does not contain any low-income census tracts; therefore, performance ratings are derived from lending activity occurring in moderate-income census tracts.

Small Business Lending

The bank's overall geographic distribution of small business loans is excellent.

In 2020, the distribution of small business loans in moderate-income census tracts (15.8 percent) was well above the aggregate lending level in moderate-income geographies (9.0 percent) and the demographic figure of businesses operating in moderate-income geographies (11.4 percent), reflecting excellent performance.

In 2021, the distribution of small business loans in moderate-income census tracts (14.8 percent), was similarly above both the aggregate lending level (8.0 percent) and the demographic figure (11.2 percent), reflecting excellent performance.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is excellent.

In 2020, the distribution of HMDA loans in moderate-income geographies (6.2 percent) was above the aggregate lending level in moderate-income geographies (5.3 percent) and comparable to the demographic figure of owner-occupied housing units in moderate-income census tracts (7.2 percent), reflecting good performance.

In 2021, the distribution of HMDA loans in moderate-income geographies (7.7 percent) improved and was above both the aggregate lending level (5.6 percent) and the demographic figure of owner-occupied housing units in moderate-income census tracts (7.2 percent), reflecting excellent performance. Considering the difficulties cited above by community contacts in relation to the housing market in the assessment area, this overperformance of demographics is notable, helping to drive the overall excellent HMDA performance rating.

Small Farm Lending

The bank's overall geographic distribution of small farm loans is excellent. In 2020, the distribution of small farm loans in moderate-income census tracts (11.8 percent) was above both the aggregate lending (9.3 percent) and the demographic figure (5.0 percent), reflecting excellent performance.

Similarly, in 2021, bank performance (11.0 percent) again outperformed both the aggregate lending level (8.5 percent) and the demographic figure (5.1 percent), reflecting excellent performance.

Finally, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. The bank had loan activity in 100 percent of all assessment area census tracts for both years of lending data review.

Community Development Lending Activities

The bank makes an adequate level of community development loans in this assessment area. During the review period, Centennial Bank originated seven community development loans in the assessment area totaling \$12.9 million, an increase from the \$4.8 million at the bank's previous CRA evaluation. Notable community development loans include:

- One loan for \$3.0 million that will retain and expand LMI jobs in the assessment area due to the expansion of the business.
- One loan for \$2.0 million loan originated in the assessment area to a local business that helped to revitalize and stabilize a middle-income distressed census tract through job retention.
- One \$1.4 million loan provided affordable housing for those with Section 8 vouchers. This was considered particularly impactful given the need for affordable housing within the area cited during community contact interviews.

INVESTMENT TEST

The bank makes an adequate level of community development investments in this assessment area and is rarely in a leadership position. At the time of the evaluation, the bank had a total of \$6.3 million in outstanding investments that qualified for community development credit. This amount included \$6.1 million in investments made in the current review period and \$178,068 from prior-period investments that remain in the bank's portfolio. Additionally, the bank made 150 qualifying donations totaling \$170,122, the majority of which benefited organizations providing community services to the LMI population with a primary focus on helping through the area of education. The following is a summary of qualifying investments.

- Of the investments made during the current review period, 12 investments totaling \$3.1 million were invested in MBS pools consisting of home loans to LMI borrowers residing in the assessment area. While not particularly innovative, investments in affordable housing for LMI borrowers are responsive to a credit need identified by community contacts. The remaining \$3.0 million in current period investments was spread across three municipal bonds for the purpose of purchasing equipment or renovating school facilities in LMI areas.
- Prior-period investments still in the bank’s portfolio included \$178,068 in four MBS pools secured by housing loans made to LMI borrowers.

SERVICE TEST

The bank’s service delivery systems are accessible to geographies and individuals of different income levels in the assessment area. The bank’s record of opening and closing branch offices has not adversely affected accessibility of its delivery systems, particularly to moderate-income geographies and LMI individuals. The business hours and retail services offered by the bank do not vary in a way that inconveniences moderate-income geographies and LMI individuals. Finally, the bank provides an adequate level of community development services within this assessment area.

Accessibility of Delivery Systems

The bank operates 21 branches with full-service ATMs along with 2 stand-alone ATMs within the assessment area. The following table details the distribution of assessment area branches, census tracts, and families by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	2	13	6	0	21
	0.0%	9.5%	61.9%	28.6%	0.0%	100%
Census Tracts	0.0%	10.7%	71.4%	17.9%	0.0%	100%
Household Population	0.0%	8.9%	71.0%	20.1%	0.0%	100%

As shown above, 2 of the bank’s 21 branches (9.5 percent) in this assessment area are located within moderate-income census tracts, which compares favorably to the percentage of households living in census tracts that are moderate-income (8.9 percent) and is similar to the percentage of moderate-income census tracts in the assessment area (10.7 percent). In addition to these branch locations, the bank operates two stand-alone ATMs in the assessment area, one of which is located in a moderate-income census tract, which further increases the accessibility of bank services, particularly to LMI individuals. Finally, the largest percentage of bank branches is located in

middle-income census tracts with multiple branches adjacent to moderate-income census tracts. Therefore, based on the bank's branch and ATM locations, service delivery systems are accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

The bank's record of opening and closing branches in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and individuals. During the review period, the bank relocated a branch from one moderate-income census tract to an adjacent moderate-income census tract, which limits any impact on the availability of financial services.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain segments of this assessment area, particularly LMI geographies or individuals. Business hours and services are relatively consistent across all branches in the assessment area. All branches in the assessment area are drive-through accessible and have ATMs on site.

Community Development Services

Bank employees provide an adequate level of community development services in this assessment area. During the evaluation period, bank employees engaged in community development services by providing their technical financial expertise to 18 different organizations. In total, bank employees engaged in 557 hours of community development service activities during the review period. A significant number of the hours provided by bank employees were dedicated to schools where the majority of students receive free or reduced-price lunch. Additional organizations that benefited through employee financial expertise include an area Rotary Club, Lions Club, and a local housing authority working to improve the accessibility of affordable housing to local residents.

FAYETTEVILLE-SPRINGDALE-ROGERS, ARKANSAS MSA *(Full-Scope Review)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FAYETTEVILLE ASSESSMENT AREA

Bank Structure

The bank operates eight branches in the Fayetteville MSA assessment area representing 13.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	1	5	2

The bank did not have any branch structure changes during the review period. The bank also operates one stand-alone ATM located in a middle-income census tract. Based on the current branch network and service delivery systems, the bank is positioned to deliver financial services to the assessment area.

General Demographics

The bank's Fayetteville MSA assessment area is comprised of the entireties of Benton, Madison, and Washington counties in northwest Arkansas, which comprise all three of the counties that make up the Fayetteville-Springdale-Rogers, Arkansas MSA. The assessment area has a total population of 470,332, with Benton County (238,198) and Washington County (216,432) being comparable in size, and a much smaller population residing in Madison County (15,702). The assessment area is largely urban in its two larger counties, whereas Madison County is rural in nature.

This assessment area contains a competitive banking market. According to the FDIC Deposit Market Share Report as of June 30, 2022, a total of 36 FDIC-insured institutions operate 194 branches within the assessment area. Notably, the market is largely dominated by one financial institution, which accounts for 23.2 percent of branches and 45.7 percent of deposits in the assessment area. Of the 36 FDIC-insured institutions, Centennial Bank ranked eighth in total deposits with a market share of 2.6 percent. Competition for HMDA and CRA loans is relatively high. An analysis of 2021 HMDA-reportable loans shows that 475 institutions had loan activity in the assessment area, of which Centennial Bank ranked 30th with less than 1.0 percent of total HMDA loans. Out of 124 institutions with CRA loan activity, Centennial Bank ranked 14th with 1.3 percent of total CRA loan activity.

As the demographics in this assessment area are diverse and varied, credit needs are also varied and include a mix of consumer, business, and, to a much lesser extent, farm credit products. Other particular needs in the assessment area noted during a community contact interview include an

increase in financial literacy and small business development training, as well as small dollar business loans.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	2	2.4%	1,973	1.7%
Moderate	18	21.2%	25,064	21.0%
Middle	40	47.1%	52,270	43.9%
Upper	25	29.4%	39,767	33.4%
Unknown	0	0.0%	0	0.0%
TOTAL	85	100%	119,074	100%

Based on the information in the table above, LMI census tracts account for 23.6 percent of assessment area geographies. Family population levels are slightly below the distribution of census tracts, with 22.7 percent of assessment area families residing in LMI census tracts.

Based on 2015 ACS data, the median family income for the assessment area was \$60,876, which is well above the Arkansas statewide figure of \$51,782. As of 2021, the FFIEC estimates that the median family income for the Fayetteville MSA is \$71,200. The following table compares the population of assessment area families by income level to the state of Arkansas.

Family Population by Income Level				
	Assessment Area		Arkansas	
Low	24,295	20.4%	164,346	21.6%
Moderate	22,143	18.6%	134,818	17.7%
Middle	24,183	20.3%	149,580	19.7%
Upper	48,453	40.7%	311,180	41.0%
TOTAL	119,074	100%	759,924	100%

When compared to the first table in this section, the information in the table above shows that a much greater percentage of families in the assessment area are LMI (39.0 percent) than reside in LMI census tracts (22.7 percent). This percentage of LMI families in the assessment area is in line with the overall state percentage of LMI families (39.3 percent). While not shown in either of the preceding tables, the portion of families below the poverty line in the assessment area (11.2 percent) is below the statewide level (14.3 percent). Therefore, when considering income and poverty levels, the Fayetteville assessment area is slightly more affluent than the state of Arkansas as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Arkansas.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$149,333	33.4%	\$743
Arkansas	\$111,400	37.1%	\$677

Housing costs in the assessment area are higher than the state of Arkansas when adjusting for income levels. While median family income levels in the assessment area are higher than statewide levels, median housing values are also higher in the assessment area. There is also considerable difference between the three counties that comprise the Fayetteville MSA. While median housing values in Benton and Washington counties are nearly identical, the affordability ratio in Benton County (37.3 percent) is much higher than Washington County (28.7 percent). The median housing value in Madison County is significantly less than the other two counties, and also has a higher affordability ratio (39.2 percent).

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. According to the BLS, there are 222,399 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are manufacturing (12.9 percent), healthcare and social assistance (12.2 percent), and accommodation and food service (11.1 percent). According to the community contact, a significant portion of the local economy is based around a handful of large employers headquartered in the area, in addition to a major public university.

The following table details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for each county of the assessment area, the assessment area as a whole, and the state of Arkansas.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area Average	4.6%	2.9%
Arkansas	6.1%	4.0%

As shown in the table above, the unemployment level for the assessment area is lower than statewide levels over the period. All three counties in the MSA are closely aligned and were all consistently below the statewide levels.

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank's activities in the assessment area were evaluated. The interview was with an individual representing a small business development organization. The contact described the local economy as strong and growing. The contact cited that the Fayetteville MSA is one of the fastest growing MSAs in the state and continues to see people move to the area. New residents are lured to the area for its outdoor recreation, job opportunities, and an economy that is supported by several large corporations, a major university, and a strong small business sector. While the economy is largely doing well, the contact stated certain industries, such as food and event venues, were dramatically impacted by the COVID-19 pandemic. Additionally, while the MSA is largely thriving, there are areas within the MSA, specifically within the smaller Madison County, that are more rural and have stark disparities in income levels and housing quality. The contact noted that due to the number and availability of banks in the area, banks are accessible to residents of Washington and Madison County. While the contact noted that the banking conditions in the assessment area are good, there are some opportunities for banks to better meet the needs of the community. One major need cited by the contact was related to demand for small business loans, specifically small dollar loans. The contact cited that businesses who cannot obtain traditional financing for small dollar amounts often seek financing from online financial technology companies and other alternative financiers that have higher fees and rates. Additionally, the contact noted several other barriers faced by small businesses in the assessment area, including a lack of funding and resources, lack of collateral and working capital when applying for credit, and limited resources for financial literacy and business counseling. Financial institutions that could offer services and products to meet those needs would dramatically help small businesses in the assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE ASSESSMENT AREA

LENDING TEST

Lending levels reflect good responsiveness to assessment area credit needs. The overall distribution of loans by borrower’s income and revenue profile reflects good penetration among customers of different income levels and businesses of various sizes, and the overall geographic distribution of loans reflects good penetration throughout the assessment area. Finally, the bank makes an adequate level community development loans within the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	0	0.0%	0	0.0%
Home Purchase	384	37.0%	82,878	46.7%
Multifamily Housing	3	0.3%	1,000	0.6%
Refinancing	181	17.5%	39,798	22.4%
Total HMDA	569	54.9%	123,852	69.8%
Small Business	456	44.0%	52,567	29.6%
Small Farm	12	1.2%	909	0.5%
TOTAL LOANS	1,037	100%	177,328	100%

The bank’s lending activity in the assessment area represents 4.6 percent of total 2020 and 2021 HMDA and CRA loans in the bank’s combined assessment areas. This level of lending activity exceeds both the percentage of total bank branches in the assessment area (3.6 percent) and, as of June 30, 2021, the percentage of total bank deposits in the assessment area (3.2 percent). In addition, the bank ranked 10th out of 127 and 14th out of 124 lenders in total CRA originations in the assessment area in 2020 and 2021, respectively. In light of these factors, the bank’s lending activity in the assessment area reflects good responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good, with primary emphasis placed on HMDA lending.

HMDA Lending

The bank’s overall distribution of HMDA loans by borrower’s profile is good.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (13.9 percent) more than doubled aggregate lending (4.9 percent) but trailed the demographic figure of low-income families in the assessment area (20.4 percent), reflecting good performance. The distribution of HMDA loans to moderate-income borrowers (22.3 percent) was above both the aggregate lending level (13.5 percent) and the demographic figure of moderate-income families in the assessment area (18.6 percent), reflecting excellent performance.

In 2021, the distribution of HMDA loans to low-income borrowers (9.2 percent) was above aggregate lending (5.4 percent), but below the demographic figure (20.4 percent), again reflecting good performance. The distribution of HMDA loans to moderate-income borrowers (22.1 percent) was above both aggregate lending (13.4 percent) and the demographic estimate of moderate-income families in the assessment area (18.6 percent), reflecting excellent performance.

Small Business Lending

The bank's overall distribution of small business loans by borrowers' profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 24.3 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is below both the aggregate lending level (31.9 percent) and well below the demographic figure used for comparison (91.8 percent). Similarly, in 2021, the bank made 50.5 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is above the aggregate lending level (40.5 percent) but again well below the demographic figure used for comparison (91.8 percent). However, additional analysis indicates that a considerable portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 57.5 percent of 2020 small business loans and 28.2 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 81.2 percent of total unknown revenue small business loans in 2020 and 81.1 percent of total unknown revenue small business loans in 2021 had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community, with small dollar business loans being a need cited by the community contact interviewed. Therefore, the distribution of loans to businesses of different revenue sizes is good.

Geographic Distribution of Loans

The bank's geographic distribution in the assessment area is good.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is good.

In 2020, the bank did not originate any HMDA loans in low-income geographies; however, aggregate performance in the assessment area (0.4 percent), as well as the demographic figure (0.6 percent), suggests limited opportunities within these tracts; thus, the bank's performance is considered adequate. The distribution of HMDA loans in moderate-income geographies (23.6 percent) more than doubled the aggregate lending level in moderate-income geographies (11.2 percent) and exceeded the demographic figure (18.1 percent), reflecting excellent performance.

In 2021, the distribution of HMDA loans in low-income geographies improved as the bank's percentage of HMDA loans originated (0.7 percent) was more in line with the aggregate lending level in low-income geographies (0.5 percent), as well as the demographic figure (0.6 percent), reflecting good performance. In moderate-income geographies, the bank's level of lending (14.7 percent) was above the aggregate lending level in moderate-income geographies (12.0 percent) and approached the demographic figure of owner-occupied housing units in moderate-income census tracts (18.1 percent), reflecting good performance.

Small Business Lending

The bank's overall geographic distribution of small business loans is good.

In 2020, the distribution of small business loans in low-income census tracts (1.9 percent) matched both aggregate lending levels and (1.9 percent) and the demographic figure (1.9 percent), reflecting good performance. In moderate-income census tracts, the bank's small business lending (23.5 percent) exceeded both the aggregate lending level (16.6 percent) and the demographic figure of businesses operating in moderate-income census tracts (18.4 percent), demonstrating excellent performance.

In 2021, the bank's distribution of small business loans (2.1 percent) was above but comparable to both the aggregate lending level in low-income geographies (1.4 percent) and the demographic figure (1.8 percent), reflecting good performance. In moderate-income census tracts, the bank's performance (19.1 percent) exceeded yet was comparable to both the aggregate lending level (16.6 percent) and the demographic figure of businesses operating in moderate-income census tracts (18.3 percent), which demonstrates good performance.

Finally, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020 and in 2021, the bank had loan activity in 95.0 percent of LMI census tracts in the assessment area. Additionally, all low-income geographies had loan activity in each year, and between both years, all moderate-income census tracts had loan activity.

Community Development Lending Activities

The bank makes an adequate level of community development loans in this assessment area. During the review period, the bank originated one large community development loan for \$7.8 million. This loan qualified under revitalization and stabilization within a moderate-income census tract, which retained LMI jobs within the assessment area.

INVESTMENT TEST

The bank makes an excellent level of qualified community development investments and grants within the assessment area and is often in a leadership position. Qualified investments made during the current review period and those that were made previously, but are still outstanding, totaled \$18.9 million and are described below.

- During the review period, the bank made three investments in school bonds that predominantly served LMI students in the assessment area. These investments totaled \$8.4 million.
- The remaining current-period investments, 14 investments totaling \$6.8 million, were in MBS. These investments provide affordable housing in the area.
- Investments made prior to the current review period, but still outstanding, consisted of eight separate MBS totaling \$3.8 million.

In addition to the investments listed above, the bank made 67 donations totaling \$85,946 to various organizations in the assessment area. These organizations serve a variety of community development purposes, although they predominantly were in support of community services that provided assistance to LMI individuals within the assessment area.

SERVICE TEST

The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the assessment area. Furthermore, the bank's record of opening and closing branch offices has not adversely affected accessibility of its delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and LMI individuals. Finally, Centennial Bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates eight branches with full-service ATMs and drive-through access within the assessment area. The following table illustrates the location of the bank's branches by geography income level as compared to the distribution of assessment area census tracts and household population by income level of the geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	1	5	2	0	8
	0.0%	12.5%	62.5%	25.0%	0.0%	100%
Census Tracts	2.4%	21.2%	47.1%	29.4%	0.0%	100%
Household Population	3.0%	21.9%	42.8%	32.4%	0.0%	100%

As shown in the table above, 12.5 percent of all the bank’s branches in the assessment area are located in moderate-income census tracts. The bank’s branch presence in LMI tracts is below the percentage of LMI geographies (23.6 percent), as well as the household population within those geographies (24.9 percent). Although the bank does not operate any branches in low-income census tracts, three of the bank’s branches are in close proximity to surrounding low-income census tracts. Lastly, six out of the eight total bank branches, including the three mentioned previously near low-income census tracts, are also near the area’s moderate-income census tracts. Given this context and the bank’s percentage of branches in LMI tracts relative to comparison data, the bank’s service delivery systems are reasonably accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank’s record of opening and closing branches in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and individuals. No branches were opened or closed during the review period.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of this assessment area, particularly LMI geographies and LMI individuals. The bank’s branches in the assessment area operate during standard business hours, Monday through Friday, and all offer drive-up facilities and ATMs. The majority of branches also offer lending services on site. Lastly, the bank’s sole branch in a moderate-income census tract offers extended Saturday hours, further demonstrating that business hours do not vary in a way that inconveniences LMI geographies or individuals.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. During the review period, bank employees provided community service activities to six different organizations, totaling 154 hours of community service. The organizations served by bank employees promote a variety of community development aims. One bank employee offered financial expertise by sitting on the board of an organization that provided educational scholarships

to single parents who are considered LMI. Another employee volunteered time on the board of an organization that provided housing for LMI individuals in the assessment area. Lastly, a number of individuals within the organization utilized their expertise by teaching financial literacy to LMI students in the community or by providing budget counseling for LMI adults in the region.

FORT SMITH, ARKANSAS-OKLAHOMA MSA (Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE FORT SMITH MSA ASSESSMENT AREA

The bank’s Fort Smith MSA assessment area is comprised of Crawford, Sebastian, and Franklin counties in Arkansas, which comprise the full Arkansas portion of the five-county Fort Smith, Arkansas-Oklahoma MSA (Fort Smith MSA). The bank operates three offices in this assessment area. There was one branch closure in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	11	19	10	0	40
	0.0%	27.5%	47.5%	25.0%	0.0%	100%
Family Population	0	11,045	29,731	14,182	0	54,958
	0.0%	20.1%	54.1%	25.8%	0.0%	100%
Household Population	0	18,347	41,258	20,407	0	80,012
	0.0%	22.9%	51.6%	25.5%	0.0%	100%
Business Institutions	0	1,896	3,031	1,905	0	6,832
	0.0%	27.8%	44.4%	27.9%	0.0%	100%
Agricultural Institutions	0	5	76	35	0	116
	0.0%	4.3%	65.5%	30.2%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Classification				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	11,746	9,729	10,480	23,003	54,958
	21.4%	17.7%	19.1%	41.9%	100%
Household Population	19,349	12,304	13,818	34,541	80,012
	24.2%	15.4%	17.3%	43.2%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FORT SMITH MSA ASSESSMENT AREA

LENDING TEST

The bank’s lending performance in this assessment area is consistent with the bank’s Lending Test performance for the state of Arkansas, as detailed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Below
Distribution of Loans by Borrower’s Profile	Exceeds
Geographic Distribution of Loans	Exceeds
Community Development Lending Activities	Below
OVERALL	CONSISTENT

The bank’s level of community development lending in this assessment area is below that of the state of Arkansas. During the review period, the bank did not originate any community development loans.

INVESTMENT TEST

The bank’s performance in this assessment area exceeds the Investment Test performance in the state of Arkansas. During the evaluation period, the bank had 19 qualifying investments totaling \$8.2 million. Of these investments, 14 totaling \$8.1 million were made during the current review period and included investments in MBS secured by affordable housing for LMI residents in the assessment area and investments in school bonds in districts where the majority of students are eligible for free or reduced-price lunches. Five prior-period investments totaling \$130,682 also qualified for community development. In addition, the bank made 15 community development donations totaling \$12,450.

SERVICE TEST

The bank’s Service Test performance in this assessment area is consistent with the service performance in the state of Arkansas, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Below
OVERALL	CONSISTENT

During the review period, the bank provided community development services totaling four service hours to one organization in the assessment area.

JONESBORO, ARKANSAS MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE JONESBORO MSA ASSESSMENT AREA

This assessment area includes the entireties of Craighead and Poinsett counties, the two counties that make up the Jonesboro, Arkansas MSA (Jonesboro MSA). The bank operates seven branches in this assessment area, none of which were opened or closed during the review period. In addition, the bank operates two stand-alone ATMs in this assessment area. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	2	6	13	3	0	24
	8.3%	25.0%	54.2%	12.5%	0.0%	100%
Family Population	1,568	6,527	17,886	6,303	0	32,284
	4.9%	20.2%	55.4%	19.5%	0.0%	100%
Household Population	3,518	11,095	25,363	8,034	0	48,010
	7.3%	23.1%	52.8%	16.7%	0.0%	100%
Business Institutions	367	988	2,149	781	0	4,285
	8.6%	23.1%	50.2%	18.2%	0.0%	100%
Agricultural Institutions	3	108	260	92	0	463
	0.6%	23.3%	56.2%	19.9%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Classification				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	7,075	5,559	6,443	13,207	32,284
	21.9%	17.2%	20.0%	40.9%	100%
Household Population	11,851	7,821	8,305	20,033	48,010
	24.7%	16.3%	17.3%	41.7%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JONESBORO MSA ASSESSMENT AREA

LENDING TEST

The bank’s lending performance in this assessment area is consistent with the bank’s Lending Test performance in the state of Arkansas, as detailed in the following table. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Geographic Distribution of Loans	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Community Development Lending Activities	Consistent
OVERALL	CONSISTENT

During the review period, the bank made three community development loans totaling \$4.2 million, a level consistent with the bank’s performance in Arkansas. Two of these loans qualified for a community development purpose of revitalizing and stabilizing a low- or moderate-income geography; with each helping to retain both jobs and services in these geographies.

INVESTMENT TEST

The bank’s performance in this assessment area exceeds the Investment Test performance for the state of Arkansas. The bank made new investments totaling \$4.1 million in addition to three investments totaling \$152,179 made prior to this review period but still outstanding. The majority of the bank’s investments were made in MBS secured by affordable housing to LMI residents in the assessment area. In addition to these investments, the bank made 120 community development donations for \$214,519 to organizations involved in community development activities, such as affordable housing, community services, and revitalization/stabilization in the assessment area.

SERVICE TEST

The bank’s Service Test performance in the Jonesboro MSA assessment is consistent with the service performance for the state of Arkansas, as detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Exceeds
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	CONSISTENT

During the review period, bank employees provided community development services totaling 212 service hours to 10 different organizations.

NORTHEAST ARKANSAS NONMETROPOLITAN ASSESSMENT AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE NORTHEAST ARKANSAS ASSESSMENT AREA

The bank’s Northeast Arkansas assessment area includes the entireties of Clay and Greene counties, two largely rural counties adjacent to the Jonesboro, Arkansas MSA. The bank operates four branches in the assessment area, and there were no branch structure changes during the review period. The tables below detail key demographics relating to the assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown	TOTAL
Census Tracts	0	1	10	4	0	15
	0.0%	6.7%	66.7%	26.7%	0.0%	100%
Family Population	0	534	9,537	5,667	0	15,738
	0.0%	3.4%	60.6%	36.0%	0.0%	100%
Household Population	0	823	14,791	7,679	0	23,293
	0.0%	3.5%	63.5%	33.0%	0.0%	100%
Business Institutions	0	74	1,011	450	0	1,535
	0.0%	4.8%	65.9%	29.3%	0.0%	100%
Agricultural Institutions	0	4	119	71	0	194
	0.0%	2.1%	61.3%	36.6%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	2,862	2,718	3,082	7,076	15,738
	18.2%	17.3%	19.6%	45.0%	100%
Household Population	5,221	3,466	3,903	10,703	23,293
	22.4%	14.9%	16.8%	46.0%	100%

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHEAST ARKANSAS ASSESSMENT AREA

LENDING TEST

The bank’s lending performance in this assessment area is consistent with the bank’s Lending Test performance in the full-scope review, North Central Arkansas nonMSA assessment area. For more detailed information relating to the bank’s Lending Test performance in this assessment area, see the tables in *Appendix C*.

Lending Test Criteria	Performance
Lending Activity	Consistent
Distribution of Loans by Borrower’s Profile	Consistent
Geographic Distribution of Loans	Consistent
Community Development Lending Activities	Consistent
OVERALL	CONSISTENT

The bank originated two community development loans in the assessment area during the review period, which was consistent with the performance of the North Central Arkansas nonMSA assessment area reviewed under full-scope procedures. One of these loans was for \$5.0 million for multifamily affordable housing, while the other was a \$1.0 million PPP loan that qualified for community development.

INVESTMENT TEST

The bank’s performance in this assessment area exceeds the Investment Test performance of the full-scope, North Central Arkansas nonMSA assessment area. The bank made eight new investments totaling \$1.5 million, in addition to two prior-period investments totaling \$85,828. Of the current period investments, the majority were in MBS secured by affordable housing for LMI residents in the assessment area. In addition, the bank made 28 community development donations totaling \$14,875 to various organizations participating in community development activities in the assessment area.

SERVICE TEST

The bank’s Service Test performance in the assessment area is consistent with the bank’s service performance in the North Central Arkansas assessment area, detailed in the following table.

Service Test Criteria	Performance
Accessibility of Delivery Systems	Consistent
Changes in Branch Locations	Consistent
Reasonableness of Business Hours and Services	Consistent
Community Development Services	Consistent
OVERALL	CONSISTENT

During the review period, the bank provided community development services totaling 181 service hours to seven different organizations participating in community development activities throughout the assessment area.

ALABAMA

CRA RATING FOR ARKANSAS: SATISFACTORY

The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **High Satisfactory**
The Service Test is rated: **High Satisfactory**

Factors supporting the institution's ratings for the state of Alabama include:

- The bank's lending levels reflect adequate responsiveness to credit needs of the assessment areas in the state.
- The distribution of loans by borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.
- The bank's overall geographic distribution of loans reflects excellent penetration throughout the bank's Alabama assessment area.
- The bank makes an adequate level of community development loans in its Alabama assessment area.
- The bank makes a significant level of qualified community development investments and grants throughout its Alabama assessment area.
- Service delivery systems are readily accessible to the geographies and individuals of different income levels in the Alabama assessment area. Changes in branch locations have not adversely affected the delivery systems, and services do not vary in a way that inconveniences the needs of its assessment areas, particularly in LMI geographies.
- The bank provides an adequate level of community development services in its Alabama assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Alabama assessment area are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. Given the bank's limited operations in the state, performance in Alabama carried minimal weight toward the bank's overall rating.

The bank has a single assessment area in the state of Alabama, comprised of the Daphne-Fairhope-Foley MSA (Daphne MSA), which was evaluated using full-scope review procedures; consequently, the bank's ratings in the state of Alabama are a reflection of the performance in this assessment area.

To augment the evaluation of the full-scope review assessment area in Alabama, one community contact interview was referenced to ascertain specific community credit needs, community

development opportunities, and local economic conditions. This contact represented a small business development organization in the assessment area. Details from this interview is included in the *Description of Institution's Operations in Alabama* section.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

Bank Structure

The bank operates five branches in the Daphne MSA, representing 2.3 percent of all bank branches. All branches include drive-up and ATM facilities. The table below displays the distribution of these branches by census tract income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	3	1	1

During the review period, the bank did not close or open any branches in the assessment area. The bank's branches are primarily located in the southern and southwestern portions of the MSA, which are also the most densely populated areas. Based on this branch network and service delivery systems, the bank is positioned to deliver financial services to those areas of the assessment area that are most populated.

General Demographics

The Daphne assessment area consists of the entirety of Baldwin County, Alabama, which is located in southern Alabama, along the Gulf of Mexico, bordering the urban markets of Mobile, Alabama, to the west and Pensacola, Florida, to the east. According to 2015 ACS data, the MSA has a population of 195,121 and, according to the community contact, has been growing considerably.

In total, 26 financial institutions operate 85 branches throughout the assessment area, according to the June 30, 2022, FDIC Deposit Market Share Report. Of these institutions, Centennial Bank ranks third in deposit market share, with 9.9 percent of total assessment area deposits. Deposits held in this assessment area account for 3.4 percent of total institution deposits. An analysis of 2021 HMDA-reportable loans indicates that there were 575 financial institutions with loan activity in the assessment area, of which Centennial Bank ranked 59th, with less than 1.0 percent of total HMDA loans. Additionally, of the 114 financial institutions with CRA loan activity in the assessment area, Centennial Bank ranked eighth, with 3.2 percent of all CRA loans.

This assessment area is a primarily metropolitan area with diverse demographics and credit needs. As noted by the community contact interview, the assessment area is a popular vacation destination but also maintains a diverse economy beyond the tourism industry. As a result, credit needs include a blend of consumer and business credit products, with the community contact stating that the credit product offerings within the assessment area are meeting the needs of the local community.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	6	18.8%	7,680	15.3%
Middle	20	62.5%	32,295	64.2%
Upper	5	15.6%	10,301	20.5%
Unknown	1	3.1%	0	0.0%
TOTAL	32	100%	50,276	100%

As shown above, the assessment area contains no low-income tracts and six moderate-income tracts. Within these six moderate-income census tracts reside 15.3 percent of the assessment area family population. Four of the assessment area’s six moderate-income tracts are located in the southern, urban portion of the assessment area. The majority of assessment area families reside in middle-income census tracts that are spread throughout the county.

Based on 2015 ACS data, the median family income for the assessment area was \$62,271, while the median family income for Alabama as a whole was \$55,341. More recently, the FFIEC estimates the 2021 median family income for the Daphne MSA to be \$74,300. The following table displays the population percentages of assessment area families by income level compared to Alabama family populations.

Family Population by Income Level				
	Assessment Area		Alabama	
Low	10,340	20.6%	288,012	23.3%
Moderate	8,888	17.7%	206,093	16.6%
Middle	10,504	20.9%	233,934	18.9%
Upper	20,544	40.9%	510,928	41.2%
TOTAL	50,276	100%	1,238,967	100%

Although the assessment area does not contain any low-income census tracts, there is still a considerable portion of the population classified as low-income (20.6 percent). This is roughly in line with the state of Alabama as a whole (23.3 percent). Similarly, the percentage of moderate-income families in the assessment area (17.7 percent) is in line with Alabama (16.6 percent). The percentage of families below the poverty level in the assessment area (9.6 percent), however, is considerably below the statewide level (14.5 percent). Therefore, based on these income and wealth demographics, the assessment area is slightly more affluent than the state of Alabama as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of Alabama.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$169,299	29.7%	\$878
Alabama	\$125,500	34.8%	\$717

Based on the data in the preceding table, housing in the assessment area is less affordable than in the state of Alabama as a whole. Income levels in the assessment area are higher than statewide levels; however, median housing values are even higher relative to income in the assessment area, making homeownership less affordable for area residents. This is evidenced by the lower affordability ratio in the assessment area (29.7 percent) than the state of Alabama (34.8 percent). Additionally, increased housing costs extend to the area’s median gross rents, which are higher than those in the state of Alabama.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. County business patterns indicate that there are 69,898 paid employees in the assessment area. The three largest industries within the assessment area are retail trade (20.7 percent), accommodation and food services (19.7 percent), and health care and social assistance (13.9 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for the assessment area and the state of Alabama as a whole.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	6.2%	3.0%
Alabama	6.5%	3.4%

As shown in the table above, unemployment levels in the assessment area remained lower than statewide levels throughout the review period and reflected a declining trend.

Community Contact Information

Information from one community contact interview was used to help shape the performance context in which the bank’s activities in the assessment area were evaluated. The interview was with an individual representing a small business development organization. The contact characterized the local economy as strong. The contact cited recent population increases, as well as new businesses entering the area, as indicators of its recent growth. Strong growth in the assessment area has contributed to low unemployment and has made job opportunities plentiful.

The contact also noted that demographically, the minority population is increasing and has seen more local Hispanic- and minority-owned businesses enter the market. Moreover, much of the area's economic growth can be attributed to a strong tourism industry, as the area has become a nationally recognized travel destination. Due to the heavy influence tourism has on the economy, the start-up market is largely dominated by the service industry, particularly food service. The contact noted competition amongst financial institutions is strong due to the large number of banks in the assessment area. Due to the availability and number of institutions, access to banking products and services are plentiful and available to all populations. While the economy is strong and financial institutions remain readily available, the need for start-up capital, business planning, and skilled workforce are barriers faced by local start-ups.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The bank’s Lending Test performance in the state of Alabama is rated high satisfactory. Lending levels reflect adequate responsiveness to assessment area credit needs. The loan distribution by borrower’s income and revenue profile reflects good penetration among borrowers of different income levels and businesses of different sizes. The geographic distribution of loans reflects excellent penetration throughout the assessment area. Lastly, the bank makes an adequate level of community development loans throughout the assessment area.

Lending Activity

The following table displays the summary of the bank’s lending activity analyzed under the Lending Test for this assessment area.

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	2	0.3%	560	0.5%
Home Purchase	88	12.4%	20,040	18.1%
Multifamily Housing	1	0.1%	500	0.5%
Refinancing	37	5.2%	8,683	7.8%
Total HMDA	129	18.2%	29,891	27.0%
Small Business	578	81.6%	80,776	73.0%
Small Farm	1	0.1%	49	0.0%
TOTAL LOANS	708	100%	110,716	100%

Lending activity in the state of Alabama represents 3.1 percent of total 2020 and 2021 HMDA and CRA loans made inside the bank’s combined assessment areas. By comparison, the bank operates 2.3 percent of its total branches, and as of June 30, 2021, holds 4.6 percent of total bank deposits in the assessment area. Based on these factors, the bank’s lending activity in Alabama reflects adequate responsiveness to assessment area credit needs.

Loan Distribution by Borrower’s Profile

The bank’s overall borrower distribution of loans in the assessment area is good, with primary emphasis placed on small business lending.

Small Business Lending

The bank’s overall distribution of small business loans by borrowers’ profile is good.

Although bank performance might appear poor, after considering the impacts of the COVID-19 pandemic and the bank's participation in the PPP, the bank's distribution of small business loans by borrower's profile is good. In 2020, the bank made 24.1 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is below the aggregate lending level (34.5 percent) and the demographic figure used for comparison (92.7 percent). Similarly, in 2021, the bank made 46.7 percent of its small business loans to businesses with annual revenues of \$1 million or less, which is in line with the aggregate lending level (41.5 percent) but well below the demographic figure used for comparison (92.7 percent). However, additional analysis indicates that a considerable portion of the bank's small business lending during the review period consisted of PPP loans. As the program's guidelines did not require the bank to collect revenue information for PPP loans, a high percentage of small business loans were reported with unknown revenue. Further analysis indicated that 65.2 percent of 2020 small business loans and 35.5 percent of 2021 small business loans were originated with unknown revenue. Using loan size as a proxy for small business revenue criteria revealed that 91.3 percent of total unknown revenue small business loans in 2020 and 66.3 percent of total unknown revenue small business loans in 2021 had loan sizes of \$100,000 or less. This level of lending reflects the bank's responsiveness to the needs of the small business community. Therefore, the distribution of loans to businesses of different revenue sizes in 2020 and 2021 is good.

HMDA Lending

The bank's overall distribution of HMDA loans by borrower's profile is adequate.

In 2020, the bank's distribution of HMDA loans to low-income borrowers (6.7 percent) was comparable to the aggregate lending level to low-income borrowers (6.9 percent), but was below the demographic figure (20.6 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (10.7 percent) was below the aggregate lending level to moderate-income borrowers (17.1 percent) and the demographic figure of moderate-income families in the assessment area (17.7 percent), reflecting poor performance.

In 2021, the bank's distribution of HMDA loans to low-income borrowers (5.7 percent) exceeded but was comparable to the aggregate lending level (5.3 percent) yet trailed the demographic figure of low-income families in the assessment area (20.6 percent), reflecting adequate bank performance. The distribution of HMDA loans to moderate-income borrowers (26.4 percent) was well above both the aggregate lending level to moderate-income borrowers (14.6 percent) and the demographic figure of moderate-income families in the assessment area (17.7 percent), reflecting excellent performance.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is excellent. As previously mentioned, the assessment area contains no low-income census tracts; thus, geographic distribution is based on the bank's performance in moderate-income census tracts.

Small Business Lending

The bank's overall geographic distribution of small business loans is excellent.

In 2020, the bank's distribution of small business loans in moderate-income census tracts (40.4 percent) is well above the aggregate lending level (16.7 percent) and the demographic figure (18.9 percent), reflecting excellent bank performance.

In 2021, the bank's distribution of small business loans in moderate-income census tracts (46.3 percent) improved and continued to exceed aggregate lending (16.6 percent) and the demographic figure of business operating in low-income geographies (18.9 percent), reflecting continued excellent bank performance.

HMDA Lending

The bank's overall geographic distribution of HMDA loans is similarly excellent.

In 2020, the bank's distribution of HMDA loans in moderate-income geographies (28.0 percent) was above both aggregate lending level (15.0 percent) and the demographic figure of owner-occupied housing units in moderate-income census tracts (14.9 percent), reflecting excellent bank performance.

In 2021, the bank's distribution of HMDA loans in moderate-income geographies (45.3 percent) improved and remained above both the aggregate lending level (15.9 percent) and the demographic figure (14.9 percent), reflecting excellent bank performance.

Lastly, based on an analysis of the dispersion of assessment area lending activity, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020, the bank had loan activity in all six moderate-income census tracts; in 2021, there was loan activity in five of six (83.3 percent) moderate-income geographies.

Community Development Lending Activities

Centennial Bank makes an adequate level of community development loans in the Daphne assessment area. During the review period, the bank made five community development loans totaling \$7.9 million. These loans helped to provide the assessment area with economic development, revitalization and stabilization, and community services. Specifically, four of these loans were made that qualified based on helping the area recover following the designated disaster area declaration within the assessment area after Hurricane Sally. Additionally, the bank originated six loans within the state of Alabama, but outside of the assessment area, totaling \$1.3 million, that qualified for community development.

INVESTMENT TEST

Overall, the bank's performance under the Investment Test is rated high satisfactory for the state of Alabama. During the review period, the bank made a significant level of community

development investments in Alabama. At the time of the examination, the bank had a total of \$10.6 million in outstanding investments that qualified for community development credit. This amount included 11 investments totaling \$10.4 million made during the current review period and five prior period investments still in the bank’s portfolio for \$225,712. All the bank’s qualifying investments were made in MBS secured by affordable housing to LMI residents in the assessment area. The bank also made 49 donations to various community service and affordable housing organizations in the assessment area totaling \$62,009.

SERVICE TEST

The bank’s Service Test rating in the state of Alabama is high satisfactory. Service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area. The bank’s record of opening and closing branch offices has not adversely affected accessibility of its delivery systems to LMI individuals or geographies. Similarly, business hours and services do not vary in a way that inconveniences certain portions of this assessment area, particularly LMI geographies and individuals. Finally, the bank provides an adequate level of community development services within this assessment area.

Accessibility of Delivery Systems

The bank operates five branches with full-service ATMs in the state of Alabama. The following table displays the location of the bank’s branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown	
Branches	0	3	1	1	0	5
	0.0%	60.0%	20.0%	20.0%	0.0%	100%
Census Tracts	0.0%	18.8%	62.5%	15.6%	3.1%	100%
Household Population	0.0%	16.9%	63.9%	19.2%	0.0%	100%

As previously noted, there are no low-income census tracts in the Daphne MSA. The bank operates three (60.0 percent) of its branches in moderate-income census tracts, which is well above both the household population residing in these tracts (16.9 percent) and the percentage of assessment area tracts that are moderate-income (18.8 percent). Therefore, the bank’s service delivery systems are readily accessible to geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

During this review period, the bank did not open or close any branches in the assessment area. Therefore, the bank’s record of opening and closing branches in this assessment area has not

adversely affected the accessibility of delivery systems, particularly to moderate-income geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of this assessment area, particularly moderate-income geographies and LMI individuals, as business hours and services are consistent across all branches in this assessment area. All five of the bank's branches in the assessment area are open standard business hours, Monday through Friday, and all locations offer drive-up accessibility. Additionally, all five locations, including all three branches in moderate-income tracts, offer extended drive-up hours on Friday.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. During the review period, bank employees provided community services to three different organizations in the assessment area, totaling 123 hours. These organizations provided community services and affordable housing options for LMI families in the assessment area. Specifically, one bank employee served as a lending advisor for an organization facilitating development of affordable housing in the assessment area, and other employees provided their financial expertise to local organizations assisting LMI individuals by participating on their boards of directors.

NEW YORK

CRA RATING FOR ARKANSAS: SATISFACTORY

The Lending Test is rated: **Low Satisfactory**
The Investment Test is rated: **Outstanding**
The Service Test is rated: **Low Satisfactory**

Factors supporting the institution's ratings for the state of New York include:

- The bank's lending levels reflect poor responsiveness to credit needs of the assessment areas in the state.
- The bank is a leader in making community development loans within the New York assessment area.
- The bank makes an excellent level of qualified community development investments and grants throughout its New York assessment area and is often in a leadership position.
- Business hours and services for the only branch in this state vary from the rest of the bank's service/product delivery systems in a way that inconveniences the New York assessment area, particularly LMI individuals.
- The bank provides an adequate level of community development services in the New York assessment area.

SCOPE OF EXAMINATION

The bank has one assessment area in the state of New York, which was reviewed using full-scope CRA examination procedures. Consequently, the bank's rating in the state of New York is based solely on performance in this assessment area. Scoping considerations applicable to the review of the New York assessment area vary from those applicable to the rest of the bank's retail operations, particularly under the Lending Test. In light of the bank's targeted business strategy applicable to the bank's only branch in this state, which is discussed in more detail in the following section, there were only 13 small business loans made in this assessment area during the review period, and no HMDA or small farm loans were originated. Considering this lack of retail lending activity available for analysis, performance under the Lending Test was considered primarily on the evaluation of the bank's level of community development lending. Moreover, given the bank's limited operations in the state, performance in New York carried minimal weight toward the bank's overall rating.

To augment the evaluation in New York, two community contact interviews were referenced to ascertain specific community credit needs, community development opportunities, and local market conditions. One interview was with an affordable housing specialist, and the other was

with an individual working on funding community projects and housing. Key details from these interviews are included in the *Description of Institution's Operations* section for New York.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NEW YORK

Bank Structure

As of this evaluation date, the bank operates one branch office and one LPO, both of which are tailored solely to meet the loan and deposit needs of large commercial customers.

The bank did not open or close any branches in New York during the review period. Bank deposits in New York as of June 30, 2022, total \$123.0 million, or 0.6 percent of total bank deposits. Considering its limited branch network within this highly competitive and densely populated area, the bank is not positioned to serve the entire assessment area.

General Demographics

The bank's sole New York assessment area is located in New York City and consists of Bronx, Kings, New York, and Queens counties. These counties are four of the ten counties that make up the New York portion of the larger New York-Newark-Jersey City multistate MSA. This MSA is further subdivided into four MDs. The bank's assessment area is contained within the New York-Jersey City-White Plains multistate MD (New York MD), which includes eight counties in New York and six counties in New Jersey. The assessment area had a total population of 7,954,262, and, based on the FDIC Deposit Market Share Report data as of June 30, 2022, there were 107 FDIC-insured depository institutions operating 1,405 offices within the assessment area. The bank ranked 89th in terms of deposit market share, with 0.1 percent of the total deposit dollars. Finally, competition for HMDA and CRA loans is high. An analysis of 2021 HMDA-reportable loans shows that 413 institutions had loan activity in the assessment area.

As one of the most important economic regions in the world and a central hub for many industries, including finance, international trade, real estate, and manufacturing, the New York City region has a high demand for diverse and often highly specialized banking services. Other significant credit and community development needs in the assessment area highlighted by community contacts include financial literacy training, specifically homebuyer training. Additionally, affordable housing is a current need in the assessment area. Lastly, one area of need mentioned was bilingual or multilingual bank employees in order to meet the needs of the incredibly diverse demographics of New York City.

Income and Wealth Demographics

The following table summarizes the distribution of assessment area census tracts by income level and the family population in those geographies.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	285	13.9%	311,907	17.9%
Moderate	562	27.3%	519,017	29.8%
Middle	614	29.8%	475,037	27.3%
Upper	533	25.9%	434,160	24.9%
Unknown	63	3.1%	2,404	0.1%
TOTAL	2,057	100%	1,742,525	100%

As displayed above, 41.2 percent of assessment area census tracts are categorized as LMI, while a higher percentage, 47.7 percent, of the family population resides in those geographies. The family population is relatively evenly spread across income categories, but the largest portion, 29.8 percent, resides in moderate-income geographies.

Based on 2015 ACS data, the median family income for the assessment area was \$57,404, which was well below the median family income for the New York MD, \$67,560. More recently, the FFIEC estimates the 2021 median family income for the New York MD to be \$85,500. The following table displays population percentages of assessment area families by income level compared to the New York MD family population as a whole.

Family Population by Income Level				
	Assessment Area		New York MD	
Low	547,767	31.4%	722,655	26.6%
Moderate	279,833	16.1%	400,173	14.7%
Middle	273,129	15.7%	416,822	15.3%
Upper	641,796	36.8%	1,177,925	43.3%
TOTAL	1,742,525	100%	2,717,575	100%

As shown in the previous table, 47.5 percent of families in the assessment area were considered LMI, which is higher than the LMI family percentage of 41.3 percent for the entire New York MD. Additionally, 18.0 percent of assessment area families were living below the poverty threshold, which is higher than the overall percentage of New York MD families below the poverty level, 14.9 percent. Therefore, based on these data points, the assessment area is broadly less affluent than the New York MD in its entirety.

Housing Demographics

The following table displays housing demographics for the assessment area and the state of New York.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (Monthly)
Assessment Area	\$509,522	10.3%	\$1,259
New York MD	\$461,711	12.9%	\$1,261

Although there are significant differences in each of the four counties that make up the assessment area, generally, housing in the assessment area appears to be less affordable than in the New York MD overall. The median housing value for the assessment area was \$509,552, which is well above the figure for the New York MD (\$461,711). However, the substantial difference in housing value is not seen in the median gross rent average, which is nearly identical. Additionally, in each of the four counties, the affordability ratio is less than the New York MD, pointing to increased financial hurdles facing prospective homebuyers in the assessment area. Lastly, housing stock within the assessment area consists of 63.8 percent rental units, compared to 56.0 percent in the New York MD, limiting the availability of homes for purchase relative to the New York MD.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. County business patterns indicate that there are 3,643,498 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are healthcare and social assistance (22.0 percent); professional and technical services (11.5 percent); and finance and insurance (9.1 percent). The table below details unemployment data from the U.S. Department of Labor, BLS (not seasonally adjusted) for the counties in the assessment area compared to the New York MD as a whole.

Unemployment Levels for the Assessment Area		
Dataset	Time Period (Annual Average)	
	2020	2021
Assessment Area	12.5%	9.9%
New York MD	11.5	8.7%

As shown in the table above, the unemployment level for the assessment area overall is higher than statewide unemployment levels over the period. Within the assessment area, Bronx County had the highest level of unemployment for both years. The remaining three counties were similar to the New York MD average; however, New York County was the sole county to experience unemployment figures below the New York MD average.

Community Contact Information

Information from two community contact interviews was used to help shape the performance context in which the bank’s activities in the assessment area were evaluated. Of the interviews one was with an individual specializing in affordable housing projects and advocacy for LMI individuals, and the other interview was with an organization that specializes in funding of

community projects. Both contacts stated that there is a need for additional affordable housing. Contacts described shortage of affordable housing and rental options due to zoning issues in metropolitan areas and limited subsidies. Furthermore, contacts stated that while housing has always been hard for residents to afford, recent rising interest rates have exacerbated the issue.

Both contacts stated there were several community development opportunities to address significant needs in the assessment area. These include:

- Additional mortgage loan programs aimed at LMI individuals to help them qualify for and afford housing.
- Additional work with local community organizations to help match LMI homebuyers with community organizations that can provide gap financing.
- Additional homebuyer counseling and seminars for people of all ages and income levels to help them understand resources available to them.
- Employing bilingual employees to help communicate and reach residents of different ethnicities.
- Additional outreach and work with local community development organizations to improve the community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

LENDING TEST

The bank's Lending Test performance in the state of New York is rated low satisfactory. While lending levels reflect poor responsiveness to assessment area credit needs, the bank is a leader in making community development loans in the assessment area.

Lending Activity

Summary of Lending Activity January 1, 2020 through December 31, 2021				
Loan Type	#	%	\$(000s)	%
Home Improvement	0	0.0%	0	0.0%
Home Purchase	0	0.0%	0	0.0%
Multifamily Housing	0	0.0%	0	0.0%
Refinancing	0	0.0%	0	0.0%
Total HMDA	0	0.0%	0	0.0%
Small Business	13	100.0%	742	100.0%
Small Farm	0	0.0%	0	0.0%
TOTAL LOANS	13	100%	742	100%

Based on the loan products analyzed under the Lending Test, the bank's lending levels reflect poor responsiveness to home mortgage loan and small business credit needs in this assessment area. The bank did not make any HMDA loans in the assessment area in either 2020 or 2021 and originated only 13 small business loans in the assessment area totaling \$742,000 across those same two years.

Geographic and Borrower Distribution

Due to a lack of HMDA and CRA loan activity during the review period, meaningful analyses by geographic and borrower's profile distribution were unable to be completed.

Community Development Lending Activities

The bank was a leader in making community development loans in the New York assessment area. During the review period, the bank originated four community development loans totaling \$184.5 million. Highlights from this loan activity include three very large loans to construct multifamily, affordable housing developments that also supported revitalization/stabilization efforts in LMI areas through the presence of retail spaces located within the multiuse buildings.

INVESTMENT TEST

Overall, the bank's performance under the Investment Test for New York is rated outstanding. The bank makes an excellent level of community development investments and grants in the New York assessment area and is often in a leadership position. During the review period, the bank made 15 investments totaling \$20.6 million in MBS supporting affordable housing, a noted need in the assessment area according to community contact interviews. The bank also had prior-period investments still outstanding in two MBS funds that totaled \$530,888. Finally, the bank made numerous donations to community development organizations serving the New York assessment area. Donations totaled \$444,241 and were made to ten different organizations providing community services for the benefit of the LMI population.

SERVICE TEST

The bank's Service Test in the state of New York is rated low satisfactory. The bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels in the New York assessment area, and the bank's record of opening and closing branch offices has not adversely affected accessibility of its delivery systems, particularly to LMI individuals. The hours and services for the bank's sole branch vary in a way that inconveniences the assessment area, due to the limited services provided at the branch that specializes in large business customers. Lastly, the bank provides an adequate level of community development services within this assessment area.

Accessibility of Delivery Systems

The bank operates one branch and one LPO (both in the same building) in the New York assessment area. While these offices are located in a census tract having an "unknown income" level, they are near geographies with various income levels, including LMI census tracts. Based on its branch structure and other service delivery systems, the bank's service delivery systems are reasonably accessible to geographies of different income levels.

Changes in Branch Locations

The bank's record of opening and closing branches in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and individuals, as no branches have been opened or closed during the review period.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services for the bank's only branch in this state vary from the rest of the bank's service/product delivery systems in a way that inconveniences the New York assessment area, particularly LMI individuals. As previously mentioned, the bank only offers products and services in this assessment that are tailored to the needs of large commercial customers. Consequently, customers in this assessment area cannot obtain home mortgage loans or small business loans that are offered throughout the bank's network of delivery systems in other states.

Community Development Services

The bank provides an adequate level of community development services in the New York assessment area. During the review period, bank employees provided five community development services to four different organizations in the assessment area, totaling 14 hours. Organizations supported by these efforts provide assistance to the homeless and helped teach financial literacy in schools with predominantly LMI students.

SCOPE OF EXAMINATION TABLES

Scope of Examination		
TIME PERIOD REVIEWED	January 1, 2020 to December 31, 2021 for HMDA, small business, and small farm lending September 11, 2018 to December 31, 2022 for community development loans, investment, and service activities	
FINANCIAL INSTITUTION Centennial Bank Conway, Arkansas	PRODUCTS REVIEWED HMDA Small Business Small Farm	
AFFILIATE(S) N/A	AFFILIATE RELATIONSHIP N/A	PRODUCTS REVIEWED N/A

Assessment Area – Examination Scope Details					
Assessment Area	Rated Area	# of Offices	Deposits (\$ 000s) (as of June 30, 2021)	Branches Visited	CRA Review Procedures
Miami MSA	Florida	17	\$2,891,977	-	Full Scope
Tampa MSA	Florida	10	\$816,895	-	Full Scope
Orlando MSA	Florida	5	\$207,594	-	Full Scope
North Florida NonMSA	Florida	8	\$590,404	-	Full Scope
Naples CSA	Florida	4	\$474,094	-	Full Scope
Sarasota CSA	Florida	5	\$730,695	-	Limited Scope
Key West NonMSA	Florida	8	\$854,148	-	Limited Scope
Panama City MSA	Florida	5	\$295,013	-	Limited Scope
Destin MSA	Florida	2	\$149,958	-	Limited Scope
Tallahassee MSA	Florida	8	\$743,004	-	Limited Scope
Pensacola MSA	Florida	3	\$182,405	-	Limited Scope
Lakeland MSA	Florida	2	\$46,204	-	Limited Scope
Little Rock MSA	Arkansas	32	\$2,736,956	1	Full Scope
North Central Arkansas NonMSA	Arkansas	21	\$1,051,789	-	Full Scope
Fayetteville MSA	Arkansas	8	\$455,560	-	Full Scope
Fort Smith MSA	Arkansas	3	\$94,110	-	Limited Scope
Jonesboro MSA	Arkansas	7	\$905,617	-	Limited Scope
Northeast Arkansas NonMSA	Arkansas	4	\$113,737	-	Limited Scope
Daphne MSA	Alabama	5	\$648,353	-	Full Scope
New York MSA	New York	1	\$119,529	-	Full Scope
OVERALL		158	\$14,108,042	-	10 Full Scope

SUMMARY OF STATE AND MULTISTATE METROPOLITAN AREA RATINGS

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Florida	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Arkansas	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Alabama	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
New York	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area for large banks. Summing the points from the Lending, Investment, and Service Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC's Interagency Large Institution CRA Examination Procedures.

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Florida	9	4	3	16	Satisfactory
Arkansas	9	3	3	15	Satisfactory
Alabama	9	4	4	17	Satisfactory
New York	6	6	3	15	Satisfactory

LENDING PERFORMANCE TABLES BY FULL-SCOPE ASSESSMENT AREA

FLORIDA

Miami MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	23.1%	2.4%	0.9%
Moderate	6	13.3%	1,205	4.7%	17.0%	12.8%	7.4%
Middle	5	11.1%	1,118	4.4%	17.7%	21.4%	16.5%
Upper	31	68.9%	21,235	83.6%	42.2%	50.6%	62.3%
Unknown	3	6.7%	1,843	7.3%	0.0%	12.8%	12.9%
TOTAL	45	100.0%	25,401	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	4	3.4%	309	0.8%	23.1%	2.1%	1.0%
Moderate	9	7.6%	1,424	3.8%	17.0%	8.4%	4.8%
Middle	23	19.3%	5,329	14.2%	17.7%	16.9%	12.5%
Upper	81	68.1%	30,164	80.3%	42.2%	54.5%	62.8%
Unknown	2	1.7%	353	0.9%	0.0%	18.1%	18.9%
TOTAL	119	100.0%	37,579	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	23.1%	3.4%	1.6%
Moderate	0	0.0%	0	0.0%	17.0%	9.8%	5.5%
Middle	0	0.0%	0	0.0%	17.7%	15.4%	10.2%
Upper	0	0.0%	0	0.0%	42.2%	67.6%	76.5%
Unknown	0	0.0%	0	0.0%	0.0%	3.8%	6.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	23.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	17.7%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	42.2%	1.6%	0.2%
Unknown	5	100.0%	14,268	100.0%	0.0%	98.4%	99.8%
TOTAL	5	100.0%	14,268	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	4	2.3%	309	0.4%	23.1%	2.2%	0.9%
Moderate	16	9.4%	2,779	3.6%	17.0%	10.1%	5.7%
Middle	28	16.4%	6,447	8.3%	17.7%	18.2%	13.3%
Upper	113	66.1%	51,909	66.6%	42.2%	51.9%	59.7%
Unknown	10	5.8%	16,464	21.1%	0.0%	17.6%	20.3%
TOTAL	171	100.0%	77,908	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	23.1%	2.0%	0.7%
Moderate	3	4.8%	852	1.6%	17.0%	9.8%	4.9%
Middle	6	9.7%	1,147	2.1%	17.7%	18.7%	12.7%
Upper	52	83.9%	46,672	86.9%	42.2%	52.7%	63.9%
Unknown	1	1.6%	5,017	9.3%	0.0%	16.9%	17.8%
TOTAL	62	100.0%	53,688	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	23.1%	2.4%	1.2%
Moderate	11	17.5%	2,161	7.8%	17.0%	9.8%	5.5%
Middle	7	11.1%	1,737	6.3%	17.7%	18.1%	13.1%
Upper	44	69.8%	23,516	85.0%	42.2%	51.3%	61.3%
Unknown	1	1.6%	256	0.9%	0.0%	18.4%	19.0%
TOTAL	63	100.0%	27,670	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	23.1%	2.7%	1.6%
Moderate	0	0.0%	0	0.0%	17.0%	6.9%	3.6%
Middle	0	0.0%	0	0.0%	17.7%	14.4%	9.2%
Upper	3	100.0%	1,239	100.0%	42.2%	71.8%	79.6%
Unknown	0	0.0%	0	0.0%	0.0%	4.2%	5.9%
TOTAL	3	100.0%	1,239	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	23.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	17.7%	0.2%	0.0%
Upper	0	0.0%	0	0.0%	42.2%	0.2%	0.0%
Unknown	5	100.0%	61,882	100.0%	0.0%	99.6%	100.0%
TOTAL	5	100.0%	61,882	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	0	0.0%	0	0.0%	23.1%	2.3%	0.9%
Moderate	14	10.5%	3,013	2.1%	17.0%	9.6%	4.7%
Middle	13	9.8%	2,884	2.0%	17.7%	18.0%	11.7%
Upper	99	74.4%	71,427	49.4%	42.2%	52.4%	59.8%
Unknown	7	5.3%	67,155	46.5%	0.0%	17.7%	23.0%
TOTAL	133	100.0%	144,479	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	52	3.2%	39.7%	\$6,918	4.2%	23.2%	93.5%
	Over \$1 Million/ Unknown	1579	96.8%	60.3%	\$157,138	95.8%	76.8%	6.5%
	TOTAL	1631	100.0%	100.0%	\$164,056	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1166	71.5%	91.6%	\$36,332	22.1%	41.5%	
	\$100,001–\$250,000	278	17.0%	5.3%	\$43,551	26.5%	20.6%	
	\$250,001–\$1 Million	187	11.5%	3.2%	\$84,173	51.3%	37.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1631	100.0%	100.0%	\$164,056	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	36	69.2%		\$1,194	17.3%		
	\$100,001–\$250,000	5	9.6%		\$729	10.5%		
	\$250,001–\$1 Million	11	21.2%		\$4,995	72.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	52	100.0%		\$6,918	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	153	16.5%	42.9%	\$15,805	14.0%	24.1%	93.6%
	Over \$1 Million/ Unknown	775	83.5%	57.1%	\$96,822	86.0%	75.9%	6.4%
	TOTAL	928	100.0%	100.0%	\$112,627	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	608	65.5%	94.7%	\$20,210	17.9%	47.5%	
	\$100,001–\$250,000	188	20.3%	3.4%	\$30,551	27.1%	18.4%	
	\$250,001–\$1 Million	132	14.2%	2.0%	\$61,866	54.9%	34.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	928	100.0%	100.0%	\$112,627	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	119	77.8%		\$2,510	15.9%		
	\$100,001–\$250,000	8	5.2%		\$1,527	9.7%		
	\$250,001–\$1 Million	26	17.0%		\$11,768	74.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	153	100.0%		\$15,805	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	3	6.7%	821	3.2%	2.6%	2.6%	1.6%
Moderate	6	13.3%	3,243	12.8%	23.2%	21.9%	15.7%
Middle	12	26.7%	4,940	19.4%	32.9%	33.4%	27.7%
Upper	24	53.3%	16,397	64.6%	41.2%	41.8%	54.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.4%	0.7%
TOTAL	45	100.0%	25,401	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	1.7%	499	1.3%	2.6%	1.3%	0.9%
Moderate	17	14.3%	3,736	9.9%	23.2%	14.8%	10.9%
Middle	34	28.6%	9,046	24.1%	32.9%	32.1%	26.7%
Upper	66	55.5%	24,298	64.7%	41.2%	51.6%	60.9%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.7%
TOTAL	119	100.0%	37,579	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.6%	1.1%	0.8%
Moderate	0	0.0%	0	0.0%	23.2%	12.7%	8.0%
Middle	0	0.0%	0	0.0%	32.9%	28.9%	22.0%
Upper	0	0.0%	0	0.0%	41.2%	57.1%	69.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		6.7%	18.7%
Moderate	3	60.0%	2,148	15.1%	31.3%	40.1%	35.8%
Middle	0	0.0%	0	0.0%	29.7%	23.0%	28.1%
Upper	2	40.0%	12,120	84.9%	31.7%	17.3%	25.0%
Unknown	0	0.0%	0	0.0%	0.6%	0.8%	0.2%
TOTAL	5	100.0%	14,268	100.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	5	3.0%	1,320	1.7%	2.6%	1.9%	1.5%
Moderate	26	15.4%	9,127	11.8%	23.2%	18.0%	13.9%
Middle	46	27.2%	13,986	18.1%	32.9%	32.7%	26.8%
Upper	92	54.4%	52,815	68.4%	41.2%	47.1%	56.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.3%	0.9%
TOTAL	169	100.0%	77,248	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	2.6%	2.7%	1.7%
Moderate	9	14.5%	3,392	6.3%	23.2%	21.9%	14.6%
Middle	13	21.0%	6,682	12.4%	32.9%	32.6%	25.7%
Upper	39	62.9%	43,019	80.1%	41.2%	42.2%	56.8%
Unknown	1	1.6%	595	1.1%	0.2%	0.6%	1.1%
TOTAL	62	100.0%	53,688	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.6%	135	0.5%	2.6%	1.5%	1.0%
Moderate	9	14.3%	2,006	7.2%	23.2%	17.1%	12.2%
Middle	13	20.6%	3,425	12.4%	32.9%	32.8%	26.7%
Upper	40	63.5%	22,104	79.9%	41.2%	48.3%	59.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.3%	0.6%
TOTAL	63	100.0%	27,670	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.6%	1.4%	1.0%
Moderate	1	33.3%	311	25.1%	23.2%	11.7%	8.1%
Middle	1	33.3%	380	30.7%	32.9%	27.9%	21.2%
Upper	1	33.3%	548	44.2%	41.2%	58.9%	69.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.6%
TOTAL	3	100.0%	1,239	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	6.7%	16.5%	6.1%
Moderate	3	60.0%	56,557	91.4%	31.3%	46.9%	41.9%
Middle	1	20.0%	450	0.7%	29.7%	20.8%	27.3%
Upper	1	20.0%	4,875	7.9%	31.7%	15.6%	24.7%
Unknown	0	0.0%	0	0.0%	0.6%	0.2%	0.0%
TOTAL	5	100.0%	61,882	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	0.8%	135	0.1%	2.6%	2.1%	1.6%
Moderate	22	16.5%	62,266	43.1%	23.2%	19.1%	14.6%
Middle	28	21.1%	10,937	7.6%	32.9%	32.4%	25.5%
Upper	81	60.9%	70,546	48.8%	41.2%	46.0%	57.4%
Unknown	1	0.8%	595	0.4%	0.2%	0.4%	1.0%
TOTAL	133	100.0%	144,479	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	137	8.4%	\$22,322	13.6%	4.5%	4.6%	6.0%
Moderate	340	20.8%	\$39,521	24.1%	22.8%	22.2%	23.3%
Middle	438	26.9%	\$40,163	24.5%	28.7%	27.2%	24.6%
Upper	707	43.3%	\$60,642	37.0%	42.9%	44.5%	43.8%
Unknown	9	0.6%	\$1,408	0.9%	1.2%	1.5%	2.3%
TOTAL	1,631	100.0%	\$164,056	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	80	8.6%	\$12,279	10.9%	4.5%	4.4%	5.7%
Moderate	202	21.8%	\$27,260	24.2%	22.9%	23.4%	23.8%
Middle	217	23.4%	\$26,153	23.2%	28.8%	28.5%	25.6%
Upper	420	45.3%	\$45,058	40.0%	42.6%	42.3%	42.8%
Unknown	9	1.0%	\$1,877	1.7%	1.2%	1.4%	2.1%
TOTAL	928	100.0%	\$112,627	100.0%	100.0%	100.0%	100.0%

Tampa MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	1	2.0%	207	1.2%	21.6%	4.1%	2.0%
Moderate	4	8.0%	606	3.4%	17.9%	18.9%	13.1%
Middle	10	20.0%	2,650	14.9%	19.1%	22.7%	19.6%
Upper	32	64.0%	13,895	78.1%	41.4%	41.8%	53.6%
Unknown	3	6.0%	429	2.4%	0.0%	12.5%	11.6%
TOTAL	50	100.0%	17,787	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	6.9%	468	2.3%	21.6%	3.4%	1.5%
Moderate	12	16.7%	1,946	9.7%	17.9%	10.8%	6.6%
Middle	9	12.5%	1,513	7.5%	19.1%	16.5%	12.7%
Upper	43	59.7%	15,044	74.8%	41.4%	42.7%	50.0%
Unknown	3	4.2%	1,145	5.7%	0.0%	26.6%	29.1%
TOTAL	72	100.0%	20,116	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.6%	5.8%	3.4%
Moderate	0	0.0%	0	0.0%	17.9%	15.2%	10.6%
Middle	0	0.0%	0	0.0%	19.1%	20.7%	17.1%
Upper	2	100.0%	1,000	100.0%	41.4%	54.5%	64.7%
Unknown	0	0.0%	0	0.0%	0.0%	3.9%	4.1%
TOTAL	2	100.0%	1,000	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.6%	0.5%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.1%	0.5%	0.0%
Upper	0	0.0%	0	0.0%	41.4%	4.4%	0.4%
Unknown	3	100.0%	3,080	100.0%	0.0%	94.5%	99.5%
TOTAL	3	100.0%	3,080	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	6	4.7%	675	1.6%	21.6%	3.8%	1.7%
Moderate	16	12.4%	2,552	6.0%	17.9%	14.5%	9.5%
Middle	19	14.7%	4,163	9.8%	19.1%	19.2%	15.5%
Upper	79	61.2%	30,512	71.7%	41.4%	42.0%	50.1%
Unknown	9	7.0%	4,654	10.9%	0.0%	20.4%	23.2%
TOTAL	129	100.0%	42,556	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	1	2.2%	77	0.5%	21.6%	3.8%	1.9%
Moderate	6	13.0%	1,122	7.4%	17.9%	16.2%	10.9%
Middle	9	19.6%	2,361	15.6%	19.1%	21.3%	18.1%
Upper	30	65.2%	11,576	76.5%	41.4%	43.2%	54.3%
Unknown	0	0.0%	0	0.0%	0.0%	15.5%	14.9%
TOTAL	46	100.0%	15,136	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	5.6%	278	1.7%	21.6%	5.0%	2.5%
Moderate	8	14.8%	1,593	9.5%	17.9%	14.7%	9.8%
Middle	9	16.7%	1,833	10.9%	19.1%	19.4%	16.1%
Upper	32	59.3%	12,061	71.8%	41.4%	39.3%	48.8%
Unknown	2	3.7%	1,044	6.2%	0.0%	21.6%	22.6%
TOTAL	54	100.0%	16,809	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.6%	6.0%	3.2%
Moderate	0	0.0%	0	0.0%	17.9%	14.9%	9.9%
Middle	1	50.0%	125	55.6%	19.1%	20.7%	16.5%
Upper	1	50.0%	100	44.4%	41.4%	55.8%	67.0%
Unknown	0	0.0%	0	0.0%	0.0%	2.5%	3.5%
TOTAL	2	100.0%	225	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.1%	0.0%	0.0%
Upper	1	50.0%	292	26.7%	41.4%	1.3%	0.0%
Unknown	1	50.0%	800	73.3%	0.0%	98.7%	100.0%
TOTAL	2	100.0%	1,092	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	4	3.8%	355	1.1%	21.6%	4.5%	2.1%
Moderate	14	13.5%	2,715	8.2%	17.9%	15.2%	9.7%
Middle	19	18.3%	4,319	13.0%	19.1%	20.1%	16.0%
Upper	64	61.5%	24,029	72.2%	41.4%	41.7%	49.0%
Unknown	3	2.9%	1,844	5.5%	0.0%	18.4%	23.2%
TOTAL	104	100.0%	33,262	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	66	9.1%	42.4%	\$7,872	13.4%	25.4%	93.9%
	Over \$1 Million/ Unknown	657	90.9%	57.6%	\$50,839	86.6%	74.6%	6.1%
	TOTAL	723	100.0%	100.0%	\$58,711	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	562	77.7%	90.4%	\$18,632	31.7%	37.0%	
	\$100,001–\$250,000	109	15.1%	5.7%	\$16,915	28.8%	20.2%	
	\$250,001–\$1 Million	52	7.2%	3.9%	\$23,164	39.5%	42.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	723	100.0%	100.0%	\$58,711	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	49	74.2%		\$1,838	23.3%		
	\$100,001–\$250,000	7	10.6%		\$1,224	15.5%		
	\$250,001–\$1 Million	10	15.2%		\$4,810	61.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	66	100.0%		\$7,872	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	91	24.7%	46.7%	\$13,343	30.0%	28.5%	94.0%
	Over \$1 Million/ Unknown	278	75.3%	53.3%	\$31,125	70.0%	71.5%	6.0%
	TOTAL	369	100.0%	100.0%	\$44,468	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	252	68.3%	94.1%	\$9,161	20.6%	41.8%	
	\$100,001–\$250,000	66	17.9%	3.3%	\$10,821	24.3%	17.0%	
	\$250,001–\$1 Million	51	13.8%	2.5%	\$24,486	55.1%	41.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	369	100.0%	100.0%	\$44,468	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	60	65.9%		\$1,794	13.4%		
	\$100,001–\$250,000	13	14.3%		\$2,341	17.5%		
	\$250,001–\$1 Million	18	19.8%		\$9,208	69.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	91	100.0%		\$13,343	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	1	2.0%	340	1.9%	1.9%	2.1%	1.6%
Moderate	8	16.0%	1,595	9.0%	21.9%	19.4%	14.3%
Middle	20	40.0%	4,704	26.4%	39.7%	37.7%	33.7%
Upper	21	42.0%	11,148	62.7%	36.5%	40.7%	50.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	50	100.0%	17,787	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.4%	97	0.5%	1.9%	1.1%	0.8%
Moderate	5	6.9%	743	3.7%	21.9%	12.5%	8.9%
Middle	29	40.3%	6,792	33.8%	39.7%	36.1%	30.7%
Upper	37	51.4%	12,484	62.1%	36.5%	50.3%	59.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	72	100.0%	20,116	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.9%	1.2%	0.8%
Moderate	0	0.0%	0	0.0%	21.9%	14.3%	10.1%
Middle	0	0.0%	0	0.0%	39.7%	36.7%	32.2%
Upper	2	100.0%	1,000	100.0%	36.5%	47.8%	56.8%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.1%
TOTAL	2	100.0%	1,000	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	1	33.3%	2,300	74.7%		6.8%	18.7%
Moderate	2	66.7%	780	25.3%	22.7%	30.2%	23.3%
Middle	0	0.0%	0	0.0%	40.8%	33.0%	39.4%
Upper	0	0.0%	0	0.0%	29.3%	18.1%	25.1%
Unknown	0	0.0%	0	0.0%	0.5%	0.0%	0.0%
TOTAL	3	100.0%	3,080	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	3	2.4%	2,737	6.5%	1.9%	1.6%	1.5%
Moderate	15	11.8%	3,118	7.4%	21.9%	16.0%	12.0%
Middle	49	38.6%	11,496	27.4%	39.7%	36.9%	32.4%
Upper	60	47.2%	24,632	58.7%	36.5%	45.5%	54.1%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	127	100.0%	41,983	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	1.9%	2.3%	1.8%
Moderate	4	8.7%	928	6.1%	21.9%	20.7%	15.5%
Middle	27	58.7%	7,785	51.4%	39.7%	38.2%	34.1%
Upper	15	32.6%	6,423	42.4%	36.5%	38.8%	48.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	46	100.0%	15,136	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.9%	1.4%	1.1%
Moderate	8	14.8%	2,136	12.7%	21.9%	15.0%	11.0%
Middle	19	35.2%	4,954	29.5%	39.7%	37.1%	32.3%
Upper	27	50.0%	9,719	57.8%	36.5%	46.4%	55.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	54	100.0%	16,809	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.9%	1.1%	0.9%
Moderate	0	0.0%	0	0.0%	21.9%	14.2%	10.9%
Middle	2	100.0%	225	100.0%	39.7%	36.0%	30.8%
Upper	0	0.0%	0	0.0%	36.5%	48.7%	57.4%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	2	100.0%	225	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	6.8%	16.7%	10.4%
Moderate	1	50.0%	800	73.3%	22.7%	33.5%	12.6%
Middle	1	50.0%	292	26.7%	40.8%	32.6%	17.6%
Upper	0	0.0%	0	0.0%	29.3%	17.2%	59.4%
Unknown	0	0.0%	0	0.0%	0.5%	0.0%	0.0%
TOTAL	2	100.0%	1,092	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	1.9%	1.8%	1.9%
Moderate	13	12.5%	3,864	11.6%	21.9%	17.5%	13.2%
Middle	49	47.1%	13,256	39.9%	39.7%	37.5%	32.2%
Upper	42	40.4%	16,142	48.5%	36.5%	43.2%	52.6%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	104	100.0%	33,262	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	29	4.0%	\$3,346	5.7%	4.1%	4.7%	6.6%
Moderate	163	22.5%	\$13,176	22.4%	21.7%	20.3%	20.9%
Middle	274	37.9%	\$24,248	41.3%	35.5%	34.3%	35.8%
Upper	256	35.4%	\$17,870	30.4%	38.4%	40.2%	36.1%
Unknown	1	0.1%	\$71	0.1%	0.3%	0.5%	0.6%
TOTAL	723	100.0%	\$58,711	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	21	5.7%	\$2,915	6.6%	4.1%	4.5%	6.6%
Moderate	94	25.5%	\$12,353	27.8%	21.7%	20.4%	21.5%
Middle	129	35.0%	\$14,998	33.7%	35.3%	34.4%	35.3%
Upper	125	33.9%	\$14,202	31.9%	38.6%	40.1%	36.2%
Unknown	0	0.0%	\$0	0.0%	0.3%	0.6%	0.4%
TOTAL	369	100.0%	\$44,468	100.0%	100.0%	100.0%	100.0%

Orlando MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	1.0%	200	0.3%	21.5%	3.1%	1.6%
Moderate	8	4.1%	1,137	2.0%	18.1%	16.3%	11.7%
Middle	19	9.7%	4,031	7.0%	19.2%	24.0%	21.5%
Upper	164	84.1%	51,557	90.1%	41.2%	44.3%	53.9%
Unknown	2	1.0%	299	0.5%	0.0%	12.3%	11.2%
TOTAL	195	100.0%	57,224	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	2.1%	181	1.5%	21.5%	3.0%	1.5%
Moderate	9	19.1%	1,329	11.0%	18.1%	10.5%	7.1%
Middle	4	8.5%	940	7.8%	19.2%	17.6%	14.5%
Upper	29	61.7%	8,647	71.6%	41.2%	45.7%	52.7%
Unknown	4	8.5%	973	8.1%	0.0%	23.2%	24.3%
TOTAL	47	100.0%	12,070	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.5%	4.7%	2.5%
Moderate	0	0.0%	0	0.0%	18.1%	12.0%	8.7%
Middle	0	0.0%	0	0.0%	19.2%	18.4%	14.7%
Upper	0	0.0%	0	0.0%	41.2%	62.0%	71.1%
Unknown	0	0.0%	0	0.0%	0.0%	2.9%	3.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.5%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.1%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.2%	1.6%	0.1%
Upper	0	0.0%	0	0.0%	41.2%	0.8%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	97.6%	99.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	3	1.2%	381	0.5%	21.5%	3.1%	1.5%
Moderate	17	7.0%	2,466	3.6%	18.1%	12.8%	8.7%
Middle	23	9.5%	4,971	7.2%	19.2%	20.1%	16.7%
Upper	193	79.8%	60,204	86.9%	41.2%	44.5%	50.1%
Unknown	6	2.5%	1,272	1.8%	0.0%	19.5%	22.9%
TOTAL	242	100.0%	69,294	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	2.1%	411	1.1%	21.5%	2.8%	1.4%
Moderate	11	11.3%	1,850	5.0%	18.1%	13.5%	9.2%
Middle	18	18.6%	4,691	12.7%	19.2%	21.0%	18.3%
Upper	60	61.9%	29,069	78.5%	41.2%	45.4%	54.7%
Unknown	6	6.2%	1,005	2.7%	0.0%	17.3%	16.4%
TOTAL	97	100.0%	37,026	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.5%	4.3%	2.2%
Moderate	6	18.2%	1,152	8.7%	18.1%	13.6%	9.5%
Middle	4	12.1%	1,191	9.0%	19.2%	19.5%	16.5%
Upper	23	69.7%	10,835	82.2%	41.2%	41.1%	49.7%
Unknown	0	0.0%	0	0.0%	0.0%	21.5%	22.1%
TOTAL	33	100.0%	13,178	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.5%	3.7%	2.2%
Moderate	0	0.0%	0	0.0%	18.1%	11.3%	8.5%
Middle	0	0.0%	0	0.0%	19.2%	18.8%	14.6%
Upper	0	0.0%	0	0.0%	41.2%	62.9%	70.8%
Unknown	0	0.0%	0	0.0%	0.0%	3.3%	3.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.5%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.1%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.2%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	41.2%	1.4%	0.0%
Unknown	2	100.0%	71,590	100.0%	0.0%	98.6%	100.0%
TOTAL	2	100.0%	71,590	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	2	1.5%	411	0.3%	21.5%	3.6%	1.7%
Moderate	17	12.9%	3,002	2.5%	18.1%	13.4%	8.9%
Middle	22	16.7%	5,882	4.8%	19.2%	20.0%	16.6%
Upper	83	62.9%	39,904	32.8%	41.2%	43.6%	50.4%
Unknown	8	6.1%	72,595	59.6%	0.0%	19.4%	22.5%
TOTAL	132	100.0%	121,794	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	22	10.2%	41.9%	\$2,376	11.9%	25.1%	94.5%
	Over \$1 Million/ Unknown	193	89.8%	58.1%	\$17,649	88.1%	74.9%	5.5%
	TOTAL	215	100.0%	100.0%	\$20,025	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	161	74.9%	90.9%	\$4,951	24.7%	38.7%	
	\$100,001–\$250,000	33	15.3%	5.6%	\$5,311	26.5%	21.3%	
	\$250,001–\$1 Million	21	9.8%	3.5%	\$9,763	48.8%	40.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	215	100.0%	100.0%	\$20,025	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	15	68.2%		\$379	16.0%		
	\$100,001–\$250,000	4	18.2%		\$726	30.6%		
	\$250,001–\$1 Million	3	13.6%		\$1,271	53.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	22	100.0%		\$2,376	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	26	21.8%	45.3%	\$1,795	10.8%	26.6%	94.6%
	Over \$1 Million/ Unknown	93	78.2%	54.7%	\$14,787	89.2%	73.4%	5.4%
	TOTAL	119	100.0%	100.0%	\$16,582	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	75	63.0%	94.8%	\$2,753	16.6%	45.7%	
	\$100,001–\$250,000	27	22.7%	3.2%	\$4,649	28.0%	17.8%	
	\$250,001–\$1 Million	17	14.3%	2.1%	\$9,180	55.4%	36.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	119	100.0%	100.0%	\$16,582	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	23	88.5%		\$567	31.6%		
	\$100,001–\$250,000	2	7.7%		\$470	26.2%		
	\$250,001–\$1 Million	1	3.8%		\$758	42.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	26	100.0%		\$1,795	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	1.0%	435	0.8%	1.0%	1.1%	0.9%
Moderate	26	13.3%	6,090	10.6%	21.1%	17.7%	13.3%
Middle	114	58.5%	31,922	55.8%	39.1%	42.8%	39.9%
Upper	52	26.7%	18,321	32.0%	38.8%	38.3%	45.9%
Unknown	1	0.5%	456	0.8%	0.0%	0.0%	0.1%
TOTAL	195	100.0%	57,224	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.0%	0.6%	0.5%
Moderate	6	12.8%	1,156	9.6%	21.1%	12.8%	9.6%
Middle	20	42.6%	4,817	39.9%	39.1%	37.9%	34.5%
Upper	21	44.7%	6,097	50.5%	38.8%	48.7%	55.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	47	100.0%	12,070	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.0%	0.6%	0.4%
Moderate	0	0.0%	0	0.0%	21.1%	11.7%	9.3%
Middle	0	0.0%	0	0.0%	39.1%	33.3%	28.2%
Upper	0	0.0%	0	0.0%	38.8%	54.3%	62.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		6.2%	8.1%
Moderate	0	0.0%	0	0.0%	37.3%	55.6%	49.2%
Middle	0	0.0%	0	0.0%	35.8%	21.0%	20.5%
Upper	0	0.0%	0	0.0%	20.8%	15.3%	20.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	2	0.8%	435	0.6%	1.0%	0.8%	1.2%
Moderate	32	13.2%	7,246	10.5%	21.1%	15.4%	13.5%
Middle	134	55.4%	36,739	53.0%	39.1%	40.0%	36.2%
Upper	73	30.2%	24,418	35.2%	38.8%	43.7%	49.1%
Unknown	1	0.4%	456	0.7%	0.0%	0.0%	0.0%
TOTAL	242	100.0%	69,294	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	1.0%	1.0%	0.7%
Moderate	15	15.5%	4,065	11.0%	21.1%	18.6%	14.2%
Middle	47	48.5%	14,081	38.0%	39.1%	42.5%	39.5%
Upper	33	34.0%	18,210	49.2%	38.8%	37.9%	45.5%
Unknown	2	2.1%	670	1.8%	0.0%	0.0%	0.0%
TOTAL	97	100.0%	37,026	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.0%	0.7%	0.6%
Moderate	7	21.2%	1,843	14.0%	21.1%	15.0%	11.0%
Middle	12	36.4%	3,795	28.8%	39.1%	40.0%	36.6%
Upper	13	39.4%	7,040	53.4%	38.8%	44.3%	51.8%
Unknown	1	3.0%	500	3.8%	0.0%	0.0%	0.0%
TOTAL	33	100.0%	13,178	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.0%	0.6%	0.3%
Moderate	0	0.0%	0	0.0%	21.1%	10.5%	8.6%
Middle	0	0.0%	0	0.0%	39.1%	32.6%	29.4%
Upper	0	0.0%	0	0.0%	38.8%	56.3%	61.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	6.2%	7.9%	4.4%
Moderate	1	50.0%	2,976	4.2%	37.3%	51.4%	45.5%
Middle	0	0.0%	0	0.0%	35.8%	27.1%	27.2%
Upper	1	50.0%	68,614	95.8%	20.8%	13.6%	22.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	71,590	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	1.0%	0.9%	0.8%
Moderate	23	17.4%	8,884	7.3%	21.1%	16.6%	14.1%
Middle	59	44.7%	17,876	14.7%	39.1%	40.9%	37.5%
Upper	47	35.6%	93,864	77.1%	38.8%	41.7%	47.6%
Unknown	3	2.3%	1,170	1.0%	0.0%	0.0%	0.0%
TOTAL	132	100.0%	121,794	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	3	1.4%	\$620	3.1%	1.6%	1.4%	1.4%
Moderate	79	36.7%	\$7,322	36.6%	26.2%	24.8%	29.2%
Middle	75	34.9%	\$6,390	31.9%	34.7%	34.3%	33.7%
Upper	58	27.0%	\$5,693	28.4%	37.4%	39.1%	35.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.3%
TOTAL	215	100.0%	\$20,025	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	1.6%	1.8%	1.7%
Moderate	44	37.0%	\$6,754	40.7%	26.5%	24.8%	27.8%
Middle	40	33.6%	\$7,025	42.4%	34.7%	35.4%	34.3%
Upper	34	28.6%	\$2,707	16.3%	37.1%	37.7%	36.1%
Unknown	1	0.8%	\$96	0.6%	0.0%	0.4%	0.1%
TOTAL	119	100.0%	\$16,582	100.0%	100.0%	100.0%	100.0%

North Florida NonMSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	1	1.0%	125	0.5%	19.6%	1.3%	0.4%
Moderate	18	18.0%	1,788	7.5%	18.6%	10.3%	4.3%
Middle	9	9.0%	1,543	6.4%	19.0%	12.7%	6.8%
Upper	70	70.0%	19,283	80.6%	42.7%	65.2%	76.2%
Unknown	2	2.0%	1,194	5.0%	0.0%	10.6%	12.4%
TOTAL	100	100.0%	23,933	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	19.6%	1.0%	0.2%
Moderate	8	16.3%	808	7.9%	18.6%	6.3%	2.7%
Middle	10	20.4%	1,338	13.1%	19.0%	11.5%	7.1%
Upper	31	63.3%	8,086	79.0%	42.7%	62.0%	69.9%
Unknown	0	0.0%	0	0.0%	0.0%	19.2%	20.0%
TOTAL	49	100.0%	10,232	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	25.0%	60	18.5%	19.6%	3.4%	1.8%
Moderate	1	25.0%	48	14.8%	18.6%	13.8%	6.7%
Middle	0	0.0%	0	0.0%	19.0%	20.7%	15.3%
Upper	2	50.0%	216	66.7%	42.7%	44.8%	48.4%
Unknown	0	0.0%	0	0.0%	0.0%	17.2%	28.0%
TOTAL	4	100.0%	324	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	19.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.6%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.0%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	42.7%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	2	1.3%	185	0.5%	19.6%	1.2%	0.3%
Moderate	27	17.6%	2,644	7.7%	18.6%	8.7%	3.7%
Middle	19	12.4%	2,881	8.4%	19.0%	12.2%	7.0%
Upper	103	67.3%	27,585	80.0%	42.7%	62.5%	72.8%
Unknown	2	1.3%	1,194	3.5%	0.0%	15.4%	16.2%
TOTAL	153	100.0%	34,489	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	2.5%	52	0.2%	19.6%	1.0%	0.4%
Moderate	5	6.2%	870	3.6%	18.6%	5.6%	1.9%
Middle	16	19.8%	2,666	11.0%	19.0%	12.8%	5.8%
Upper	57	70.4%	20,434	84.5%	42.7%	65.4%	75.0%
Unknown	1	1.2%	151	0.6%	0.0%	15.2%	17.0%
TOTAL	81	100.0%	24,173	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	19.6%	1.8%	0.7%
Moderate	2	5.9%	209	2.6%	18.6%	6.6%	3.2%
Middle	5	14.7%	944	11.6%	19.0%	13.6%	8.9%
Upper	27	79.4%	6,964	85.8%	42.7%	58.3%	66.6%
Unknown	0	0.0%	0	0.0%	0.0%	19.7%	20.6%
TOTAL	34	100.0%	8,117	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.6%	0.0%	0.0%
Middle	1	25.0%	130	21.1%	19.0%	14.7%	7.8%
Upper	3	75.0%	486	78.9%	42.7%	76.5%	72.1%
Unknown	0	0.0%	0	0.0%	0.0%	8.8%	20.1%
TOTAL	4	100.0%	616	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	19.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.6%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.0%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	42.7%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	2	1.7%	52	0.2%	19.6%	1.3%	0.4%
Moderate	7	5.9%	1,079	3.3%	18.6%	5.8%	2.2%
Middle	22	18.5%	3,740	11.4%	19.0%	13.1%	6.8%
Upper	87	73.1%	27,884	84.7%	42.7%	62.8%	72.4%
Unknown	1	0.8%	151	0.5%	0.0%	16.9%	18.2%
TOTAL	119	100.0%	32,906	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	66	16.8%	24.6%	\$4,810	22.6%	23.3%	94.6%
	Over \$1 Million/ Unknown	327	83.2%	75.4%	\$16,461	77.4%	76.7%	5.4%
	TOTAL	393	100.0%	100.0%	\$21,271	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	349	88.8%	92.0%	\$10,415	49.0%	47.8%	
	\$100,001–\$250,000	28	7.1%	5.2%	\$4,295	20.2%	20.6%	
	\$250,001–\$1 Million	16	4.1%	2.8%	\$6,561	30.8%	31.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	393	100.0%	100.0%	\$21,271	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	57	86.4%		\$2,140	44.5%		
	\$100,001–\$250,000	5	7.6%		\$760	15.8%		
	\$250,001–\$1 Million	4	6.1%		\$1,910	39.7%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	66	100.0%		\$4,810	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	80	49.7%	40.4%	\$4,069	39.4%	37.0%	94.5%
	Over \$1 Million/ Unknown	81	50.3%	59.6%	\$6,269	60.6%	63.0%	5.5%
	TOTAL	161	100.0%	100.0%	\$10,338	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	140	87.0%	93.7%	\$3,923	37.9%	43.0%	
	\$100,001–\$250,000	9	5.6%	3.1%	\$1,429	13.8%	15.2%	
	\$250,001–\$1 Million	12	7.5%	3.2%	\$4,986	48.2%	41.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	161	100.0%	100.0%	\$10,338	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	71	88.8%		\$1,454	35.7%		
	\$100,001–\$250,000	4	5.0%		\$651	16.0%		
	\$250,001–\$1 Million	5	6.3%		\$1,964	48.3%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	80	100%		\$4,069	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	52	52.0%	9,561	39.9%	80.4%	60.9%	45.1%
Upper	48	48.0%	14,372	60.1%	19.6%	38.9%	54.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.1%
TOTAL	100	100.0%	23,933	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	19	38.8%	2,404	23.5%	80.4%	50.6%	38.4%
Upper	30	61.2%	7,828	76.5%	19.6%	49.4%	61.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	49	100.0%	10,232	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	3	75.0%	164	50.6%	80.4%	51.7%	44.3%
Upper	1	25.0%	160	49.4%	19.6%	48.3%	55.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	324	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	66.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	33.5%	100.0%	100.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	74	48.4%	12,129	35.2%	80.4%	56.8%	42.5%
Upper	79	51.6%	22,360	64.8%	19.6%	43.1%	57.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.0%
TOTAL	153	100.0%	34,489	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	43	53.1%	9,254	38.3%	80.4%	55.3%	36.9%
Upper	38	46.9%	14,919	61.7%	19.6%	44.3%	62.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.4%	0.2%
TOTAL	81	100.0%	24,173	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	16	47.1%	3,024	37.3%	80.4%	59.1%	47.8%
Upper	18	52.9%	5,093	62.7%	19.6%	40.7%	51.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.3%	0.3%
TOTAL	34	100.0%	8,117	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	4	100.0%	616	100.0%	80.4%	73.5%	60.7%
Upper	0	0.0%	0	0.0%	19.6%	23.5%	37.7%
Unknown	0	0.0%	0	0.0%	0.0%	2.9%	1.6%
TOTAL	4	100.0%	616	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	66.5%	100.0%	100.0%
Upper	0	0.0%	0	0.0%	33.5%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Middle	63	52.9%	12,894	39.2%	80.4%	57.2%	40.6%
Upper	56	47.1%	20,012	60.8%	19.6%	42.4%	59.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.4%	0.3%
TOTAL	119	100.0%	32,906	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Middle	263	66.9%	\$12,023	56.5%	67.8%	68.4%	66.4%
Upper	126	32.1%	\$9,022	42.4%	32.2%	30.8%	32.7%
Unknown	4	1.0%	\$226	1.1%	0.0%	0.8%	0.9%
TOTAL	393	100.0%	\$21,271	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Middle	107	66.5%	\$6,528	63.1%	67.7%	68.3%	69.6%
Upper	54	33.5%	\$3,810	36.9%	32.3%	31.2%	30.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.1%
TOTAL	161	100.0%	\$10,338	100.0%	100.0%	100.0%	100.0%

Naples MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	1	2.9%	130	0.9%	20.8%	3.7%	1.9%
Moderate	1	2.9%	306	2.1%	18.2%	17.4%	11.6%
Middle	7	20.6%	1,542	10.5%	19.5%	20.3%	15.7%
Upper	25	73.5%	12,740	86.6%	41.5%	48.4%	61.1%
Unknown	0	0.0%	0	0.0%	0.0%	10.2%	9.8%
TOTAL	34	100.0%	14,718	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	3.7%	130	1.7%	20.8%	3.2%	1.6%
Moderate	2	7.4%	327	4.2%	18.2%	11.4%	7.0%
Middle	6	22.2%	1,201	15.4%	19.5%	18.4%	14.0%
Upper	18	66.7%	6,118	78.7%	41.5%	46.4%	57.1%
Unknown	0	0.0%	0	0.0%	0.0%	20.6%	20.3%
TOTAL	27	100.0%	7,776	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.8%	5.4%	2.6%
Moderate	0	0.0%	0	0.0%	18.2%	14.8%	8.4%
Middle	0	0.0%	0	0.0%	19.5%	22.7%	15.9%
Upper	0	0.0%	0	0.0%	41.5%	53.5%	67.8%
Unknown	0	0.0%	0	0.0%	0.0%	3.5%	5.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.8%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.2%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.5%	2.3%	0.0%
Upper	0	0.0%	0	0.0%	41.5%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	97.7%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans					Families by Family Income %		
Low	2	3.2%	260	1.1%	20.8%	3.5%	1.8%
Moderate	3	4.8%	633	2.7%	18.2%	14.4%	9.2%
Middle	13	21.0%	2,743	11.8%	19.5%	19.2%	14.4%
Upper	44	71.0%	19,533	84.3%	41.5%	47.0%	58.3%
Unknown	0	0.0%	0	0.0%	0.0%	15.9%	16.3%
TOTAL	62	100.0%	23,169	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	20.8%	2.8%	1.4%
Moderate	1	4.0%	225	1.2%	18.2%	14.1%	8.7%
Middle	1	4.0%	350	1.9%	19.5%	18.3%	13.5%
Upper	23	92.0%	18,243	96.9%	41.5%	51.3%	62.7%
Unknown	0	0.0%	0	0.0%	0.0%	13.6%	13.7%
TOTAL	25	100.0%	18,818	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	7.7%	90	1.7%	20.8%	4.1%	2.3%
Moderate	1	7.7%	153	2.9%	18.2%	15.2%	9.8%
Middle	4	30.8%	950	18.2%	19.5%	20.5%	16.3%
Upper	7	53.8%	4,036	77.2%	41.5%	42.0%	54.1%
Unknown	0	0.0%	0	0.0%	0.0%	18.2%	17.6%
TOTAL	13	100.0%	5,229	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.8%	5.3%	3.1%
Moderate	0	0.0%	0	0.0%	18.2%	15.0%	9.0%
Middle	0	0.0%	0	0.0%	19.5%	21.7%	16.1%
Upper	0	0.0%	0	0.0%	41.5%	55.3%	66.5%
Unknown	0	0.0%	0	0.0%	0.0%	2.7%	5.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.8%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.2%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	41.5%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	1	2.6%	90	0.4%	20.8%	3.5%	1.7%
Moderate	2	5.3%	378	1.6%	18.2%	14.5%	8.6%
Middle	5	13.2%	1,300	5.4%	19.5%	19.2%	13.8%
Upper	30	78.9%	22,279	92.6%	41.5%	47.5%	57.9%
Unknown	0	0.0%	0	0.0%	0.0%	15.4%	18.0%
TOTAL	38	100.0%	24,047	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	18	6.4%	40.4%	\$1,400	5.9%	27.6%	94.6%
	Over \$1 Million/ Unknown	262	93.6%	59.6%	\$22,336	94.1%	72.4%	5.4%
	TOTAL	280	100.0%	100.0%	\$23,736	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	213	76.1%	90.3%	\$6,404	27.0%	38.0%	
	\$100,001–\$250,000	41	14.6%	5.8%	\$5,991	25.2%	19.9%	
	\$250,001–\$1 Million	26	9.3%	4.0%	\$11,341	47.8%	42.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	280	100.0%	100.0%	\$23,736	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	13	72.2%		\$378	27.0%		
	\$100,001–\$250,000	4	22.2%		\$551	39.4%		
	\$250,001–\$1 Million	1	5.6%		\$471	33.6%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	18	100.0%		\$1,400	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	35	28.2%	46.3%	\$2,925	21.5%	30.1%	94.6%
	Over \$1 Million/ Unknown	89	71.8%	53.7%	\$10,664	78.5%	69.9%	5.4%
	TOTAL	124	100.0%	100.0%	\$13,589	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	86	69.4%	94.2%	\$2,763	20.3%	42.7%	
	\$100,001–\$250,000	21	16.9%	3.3%	\$3,297	24.3%	16.4%	
	\$250,001–\$1 Million	17	13.7%	2.5%	\$7,529	55.4%	40.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	124	100.0%	100.0%	\$13,589	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	27	77.1%		\$706	24.1%		
	\$100,001–\$250,000	5	14.3%		\$763	26.1%		
	\$250,001–\$1 Million	3	8.6%		\$1,456	49.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	35	100.0%		\$2,925	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	2.1%	1.8%	1.3%
Moderate	0	0.0%	0	0.0%	17.8%	18.3%	14.7%
Middle	19	55.9%	8,008	54.4%	43.2%	42.4%	37.4%
Upper	15	44.1%	6,710	45.6%	36.9%	37.3%	46.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	34	100.0%	14,718	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	3.7%	510	6.6%	2.1%	0.7%	0.5%
Moderate	0	0.0%	0	0.0%	17.8%	14.0%	10.7%
Middle	15	55.6%	3,180	40.9%	43.2%	44.7%	39.6%
Upper	11	40.7%	4,086	52.5%	36.9%	40.5%	49.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	27	100.0%	7,776	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.1%	0.7%	0.3%
Moderate	0	0.0%	0	0.0%	17.8%	13.2%	10.5%
Middle	0	0.0%	0	0.0%	43.2%	47.8%	40.5%
Upper	0	0.0%	0	0.0%	36.9%	38.2%	48.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		2.5%	4.7%
Moderate	0	0.0%	0	0.0%	17.5%	41.9%	40.1%
Middle	0	0.0%	0	0.0%	31.8%	41.9%	50.9%
Upper	0	0.0%	0	0.0%	48.1%	11.6%	5.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	1.6%	510	2.3%	2.1%	1.3%	1.0%
Moderate	0	0.0%	0	0.0%	17.8%	16.5%	13.3%
Middle	34	55.7%	11,188	49.7%	43.2%	43.4%	38.2%
Upper	26	42.6%	10,796	48.0%	36.9%	38.7%	47.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	61	100.0%	22,494	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	1	4.0%	5,000	26.6%	2.1%	1.8%	1.3%
Moderate	1	4.0%	392	2.1%	17.8%	19.7%	15.7%
Middle	9	36.0%	3,601	19.1%	43.2%	42.4%	37.7%
Upper	14	56.0%	9,825	52.2%	36.9%	36.1%	45.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	25	100.0%	18,818	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.1%	0.9%	0.6%
Moderate	0	0.0%	0	0.0%	17.8%	16.1%	12.3%
Middle	8	61.5%	2,736	52.3%	43.2%	45.9%	40.8%
Upper	5	38.5%	2,493	47.7%	36.9%	37.2%	46.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	13	100.0%	5,229	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.1%	1.1%	0.6%
Moderate	0	0.0%	0	0.0%	17.8%	13.7%	9.8%
Middle	0	0.0%	0	0.0%	43.2%	47.6%	40.7%
Upper	0	0.0%	0	0.0%	36.9%	37.6%	48.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	2.5%	7.1%	1.9%
Moderate	0	0.0%	0	0.0%	17.5%	34.3%	8.8%
Middle	0	0.0%	0	0.0%	31.8%	37.1%	63.0%
Upper	0	0.0%	0	0.0%	48.1%	21.4%	26.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	2.6%	5,000	20.8%	2.1%	1.4%	1.0%
Moderate	1	2.6%	392	1.6%	17.8%	17.8%	13.9%
Middle	17	44.7%	6,337	26.4%	43.2%	43.9%	39.3%
Upper	19	50.0%	12,318	51.2%	36.9%	36.9%	45.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	38	100.0%	24,047	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ 000s	\$ %		%	\$ %
Low	7	2.5%	\$611	2.6%	2.9%	2.6%	2.8%
Moderate	29	10.4%	\$2,047	8.6%	19.1%	18.1%	17.5%
Middle	145	51.8%	\$13,779	58.1%	40.6%	39.7%	35.6%
Upper	99	35.4%	\$7,299	30.8%	37.4%	39.3%	43.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.2%
TOTAL	280	100.0%	\$23,736	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	6	4.8%	\$925	6.8%	2.9%	2.7%	2.8%
Moderate	11	8.9%	\$1,806	13.3%	19.2%	19.4%	18.2%
Middle	56	45.2%	\$6,400	47.1%	40.4%	40.2%	35.0%
Upper	51	41.1%	\$4,458	32.8%	37.4%	37.3%	43.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.1%
TOTAL	124	100.0%	\$13,589	100.0%	100.0%	100.0%	100.0%

Sarasota CSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	3.0%	317	1.4%	19.0%	4.8%	2.5%
Moderate	6	9.0%	1,143	5.2%	19.4%	17.3%	11.9%
Middle	12	17.9%	2,905	13.3%	21.2%	21.3%	17.6%
Upper	47	70.1%	17,538	80.1%	40.4%	47.9%	59.4%
Unknown	0	0.0%	0	0.0%	0.0%	8.7%	8.6%
TOTAL	67	100.0%	21,903	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	5.9%	655	2.7%	19.0%	4.6%	2.4%
Moderate	5	5.9%	933	3.8%	19.4%	13.8%	9.1%
Middle	18	21.2%	3,709	15.1%	21.2%	19.9%	16.4%
Upper	49	57.6%	16,536	67.2%	40.4%	40.8%	50.6%
Unknown	8	9.4%	2,789	11.3%	0.0%	20.8%	21.5%
TOTAL	85	100.0%	24,622	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.0%	6.1%	2.9%
Moderate	0	0.0%	0	0.0%	19.4%	17.2%	11.8%
Middle	0	0.0%	0	0.0%	21.2%	24.1%	20.1%
Upper	2	100.0%	810	100.0%	40.4%	47.6%	60.6%
Unknown	0	0.0%	0	0.0%	0.0%	4.9%	4.6%
TOTAL	2	100.0%	810	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	19.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	19.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.2%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.4%	2.0%	0.0%
Unknown	2	100.0%	1,438	100.0%	0.0%	98.0%	100.0%
TOTAL	2	100.0%	1,438	100.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans					Families by Family Income %		
Low	7	4.4%	972	2.0%	19.0%	4.8%	2.4%
Moderate	11	7.0%	2,076	4.2%	19.4%	15.5%	10.3%
Middle	30	19.0%	6,614	13.4%	21.2%	20.5%	16.5%
Upper	100	63.3%	35,421	71.8%	40.4%	44.2%	54.0%
Unknown	10	6.3%	4,227	8.6%	0.0%	15.0%	16.9%
TOTAL	158	100.0%	49,310	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	1	1.1%	128	0.4%	19.0%	3.2%	1.6%
Moderate	8	9.2%	1,582	5.5%	19.4%	13.4%	8.6%
Middle	21	24.1%	4,951	17.1%	21.2%	19.5%	15.4%
Upper	57	65.5%	22,216	76.9%	40.4%	50.9%	62.0%
Unknown	0	0.0%	0	0.0%	0.0%	12.9%	12.4%
TOTAL	87	100.0%	28,877	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	6.1%	370	2.1%	19.0%	5.9%	3.1%
Moderate	6	12.2%	1,130	6.4%	19.4%	16.6%	11.2%
Middle	9	18.4%	2,494	14.1%	21.2%	21.2%	17.8%
Upper	27	55.1%	12,816	72.6%	40.4%	38.9%	49.8%
Unknown	4	8.2%	846	4.8%	0.0%	17.5%	18.0%
TOTAL	49	100.0%	17,656	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.0%	6.1%	3.2%
Moderate	0	0.0%	0	0.0%	19.4%	15.3%	11.5%
Middle	0	0.0%	0	0.0%	21.2%	23.2%	16.5%
Upper	1	100.0%	200	100.0%	40.4%	53.4%	66.0%
Unknown	0	0.0%	0	0.0%	0.0%	2.0%	2.8%
TOTAL	1	100.0%	200	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	19.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	19.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.2%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.4%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	4	2.9%	498	1.1%	19.0%	4.6%	2.2%
Moderate	14	10.2%	2,712	5.8%	19.4%	14.9%	9.4%
Middle	30	21.9%	7,445	15.9%	21.2%	20.4%	15.7%
Upper	85	62.0%	35,232	75.4%	40.4%	45.5%	55.3%
Unknown	4	2.9%	846	1.8%	0.0%	14.6%	17.5%
TOTAL	137	100.0%	46,733	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	41	8.4%	43.6%	\$4,799	9.5%	27.1%	94.5%
	Over \$1 Million/ Unknown	449	91.6%	56.4%	\$45,854	90.5%	72.9%	5.5%
	TOTAL	490	100.0%	100.0%	\$50,653	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	350	71.4%	90.6%	\$11,202	22.1%	38.8%	
	\$100,001–\$250,000	87	17.8%	5.8%	\$14,350	28.3%	20.8%	
	\$250,001–\$1 Million	53	10.8%	3.6%	\$25,101	49.6%	40.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	490	100.0%	100.0%	\$50,653	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	29	70.7%		\$962	20.0%		
	\$100,001–\$250,000	8	19.5%		\$1,377	28.7%		
	\$250,001–\$1 Million	4	9.8%		\$2,460	51.3%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	41	100.0%		\$4,799	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	42	21.4%	49.9%	\$6,249	22.4%	31.7%	94.6%
	Over \$1 Million/ Unknown	154	78.6%	50.1%	\$21,600	77.6%	68.3%	5.4%
	TOTAL	196	100.0%	100.0%	\$27,849	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	123	62.8%	94.3%	\$4,729	17.0%	42.7%	
	\$100,001–\$250,000	40	20.4%	3.2%	\$6,601	23.7%	16.6%	
	\$250,001–\$1 Million	33	16.8%	2.5%	\$16,519	59.3%	40.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	196	100.0%	100.0%	\$27,849	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	27	64.3%		\$885	14.2%		
	\$100,001–\$250,000	8	19.0%		\$1,283	20.5%		
	\$250,001–\$1 Million	7	16.7%		\$4,081	65.3%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	42	100.0%		\$6,249	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.8%	0.4%	0.2%
Moderate	4	6.0%	779	3.6%	16.8%	13.8%	10.2%
Middle	37	55.2%	10,431	47.6%	54.7%	46.8%	40.2%
Upper	26	38.8%	10,693	48.8%	27.6%	39.0%	49.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	67	100.0%	21,903	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	0	0.0%	0	0.0%	0.8%	0.2%	0.1%
Moderate	6	7.1%	1,457	5.9%	16.8%	10.1%	7.8%
Middle	34	40.0%	7,091	28.8%	54.7%	49.6%	41.7%
Upper	45	52.9%	16,074	65.3%	27.6%	40.2%	50.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	85	100.0%	24,622	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.8%	0.2%	0.1%
Moderate	0	0.0%	0	0.0%	16.8%	10.9%	8.0%
Middle	1	50.0%	300	37.0%	54.7%	52.3%	44.1%
Upper	1	50.0%	510	63.0%	27.6%	36.5%	47.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	810	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	1.3%	0.0%	0.0%
Moderate	1	50.0%	1,188	82.6%	21.8%	34.0%	22.2%
Middle	0	0.0%	0	0.0%	41.8%	34.0%	44.8%
Upper	1	50.0%	250	17.4%	35.1%	32.0%	33.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	1,438	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.8%	0.3%	0.2%
Moderate	11	7.1%	3,424	7.0%	16.8%	12.0%	9.4%
Middle	72	46.2%	17,822	36.5%	54.7%	48.4%	41.0%
Upper	73	46.8%	27,527	56.4%	27.6%	39.3%	49.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	156	100.0%	48,773	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.8%	0.4%	0.2%
Moderate	5	5.7%	1,037	3.6%	16.8%	14.3%	10.7%
Middle	51	58.6%	15,273	52.9%	54.7%	46.0%	39.7%
Upper	31	35.6%	12,567	43.5%	27.6%	39.3%	49.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	87	100.0%	28,877	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	6.1%	497	2.8%	0.8%	0.3%	0.1%
Moderate	3	6.1%	1,950	11.0%	16.8%	11.7%	9.1%
Middle	18	36.7%	4,807	27.2%	54.7%	51.7%	44.0%
Upper	25	51.0%	10,402	58.9%	27.6%	36.3%	46.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	49	100.0%	17,656	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.8%	0.3%	0.2%
Moderate	0	0.0%	0	0.0%	16.8%	11.5%	10.2%
Middle	0	0.0%	0	0.0%	54.7%	52.1%	44.2%
Upper	1	100.0%	200	100.0%	27.6%	36.2%	45.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	200	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	1.3%	5.0%	2.5%
Moderate	0	0.0%	0	0.0%	21.8%	40.0%	29.3%
Middle	0	0.0%	0	0.0%	41.8%	33.3%	51.1%
Upper	0	0.0%	0	0.0%	35.1%	21.7%	17.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	3	2.2%	497	1.1%	0.8%	0.3%	0.3%
Moderate	8	5.8%	2,987	6.4%	16.8%	12.9%	10.5%
Middle	69	50.4%	20,080	43.0%	54.7%	48.9%	41.6%
Upper	57	41.6%	23,169	49.6%	27.6%	37.8%	47.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	137	100.0%	46,733	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	2	0.4%	\$313	0.6%	1.1%	1.0%	1.1%
Moderate	95	19.4%	\$10,596	20.9%	19.0%	17.9%	19.6%
Middle	256	52.2%	\$24,374	48.1%	49.6%	46.0%	43.4%
Upper	137	28.0%	\$15,370	30.3%	30.3%	34.7%	35.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.3%
TOTAL	490	100.0%	\$50,653	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	1.1%	1.0%	1.2%
Moderate	38	19.4%	\$4,334	15.6%	19.1%	17.3%	18.7%
Middle	102	52.0%	\$15,309	55.0%	49.3%	46.1%	43.5%
Upper	56	28.6%	\$8,206	29.5%	30.5%	35.1%	36.5%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.1%
TOTAL	196	100.0%	\$27,849	100.0%	100.0%	100.0%	100.0%

Key West NonMSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	11.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	11.0%	0.6%	0.3%
Middle	1	2.6%	339	1.5%	16.4%	2.9%	1.6%
Upper	37	97.4%	22,103	98.5%	60.9%	87.0%	87.8%
Unknown	0	0.0%	0	0.0%	0.0%	9.5%	10.3%
TOTAL	38	100.0%	22,442	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	11.7%	0.5%	0.6%
Moderate	1	2.6%	108	0.7%	11.0%	1.4%	0.9%
Middle	2	5.3%	451	2.9%	16.4%	5.0%	2.8%
Upper	34	89.5%	13,904	90.2%	60.9%	74.3%	75.3%
Unknown	1	2.6%	950	6.2%	0.0%	18.9%	20.4%
TOTAL	38	100.0%	15,413	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	11.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	11.0%	1.1%	0.4%
Middle	0	0.0%	0	0.0%	16.4%	5.6%	4.2%
Upper	1	100.0%	300	100.0%	60.9%	89.9%	87.3%
Unknown	0	0.0%	0	0.0%	0.0%	3.4%	8.1%
TOTAL	1	100.0%	300	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	11.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	11.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	16.4%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	60.9%	0.0%	0.0%
Unknown	1	100.0%	356	100.0%	0.0%	100.0%	100.0%
TOTAL	1	100.0%	356	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	0	0.0%	0	0.0%	11.7%	0.3%	0.4%
Moderate	1	1.3%	108	0.3%	11.0%	1.0%	0.6%
Middle	3	3.8%	790	2.1%	16.4%	3.9%	2.0%
Upper	72	92.3%	36,307	94.3%	60.9%	79.8%	80.3%
Unknown	2	2.6%	1,306	3.4%	0.0%	15.0%	16.7%
TOTAL	78	100.0%	38,511	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	11.7%	0.1%	0.2%
Moderate	0	0.0%	0	0.0%	11.0%	0.3%	0.1%
Middle	0	0.0%	0	0.0%	16.4%	2.2%	1.0%
Upper	11	84.6%	6,538	87.5%	60.9%	81.7%	81.6%
Unknown	2	15.4%	930	12.5%	0.0%	15.8%	17.1%
TOTAL	13	100.0%	7,468	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	11.7%	0.3%	0.2%
Moderate	0	0.0%	0	0.0%	11.0%	1.1%	0.5%
Middle	2	15.4%	515	7.8%	16.4%	4.7%	2.3%
Upper	11	84.6%	6,090	92.2%	60.9%	73.6%	74.2%
Unknown	0	0.0%	0	0.0%	0.0%	20.3%	22.8%
TOTAL	13	100.0%	6,605	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	11.7%	1.0%	0.2%
Moderate	0	0.0%	0	0.0%	11.0%	1.0%	0.1%
Middle	0	0.0%	0	0.0%	16.4%	5.9%	3.3%
Upper	1	100.0%	166	100.0%	60.9%	86.3%	86.5%
Unknown	0	0.0%	0	0.0%	0.0%	5.9%	9.9%
TOTAL	1	100.0%	166	100.0%	100.0%	100.0%	100.0%

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	11.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	11.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	16.4%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	60.9%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	0	0.0%	0	0.0%	11.7%	0.3%	0.2%
Moderate	0	0.0%	0	0.0%	11.0%	0.7%	0.3%
Middle	2	7.4%	515	3.6%	16.4%	3.4%	1.5%
Upper	23	85.2%	12,794	89.9%	60.9%	77.9%	76.3%
Unknown	2	7.4%	930	6.5%	0.0%	17.9%	21.8%
TOTAL	27	100.0%	14,239	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	43	7.5%	28.1%	\$3,039	10.1%	21.4%	94.3%
	Over \$1 Million/Unknown	530	92.5%	71.9%	\$27,041	89.9%	78.6%	5.7%
	TOTAL	573	100.0%	100.0%	\$30,080	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	493	86.0%	92.5%	\$12,403	41.2%	46.1%	
	\$100,001-\$250,000	58	10.1%	5.0%	\$8,458	28.1%	21.4%	
	\$250,001-\$1 Million	22	3.8%	2.6%	\$9,219	30.6%	32.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	573	100.0%	100.0%	\$30,080	100.0%	100.0%	

Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	37	86.0%		\$1,052	34.6%		
		\$100,001–\$250,000	5	11.6%		\$1,057	34.8%		
		\$250,001–\$1 Million	1	2.3%		\$930	30.6%		
		Over \$1 Million	0	0.0%		\$0	0.0%		
		TOTAL	43	100.0%		\$3,039	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	93	26.9%	39.0%	\$8,791	25.8%	27.9%	94.4%
	Over \$1 Million/ Unknown	253	73.1%	61.0%	\$25,326	74.2%	72.1%	5.6%
	TOTAL	346	100.0%	100.0%	\$34,117	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	252	72.8%	92.6%	\$7,560	22.2%	37.4%	
	\$100,001–\$250,000	63	18.2%	4.6%	\$9,837	28.8%	20.4%	
	\$250,001–\$1 Million	31	9.0%	2.9%	\$16,720	49.0%	42.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	346	100.0%	100.0%	\$34,117	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	75	80.6%		\$1,674	19.0%	
		\$100,001–\$250,000	10	10.8%		\$1,772	20.2%	
		\$250,001–\$1 Million	8	8.6%		\$5,345	60.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	93	100.0%		\$8,791	100.0%	

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	1.7%	1.1%
Middle	13	34.2%	6,756	30.1%	12.5%	11.7%	10.3%
Upper	25	65.8%	15,686	69.9%	86.2%	86.6%	88.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	38	100.0%	22,442	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	0.7%	0.6%
Middle	9	23.7%	3,950	25.6%	12.5%	13.8%	13.6%
Upper	29	76.3%	11,463	74.4%	86.2%	85.5%	85.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	38	100.0%	15,413	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	2.2%	0.9%
Middle	0	0.0%	0	0.0%	12.5%	10.1%	6.3%
Upper	1	100.0%	300	100.0%	86.2%	87.6%	92.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	300	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.9%	14.3%	57.9%
Middle	0	0.0%	0	0.0%	17.6%	0.0%	0.0%
Upper	1	100.0%	356	100.0%	80.4%	85.7%	42.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	356	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	1.2%	1.4%
Middle	22	28.2%	10,706	27.8%	12.5%	12.8%	11.5%
Upper	56	71.8%	27,805	72.2%	86.2%	86.0%	87.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	78	100.0%	38,511	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	1.7%	0.9%
Middle	2	15.4%	1,982	26.5%	12.5%	12.6%	11.7%
Upper	11	84.6%	5,486	73.5%	86.2%	85.7%	87.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	13	100.0%	7,468	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	0.5%	0.4%
Middle	3	23.1%	2,166	32.8%	12.5%	12.0%	11.1%
Upper	10	76.9%	4,439	67.2%	86.2%	87.5%	88.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	13	100.0%	6,605	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	2.0%	1.9%
Middle	0	0.0%	0	0.0%	12.5%	13.7%	15.5%
Upper	1	100.0%	166	100.0%	86.2%	84.3%	82.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	166	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	17.6%	23.1%	17.9%
Upper	0	0.0%	0	0.0%	80.4%	76.9%	82.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	1.3%	1.1%	0.7%
Middle	5	18.5%	4,148	29.1%	12.5%	12.3%	11.8%
Upper	22	81.5%	10,091	70.9%	86.2%	86.5%	87.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	27	100.0%	14,239	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	22	3.8%	\$796	2.6%	2.5%	2.4%	1.7%
Middle	116	20.2%	\$5,864	19.5%	17.1%	18.3%	19.1%
Upper	435	75.9%	\$23,420	77.9%	80.3%	78.6%	78.0%
Unknown	0	0.0%	\$0	0.0%	0.1%	0.7%	1.2%
TOTAL	573	100.0%	\$30,080	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	7	2.0%	\$1,464	4.3%	2.6%	2.2%	2.4%
Middle	76	22.0%	\$7,428	21.8%	17.2%	17.8%	20.0%
Upper	263	76.0%	\$25,225	73.9%	80.1%	78.7%	76.8%
Unknown	0	0.0%	\$0	0.0%	0.1%	1.3%	0.8%
TOTAL	346	100.0%	\$34,117	100.0%	100.0%	100.0%	100.0%

Panama City MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	18	7.9%	2,224	4.5%	21.4%	5.3%	2.6%
Moderate	61	26.8%	7,794	15.9%	17.9%	18.4%	12.8%
Middle	64	28.1%	11,773	24.0%	20.0%	22.7%	20.6%
Upper	83	36.4%	25,246	51.5%	40.7%	39.9%	49.8%
Unknown	2	0.9%	1,950	4.0%	0.0%	13.7%	14.2%
TOTAL	228	100.0%	48,987	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.4%	2.9%	1.4%
Moderate	8	16.3%	1,143	10.6%	17.9%	10.1%	6.9%
Middle	10	20.4%	2,020	18.8%	20.0%	15.0%	12.1%
Upper	22	44.9%	5,277	49.2%	40.7%	36.1%	40.2%
Unknown	9	18.4%	2,293	21.4%	0.0%	35.9%	39.3%
TOTAL	49	100.0%	10,733	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.4%	5.5%	2.1%
Moderate	0	0.0%	0	0.0%	17.9%	11.7%	4.5%
Middle	2	66.7%	605	85.9%	20.0%	25.2%	19.1%
Upper	1	33.3%	99	14.1%	40.7%	52.1%	69.5%
Unknown	0	0.0%	0	0.0%	0.0%	5.5%	4.9%
TOTAL	3	100.0%	704	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.0%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.7%	5.0%	0.1%
Unknown	0	0.0%	0	0.0%	0.0%	95.0%	99.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	18	6.3%	2,224	3.6%	21.4%	4.3%	2.0%
Moderate	71	25.0%	9,337	15.2%	17.9%	14.9%	9.6%
Middle	76	26.8%	14,398	23.4%	20.0%	19.4%	15.9%
Upper	108	38.0%	31,304	50.9%	40.7%	38.3%	42.6%
Unknown	11	3.9%	4,243	6.9%	0.0%	23.1%	30.0%
TOTAL	284	100.0%	61,506	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	5	2.7%	681	1.4%	21.4%	3.0%	1.4%
Moderate	42	22.7%	6,080	12.9%	17.9%	12.3%	7.8%
Middle	46	24.9%	10,205	21.7%	20.0%	18.9%	16.5%
Upper	91	49.2%	29,454	62.6%	40.7%	47.2%	56.5%
Unknown	1	0.5%	600	1.3%	0.0%	18.7%	17.8%
TOTAL	185	100.0%	47,020	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.4%	3.5%	1.7%
Moderate	1	3.0%	85	0.9%	17.9%	9.9%	6.2%
Middle	8	24.2%	1,583	16.1%	20.0%	15.4%	12.1%
Upper	22	66.7%	7,613	77.4%	40.7%	38.8%	42.8%
Unknown	2	6.1%	558	5.7%	0.0%	32.4%	37.1%
TOTAL	33	100.0%	9,839	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.4%	3.1%	1.1%
Moderate	0	0.0%	0	0.0%	17.9%	10.9%	5.2%
Middle	0	0.0%	0	0.0%	20.0%	17.7%	15.0%
Upper	0	0.0%	0	0.0%	40.7%	61.5%	69.3%
Unknown	0	0.0%	0	0.0%	0.0%	6.8%	9.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.0%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.7%	5.0%	0.3%
Unknown	0	0.0%	0	0.0%	0.0%	95.0%	99.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	5	2.3%	681	1.2%	21.4%	3.2%	1.5%
Moderate	43	19.7%	6,165	10.8%	17.9%	11.3%	7.0%
Middle	54	24.8%	11,788	20.7%	20.0%	17.5%	14.5%
Upper	113	51.8%	37,067	65.2%	40.7%	44.3%	50.7%
Unknown	3	1.4%	1,158	2.0%	0.0%	23.7%	26.4%
TOTAL	218	100.0%	56,859	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$(000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	21	9.1%	30.7%	\$3,308	20.8%	23.4%	94.4%
	Over \$1 Million/Unknown	209	90.9%	69.3%	\$12,558	79.2%	76.6%	5.6%
	TOTAL	230	100.0%	100.0%	\$15,866	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	187	81.3%	87.7%	\$5,204	32.8%	33.7%	
	\$100,001–\$250,000	32	13.9%	7.6%	\$4,824	30.4%	23.6%	
	\$250,001–\$1 Million	11	4.8%	4.7%	\$5,838	36.8%	42.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	230	100.0%	100.0%	\$15,866	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	16	76.2%		\$396	12.0%		
	\$100,001–\$250,000	1	4.8%		\$206	6.2%		
	\$250,001–\$1 Million	4	19.0%		\$2,706	81.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	21	100.0%		\$3,308	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	23	30.3%	40.9%	\$3,735	38.7%	27.3%	94.5%
	Over \$1 Million/ Unknown	53	69.7%	59.1%	\$5,917	61.3%	72.7%	5.5%
	TOTAL	76	100.0%	100.0%	\$9,652	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	41	53.9%	90.9%	\$1,865	19.3%	36.3%	
	\$100,001–\$250,000	27	35.5%	5.7%	\$4,495	46.6%	23.6%	
	\$250,001–\$1 Million	8	10.5%	3.4%	\$3,292	34.1%	40.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	76	100.0%	100.0%	\$9,652	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	11	47.8%		\$465	12.4%		
	\$100,001–\$250,000	6	26.1%		\$1,005	26.9%		
	\$250,001–\$1 Million	6	26.1%		\$2,265	60.6%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	23	100.0%		\$3,735	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	4	1.8%	564	1.2%	2.5%	1.4%	1.0%
Moderate	14	6.1%	2,742	5.6%	13.3%	7.4%	5.8%
Middle	146	64.0%	29,664	60.6%	52.4%	58.5%	57.3%
Upper	64	28.1%	16,017	32.7%	31.8%	32.7%	35.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	228	100.0%	48,987	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	2	4.1%	399	3.7%	2.5%	0.7%	0.5%
Moderate	1	2.0%	120	1.1%	13.3%	5.6%	4.2%
Middle	17	34.7%	3,909	36.4%	52.4%	56.6%	55.6%
Upper	29	59.2%	6,305	58.7%	31.8%	37.1%	39.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	49	100.0%	10,733	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.5%	1.8%	3.6%
Moderate	1	33.3%	99	14.1%	13.3%	10.4%	6.1%
Middle	2	66.7%	605	85.9%	52.4%	49.7%	47.2%
Upper	0	0.0%	0	0.0%	31.8%	38.0%	43.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	704	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	4.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	10.4%	35.0%	14.3%
Middle	0	0.0%	0	0.0%	62.4%	50.0%	81.3%
Upper	0	0.0%	0	0.0%	22.9%	15.0%	4.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	6	2.1%	963	1.6%	2.5%	1.2%	0.8%
Moderate	16	5.7%	2,961	4.9%	13.3%	6.8%	5.9%
Middle	165	58.9%	34,178	56.6%	52.4%	57.5%	58.4%
Upper	93	33.2%	22,322	36.9%	31.8%	34.5%	35.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	280	100.0%	60,424	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	3	1.6%	410	0.9%	2.5%	1.1%	0.9%
Moderate	8	4.3%	1,303	2.8%	13.3%	7.4%	5.1%
Middle	117	63.2%	29,466	62.7%	52.4%	59.6%	58.5%
Upper	57	30.8%	15,841	33.7%	31.8%	31.9%	35.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	185	100.0%	47,020	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.5%	1.2%	0.7%
Moderate	2	6.1%	261	2.7%	13.3%	6.2%	4.5%
Middle	19	57.6%	5,486	55.8%	52.4%	54.7%	54.3%
Upper	12	36.4%	4,092	41.6%	31.8%	37.9%	40.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	33	100.0%	9,839	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.5%	1.6%	0.5%
Moderate	0	0.0%	0	0.0%	13.3%	6.3%	7.4%
Middle	0	0.0%	0	0.0%	52.4%	57.3%	59.9%
Upper	0	0.0%	0	0.0%	31.8%	34.9%	32.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	4.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	10.4%	10.0%	6.0%
Middle	0	0.0%	0	0.0%	62.4%	70.0%	40.6%
Upper	0	0.0%	0	0.0%	22.9%	20.0%	53.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	3	1.4%	410	0.7%	2.5%	1.1%	0.8%
Moderate	10	4.6%	1,564	2.8%	13.3%	7.1%	5.0%
Middle	136	62.4%	34,952	61.5%	52.4%	57.5%	56.5%
Upper	69	31.7%	19,933	35.1%	31.8%	34.3%	37.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	218	100.0%	56,859	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	5	2.2%	\$127	0.8%	3.1%	2.5%	3.2%
Moderate	29	12.6%	\$1,505	9.5%	19.3%	16.7%	19.9%
Middle	131	57.0%	\$10,050	63.3%	53.1%	53.9%	51.9%
Upper	65	28.3%	\$4,184	26.4%	24.5%	26.6%	24.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.1%
TOTAL	230	100.0%	\$15,866	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	2	2.6%	\$86	0.9%	3.1%	2.6%	2.8%
Moderate	11	14.5%	\$1,641	17.0%	19.0%	15.5%	19.8%
Middle	50	65.8%	\$6,257	64.8%	53.2%	53.1%	50.2%
Upper	13	17.1%	\$1,668	17.3%	24.7%	28.1%	27.2%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.7%	0.1%
TOTAL	76	100.0%	\$9,652	100.0%	100.0%	100.0%	100.0%

Destin MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	1.9%	486	1.6%	20.3%	4.0%	1.6%
Moderate	21	20.0%	4,727	15.2%	17.9%	17.2%	9.9%
Middle	30	28.6%	8,185	26.3%	21.5%	17.9%	12.6%
Upper	41	39.0%	16,904	54.4%	40.3%	45.9%	61.4%
Unknown	11	10.5%	783	2.5%	0.0%	15.0%	14.5%
TOTAL	105	100.0%	31,085	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	1.8%	276	0.7%	20.3%	3.1%	1.3%
Moderate	6	5.4%	1,081	2.9%	17.9%	7.6%	4.6%
Middle	16	14.4%	4,524	12.3%	21.5%	10.6%	8.0%
Upper	46	41.4%	17,195	46.6%	40.3%	33.9%	42.3%
Unknown	41	36.9%	13,854	37.5%	0.0%	44.8%	43.8%
TOTAL	111	100.0%	36,930	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.3%	4.8%	3.6%
Moderate	1	100.0%	115	100.0%	17.9%	12.5%	7.7%
Middle	0	0.0%	0	0.0%	21.5%	20.0%	12.1%
Upper	0	0.0%	0	0.0%	40.3%	56.7%	67.5%
Unknown	0	0.0%	0	0.0%	0.0%	6.0%	9.0%
TOTAL	1	100.0%	115	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.3%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	4	1.8%	762	1.1%	20.3%	3.5%	1.4%
Moderate	28	12.9%	5,923	8.7%	17.9%	12.4%	7.4%
Middle	46	21.2%	12,709	18.7%	21.5%	14.2%	10.4%
Upper	87	40.1%	34,099	50.0%	40.3%	40.1%	52.4%
Unknown	52	24.0%	14,637	21.5%	0.0%	29.8%	28.4%
TOTAL	217	100.0%	68,130	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	##%	\$	%		##%	\$ %
Home Purchase Loans							
Low	3	2.7%	563	1.5%	20.3%	3.3%	1.3%
Moderate	29	26.4%	6,778	17.8%	17.9%	14.9%	8.1%
Middle	22	20.0%	5,859	15.4%	21.5%	17.7%	11.9%
Upper	56	50.9%	24,793	65.3%	40.3%	45.1%	59.4%
Unknown	0	0.0%	0	0.0%	0.0%	18.9%	19.4%
TOTAL	110	100.0%	37,993	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	2.9%	152	1.3%	20.3%	3.9%	2.0%
Moderate	4	11.8%	705	5.9%	17.9%	9.8%	5.9%
Middle	6	17.6%	1,862	15.6%	21.5%	14.0%	10.3%
Upper	17	50.0%	7,318	61.3%	40.3%	35.3%	47.5%
Unknown	6	17.6%	1,895	15.9%	0.0%	37.0%	34.2%
TOTAL	34	100.0%	11,932	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.3%	4.5%	1.6%
Moderate	1	100.0%	85	100.0%	17.9%	11.1%	8.5%
Middle	0	0.0%	0	0.0%	21.5%	15.6%	9.9%
Upper	0	0.0%	0	0.0%	40.3%	62.4%	67.8%
Unknown	0	0.0%	0	0.0%	0.0%	6.4%	12.2%
TOTAL	1	100.0%	85	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.9%	2.4%	0.2%
Middle	0	0.0%	0	0.0%	21.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.3%	9.5%	0.9%
Unknown	0	0.0%	0	0.0%	0.0%	88.1%	99.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	4	2.8%	715	1.4%	20.3%	3.6%	1.5%
Moderate	34	23.4%	7,568	15.1%	17.9%	12.5%	7.0%
Middle	28	19.3%	7,721	15.4%	21.5%	15.9%	10.9%
Upper	73	50.3%	32,111	64.2%	40.3%	41.5%	54.7%
Unknown	6	4.1%	1,895	3.8%	0.0%	26.4%	25.9%
TOTAL	145	100.0%	50,010	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	13	9.0%	35.5%	\$1,268	14.3%	27.9%	95.1%
	Over \$1 Million/ Unknown	131	91.0%	64.5%	\$7,576	85.7%	72.1%	4.9%
	TOTAL	144	100.0%	100.0%	\$8,844	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	119	82.6%	89.5%	\$3,054	34.5%	36.4%	
	\$100,001–\$250,000	18	12.5%	6.4%	\$2,833	32.0%	21.2%	
	\$250,001–\$1 Million	7	4.9%	4.2%	\$2,957	33.4%	42.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	144	100.0%	100.0%	\$8,844	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	10	76.9%		\$412	32.5%		
	\$100,001–\$250,000	2	15.4%		\$210	16.6%		
	\$250,001–\$1 Million	1	7.7%		\$646	50.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	13	100.0%		\$1,268	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	29	41.4%	43.1%	\$4,746	51.1%	33.2%	95.2%
	Over \$1 Million/ Unknown	41	58.6%	56.9%	\$4,540	48.9%	66.8%	4.8%
	TOTAL	70	100.0%	100.0%	\$9,286	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	45	64.3%	91.3%	\$1,072	11.5%	34.9%	
	\$100,001–\$250,000	12	17.1%	4.8%	\$2,054	22.1%	18.7%	
	\$250,001–\$1 Million	13	18.6%	3.9%	\$6,160	66.3%	46.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	70	100.0%	100.0%	\$9,286	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	20	69.0%		\$269	5.7%		
	\$100,001–\$250,000	1	3.4%		\$104	2.2%		
	\$250,001–\$1 Million	8	27.6%		\$4,373	92.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	29	100.0%		\$4,746	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	7.6%	1,091	3.5%	12.2%	6.0%	3.2%
Middle	57	54.3%	15,286	49.2%	62.3%	58.2%	53.2%
Upper	40	38.1%	14,708	47.3%	25.5%	35.9%	43.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	105	100.0%	31,085	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	1.8%	317	0.9%	12.2%	4.1%	2.8%
Middle	45	40.5%	14,650	39.7%	62.3%	57.0%	49.8%
Upper	64	57.7%	21,963	59.5%	25.5%	38.9%	47.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	111	100.0%	36,930	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	12.2%	3.3%	1.7%
Middle	1	100.0%	115	100.0%	62.3%	51.3%	45.1%
Upper	0	0.0%	0	0.0%	25.5%	45.4%	53.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	115	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.5%	17.4%	6.5%
Middle	0	0.0%	0	0.0%	27.6%	60.9%	73.7%
Upper	0	0.0%	0	0.0%	64.8%	21.7%	19.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	10	4.6%	1,408	2.1%	12.2%	5.1%	3.1%
Middle	103	47.5%	30,051	44.1%	62.3%	57.6%	52.2%
Upper	104	47.9%	36,671	53.8%	25.5%	37.2%	44.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	217	100.0%	68,130	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	6	5.5%	1,593	4.2%	12.2%	6.0%	3.1%
Middle	65	59.1%	20,088	52.9%	62.3%	59.6%	53.7%
Upper	39	35.5%	16,312	42.9%	25.5%	34.4%	43.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	110	100.0%	37,993	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	2.9%	211	1.8%	12.2%	4.9%	3.0%
Middle	18	52.9%	5,920	49.6%	62.3%	59.8%	52.5%
Upper	15	44.1%	5,801	48.6%	25.5%	35.3%	44.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	34	100.0%	11,932	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	12.2%	4.5%	1.8%
Middle	0	0.0%	0	0.0%	62.3%	47.1%	45.8%
Upper	1	100.0%	85	100.0%	25.5%	48.4%	52.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	85	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.5%	11.9%	9.5%
Middle	0	0.0%	0	0.0%	27.6%	57.1%	37.7%
Upper	0	0.0%	0	0.0%	64.8%	31.0%	52.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	4.8%	1,804	3.6%	12.2%	5.5%	3.2%
Middle	83	57.2%	26,008	52.0%	62.3%	59.3%	52.6%
Upper	55	37.9%	22,198	44.4%	25.5%	35.1%	44.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	145	100.0%	50,010	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	6	4.2%	\$275	3.1%	10.8%	9.4%	9.9%
Middle	34	23.6%	\$2,054	23.2%	55.2%	46.9%	43.8%
Upper	104	72.2%	\$6,515	73.7%	34.0%	43.4%	46.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.2%
TOTAL	144	100.0%	\$8,844	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	5	7.1%	\$940	10.1%	10.8%	9.1%	9.0%
Middle	20	28.6%	\$3,451	37.2%	54.9%	48.9%	43.8%
Upper	45	64.3%	\$4,895	52.7%	34.2%	41.4%	47.2%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.1%
TOTAL	70	100.0%	\$9,286	100.0%	100.0%	100.0%	100.0%

Tallahassee MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	15	14.0%	1,443	7.9%	23.4%	9.2%	5.1%
Moderate	39	36.4%	5,402	29.4%	16.7%	21.5%	16.4%
Middle	25	23.4%	4,935	26.9%	19.6%	20.8%	20.2%
Upper	26	24.3%	6,426	35.0%	40.2%	36.6%	47.9%
Unknown	2	1.9%	157	0.9%	0.0%	11.8%	10.4%
TOTAL	107	100.0%	18,363	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	4	7.5%	436	4.0%	23.4%	3.4%	1.6%
Moderate	9	17.0%	1,522	14.1%	16.7%	13.0%	8.6%
Middle	17	32.1%	2,931	27.2%	19.6%	18.9%	15.8%
Upper	22	41.5%	5,365	49.8%	40.2%	45.3%	53.8%
Unknown	1	1.9%	513	4.8%	0.0%	19.4%	20.2%
TOTAL	53	100.0%	10,767	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	23.4%	5.6%	3.3%
Moderate	0	0.0%	0	0.0%	16.7%	14.1%	13.3%
Middle	0	0.0%	0	0.0%	19.6%	17.7%	15.3%
Upper	0	0.0%	0	0.0%	40.2%	59.3%	64.0%
Unknown	0	0.0%	0	0.0%	0.0%	3.2%	4.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	23.4%	3.1%	0.4%
Moderate	0	0.0%	0	0.0%	16.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.6%	3.1%	0.1%
Upper	0	0.0%	0	0.0%	40.2%	9.4%	0.7%
Unknown	0	0.0%	0	0.0%	0.0%	84.4%	98.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	19	11.5%	1,879	6.4%	23.4%	6.1%	2.9%
Moderate	49	29.7%	7,052	23.8%	16.7%	16.4%	10.4%
Middle	42	25.5%	7,866	26.6%	19.6%	19.0%	15.1%
Upper	52	31.5%	12,115	41.0%	40.2%	40.0%	43.1%
Unknown	3	1.8%	670	2.3%	0.0%	18.4%	28.5%
TOTAL	165	100.0%	29,582	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	18	16.5%	1,861	9.2%	23.4%	8.2%	4.6%
Moderate	37	33.9%	5,909	29.3%	16.7%	21.3%	16.3%
Middle	27	24.8%	5,871	29.2%	19.6%	21.8%	21.4%
Upper	26	23.9%	6,417	31.9%	40.2%	33.8%	44.3%
Unknown	1	0.9%	79	0.4%	0.0%	14.8%	13.4%
TOTAL	109	100.0%	20,137	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	7.1%	371	4.1%	23.4%	4.5%	2.4%
Moderate	8	19.0%	1,208	13.5%	16.7%	16.4%	11.2%
Middle	14	33.3%	2,508	28.0%	19.6%	21.3%	18.2%
Upper	16	38.1%	4,680	52.3%	40.2%	40.7%	50.0%
Unknown	1	2.4%	183	2.0%	0.0%	17.2%	18.1%
TOTAL	42	100.0%	8,950	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	23.4%	7.5%	3.7%
Moderate	0	0.0%	0	0.0%	16.7%	11.7%	9.3%
Middle	1	50.0%	26	25.7%	19.6%	20.5%	16.9%
Upper	1	50.0%	75	74.3%	40.2%	56.1%	63.5%
Unknown	0	0.0%	0	0.0%	0.0%	4.2%	6.5%
TOTAL	2	100.0%	101	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	23.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.7%	2.2%	0.1%
Middle	0	0.0%	0	0.0%	19.6%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.2%	10.9%	0.7%
Unknown	0	0.0%	0	0.0%	0.0%	87.0%	99.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	21	13.7%	2,232	7.6%	23.4%	6.3%	3.3%
Moderate	45	29.4%	7,117	24.4%	16.7%	18.5%	12.5%
Middle	42	27.5%	8,405	28.8%	19.6%	21.1%	17.9%
Upper	43	28.1%	11,172	38.3%	40.2%	37.5%	43.0%
Unknown	2	1.3%	262	0.9%	0.0%	16.6%	23.2%
TOTAL	153	100.0%	29,188	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	19	4.9%	34.8%	\$2,381	11.4%	25.9%	94.1%
	Over \$1 Million/Unknown	367	95.1%	65.2%	\$18,422	88.6%	74.1%	5.9%
	TOTAL	386	100.0%	100.0%	\$20,803	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	339	87.8%	89.0%	\$8,644	41.6%	35.1%	
	\$100,001-\$250,000	31	8.0%	6.5%	\$5,116	24.6%	21.4%	
	\$250,001-\$1 Million	16	4.1%	4.5%	\$7,043	33.9%	43.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	386	100.0%	100.0%	\$20,803	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	14	73.7%		\$415	17.4%		
	\$100,001-\$250,000	0	0.0%		\$0	0.0%		
	\$250,001-\$1 Million	5	26.3%		\$1,966	82.6%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	19	100.0%		\$2,381	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	74	37.6%	45.8%	\$3,249	23.1%	34.4%	94.1%
	Over \$1 Million/ Unknown	123	62.4%	54.2%	\$10,808	76.9%	65.6%	5.9%
	TOTAL	197	100.0%	100.0%	\$14,057	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	164	83.2%	93.1%	\$4,368	31.1%	39.0%	
	\$100,001–\$250,000	21	10.7%	4.0%	\$3,706	26.4%	19.3%	
	\$250,001–\$1 Million	12	6.1%	2.9%	\$5,983	42.6%	41.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	197	100.0%	100.0%	\$14,057	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	66	89.2%		\$1,110	34.2%		
	\$100,001–\$250,000	5	6.8%		\$968	29.8%		
	\$250,001–\$1 Million	3	4.1%		\$1,171	36.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	74	100.0%		\$3,249	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	%	\$	%		%	\$ %
Home Purchase Loans							
Low	1	0.9%	162	0.9%	4.9%	3.7%	2.2%
Moderate	6	5.6%	708	3.9%	18.0%	13.6%	9.6%
Middle	73	68.2%	11,067	60.3%	41.9%	46.0%	40.3%
Upper	25	23.4%	6,169	33.6%	34.7%	35.4%	47.3%
Unknown	2	1.9%	257	1.4%	0.6%	1.2%	0.7%
TOTAL	107	100.0%	18,363	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	0	0.0%	0	0.0%	4.9%	1.2%	0.8%
Moderate	7	13.2%	1,281	11.9%	18.0%	7.9%	5.6%
Middle	24	45.3%	3,829	35.6%	41.9%	38.5%	32.4%
Upper	22	41.5%	5,657	52.5%	34.7%	51.9%	60.9%
Unknown	0	0.0%	0	0.0%	0.6%	0.4%	0.3%
TOTAL	53	100.0%	10,767	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	4.9%	0.8%	0.8%
Moderate	0	0.0%	0	0.0%	18.0%	6.0%	4.3%
Middle	0	0.0%	0	0.0%	41.9%	31.0%	28.3%
Upper	0	0.0%	0	0.0%	34.7%	62.1%	66.6%
Unknown	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	39.6%	40.6%	58.4%
Moderate	0	0.0%	0	0.0%	21.9%	25.0%	11.3%
Middle	0	0.0%	0	0.0%	24.6%	28.1%	20.8%
Upper	0	0.0%	0	0.0%	6.7%	6.3%	9.5%
Unknown	0	0.0%	0	0.0%	7.3%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	0.6%	162	0.6%	4.9%	2.8%	9.6%
Moderate	13	8.1%	1,989	6.8%	18.0%	11.2%	8.2%
Middle	97	60.6%	14,896	51.1%	41.9%	41.9%	34.1%
Upper	47	29.4%	11,826	40.6%	34.7%	43.3%	47.7%
Unknown	2	1.3%	257	0.9%	0.6%	0.8%	0.4%
TOTAL	160	100.0%	29,130	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	1.8%	182	0.9%	4.9%	5.2%	3.0%
Moderate	16	14.7%	2,352	11.7%	18.0%	15.0%	10.7%
Middle	65	59.6%	11,362	56.4%	41.9%	45.1%	40.7%
Upper	24	22.0%	5,979	29.7%	34.7%	33.4%	44.8%
Unknown	2	1.8%	262	1.3%	0.6%	1.4%	0.8%
TOTAL	109	100.0%	20,137	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	2.4%	94	1.1%	4.9%	2.0%	1.2%
Moderate	8	19.0%	1,073	12.0%	18.0%	10.4%	7.5%
Middle	20	47.6%	3,743	41.8%	41.9%	40.2%	34.4%
Upper	13	31.0%	4,040	45.1%	34.7%	46.9%	56.6%
Unknown	0	0.0%	0	0.0%	0.6%	0.4%	0.3%
TOTAL	42	100.0%	8,950	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	4.9%	2.1%	1.1%
Moderate	0	0.0%	0	0.0%	18.0%	8.4%	7.7%
Middle	2	100.0%	101	100.0%	41.9%	35.1%	29.5%
Upper	0	0.0%	0	0.0%	34.7%	53.6%	61.5%
Unknown	0	0.0%	0	0.0%	0.6%	0.8%	0.2%
TOTAL	2	100.0%	101	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	39.6%	37.0%	53.2%
Moderate	0	0.0%	0	0.0%	21.9%	41.3%	24.4%
Middle	0	0.0%	0	0.0%	24.6%	17.4%	17.1%
Upper	0	0.0%	0	0.0%	6.7%	2.2%	0.4%
Unknown	0	0.0%	0	0.0%	7.3%	2.2%	4.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	3	2.0%	276	0.9%	4.9%	3.6%	6.6%
Moderate	24	15.7%	3,425	11.7%	18.0%	12.7%	10.5%
Middle	87	56.9%	15,206	52.1%	41.9%	42.5%	35.8%
Upper	37	24.2%	10,019	34.3%	34.7%	40.2%	46.1%
Unknown	2	1.3%	262	0.9%	0.6%	0.9%	0.9%
TOTAL	153	100.0%	29,188	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	32	8.3%	\$2,870	13.8%	7.1%	6.9%	6.2%
Moderate	97	25.1%	\$5,801	27.9%	20.2%	21.5%	23.1%
Middle	152	39.4%	\$8,878	42.7%	42.6%	42.3%	45.9%
Upper	102	26.4%	\$3,179	15.3%	29.3%	28.3%	24.3%
Unknown	3	0.8%	\$75	0.4%	0.8%	1.0%	0.5%
TOTAL	386	100.0%	\$20,803	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	8	4.1%	\$1,001	7.1%	7.3%	7.6%	7.6%
Moderate	50	25.4%	\$3,556	25.3%	20.5%	22.5%	21.7%
Middle	87	44.2%	\$7,021	49.9%	42.4%	41.1%	45.8%
Upper	52	26.4%	\$2,479	17.6%	28.9%	27.6%	24.2%
Unknown	0	0.0%	\$0	0.0%	0.9%	1.3%	0.7%
TOTAL	197	100.0%	\$14,057	100.0%	100.0%	100.0%	100.0%

Pensacola MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	3	3.3%	406	1.7%	18.6%	3.2%	1.5%
Moderate	4	4.4%	598	2.5%	19.1%	15.9%	11.0%
Middle	14	15.4%	3,030	12.5%	22.7%	24.0%	21.5%
Upper	53	58.2%	17,798	73.6%	39.7%	39.6%	49.4%
Unknown	17	18.7%	2,334	9.7%	0.0%	17.3%	16.5%
TOTAL	91	100.0%	24,166	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	4.4%	223	2.0%	18.6%	2.7%	1.2%
Moderate	7	15.6%	1,122	10.1%	19.1%	7.7%	4.7%
Middle	5	11.1%	798	7.2%	22.7%	12.7%	9.7%
Upper	27	60.0%	8,172	73.7%	39.7%	31.7%	36.0%
Unknown	4	8.9%	774	7.0%	0.0%	45.1%	48.4%
TOTAL	45	100.0%	11,089	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.6%	3.8%	2.2%
Moderate	0	0.0%	0	0.0%	19.1%	13.9%	8.6%
Middle	0	0.0%	0	0.0%	22.7%	23.1%	17.9%
Upper	2	100.0%	352	100.0%	39.7%	54.3%	64.7%
Unknown	0	0.0%	0	0.0%	0.0%	5.0%	6.6%
TOTAL	2	100.0%	352	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	18.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	19.1%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	39.7%	7.1%	0.5%
Unknown	3	100.0%	632	100.0%	0.0%	92.9%	99.5%
TOTAL	3	100.0%	632	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	5	3.5%	629	1.7%	18.6%	3.0%	1.4%
Moderate	11	7.8%	1,720	4.7%	19.1%	11.8%	7.9%
Middle	19	13.5%	3,828	10.6%	22.7%	18.3%	15.6%
Upper	82	58.2%	26,322	72.6%	39.7%	35.7%	42.2%
Unknown	24	17.0%	3,740	10.3%	0.0%	31.2%	33.0%
TOTAL	141	100.0%	36,239	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	%	\$	%		#%	\$ %
Home Purchase Loans							
Low	4	4.7%	553	2.2%	18.6%	4.4%	2.2%
Moderate	12	14.1%	1,838	7.3%	19.1%	17.2%	12.3%
Middle	10	11.8%	2,215	8.8%	22.7%	23.1%	21.3%
Upper	39	45.9%	18,460	73.4%	39.7%	34.8%	45.1%
Unknown	20	23.5%	2,076	8.3%	0.0%	20.4%	19.1%
TOTAL	85	100.0%	25,142	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	18.6%	4.7%	2.5%
Moderate	5	22.7%	623	11.0%	19.1%	13.3%	9.2%
Middle	6	27.3%	1,100	19.5%	22.7%	16.6%	14.3%
Upper	8	36.4%	3,336	59.1%	39.7%	30.6%	37.5%
Unknown	3	13.6%	587	10.4%	0.0%	34.7%	36.6%
TOTAL	22	100.0%	5,646	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.6%	6.3%	3.5%
Moderate	0	0.0%	0	0.0%	19.1%	14.4%	11.5%
Middle	0	0.0%	0	0.0%	22.7%	22.9%	17.5%
Upper	1	50.0%	362	61.3%	39.7%	50.5%	61.0%
Unknown	1	50.0%	229	38.7%	0.0%	6.0%	6.5%
TOTAL	2	100.0%	591	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	18.6%	2.6%	0.0%
Moderate	0	0.0%	0	0.0%	19.1%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.7%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	39.7%	2.6%	0.2%
Unknown	6	100.0%	1,286	100.0%	0.0%	94.9%	99.8%
TOTAL	6	100.0%	1,286	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	4	3.5%	553	1.7%	18.6%	4.6%	2.3%
Moderate	17	14.8%	2,461	7.5%	19.1%	15.1%	10.6%
Middle	16	13.9%	3,315	10.1%	22.7%	19.9%	17.7%
Upper	48	41.7%	22,158	67.8%	39.7%	33.3%	41.0%
Unknown	30	26.1%	4,178	12.8%	0.0%	27.0%	28.4%
TOTAL	115	100.0%	32,665	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$(000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	71	31.0%	37.0%	\$7,298	41.5%	28.5%	94.9%
	Over \$1 Million/Unknown	158	69.0%	63.0%	\$10,298	58.5%	71.5%	5.1%
	TOTAL	229	100.0%	100.0%	\$17,596	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	181	79.0%	87.4%	\$4,765	27.1%	31.4%	
	\$100,001-\$250,000	30	13.1%	7.4%	\$4,609	26.2%	21.8%	
	\$250,001-\$1 Million	18	7.9%	5.3%	\$8,222	46.7%	46.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	229	100.0%	100.0%	\$17,596	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	54	76.1%		\$1,367	18.7%		
	\$100,001-\$250,000	7	9.9%		\$1,048	14.4%		
	\$250,001-\$1 Million	10	14.1%		\$4,883	66.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	71	100.0%		\$7,298	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	62	45.9%	44.4%	\$8,891	48.9%	33.7%	95.0%
	Over \$1 Million/ Unknown	73	54.1%	55.6%	\$9,274	51.1%	66.3%	5.0%
	TOTAL	135	100.0%	100.0%	\$18,165	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	93	68.9%	90.5%	\$2,377	13.1%	31.4%	
	\$100,001–\$250,000	16	11.9%	5.2%	\$2,705	14.9%	19.1%	
	\$250,001–\$1 Million	26	19.3%	4.4%	\$13,083	72.0%	49.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	135	100.0%	100.0%	\$18,165	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	42	67.7%		\$614	6.9%		
	\$100,001–\$250,000	6	9.7%		\$1,067	12.0%		
	\$250,001–\$1 Million	14	22.6%		\$7,210	81.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	62	100.0%		\$8,891	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	2	2.2%	226	0.9%	1.6%	0.4%	0.2%
Moderate	15	16.5%	1,914	7.9%	15.2%	9.5%	7.1%
Middle	45	49.5%	10,093	41.8%	54.7%	51.0%	46.1%
Upper	29	31.9%	11,933	49.4%	28.5%	39.1%	46.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	91	100.0%	24,166	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	0	0.0%	0	0.0%	1.6%	0.1%	0.1%
Moderate	3	6.7%	342	3.1%	15.2%	6.1%	4.6%
Middle	20	44.4%	3,748	33.8%	54.7%	47.4%	42.2%
Upper	22	48.9%	6,999	63.1%	28.5%	46.4%	53.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	45	100.0%	11,089	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.6%	0.3%	0.2%
Moderate	0	0.0%	0	0.0%	15.2%	8.9%	5.4%
Middle	1	50.0%	250	71.0%	54.7%	47.9%	41.6%
Upper	1	50.0%	102	29.0%	28.5%	42.8%	52.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	352	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	1.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	27.3%	32.1%	26.4%
Middle	3	100.0%	632	100.0%	40.0%	60.7%	61.4%
Upper	0	0.0%	0	0.0%	30.8%	7.1%	12.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	632	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	2	1.4%	226	0.6%	1.6%	0.3%	0.1%
Moderate	18	12.8%	2,256	6.2%	15.2%	8.1%	6.5%
Middle	69	48.9%	14,723	40.6%	54.7%	49.5%	44.8%
Upper	52	36.9%	19,034	52.5%	28.5%	42.0%	48.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	141	100.0%	36,239	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	2.4%	151	0.6%	1.6%	0.6%	0.2%
Moderate	15	17.6%	2,672	10.6%	15.2%	10.5%	7.7%
Middle	45	52.9%	15,510	61.7%	54.7%	50.7%	46.0%
Upper	23	27.1%	6,809	27.1%	28.5%	38.3%	46.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	85	100.0%	25,142	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.6%	0.2%	0.1%
Moderate	3	13.6%	256	4.5%	15.2%	7.5%	5.4%
Middle	9	40.9%	1,629	28.9%	54.7%	51.1%	45.8%
Upper	10	45.5%	3,761	66.6%	28.5%	41.2%	48.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	22	100.0%	5,646	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.6%	0.6%	0.7%
Moderate	1	50.0%	229	38.7%	15.2%	8.9%	7.9%
Middle	0	0.0%	0	0.0%	54.7%	49.8%	44.3%
Upper	1	50.0%	362	61.3%	28.5%	40.6%	47.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	591	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	1.9%	2.6%	0.4%
Moderate	2	33.3%	238	18.5%	27.3%	17.9%	3.4%
Middle	4	66.7%	1,048	81.5%	40.0%	64.1%	70.6%
Upper	0	0.0%	0	0.0%	30.8%	15.4%	25.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	6	100.0%	1,286	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	2	1.7%	151	0.5%	1.6%	0.4%	0.2%
Moderate	21	18.3%	3,395	10.4%	15.2%	9.1%	6.8%
Middle	58	50.4%	18,187	55.7%	54.7%	50.9%	46.5%
Upper	34	29.6%	10,932	33.5%	28.5%	39.6%	46.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	115	100.0%	32,665	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	3	1.3%	\$358	2.0%	2.3%	2.4%	2.5%
Moderate	40	17.5%	\$3,329	18.9%	20.4%	20.5%	23.5%
Middle	107	46.7%	\$9,388	53.4%	50.9%	49.8%	52.1%
Upper	79	34.5%	\$4,521	25.7%	26.5%	27.1%	21.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.2%	0.1%
TOTAL	229	100.0%	\$17,596	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	1	0.7%	\$360	2.0%	2.3%	2.3%	2.0%
Moderate	21	15.6%	\$4,657	25.6%	20.3%	18.8%	21.5%
Middle	57	42.2%	\$7,719	42.5%	50.8%	49.6%	51.5%
Upper	56	41.5%	\$5,429	29.9%	26.7%	28.9%	24.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.1%
TOTAL	135	100.0%	\$18,165	100.0%	100.0%	100.0%	100.0%

Lakeland MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	20.4%	2.7%	1.5%
Moderate	3	10.0%	400	5.2%	18.3%	18.3%	14.7%
Middle	2	6.7%	393	5.1%	21.4%	27.0%	26.2%
Upper	25	83.3%	6,870	89.7%	39.8%	35.6%	41.1%
Unknown	0	0.0%	0	0.0%	0.0%	16.5%	16.6%
TOTAL	30	100.0%	7,663	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	20.4%	2.3%	1.2%
Moderate	0	0.0%	0	0.0%	18.3%	10.6%	7.6%
Middle	1	14.3%	186	9.9%	21.4%	16.7%	14.1%
Upper	6	85.7%	1,702	90.1%	39.8%	36.6%	40.4%
Unknown	0	0.0%	0	0.0%	0.0%	33.9%	36.6%
TOTAL	7	100.0%	1,888	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.4%	3.6%	2.0%
Moderate	0	0.0%	0	0.0%	18.3%	10.1%	7.6%
Middle	0	0.0%	0	0.0%	21.4%	19.2%	15.5%
Upper	0	0.0%	0	0.0%	39.8%	64.4%	70.7%
Unknown	0	0.0%	0	0.0%	0.0%	2.8%	4.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.4%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	39.8%	6.7%	0.3%
Unknown	1	100.0%	425	100.0%	0.0%	93.3%	99.7%
TOTAL	1	100.0%	425	100.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans					Families by Family Income %		
Low	0	0.0%	0	0.0%	20.4%	2.5%	1.3%
Moderate	3	7.9%	400	4.0%	18.3%	14.6%	11.1%
Middle	3	7.9%	579	5.8%	21.4%	22.0%	20.1%
Upper	31	81.6%	8,572	85.9%	39.8%	36.0%	38.8%
Unknown	1	2.6%	425	4.3%	0.0%	24.8%	28.7%
TOTAL	38	100.0%	9,976	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	##%	\$	\$%		##%	\$ %
Home Purchase Loans							
Low	1	5.9%	181	4.6%	20.4%	2.4%	1.3%
Moderate	0	0.0%	0	0.0%	18.3%	14.6%	11.3%
Middle	3	17.6%	542	13.9%	21.4%	25.5%	24.4%
Upper	13	76.5%	3,173	81.4%	39.8%	35.1%	40.6%
Unknown	0	0.0%	0	0.0%	0.0%	22.3%	22.4%
TOTAL	17	100.0%	3,896	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	20.4%	3.6%	2.1%
Moderate	0	0.0%	0	0.0%	18.3%	12.4%	9.5%
Middle	1	100.0%	224	100.0%	21.4%	20.9%	18.9%
Upper	0	0.0%	0	0.0%	39.8%	34.5%	39.5%
Unknown	0	0.0%	0	0.0%	0.0%	28.6%	30.0%
TOTAL	1	100.0%	224	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.4%	4.6%	2.9%
Moderate	0	0.0%	0	0.0%	18.3%	12.5%	10.6%
Middle	0	0.0%	0	0.0%	21.4%	24.1%	18.6%
Upper	0	0.0%	0	0.0%	39.8%	55.4%	62.3%
Unknown	0	0.0%	0	0.0%	0.0%	3.4%	5.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.4%	1.3%	0.1%
Upper	0	0.0%	0	0.0%	39.8%	2.6%	0.6%
Unknown	1	100.0%	792	100.0%	0.0%	96.1%	99.3%
TOTAL	1	100.0%	792	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	1	5.3%	181	3.7%	20.4%	3.0%	1.5%
Moderate	0	0.0%	0	0.0%	18.3%	13.5%	10.2%
Middle	4	21.1%	766	15.6%	21.4%	23.4%	21.5%
Upper	13	68.4%	3,173	64.6%	39.8%	35.2%	39.1%
Unknown	1	5.3%	792	16.1%	0.0%	24.9%	27.6%
TOTAL	19	100.0%	4,912	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	5	6.0%	36.4%	\$493	6.5%	23.1%	94.3%
	Over \$1 Million/ Unknown	79	94.0%	63.6%	\$7,118	93.5%	76.9%	5.7%
	TOTAL	84	100.0%	100.0%	\$7,611	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	61	72.6%	92.2%	\$1,997	26.2%	42.5%	
	\$100,001–\$250,000	14	16.7%	5.1%	\$2,217	29.1%	21.9%	
	\$250,001–\$1 Million	9	10.7%	2.7%	\$3,397	44.6%	35.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	84	100.0%	100.0%	\$7,611	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	4	80.0%		\$134	27.2%		
	\$100,001–\$250,000	0	0.0%		\$0	0.0%		
	\$250,001–\$1 Million	1	20.0%		\$359	72.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	5	100.0%		\$493	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	11	24.4%	45.0%	\$2,621	30.1%	27.1%	94.5%
	Over \$1 Million/ Unknown	34	75.6%	55.0%	\$6,091	69.9%	72.9%	5.5%
	TOTAL	45	100.0%	100.0%	\$8,712	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	25	55.6%	95.7%	\$1,289	14.8%	49.5%	
	\$100,001–\$250,000	10	22.2%	2.8%	\$1,823	20.9%	18.7%	
	\$250,001–\$1 Million	10	22.2%	1.5%	\$5,600	64.3%	31.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	45	100.0%	100.0%	\$8,712	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	4	36.4%		\$355	13.5%		
	\$100,001–\$250,000	3	27.3%		\$586	22.4%		
	\$250,001–\$1 Million	4	36.4%		\$1,680	64.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	11	100.0%		\$2,621	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	1.3%	0.5%	0.4%
Moderate	0	0.0%	0	0.0%	17.3%	14.0%	11.8%
Middle	30	100.0%	7,663	100.0%	58.8%	65.5%	65.8%
Upper	0	0.0%	0	0.0%	22.6%	19.9%	22.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	30	100.0%	7,663	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.3%	0.3%	0.2%
Moderate	0	0.0%	0	0.0%	17.3%	10.1%	8.8%
Middle	3	42.9%	723	38.3%	58.8%	58.1%	56.4%
Upper	4	57.1%	1,165	61.7%	22.6%	31.5%	34.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	7	100.0%	1,888	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.3%	0.5%	0.2%
Moderate	0	0.0%	0	0.0%	17.3%	11.0%	11.2%
Middle	0	0.0%	0	0.0%	58.8%	53.5%	50.1%
Upper	0	0.0%	0	0.0%	22.6%	35.1%	38.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		5.7%	6.7%
Moderate	0	0.0%	0	0.0%	21.6%	37.8%	10.4%
Middle	1	100.0%	425	100.0%	58.0%	51.1%	85.7%
Upper	0	0.0%	0	0.0%	14.7%	4.4%	0.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	425	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	1.3%	0.5%	0.4%
Moderate	0	0.0%	0	0.0%	17.3%	12.4%	10.5%
Middle	34	89.5%	8,811	88.3%	58.8%	62.3%	63.1%
Upper	4	10.5%	1,165	11.7%	22.6%	24.8%	25.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	38	100.0%	9,976	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	1.3%	0.6%	0.4%
Moderate	2	11.8%	238	6.1%	17.3%	13.8%	11.9%
Middle	14	82.4%	3,424	87.9%	58.8%	67.2%	67.4%
Upper	1	5.9%	234	6.0%	22.6%	18.4%	20.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	17	100.0%	3,896	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.3%	0.5%	0.3%
Moderate	0	0.0%	0	0.0%	17.3%	11.5%	9.7%
Middle	1	100.0%	224	100.0%	58.8%	59.8%	58.8%
Upper	0	0.0%	0	0.0%	22.6%	28.3%	31.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	224	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.3%	0.8%	0.5%
Moderate	0	0.0%	0	0.0%	17.3%	14.2%	12.1%
Middle	0	0.0%	0	0.0%	58.8%	51.7%	52.0%
Upper	0	0.0%	0	0.0%	22.6%	33.2%	35.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	5.7%	9.1%	12.5%
Moderate	1	100.0%	792	100.0%	21.6%	37.7%	22.6%
Middle	0	0.0%	0	0.0%	58.0%	41.6%	53.2%
Upper	0	0.0%	0	0.0%	14.7%	11.7%	11.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	792	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	1.3%	0.6%	0.7%
Moderate	3	15.8%	1,030	21.0%	17.3%	13.0%	11.5%
Middle	15	78.9%	3,648	74.3%	58.8%	63.7%	63.7%
Upper	1	5.3%	234	4.8%	22.6%	22.8%	24.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	19	100.0%	4,912	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	4	4.8%	\$297	3.9%	3.9%	4.2%	5.1%
Moderate	29	34.5%	\$1,949	25.6%	21.0%	20.5%	23.3%
Middle	29	34.5%	\$2,318	30.5%	51.4%	52.0%	49.0%
Upper	22	26.2%	\$3,047	40.0%	23.7%	22.4%	21.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.9%	0.8%
TOTAL	84	100.0%	\$7,611	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	8	17.8%	\$1,345	15.4%	4.0%	4.2%	5.7%
Moderate	11	24.4%	\$1,659	19.0%	21.0%	19.3%	20.1%
Middle	18	40.0%	\$4,146	47.6%	51.5%	55.1%	52.6%
Upper	8	17.8%	\$1,562	17.9%	23.4%	20.6%	21.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.8%	0.2%
TOTAL	45	100.0%	\$8,712	100.0%	100.0%	100.0%	100.0%

ARKANSAS

Little Rock MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	87	12.0%	8,918	6.7%	21.3%	8.4%	4.9%
Moderate	151	20.8%	20,084	15.1%	17.6%	21.1%	16.4%
Middle	137	18.9%	22,774	17.2%	19.9%	21.5%	20.6%
Upper	272	37.5%	68,606	51.7%	41.2%	32.2%	42.6%
Unknown	79	10.9%	12,201	9.2%	0.0%	16.8%	15.5%
TOTAL	726	100.0%	132,583	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	17	3.9%	1,654	1.8%	21.3%	3.1%	1.5%
Moderate	37	8.6%	4,990	5.4%	17.6%	9.9%	6.3%
Middle	102	23.6%	15,908	17.2%	19.9%	16.8%	13.5%
Upper	235	54.4%	61,195	66.3%	41.2%	42.2%	51.2%
Unknown	41	9.5%	8,484	9.2%	0.0%	28.0%	27.5%
TOTAL	432	100.0%	92,231	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.3%	6.0%	3.5%
Moderate	1	9.1%	50	5.0%	17.6%	13.6%	9.0%
Middle	3	27.3%	360	35.7%	19.9%	20.1%	13.9%
Upper	4	36.4%	333	33.0%	41.2%	50.3%	57.3%
Unknown	3	27.3%	266	26.4%	0.0%	9.9%	16.4%
TOTAL	11	100.0%	1,009	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.6%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.9%	1.1%	0.2%
Upper	0	0.0%	0	0.0%	41.2%	3.3%	0.7%
Unknown	10	100.0%	10,460	100.0%	0.0%	95.6%	99.1%
TOTAL	10	100.0%	10,460	100.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans					Families by Family Income %		
Low	105	8.9%	10,652	4.5%	21.3%	5.6%	3.0%
Moderate	189	16.0%	25,124	10.6%	17.6%	14.9%	10.5%
Middle	244	20.6%	39,388	16.6%	19.9%	18.4%	15.7%
Upper	511	43.2%	130,134	55.0%	41.2%	35.9%	43.9%
Unknown	133	11.3%	31,411	13.3%	0.0%	25.3%	26.9%
TOTAL	1,182	100.0%	236,709	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	79	12.3%	7,852	6.6%	21.3%	6.4%	3.4%
Moderate	163	25.4%	23,121	19.4%	17.6%	19.1%	14.3%
Middle	142	22.1%	23,134	19.4%	19.9%	18.5%	17.3%
Upper	223	34.7%	59,136	49.6%	41.2%	31.6%	41.2%
Unknown	35	5.5%	5,958	5.0%	0.0%	24.4%	23.8%
TOTAL	642	100.0%	119,201	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	17	6.2%	1,605	3.2%	21.3%	4.3%	2.3%
Moderate	49	17.9%	6,553	13.1%	17.6%	12.1%	8.0%
Middle	63	23.0%	9,094	18.2%	19.9%	18.1%	14.7%
Upper	121	44.2%	28,330	56.7%	41.2%	35.8%	44.5%
Unknown	24	8.8%	4,348	8.7%	0.0%	29.7%	30.6%
TOTAL	274	100.0%	49,930	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	7.1%	18	0.9%	21.3%	5.2%	2.7%
Moderate	0	0.0%	0	0.0%	17.6%	14.1%	9.9%
Middle	6	42.9%	492	25.1%	19.9%	20.6%	16.3%
Upper	2	14.3%	287	14.6%	41.2%	51.7%	57.1%
Unknown	5	35.7%	1,166	59.4%	0.0%	8.4%	14.0%
TOTAL	14	100.0%	1,963	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.3%	0.4%	0.0%
Moderate	0	0.0%	0	0.0%	17.6%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.9%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	41.2%	4.1%	0.5%
Unknown	19	100.0%	12,616	100.0%	0.0%	95.5%	99.5%
TOTAL	19	100.0%	12,616	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	97	10.2%	9,475	5.2%	21.3%	5.3%	2.7%
Moderate	212	22.3%	29,674	16.2%	17.6%	15.5%	10.6%
Middle	211	22.2%	32,720	17.8%	19.9%	18.0%	14.9%
Upper	346	36.5%	87,753	47.8%	41.2%	33.8%	39.8%
Unknown	83	8.7%	24,088	13.1%	0.0%	27.5%	31.9%
TOTAL	949	100.0%	183,710	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	428	26.5%	33.4%	\$34,495	25.5%	29.2%	90.7%
	Over \$1 Million/ Unknown	1187	73.5%	66.6%	\$101,033	74.5%	70.8%	9.3%
	TOTAL	1615	100.0%	100.0%	\$135,528	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1264	78.3%	85.7%	\$37,857	27.9%	28.5%	
	\$100,001–\$250,000	224	13.9%	8.0%	\$37,116	27.4%	21.1%	
	\$250,001–\$1 Million	127	7.9%	6.3%	\$60,555	44.7%	50.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1615	100.0%	100.0%	\$135,528	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	340	79.4%		\$10,877	31.5%		
	\$100,001–\$250,000	61	14.3%		\$10,837	31.4%		
	\$250,001–\$1 Million	27	6.3%		\$12,781	37.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	428	100.0%		\$34,495	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	586	46.7%	42.1%	\$45,979	37.8%	36.9%	91.1%
	Over \$1 Million/ Unknown	668	53.3%	57.9%	\$75,687	62.2%	63.1%	8.9%
	TOTAL	1254	100.0%	100.0%	\$121,666	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	941	75.0%	89.1%	\$29,717	24.4%	31.0%	
	\$100,001–\$250,000	191	15.2%	6.2%	\$31,619	26.0%	20.3%	
	\$250,001– \$1 Million	122	9.7%	4.7%	\$60,330	49.6%	48.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1254	100.0%	100.0%	\$121,666	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	476	81.2%		\$11,625	25.3%		
	\$100,001–\$250,000	59	10.1%		\$10,307	22.4%		
	\$250,001– \$1 Million	51	8.7%		\$24,047	52.3%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	586	100.0%		\$45,979	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2020						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	17	85.0%	54.3%	1027	58.2%	68.0%	97.6%
	Over \$1 Million/ Unknown	3	15.0%	45.7%	738	41.8%	32.0%	2.4%
	TOTAL	20	100.0%	100.0%	1765	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	14	70.0%	82.7%	408	23.1%	35.4%	
	\$100,001–\$250,000	4	20.0%	11.9%	655	37.1%	32.1%	
	\$250,001–\$500,000	2	10.0%	5.4%	702	39.8%	32.5%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	20	100.0%	100.0%	1765	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	13	76.5%		372	36.2%		
	\$100,001–\$250,000	4	23.5%		655	63.8%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	17	100.0%		1027	100.0%		

Distribution of 2021 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2021						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	%
		#	%	%	\$ (000s)	\$ %	\$ %	
Farm Revenue	\$1 Million or Less	27	65.9%	53.7%	3917	69.5%	63.8%	97.6%
	Over \$1 Million/ Unknown	14	34.1%	46.3%	1719	30.5%	36.2%	2.4%
	TOTAL	41	100.0%	100.0%	5636	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	24	58.5%	76.6%	854	15.2%	26.8%	
	\$100,001–\$250,000	8	19.5%	14.8%	1402	24.9%	32.3%	
	\$250,001–\$500,000	9	22.0%	8.6%	3380	60.0%	40.9%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	41	100.0%	100.0%	5636	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	16	59.3%		539	13.8%		
	\$100,001–\$250,000	4	14.8%		798	20.4%		
	\$250,001–\$1 Million	7	25.9%		2580	65.9%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	27	100.0%		3917	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	8	1.1%	816	0.6%	2.4%	1.1%	0.7%
Moderate	78	10.7%	10,365	7.8%	17.1%	10.9%	7.4%
Middle	299	41.2%	46,729	35.2%	43.8%	42.8%	38.5%
Upper	339	46.7%	74,587	56.3%	36.4%	45.1%	53.4%
Unknown	2	0.3%	86	0.1%	0.3%	0.1%	0.1%
TOTAL	726	100.0%	132,583	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	2	0.5%	277	0.3%	2.4%	0.6%	0.4%
Moderate	41	9.5%	7,079	7.7%	17.1%	7.0%	4.8%
Middle	138	31.9%	24,103	26.1%	43.8%	37.1%	32.2%
Upper	251	58.1%	60,772	65.9%	36.4%	55.2%	62.5%
Unknown	0	0.0%	0	0.0%	0.3%	0.1%	0.1%
TOTAL	432	100.0%	92,231	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.4%	1.3%	0.9%
Moderate	3	27.3%	223	22.1%	17.1%	11.4%	8.6%
Middle	6	54.5%	526	52.1%	43.8%	40.1%	35.0%
Upper	2	18.2%	260	25.8%	36.4%	47.0%	55.4%
Unknown	0	0.0%	0	0.0%	0.3%	0.1%	0.0%
TOTAL	11	100.0%	1,009	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	3	30.0%	560	5.4%	8.7%	10.4%	4.7%
Moderate	2	20.0%	710	6.8%	23.8%	37.2%	30.5%
Middle	3	30.0%	5,758	55.0%	28.1%	25.7%	30.0%
Upper	2	20.0%	3,432	32.8%	39.1%	26.2%	34.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.5%	0.2%
TOTAL	10	100.0%	10,460	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	13	1.1%	1,653	0.7%	2.4%	1.0%	0.8%
Moderate	124	10.5%	18,377	7.8%	17.1%	9.7%	7.4%
Middle	446	37.8%	77,116	32.6%	43.8%	40.3%	35.3%
Upper	594	50.4%	139,051	58.8%	36.4%	48.9%	56.5%
Unknown	2	0.2%	86	0.0%	0.3%	0.1%	0.1%
TOTAL	1,179	100.0%	236,283	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	11	1.7%	1,418	1.2%	2.4%	1.5%	1.2%
Moderate	73	11.4%	11,382	9.5%	17.1%	11.9%	8.3%
Middle	289	45.0%	48,574	40.7%	43.8%	44.1%	39.9%
Upper	269	41.9%	57,827	48.5%	36.4%	42.3%	50.4%
Unknown	0	0.0%	0	0.0%	0.3%	0.2%	0.2%
TOTAL	642	100.0%	119,201	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.4%	0.9%	1.0%
Moderate	26	9.5%	3,294	6.6%	17.1%	9.5%	6.8%
Middle	107	39.1%	18,256	36.6%	43.8%	40.6%	35.7%
Upper	140	51.1%	28,344	56.8%	36.4%	48.9%	56.4%
Unknown	1	0.4%	36	0.1%	0.3%	0.1%	0.0%
TOTAL	274	100.0%	49,930	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	14.3%	103	5.2%	2.4%	1.5%	0.9%
Moderate	2	14.3%	544	27.7%	17.1%	12.5%	11.2%
Middle	6	42.9%	607	30.9%	43.8%	37.9%	32.1%
Upper	4	28.6%	709	36.1%	36.4%	48.0%	55.6%
Unknown	0	0.0%	0	0.0%	0.3%	0.1%	0.2%
TOTAL	14	100.0%	1,963	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	1	5.3%	1,657	13.1%	8.7%	7.4%	6.2%
Moderate	6	31.6%	3,025	24.0%	23.8%	31.3%	22.2%
Middle	11	57.9%	7,372	58.4%	28.1%	32.5%	19.1%
Upper	1	5.3%	562	4.5%	39.1%	27.2%	46.7%
Unknown	0	0.0%	0	0.0%	0.2%	1.6%	5.9%
TOTAL	19	100.0%	12,616	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	14	1.5%	3,178	1.7%	2.4%	1.3%	1.5%
Moderate	107	11.3%	18,245	9.9%	17.1%	11.1%	8.7%
Middle	413	43.5%	74,809	40.7%	43.8%	42.3%	36.7%
Upper	414	43.6%	87,442	47.6%	36.4%	45.1%	52.7%
Unknown	1	0.1%	36	0.0%	0.3%	0.2%	0.5%
TOTAL	949	100.0%	183,710	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	96	5.9%	\$13,309	9.8%	4.8%	4.8%	7.0%
Moderate	345	21.4%	\$30,498	22.5%	20.7%	18.6%	21.2%
Middle	587	36.3%	\$47,163	34.8%	33.4%	33.2%	27.9%
Upper	584	36.2%	\$44,445	32.8%	41.0%	42.8%	43.5%
Unknown	3	0.2%	\$113	0.1%	0.2%	0.7%	0.4%
TOTAL	1,615	100.0%	\$135,528	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	58	4.6%	\$8,310	6.8%	4.9%	4.6%	5.8%
Moderate	279	22.2%	\$30,819	25.3%	21.0%	18.5%	20.3%
Middle	427	34.1%	\$33,987	27.9%	33.3%	34.0%	30.1%
Upper	487	38.8%	\$48,415	39.8%	40.7%	42.3%	43.4%
Unknown	3	0.2%	\$135	0.1%	0.2%	0.7%	0.3%
TOTAL	1,254	100.0%	\$121,666	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		#%	\$ %
Low	1	5.0%	\$36	2.0%	1.0%	0.5%	0.2%
Moderate	2	10.0%	\$249	14.1%	17.2%	14.1%	14.6%
Middle	14	70.0%	\$1,262	71.5%	49.6%	62.4%	64.9%
Upper	3	15.0%	\$218	12.4%	32.3%	23.0%	20.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
TOTAL	20	100.0%	\$1,765	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		#%	\$ %
Low	0	0.0%	\$0	0.0%	1.0%	0.8%	0.3%
Moderate	6	14.6%	\$1,013	18.0%	17.4%	9.4%	9.1%
Middle	22	53.7%	\$2,815	49.9%	50.0%	67.5%	71.9%
Upper	13	31.7%	\$1,808	32.1%	31.6%	22.0%	18.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.0%
TOTAL	41	100.0%	\$5,636	100.0%	100.0%	100.0%	100.0%

North Central Arkansas NonMSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	29	9.2%	2,290	5.8%	19.0%	5.1%	2.7%
Moderate	51	16.2%	4,444	11.3%	17.4%	16.1%	11.1%
Middle	73	23.2%	7,752	19.7%	20.0%	19.2%	16.8%
Upper	140	44.6%	22,181	56.4%	43.6%	43.2%	53.5%
Unknown	21	6.7%	2,648	6.7%	0.0%	16.4%	15.8%
TOTAL	314	100.0%	39,315	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	7	4.0%	606	2.2%	19.0%	3.0%	1.3%
Moderate	23	13.2%	1,763	6.3%	17.4%	8.5%	4.9%
Middle	31	17.8%	3,025	10.8%	20.0%	14.5%	10.7%
Upper	110	63.2%	22,226	79.6%	43.6%	51.0%	58.8%
Unknown	3	1.7%	287	1.0%	0.0%	23.0%	24.4%
TOTAL	174	100.0%	27,907	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	4	23.5%	161	14.7%	19.0%	9.0%	4.8%
Moderate	1	5.9%	40	3.6%	17.4%	8.4%	5.9%
Middle	5	29.4%	303	27.6%	20.0%	16.6%	13.5%
Upper	6	35.3%	502	45.8%	43.6%	55.5%	60.7%
Unknown	1	5.9%	90	8.2%	0.0%	10.5%	15.0%
TOTAL	17	100.0%	1,096	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	19.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.0%	4.1%	1.4%
Upper	1	12.5%	178	4.6%	43.6%	17.8%	17.4%
Unknown	7	87.5%	3,709	95.4%	0.0%	78.1%	81.2%
TOTAL	8	100.0%	3,887	100.0%	100.0%	100.0%	100.0%

Total Home Mortgage Loans					Families by Family Income %		
Low	41	7.9%	3,146	4.3%	19.0%	4.2%	2.0%
Moderate	75	14.5%	6,247	8.6%	17.4%	12.2%	7.7%
Middle	111	21.5%	11,271	15.5%	20.0%	16.7%	13.3%
Upper	258	49.9%	45,337	62.3%	43.6%	46.0%	54.4%
Unknown	32	6.2%	6,734	9.3%	0.0%	20.9%	22.6%
TOTAL	517	100.0%	72,735	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	##%	\$	##%		##%	\$ %
Home Purchase Loans							
Low	21	7.9%	1,645	4.2%	19.0%	5.0%	2.6%
Moderate	56	21.0%	5,881	15.0%	17.4%	15.4%	10.9%
Middle	60	22.5%	8,179	20.9%	20.0%	19.4%	17.0%
Upper	114	42.7%	21,599	55.1%	43.6%	38.7%	48.5%
Unknown	16	6.0%	1,903	4.9%	0.0%	21.6%	21.1%
TOTAL	267	100.0%	39,207	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	3.6%	296	1.5%	19.0%	4.6%	2.3%
Moderate	18	12.9%	1,577	7.8%	17.4%	10.7%	6.7%
Middle	39	27.9%	5,251	25.9%	20.0%	17.3%	13.6%
Upper	71	50.7%	12,358	60.9%	43.6%	44.6%	52.6%
Unknown	7	5.0%	813	4.0%	0.0%	22.8%	24.8%
TOTAL	140	100.0%	20,295	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	10.0%	30	5.4%	19.0%	5.9%	3.6%
Moderate	0	0.0%	0	0.0%	17.4%	12.4%	10.0%
Middle	4	40.0%	169	30.2%	20.0%	16.5%	14.4%
Upper	3	30.0%	206	36.9%	43.6%	55.6%	55.6%
Unknown	2	20.0%	154	27.5%	0.0%	9.6%	16.4%
TOTAL	10	100.0%	559	100.0%	100.0%	100.0%	100.0%

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	19.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.0%	2.2%	1.2%
Upper	0	0.0%	0	0.0%	43.6%	20.2%	10.4%
Unknown	10	100.0%	2,860	100.0%	0.0%	77.5%	88.4%
TOTAL	10	100.0%	2,860	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	27	6.3%	1,971	3.1%	19.0%	4.8%	2.4%
Moderate	74	17.3%	7,458	11.9%	17.4%	13.1%	8.8%
Middle	103	24.1%	13,599	21.6%	20.0%	18.2%	15.1%
Upper	188	44.0%	34,163	54.3%	43.6%	41.3%	49.1%
Unknown	35	8.2%	5,730	9.1%	0.0%	22.5%	24.6%
TOTAL	427	100.0%	62,921	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	511	52.7%	44.8%	\$27,043	50.9%	43.2%	90.7%
	Over \$1 Million/Unknown	459	47.3%	55.2%	\$26,098	49.1%	56.8%	9.3%
	TOTAL	970	100.0%	100.0%	\$53,141	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	836	86.2%	86.6%	\$20,933	39.4%	33.0%	
	\$100,001–\$250,000	98	10.1%	8.3%	\$16,033	30.2%	24.1%	
	\$250,001–\$1 Million	36	3.7%	5.1%	\$16,175	30.4%	42.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	970	100.0%	100.0%	\$53,141	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	442	86.5%		\$10,964	40.5%		
	\$100,001–\$250,000	52	10.2%		\$8,729	32.3%		
	\$250,001–\$1 Million	17	3.3%		\$7,350	27.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	511	100.0%		\$27,043	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	542	58.0%	52.2%	\$34,779	53.1%	48.1%	90.6%
	Over \$1 Million/ Unknown	392	42.0%	47.8%	\$30,664	46.9%	51.9%	9.4%
	TOTAL	934	100.0%	100.0%	\$65,443	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	778	83.3%	89.1%	\$21,045	32.2%	34.1%	
	\$100,001–\$250,000	96	10.3%	6.6%	\$16,258	24.8%	22.7%	
	\$250,001–\$1 Million	60	6.4%	4.3%	\$28,140	43.0%	43.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	934	100.0%	100.0%	\$65,443	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	465	85.8%		\$11,738	33.8%		
	\$100,001–\$250,000	44	8.1%		\$7,556	21.7%		
	\$250,001–\$1 Million	33	6.1%		\$15,485	44.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	542	100.0%		\$34,779	100.0%		

Distribution of 2020 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2020						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	89	95.7%	77.5%	5461	89.3%	84.3%	97.7%
	Over \$1 Million/ Unknown	4	4.3%	22.5%	654	10.7%	15.7%	2.3%
	TOTAL	93	100.0%	100.0%	6115	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	75	80.6%	85.6%	2343	38.3%	44.6%	
	\$100,001– \$250,000	15	16.1%	10.9%	2364	38.7%	32.3%	
	\$250,001– \$500,000	3	3.2%	3.5%	1408	23.0%	23.1%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	93	100.0%	100.0%	6115	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	74	83.1%		2307	42.2%		
	\$100,001– \$250,000	12	13.5%		1746	32.0%		
	\$250,001–\$1 Million	3	3.4%		1408	25.8%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	89	100.0%		5461	100.0%		

Distribution of 2021 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2021						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	93	51.1%	65.9%	8692	58.3%	75.0%	97.9%
	Over \$1 Million/ Unknown	89	48.9%	34.1%	6225	41.7%	25.0%	2.1%
	TOTAL	182	100.0%	100.0%	14917	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	136	74.7%	84.1%	5040	33.8%	40.7%	
	\$100,001–\$250,000	34	18.7%	12.3%	5488	36.8%	36.6%	
	\$250,001–\$500,000	12	6.6%	3.6%	4389	29.4%	22.7%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	182	100.0%	100.0%	14917	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	64	68.8%		2651	30.5%		
	\$100,001–\$250,000	22	23.7%		3642	41.9%		
	\$250,001–\$1 Million	7	7.5%		2399	27.6%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	93	100.0%		8692	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	22	7.0%	2,395	6.1%	7.2%	5.6%	4.8%
Middle	189	60.2%	21,912	55.7%	71.3%	67.0%	64.2%
Upper	103	32.8%	15,008	38.2%	21.5%	27.2%	30.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	314	100.0%	39,315	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	4.6%	832	3.0%	7.2%	4.8%	4.0%
Middle	114	65.5%	17,835	63.9%	71.3%	63.2%	60.1%
Upper	52	29.9%	9,240	33.1%	21.5%	31.8%	35.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	174	100.0%	27,907	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	5.9%	134	12.2%	7.2%	6.1%	5.6%
Middle	14	82.4%	837	76.4%	71.3%	66.6%	66.1%
Upper	2	11.8%	125	11.4%	21.5%	26.2%	25.4%
Unknown	0	0.0%	0	0.0%	0.0%	1.2%	2.9%
TOTAL	17	100.0%	1,096	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		0.0%	0.0%
Moderate	1	12.5%	506	13.0%	12.1%	13.7%	
Middle	6	75.0%	3,036	78.1%	76.0%	72.6%	
Upper	1	12.5%	345	8.9%	11.9%	13.7%	
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	
TOTAL	8	100.0%	3,887	100.0%	100.0%	100.0%	

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	32	6.2%	3,867	5.4%	7.2%	5.3%	4.6%
Middle	323	63.0%	43,620	60.4%	71.3%	65.4%	62.9%
Upper	158	30.8%	24,718	34.2%	21.5%	29.1%	32.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	513	100.0%	72,205	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	22	8.2%	3,086	7.9%	7.2%	6.2%	5.4%
Middle	168	62.9%	23,595	60.2%	71.3%	66.7%	64.1%
Upper	77	28.8%	12,526	31.9%	21.5%	27.1%	30.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.0%
TOTAL	267	100.0%	39,207	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	8	5.7%	799	3.9%	7.2%	4.8%	4.4%
Middle	91	65.0%	12,500	61.6%	71.3%	66.6%	63.4%
Upper	41	29.3%	6,996	34.5%	21.5%	28.5%	32.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	140	100.0%	20,295	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	7.2%	4.3%	2.4%
Middle	6	60.0%	410	73.3%	71.3%	66.5%	69.6%
Upper	4	40.0%	149	26.7%	21.5%	28.9%	27.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.3%	0.6%
TOTAL	10	100.0%	559	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	30.0%	571	20.0%	12.1%	14.6%	8.6%
Middle	6	60.0%	1,987	69.5%	76.0%	66.3%	75.2%
Upper	1	10.0%	302	10.6%	11.9%	19.1%	16.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	10	100.0%	2,860	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	33	7.7%	4,456	7.1%	7.2%	5.6%	5.1%
Middle	271	63.5%	38,492	61.2%	71.3%	66.7%	64.2%
Upper	123	28.8%	19,973	31.7%	21.5%	27.6%	30.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.0%
TOTAL	427	100.0%	62,921	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	153	15.8%	\$7,067	13.3%	11.4%	9.0%	7.7%
Middle	589	60.7%	\$35,934	67.6%	68.2%	66.5%	71.2%
Upper	228	23.5%	\$10,140	19.1%	20.4%	24.0%	20.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.3%
TOTAL	970	100.0%	\$53,141	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	138	14.8%	\$10,579	16.2%	11.2%	8.0%	6.9%
Middle	554	59.3%	\$39,107	59.8%	68.1%	67.4%	68.9%
Upper	242	25.9%	\$15,757	24.1%	20.7%	23.8%	23.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.7%	0.3%
TOTAL	934	100.0%	\$65,443	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		#%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	11	11.8%	\$492	8.0%	5.0%	9.3%	9.5%
Middle	64	68.8%	\$3,745	61.2%	74.1%	73.5%	71.7%
Upper	18	19.4%	\$1,878	30.7%	20.9%	16.9%	18.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.1%
TOTAL	93	100.0%	\$6,115	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		#%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	20	11.0%	\$623	4.2%	5.1%	8.5%	7.7%
Middle	141	77.5%	\$11,475	76.9%	75.0%	74.7%	72.7%
Upper	21	11.5%	\$2,819	18.9%	19.9%	16.2%	19.5%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.1%
TOTAL	182	100.0%	\$14,917	100.0%	100.0%	100.0%	100.0%

Fayetteville MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	35	18.6%	3,551	10.2%	20.4%	6.0%	3.4%
Moderate	49	26.1%	7,205	20.7%	18.6%	17.6%	12.9%
Middle	41	21.8%	7,477	21.5%	20.3%	20.3%	18.0%
Upper	57	30.3%	15,638	45.0%	40.7%	42.4%	52.3%
Unknown	6	3.2%	918	2.6%	0.0%	13.7%	13.2%
TOTAL	188	100.0%	34,789	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	6	5.7%	604	2.8%	20.4%	4.1%	1.9%
Moderate	17	16.0%	2,272	10.6%	18.6%	10.4%	6.4%
Middle	19	17.9%	2,923	13.6%	20.3%	15.0%	11.5%
Upper	61	57.5%	15,085	70.1%	40.7%	50.9%	60.3%
Unknown	3	2.8%	635	3.0%	0.0%	19.6%	19.8%
TOTAL	106	100.0%	21,519	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.4%	3.7%	2.4%
Moderate	0	0.0%	0	0.0%	18.6%	9.3%	5.6%
Middle	0	0.0%	0	0.0%	20.3%	15.6%	11.6%
Upper	0	0.0%	0	0.0%	40.7%	56.7%	63.6%
Unknown	0	0.0%	0	0.0%	0.0%	14.7%	16.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.6%	1.0%	0.3%
Middle	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.7%	6.3%	2.5%
Unknown	2	100.0%	830	100.0%	0.0%	92.7%	97.2%
TOTAL	2	100.0%	830	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	41	13.9%	4,155	7.3%	20.4%	4.9%	2.5%
Moderate	66	22.3%	9,477	16.6%	18.6%	13.5%	9.1%
Middle	60	20.3%	10,400	18.2%	20.3%	17.1%	13.8%
Upper	118	39.9%	30,723	53.8%	40.7%	46.4%	53.8%
Unknown	11	3.7%	2,383	4.2%	0.0%	18.1%	20.8%
TOTAL	296	100.0%	57,138	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	21	10.7%	3,047	6.3%	20.4%	4.8%	2.7%
Moderate	48	24.5%	7,786	16.2%	18.6%	14.7%	10.7%
Middle	40	20.4%	8,476	17.6%	20.3%	18.5%	16.1%
Upper	78	39.8%	25,465	53.0%	40.7%	40.0%	48.5%
Unknown	9	4.6%	3,315	6.9%	0.0%	21.9%	21.9%
TOTAL	196	100.0%	48,089	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	4	5.3%	403	2.2%	20.4%	6.0%	3.1%
Moderate	12	16.0%	1,666	9.1%	18.6%	12.7%	8.5%
Middle	19	25.3%	3,161	17.3%	20.3%	17.6%	14.3%
Upper	37	49.3%	12,481	68.3%	40.7%	42.4%	51.3%
Unknown	3	4.0%	568	3.1%	0.0%	21.3%	22.8%
TOTAL	75	100.0%	18,279	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.4%	4.2%	2.6%
Moderate	0	0.0%	0	0.0%	18.6%	10.1%	5.8%
Middle	0	0.0%	0	0.0%	20.3%	17.7%	12.2%
Upper	0	0.0%	0	0.0%	40.7%	54.8%	62.5%
Unknown	0	0.0%	0	0.0%	0.0%	13.1%	16.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.4%	0.4%	0.0%
Moderate	0	0.0%	0	0.0%	18.6%	0.4%	0.0%
Middle	0	0.0%	0	0.0%	20.3%	0.9%	0.1%
Upper	1	100.0%	170	100.0%	40.7%	4.9%	0.7%
Unknown	0	0.0%	0	0.0%	0.0%	93.3%	99.2%
TOTAL	1	100.0%	170	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	25	9.2%	3,450	5.2%	20.4%	5.4%	2.6%
Moderate	60	22.1%	9,452	14.2%	18.6%	13.4%	8.6%
Middle	59	21.7%	11,637	17.5%	20.3%	17.8%	13.5%
Upper	116	42.6%	38,116	57.3%	40.7%	41.5%	44.6%
Unknown	12	4.4%	3,883	5.8%	0.0%	22.0%	30.8%
TOTAL	272	100.0%	66,538	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	65	24.3%	31.9%	\$5,945	20.5%	30.0%	91.8%
	Over \$1 Million/ Unknown	203	75.7%	68.1%	\$23,080	79.5%	70.0%	8.2%
	TOTAL	268	100.0%	100.0%	\$29,025	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	198	73.9%	84.8%	\$5,804	20.0%	27.8%	
	\$100,001–\$250,000	35	13.1%	8.8%	\$6,056	20.9%	22.6%	
	\$250,001–\$1 Million	35	13.1%	6.4%	\$17,165	59.1%	49.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	268	100.0%	100.0%	\$29,025	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	52	80.0%		\$1,423	23.9%		
	\$100,001–\$250,000	5	7.7%		\$822	13.8%		
	\$250,001–\$1 Million	8	12.3%		\$3,700	62.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	65	100.0%		\$5,945	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	95	50.5%	40.5%	\$9,061	38.5%	36.9%	91.8%
	Over \$1 Million/ Unknown	93	49.5%	59.5%	\$14,481	61.5%	63.1%	8.2%
	TOTAL	188	100.0%	100.0%	\$23,542	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	136	72.3%	87.8%	\$3,918	16.6%	29.8%	
	\$100,001–\$250,000	25	13.3%	6.5%	\$4,559	19.4%	19.7%	
	\$250,001–\$1 Million	27	14.4%	5.7%	\$15,065	64.0%	50.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	188	100.0%	100.0%	\$23,542	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	76	80.0%		\$1,596	17.6%		
	\$100,001–\$250,000	9	9.5%		\$1,633	18.0%		
	\$250,001–\$1 Million	10	10.5%		\$5,832	64.4%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	95	100.0%		\$9,061	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.6%	0.5%	0.3%
Moderate	51	27.1%	7,300	21.0%	18.1%	11.6%	9.1%
Middle	70	37.2%	12,247	35.2%	45.3%	41.7%	38.8%
Upper	67	35.6%	15,242	43.8%	36.0%	46.3%	51.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	188	100.0%	34,789	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.6%	0.3%	0.1%
Moderate	17	16.0%	2,466	11.5%	18.1%	10.3%	7.8%
Middle	39	36.8%	7,044	32.7%	45.3%	37.7%	35.0%
Upper	50	47.2%	12,009	55.8%	36.0%	51.7%	57.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	106	100.0%	21,519	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.6%	0.3%	0.1%
Moderate	0	0.0%	0	0.0%	18.1%	10.9%	9.1%
Middle	0	0.0%	0	0.0%	45.3%	41.2%	40.9%
Upper	0	0.0%	0	0.0%	36.0%	47.7%	49.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		11.3%	11.7%
Moderate	2	100.0%	830	100.0%	28.9%	27.7%	19.1%
Middle	0	0.0%	0	0.0%	30.2%	41.3%	40.2%
Upper	0	0.0%	0	0.0%	29.6%	19.4%	30.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	830	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.6%	0.4%	0.7%
Moderate	70	23.6%	10,596	18.5%	18.1%	11.2%	9.0%
Middle	109	36.8%	19,291	33.8%	45.3%	39.6%	37.0%
Upper	117	39.5%	27,251	47.7%	36.0%	48.8%	53.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	296	100.0%	57,138	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	1.0%	292	0.6%	0.6%	0.5%	0.5%
Moderate	22	11.2%	3,731	7.8%	18.1%	12.4%	10.0%
Middle	91	46.4%	20,608	42.9%	45.3%	42.3%	39.3%
Upper	81	41.3%	23,458	48.8%	36.0%	44.9%	50.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	196	100.0%	48,089	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.6%	0.4%	0.3%
Moderate	17	22.7%	2,202	12.0%	18.1%	11.3%	8.8%
Middle	30	40.0%	8,343	45.6%	45.3%	40.2%	37.2%
Upper	28	37.3%	7,734	42.3%	36.0%	48.1%	53.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	75	100.0%	18,279	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.6%	0.1%	0.1%
Moderate	0	0.0%	0	0.0%	18.1%	12.4%	10.3%
Middle	0	0.0%	0	0.0%	45.3%	40.5%	37.9%
Upper	0	0.0%	0	0.0%	36.0%	47.0%	51.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	11.3%	8.9%	6.9%
Moderate	1	100.0%	170	100.0%	28.9%	23.7%	7.0%
Middle	0	0.0%	0	0.0%	30.2%	39.3%	32.2%
Upper	0	0.0%	0	0.0%	29.6%	28.1%	54.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	170	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	2	0.7%	292	0.4%	0.6%	0.5%	1.1%
Moderate	40	14.7%	6,103	9.2%	18.1%	12.0%	9.2%
Middle	121	44.5%	28,951	43.5%	45.3%	41.2%	37.6%
Upper	109	40.1%	31,192	46.9%	36.0%	46.4%	52.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	272	100.0%	66,538	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	5	1.9%	\$333	1.1%	1.9%	1.9%	2.6%
Moderate	63	23.5%	\$7,971	27.5%	18.4%	16.6%	16.9%
Middle	109	40.7%	\$12,491	43.0%	45.2%	44.6%	43.7%
Upper	91	34.0%	\$8,230	28.4%	34.5%	36.7%	36.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.2%	0.1%
TOTAL	268	100.0%	\$29,025	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	4	2.1%	\$238	1.0%	1.8%	1.4%	2.0%
Moderate	36	19.1%	\$4,422	18.8%	18.3%	16.6%	15.6%
Middle	92	48.9%	\$9,477	40.3%	45.1%	44.0%	42.4%
Upper	56	29.8%	\$9,405	39.9%	34.8%	37.2%	39.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.8%	0.1%
TOTAL	188	100.0%	\$23,542	100.0%	100.0%	100.0%	100.0%

Fort Smith MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	11	17.7%	874	10.2%	21.4%	5.3%	2.8%
Moderate	18	29.0%	1,739	20.3%	17.7%	17.6%	12.4%
Middle	6	9.7%	888	10.4%	19.1%	21.6%	19.0%
Upper	21	33.9%	4,255	49.7%	41.9%	38.0%	48.5%
Unknown	6	9.7%	797	9.3%	0.0%	17.5%	17.2%
TOTAL	62	100.0%	8,553	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	6.7%	85	3.5%	21.4%	2.5%	1.0%
Moderate	2	13.3%	167	6.9%	17.7%	8.3%	4.5%
Middle	4	26.7%	581	24.1%	19.1%	16.5%	12.0%
Upper	6	40.0%	1,290	53.6%	41.9%	46.6%	55.0%
Unknown	2	13.3%	285	11.8%	0.0%	26.1%	27.5%
TOTAL	15	100.0%	2,408	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.4%	2.6%	1.3%
Moderate	0	0.0%	0	0.0%	17.7%	12.9%	8.8%
Middle	0	0.0%	0	0.0%	19.1%	13.4%	7.8%
Upper	0	0.0%	0	0.0%	41.9%	59.3%	66.0%
Unknown	1	100.0%	100	100.0%	0.0%	11.9%	16.1%
TOTAL	1	100.0%	100	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.4%	1.1%	0.3%
Moderate	0	0.0%	0	0.0%	17.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.1%	2.1%	0.7%
Upper	0	0.0%	0	0.0%	41.9%	8.5%	2.3%
Unknown	0	0.0%	0	0.0%	0.0%	88.3%	96.7%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	12	15.4%	959	8.7%	21.4%	3.9%	1.8%
Moderate	20	25.6%	1,906	17.2%	17.7%	12.6%	7.9%
Middle	10	12.8%	1,469	13.3%	19.1%	18.2%	14.2%
Upper	27	34.6%	5,545	50.1%	41.9%	40.7%	47.4%
Unknown	9	11.5%	1,182	10.7%	0.0%	24.6%	28.8%
TOTAL	78	100.0%	11,061	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	12	18.8%	922	10.7%	21.4%	4.8%	2.5%
Moderate	14	21.9%	1,372	15.9%	17.7%	15.1%	10.0%
Middle	11	17.2%	1,676	19.5%	19.1%	19.7%	17.0%
Upper	21	32.8%	3,883	45.1%	41.9%	37.8%	48.2%
Unknown	6	9.4%	756	8.8%	0.0%	22.5%	22.3%
TOTAL	64	100.0%	8,609	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.4%	4.4%	2.1%
Moderate	0	0.0%	0	0.0%	17.7%	10.3%	6.8%
Middle	2	40.0%	133	22.4%	19.1%	17.0%	13.5%
Upper	3	60.0%	460	77.6%	41.9%	41.1%	48.2%
Unknown	0	0.0%	0	0.0%	0.0%	27.3%	29.4%
TOTAL	5	100.0%	593	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	21.4%	6.6%	3.4%
Moderate	0	0.0%	0	0.0%	17.7%	18.1%	11.8%
Middle	0	0.0%	0	0.0%	19.1%	18.1%	13.5%
Upper	0	0.0%	0	0.0%	41.9%	46.9%	56.0%
Unknown	0	0.0%	0	0.0%	0.0%	10.3%	15.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.1%	0.9%	0.4%
Upper	0	0.0%	0	0.0%	41.9%	5.6%	2.4%
Unknown	0	0.0%	0	0.0%	0.0%	93.5%	97.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	12	17.4%	922	10.0%	21.4%	4.6%	2.1%
Moderate	14	20.3%	1,372	14.9%	17.7%	12.8%	7.9%
Middle	13	18.8%	1,809	19.7%	19.1%	18.1%	14.1%
Upper	24	34.8%	4,343	47.2%	41.9%	38.9%	44.1%
Unknown	6	8.7%	756	8.2%	0.0%	25.6%	31.8%
TOTAL	69	100.0%	9,202	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	12	25.5%	31.2%	\$921	35.4%	29.9%	88.2%
	Over \$1 Million/ Unknown	35	74.5%	68.8%	\$1,678	64.6%	70.1%	11.8%
	TOTAL	47	100.0%	100.0%	\$2,599	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	40	85.1%	84.7%	\$1,136	43.7%	27.6%	
	\$100,001–\$250,000	5	10.6%	8.2%	\$769	29.6%	20.4%	
	\$250,001–\$1 Million	2	4.3%	7.1%	\$694	26.7%	52.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	47	100.0%	100.0%	\$2,599	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	10	83.3%		\$403	43.8%		
	\$100,001–\$250,000	1	8.3%		\$168	18.2%		
	\$250,001–\$1 Million	1	8.3%		\$350	38.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	12	100.0%		\$921	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	14	58.3%	42.3%	\$986	56.3%	34.2%	87.9%
	Over \$1 Million/ Unknown	10	41.7%	57.7%	\$766	43.7%	65.8%	12.1%
	TOTAL	24	100.0%	100.0%	\$1,752	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	18	75.0%	87.3%	\$421	24.0%	28.1%	
	\$100,001–\$250,000	3	12.5%	6.6%	\$414	23.6%	19.8%	
	\$250,001–\$1 Million	3	12.5%	6.0%	\$917	52.3%	52.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	24	100.0%	100.0%	\$1,752	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	11	78.6%		\$214	21.7%		
	\$100,001–\$250,000	1	7.1%		\$106	10.8%		
	\$250,001–\$1 Million	2	14.3%		\$666	67.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	14	100.0%		\$986	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	9	14.5%	706	8.3%	15.4%	13.7%	8.8%
Middle	43	69.4%	6,575	76.9%	57.1%	56.1%	56.3%
Upper	10	16.1%	1,272	14.9%	27.5%	29.9%	34.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	62	100.0%	8,553	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	13.3%	171	7.1%	15.4%	8.5%	5.1%
Middle	11	73.3%	1,816	75.4%	57.1%	54.9%	54.5%
Upper	2	13.3%	421	17.5%	27.5%	36.5%	40.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	15	100.0%	2,408	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.4%	9.8%	8.8%
Middle	1	100.0%	100	100.0%	57.1%	50.0%	43.2%
Upper	0	0.0%	0	0.0%	27.5%	39.2%	46.6%
Unknown	0	0.0%	0	0.0%	0.0%	1.0%	1.4%
TOTAL	1	100.0%	100	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		0.0%	0.0%
Moderate	0	0.0%	0	0.0%	37.6%	48.9%	35.4%
Middle	0	0.0%	0	0.0%	32.5%	40.4%	45.8%
Upper	0	0.0%	0	0.0%	29.9%	10.6%	18.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	11	14.1%	877	7.9%	15.4%	12.1%	9.1%
Middle	55	70.5%	8,491	76.8%	57.1%	55.1%	54.7%
Upper	12	15.4%	1,693	15.3%	27.5%	32.6%	36.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	78	100.0%	11,061	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	%	\$	%		%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	14	21.9%	1,516	17.6%	15.4%	14.2%	8.9%
Middle	37	57.8%	4,980	57.8%	57.1%	54.5%	54.9%
Upper	13	20.3%	2,113	24.5%	27.5%	31.3%	36.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	64	100.0%	8,609	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	20.0%	53	8.9%	15.4%	9.1%	6.2%
Middle	4	80.0%	540	91.1%	57.1%	55.5%	55.5%
Upper	0	0.0%	0	0.0%	27.5%	35.4%	38.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	593	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.4%	17.7%	12.7%
Middle	0	0.0%	0	0.0%	57.1%	48.6%	46.6%
Upper	0	0.0%	0	0.0%	27.5%	33.3%	40.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.4%	0.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	37.6%	47.7%	21.4%
Middle	0	0.0%	0	0.0%	32.5%	33.6%	40.2%
Upper	0	0.0%	0	0.0%	29.9%	18.7%	38.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	15	21.7%	1,569	17.1%	15.4%	12.8%	9.2%
Middle	41	59.4%	5,520	60.0%	57.1%	54.4%	53.7%
Upper	13	18.8%	2,113	23.0%	27.5%	32.8%	37.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	69	100.0%	9,202	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	11	23.4%	\$783	30.1%	27.7%	25.1%	28.5%
Middle	29	61.7%	\$1,450	55.8%	44.3%	46.8%	45.4%
Upper	7	14.9%	\$366	14.1%	28.0%	27.3%	25.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.7%	0.4%
TOTAL	47	100.0%	\$2,599	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	4	16.7%	\$54	3.1%	27.8%	22.9%	24.6%
Middle	16	66.7%	\$1,584	90.4%	44.4%	48.7%	48.4%
Upper	4	16.7%	\$114	6.5%	27.9%	27.4%	26.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.0%	0.1%
TOTAL	24	100.0%	\$1,752	100.0%	100.0%	100.0%	100.0%

Jonesboro MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	10	10.2%	952	5.8%	21.9%	5.5%	3.2%
Moderate	21	21.4%	2,587	15.7%	17.2%	18.9%	14.1%
Middle	20	20.4%	3,144	19.0%	20.0%	20.6%	19.1%
Upper	46	46.9%	9,690	58.6%	40.9%	33.5%	43.8%
Unknown	1	1.0%	157	0.9%	0.0%	21.6%	19.9%
TOTAL	98	100.0%	16,530	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	5.6%	419	2.5%	21.9%	2.7%	1.1%
Moderate	13	14.6%	1,523	9.1%	17.2%	9.2%	5.6%
Middle	22	24.7%	2,836	17.0%	20.0%	14.8%	10.2%
Upper	46	51.7%	11,384	68.1%	40.9%	50.2%	61.1%
Unknown	3	3.4%	558	3.3%	0.0%	23.0%	22.1%
TOTAL	89	100.0%	16,720	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.9%	3.6%	2.1%
Moderate	0	0.0%	0	0.0%	17.2%	15.1%	9.2%
Middle	0	0.0%	0	0.0%	20.0%	18.7%	11.2%
Upper	0	0.0%	0	0.0%	40.9%	46.0%	52.8%
Unknown	0	0.0%	0	0.0%	0.0%	16.5%	24.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.2%	3.0%	0.8%
Middle	0	0.0%	0	0.0%	20.0%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.9%	8.1%	1.7%
Unknown	0	0.0%	0	0.0%	0.0%	88.9%	97.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	15	8.0%	1,371	4.1%	21.9%	4.0%	1.9%
Moderate	34	18.2%	4,110	12.4%	17.2%	13.7%	8.8%
Middle	42	22.5%	5,980	18.0%	20.0%	17.1%	13.0%
Upper	92	49.2%	21,074	63.4%	40.9%	39.6%	46.1%
Unknown	4	2.1%	715	2.2%	0.0%	25.6%	30.3%
TOTAL	187	100.0%	33,250	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	9	9.5%	959	5.6%	21.9%	3.3%	1.7%
Moderate	27	28.4%	3,263	19.1%	17.2%	13.6%	9.5%
Middle	29	30.5%	5,299	31.0%	20.0%	18.7%	16.7%
Upper	29	30.5%	7,497	43.8%	40.9%	36.4%	46.8%
Unknown	1	1.1%	82	0.5%	0.0%	28.0%	25.3%
TOTAL	95	100.0%	17,100	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.9%	3.1%	1.5%
Moderate	4	11.1%	425	6.9%	17.2%	9.6%	6.1%
Middle	5	13.9%	453	7.4%	20.0%	15.6%	12.1%
Upper	25	69.4%	5,011	81.6%	40.9%	42.3%	50.9%
Unknown	2	5.6%	252	4.1%	0.0%	29.5%	29.4%
TOTAL	36	100.0%	6,141	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	50.0%	60	63.2%	21.9%	3.1%	1.9%
Moderate	0	0.0%	0	0.0%	17.2%	9.9%	8.4%
Middle	0	0.0%	0	0.0%	20.0%	12.2%	8.6%
Upper	1	50.0%	35	36.8%	40.9%	61.1%	58.9%
Unknown	0	0.0%	0	0.0%	0.0%	13.7%	22.3%
TOTAL	2	100.0%	95	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	21.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.2%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.0%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.9%	9.0%	1.9%
Unknown	0	0.0%	0	0.0%	0.0%	91.0%	98.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	10	7.5%	1,019	4.4%	21.9%	3.2%	1.4%
Moderate	31	23.3%	3,688	15.8%	17.2%	11.5%	7.2%
Middle	34	25.6%	5,752	24.6%	20.0%	16.8%	13.1%
Upper	55	41.4%	12,543	53.7%	40.9%	39.0%	43.8%
Unknown	3	2.3%	334	1.4%	0.0%	29.4%	34.4%
TOTAL	133	100.0%	23,336	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	50	17.8%	43.9%	\$1,912	10.5%	45.0%	90.1%
	Over \$1 Million/Unknown	231	82.2%	56.1%	\$16,249	89.5%	55.0%	9.9%
	TOTAL	281	100.0%	100.0%	\$18,161	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	231	82.2%	82.9%	\$5,346	29.4%	26.7%	
	\$100,001–\$250,000	33	11.7%	9.5%	\$4,988	27.5%	21.5%	
	\$250,001–\$1 Million	17	6.0%	7.5%	\$7,827	43.1%	51.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	281	100.0%	100.0%	\$18,161	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	45	90.0%		\$1,240	64.9%		
	\$100,001–\$250,000	5	10.0%		\$672	35.1%		
	\$250,001–\$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	50	100.0%		\$1,912	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$(000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	127	55.7%	53.2%	\$6,444	39.9%	49.8%	89.6%
	Over \$1 Million/ Unknown	101	44.3%	46.8%	\$9,720	60.1%	50.2%	10.4%
	TOTAL	228	100.0%	100.0%	\$16,164	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	188	82.5%	85.9%	\$4,791	29.6%	29.6%	
	\$100,001–\$250,000	25	11.0%	7.8%	\$4,167	25.8%	20.2%	
	\$250,001–\$1 Million	15	6.6%	6.2%	\$7,206	44.6%	50.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	228	100.0%	100.0%	\$16,164	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	112	88.2%		\$2,426	37.6%		
	\$100,001–\$250,000	9	7.1%		\$1,370	21.3%		
	\$250,001–\$1 Million	6	4.7%		\$2,648	41.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	127	100.0%		\$6,444	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	2.0%	208	1.3%	2.4%	2.4%	1.8%
Moderate	7	7.1%	834	5.0%	18.5%	10.8%	8.4%
Middle	47	48.0%	6,655	40.3%	56.3%	54.6%	49.8%
Upper	42	42.9%	8,833	53.4%	22.9%	32.2%	40.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	98	100.0%	16,530	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	1	1.1%	247	1.5%	2.4%	2.5%	1.8%
Moderate	7	7.9%	813	4.9%	18.5%	10.0%	7.8%
Middle	44	49.4%	7,697	46.0%	56.3%	48.4%	44.1%
Upper	37	41.6%	7,963	47.6%	22.9%	39.1%	46.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	89	100.0%	16,720	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.4%	7.2%	5.8%
Moderate	0	0.0%	0	0.0%	18.5%	16.5%	8.2%
Middle	0	0.0%	0	0.0%	56.3%	53.2%	45.8%
Upper	0	0.0%	0	0.0%	22.9%	22.3%	38.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.7%	2.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	27.1%	29.3%	21.4%
Moderate	0	0.0%	0	0.0%	40.2%	13.1%	15.9%
Middle	0	0.0%	0	0.0%	24.8%	49.5%	46.0%
Upper	0	0.0%	0	0.0%	7.9%	8.1%	16.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	3	1.6%	455	1.4%	2.4%	2.9%	3.8%
Moderate	14	7.5%	1,647	5.0%	18.5%	10.9%	9.0%
Middle	91	48.7%	14,352	43.2%	56.3%	51.9%	47.2%
Upper	79	42.2%	16,796	50.5%	22.9%	34.3%	40.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	187	100.0%	33,250	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	2.4%	2.4%	1.7%
Moderate	11	11.6%	1,516	8.9%	18.5%	13.7%	10.6%
Middle	54	56.8%	7,248	42.4%	56.3%	53.0%	48.0%
Upper	30	31.6%	8,336	48.7%	22.9%	30.9%	39.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	95	100.0%	17,100	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	5.6%	198	3.2%	2.4%	2.0%	1.7%
Moderate	4	11.1%	797	13.0%	18.5%	11.3%	9.9%
Middle	25	69.4%	3,824	62.3%	56.3%	52.7%	47.7%
Upper	5	13.9%	1,322	21.5%	22.9%	33.9%	40.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	36	100.0%	6,141	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.4%	4.6%	7.5%
Moderate	0	0.0%	0	0.0%	18.5%	10.7%	7.8%
Middle	1	50.0%	60	63.2%	56.3%	60.3%	54.1%
Upper	1	50.0%	35	36.8%	22.9%	24.4%	30.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	95	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	27.1%	11.5%	10.2%
Moderate	0	0.0%	0	0.0%	40.2%	24.4%	38.1%
Middle	0	0.0%	0	0.0%	24.8%	50.0%	32.3%
Upper	0	0.0%	0	0.0%	7.9%	14.1%	19.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	2	1.5%	198	0.8%	2.4%	2.4%	2.7%
Moderate	15	11.3%	2,313	9.9%	18.5%	12.8%	13.1%
Middle	80	60.2%	11,132	47.7%	56.3%	53.0%	46.3%
Upper	36	27.1%	9,693	41.5%	22.9%	31.8%	37.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	133	100.0%	23,336	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	28	10.0%	\$3,342	18.4%	8.5%	7.9%	11.0%
Moderate	51	18.1%	\$4,354	24.0%	22.9%	16.9%	16.8%
Middle	153	54.4%	\$9,428	51.9%	50.5%	53.9%	52.6%
Upper	49	17.4%	\$1,037	5.7%	18.1%	21.0%	19.5%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.1%
TOTAL	281	100.0%	\$18,161	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	15	6.6%	\$1,365	8.4%	8.6%	7.2%	8.5%
Moderate	31	13.6%	\$1,918	11.9%	23.1%	18.4%	20.3%
Middle	131	57.5%	\$9,933	61.5%	50.2%	53.1%	51.2%
Upper	51	22.4%	\$2,948	18.2%	18.2%	20.7%	19.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.6%	0.1%
TOTAL	228	100.0%	\$16,164	100.0%	100.0%	100.0%	100.0%

Northeast Arkansas NonMSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	1	4.0%	27	1.0%	18.2%	4.0%	2.1%
Moderate	7	28.0%	933	33.7%	17.3%	17.2%	12.8%
Middle	6	24.0%	861	31.1%	19.6%	24.3%	22.6%
Upper	9	36.0%	816	29.5%	45.0%	34.6%	43.1%
Unknown	2	8.0%	131	4.7%	0.0%	19.9%	19.4%
TOTAL	25	100.0%	2,768	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	5.4%	207	3.7%	18.2%	2.9%	1.3%
Moderate	2	5.4%	121	2.2%	17.3%	8.8%	5.2%
Middle	3	8.1%	347	6.2%	19.6%	16.3%	12.4%
Upper	30	81.1%	4,893	87.9%	45.0%	49.5%	56.8%
Unknown	0	0.0%	0	0.0%	0.0%	22.6%	24.3%
TOTAL	37	100.0%	5,568	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.2%	7.4%	3.8%
Moderate	0	0.0%	0	0.0%	17.3%	16.7%	4.8%
Middle	0	0.0%	0	0.0%	19.6%	16.7%	11.0%
Upper	1	100.0%	10	100.0%	45.0%	51.9%	68.7%
Unknown	0	0.0%	0	0.0%	0.0%	7.4%	11.8%
TOTAL	1	100.0%	10	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	18.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.6%	4.5%	1.2%
Upper	0	0.0%	0	0.0%	45.0%	31.8%	26.5%
Unknown	0	0.0%	0	0.0%	0.0%	63.6%	72.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	3	4.8%	234	2.8%	18.2%	3.5%	1.7%
Moderate	9	14.3%	1,054	12.6%	17.3%	13.2%	8.7%
Middle	9	14.3%	1,208	14.5%	19.6%	20.1%	17.0%
Upper	40	63.5%	5,719	68.5%	45.0%	39.8%	47.2%
Unknown	2	3.2%	131	1.6%	0.0%	23.3%	25.4%
TOTAL	63	100.0%	8,346	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	2	8.3%	124	3.3%	18.2%	5.2%	2.6%
Moderate	3	12.5%	361	9.5%	17.3%	15.6%	12.4%
Middle	5	20.8%	855	22.5%	19.6%	19.2%	18.2%
Upper	12	50.0%	2,293	60.4%	45.0%	29.7%	38.1%
Unknown	2	8.3%	166	4.4%	0.0%	30.3%	28.8%
TOTAL	24	100.0%	3,799	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	18.2%	3.4%	1.6%
Moderate	5	17.9%	382	11.5%	17.3%	12.8%	8.5%
Middle	4	14.3%	426	12.8%	19.6%	19.1%	14.0%
Upper	18	64.3%	2,398	72.2%	45.0%	40.8%	51.4%
Unknown	1	3.6%	115	3.5%	0.0%	23.9%	24.6%
TOTAL	28	100.0%	3,321	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	18.2%	7.3%	3.7%
Moderate	0	0.0%	0	0.0%	17.3%	9.1%	4.4%
Middle	0	0.0%	0	0.0%	19.6%	20.0%	22.4%
Upper	1	100.0%	110	100.0%	45.0%	50.9%	55.0%
Unknown	0	0.0%	0	0.0%	0.0%	12.7%	14.5%
TOTAL	1	100.0%	110	100.0%	100.0%	100.0%	100.0%

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	18.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.6%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	45.0%	19.2%	14.4%
Unknown	0	0.0%	0	0.0%	0.0%	80.8%	85.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	2	3.8%	124	1.7%	18.2%	4.8%	2.2%
Moderate	8	15.1%	743	10.3%	17.3%	14.1%	10.1%
Middle	9	17.0%	1,281	17.7%	19.6%	18.6%	15.4%
Upper	31	58.5%	4,801	66.4%	45.0%	34.3%	41.6%
Unknown	3	5.7%	281	3.9%	0.0%	28.3%	30.8%
TOTAL	53	100.0%	7,230	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size			2020						
			Count			Dollars			Total Businesses
			Bank		Aggregate	Bank		Aggregate	
			#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	27	30.0%	54.2%	\$2,029	40.4%	47.6%	90.4%	
	Over \$1 Million/Unknown	63	70.0%	45.8%	\$2,989	59.6%	52.4%	9.6%	
	TOTAL	90	100.0%	100.0%	\$5,018	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	79	87.8%	86.4%	\$2,215	44.1%	34.3%		
	\$100,001-\$250,000	9	10.0%	8.5%	\$1,145	22.8%	22.5%		
	\$250,001-\$1 Million	2	2.2%	5.1%	\$1,658	33.0%	43.2%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	90	100.0%	100.0%	\$5,018	100.0%	100.0%		
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	23	85.2%		\$699	34.5%			
	\$100,001-\$250,000	3	11.1%		\$413	20.4%			
	\$250,001-\$1 Million	1	3.7%		\$917	45.2%			
	Over \$1 Million	0	0.0%		\$0	0.0%			
	TOTAL	27	100.0%		\$2,029	100.0%			

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	51	60.7%	61.6%	\$1,230	27.5%	49.6%	90.7%
	Over \$1 Million/ Unknown	33	39.3%	38.4%	\$3,245	72.5%	50.4%	9.3%
	TOTAL	84	100.0%	100.0%	\$4,475	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	77	91.7%	89.8%	\$1,840	41.1%	36.3%	
	\$100,001– \$250,000	3	3.6%	5.8%	\$334	7.5%	19.0%	
	\$250,001–\$1 Million	4	4.8%	4.4%	\$2,301	51.4%	44.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	84	100.0%	100.0%	\$4,475	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	50	98.0%		\$901	73.3%	
		\$100,001– \$250,000	0	0.0%		\$0	0.0%	
		\$250,001–\$1 Million	1	2.0%		\$329	26.7%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	51	100.0%		\$1,230	100.0%	

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	##%	\$	%		##%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.2%	0.7%	0.4%
Middle	15	60.0%	1,606	58.0%	61.9%	54.9%	47.0%
Upper	10	40.0%	1,162	42.0%	35.9%	44.4%	52.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	25	100.0%	2,768	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.2%	1.0%	0.7%
Middle	12	32.4%	1,230	22.1%	61.9%	41.3%	35.5%
Upper	25	67.6%	4,338	77.9%	35.9%	57.6%	63.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.2%
TOTAL	37	100.0%	5,568	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.2%	1.9%	0.1%
Middle	1	100.0%	10	100.0%	61.9%	51.9%	30.5%
Upper	0	0.0%	0	0.0%	35.9%	46.3%	69.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	10	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.4%	9.1%	6.3%
Middle	0	0.0%	0	0.0%	55.6%	63.6%	46.7%
Upper	0	0.0%	0	0.0%	42.0%	27.3%	47.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.2%	1.0%	0.8%
Middle	28	44.4%	2,846	34.1%	61.9%	49.8%	42.4%
Upper	35	55.6%	5,500	65.9%	35.9%	49.2%	56.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.1%
TOTAL	63	100.0%	8,346	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.2%	2.2%	1.6%
Middle	13	54.2%	1,557	41.0%	61.9%	58.1%	50.6%
Upper	11	45.8%	2,242	59.0%	35.9%	39.6%	47.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	24	100.0%	3,799	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	3.6%	115	3.5%	2.2%	1.5%	1.0%
Middle	12	42.9%	1,099	33.1%	61.9%	42.1%	35.3%
Upper	15	53.6%	2,107	63.4%	35.9%	56.4%	63.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	28	100.0%	3,321	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.2%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	61.9%	45.5%	32.7%
Upper	1	100.0%	110	100.0%	35.9%	54.5%	67.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	110	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	2.4%	11.5%	7.5%
Middle	0	0.0%	0	0.0%	55.6%	50.0%	31.2%
Upper	0	0.0%	0	0.0%	42.0%	38.5%	61.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	1.9%	115	1.6%	2.2%	2.1%	1.8%
Middle	25	47.2%	2,656	36.7%	61.9%	51.5%	43.6%
Upper	27	50.9%	4,459	61.7%	35.9%	46.4%	54.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	53	100.0%	7,230	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	8	8.9%	\$380	7.6%	4.7%	4.0%	6.0%
Middle	42	46.7%	\$2,248	44.8%	66.2%	59.1%	56.2%
Upper	40	44.4%	\$2,390	47.6%	29.2%	36.5%	37.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.2%
TOTAL	90	100.0%	\$5,018	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	3	3.6%	\$1,153	25.8%	4.8%	2.7%	6.3%
Middle	46	54.8%	\$1,972	44.1%	65.9%	57.0%	54.7%
Upper	35	41.7%	\$1,350	30.2%	29.3%	40.0%	38.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.1%
TOTAL	84	100.0%	\$4,475	100.0%	100.0%	100.0%	100.0%

ALABAMA

Daphne MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	2	3.7%	393	3.6%	20.6%	8.3%	4.8%
Moderate	4	7.4%	729	6.7%	17.7%	20.9%	15.5%
Middle	8	14.8%	1,984	18.1%	20.9%	21.5%	19.4%
Upper	16	29.6%	4,773	43.5%	40.9%	37.8%	49.1%
Unknown	24	44.4%	3,083	28.1%	0.0%	11.4%	11.2%
TOTAL	54	100.0%	10,962	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	15.8%	423	10.5%	20.6%	5.4%	2.9%
Moderate	4	21.1%	494	12.2%	17.7%	13.6%	9.5%
Middle	4	21.1%	639	15.8%	20.9%	17.1%	14.1%
Upper	8	42.1%	2,487	61.5%	40.9%	39.8%	49.3%
Unknown	0	0.0%	0	0.0%	0.0%	24.2%	24.3%
TOTAL	19	100.0%	4,043	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.6%	8.4%	4.7%
Moderate	0	0.0%	0	0.0%	17.7%	16.3%	12.3%
Middle	0	0.0%	0	0.0%	20.9%	21.4%	18.9%
Upper	2	100.0%	560	100.0%	40.9%	51.0%	60.6%
Unknown	0	0.0%	0	0.0%	0.0%	2.9%	3.5%
TOTAL	2	100.0%	560	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.9%	7.7%	1.5%
Unknown	0	0.0%	0	0.0%	0.0%	92.3%	98.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	5	6.7%	816	5.2%	20.6%	6.9%	3.8%
Moderate	8	10.7%	1,223	7.9%	17.7%	17.1%	12.2%
Middle	12	16.0%	2,623	16.9%	20.9%	19.2%	16.5%
Upper	26	34.7%	7,820	50.2%	40.9%	38.8%	48.2%
Unknown	24	32.0%	3,083	19.8%	0.0%	17.9%	19.2%
TOTAL	75	100.0%	15,565	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	20.6%	5.2%	2.7%
Moderate	8	23.5%	1,641	18.1%	17.7%	15.5%	10.7%
Middle	6	17.6%	1,551	17.1%	20.9%	19.8%	16.3%
Upper	15	44.1%	5,299	58.4%	40.9%	43.3%	53.9%
Unknown	5	14.7%	587	6.5%	0.0%	16.2%	16.5%
TOTAL	34	100.0%	9,078	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	16.7%	436	9.4%	20.6%	5.2%	2.9%
Moderate	6	33.3%	977	21.1%	17.7%	13.7%	9.0%
Middle	5	27.8%	726	15.6%	20.9%	18.6%	15.1%
Upper	4	22.2%	2,501	53.9%	40.9%	39.8%	50.0%
Unknown	0	0.0%	0	0.0%	0.0%	22.7%	23.0%
TOTAL	18	100.0%	4,640	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	20.6%	6.2%	2.7%
Moderate	0	0.0%	0	0.0%	17.7%	13.0%	7.5%
Middle	0	0.0%	0	0.0%	20.9%	25.2%	21.3%
Upper	0	0.0%	0	0.0%	40.9%	52.2%	63.7%
Unknown	0	0.0%	0	0.0%	0.0%	3.4%	4.8%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	40.9%	3.1%	0.9%
Unknown	1	100.0%	500	100.0%	0.0%	96.9%	99.1%
TOTAL	1	100.0%	500	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	3	5.7%	436	3.1%	20.6%	5.3%	2.7%
Moderate	14	26.4%	2,618	18.4%	17.7%	14.6%	9.8%
Middle	11	20.8%	2,277	16.0%	20.9%	19.3%	15.5%
Upper	19	35.8%	7,800	54.9%	40.9%	42.2%	51.8%
Unknown	6	11.3%	1,087	7.6%	0.0%	18.7%	20.2%
TOTAL	53	100.0%	14,218	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	77	24.1%	34.5%	\$16,722	47.8%	29.7%	92.7%
	Over \$1 Million/ Unknown	242	75.9%	65.5%	\$18,254	52.2%	70.3%	7.3%
	TOTAL	319	100.0%	100.0%	\$34,976	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	243	76.2%	85.6%	\$6,640	19.0%	30.3%	
	\$100,001– \$250,000	34	10.7%	8.4%	\$5,813	16.6%	21.8%	
	\$250,001– \$1 Million	42	13.2%	6.1%	\$22,523	64.4%	47.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	319	100.0%	100.0%	\$34,976	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	47	61.0%		\$1,751	10.5%		
	\$100,001– \$250,000	5	6.5%		\$839	5.0%		
	\$250,001– \$1 Million	25	32.5%		\$14,132	84.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	77	100.0%		\$16,722	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	121	46.7%	41.5%	\$19,292	42.1%	34.8%	92.7%
	Over \$1 Million/ Unknown	138	53.3%	58.5%	\$26,508	57.9%	65.2%	7.3%
	TOTAL	259	100.0%	100.0%	\$45,800	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	151	58.3%	87.4%	\$3,589	7.8%	26.1%	
	\$100,001–\$250,000	43	16.6%	6.2%	\$7,179	15.7%	17.8%	
	\$250,001–\$1 Million	65	25.1%	6.4%	\$35,032	76.5%	56.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	259	100.0%	100.0%	\$45,800	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	80	66.1%		\$1,650	8.6%		
	\$100,001–\$250,000	11	9.1%		\$1,953	10.1%		
	\$250,001–\$1 Million	30	24.8%		\$15,689	81.3%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	121	100.0%		\$19,292	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	13	24.1%	2,847	26.0%	14.9%	17.0%	16.4%
Middle	38	70.4%	7,318	66.8%	65.0%	56.8%	52.0%
Upper	3	5.6%	797	7.3%	20.1%	26.2%	31.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	54	100.0%	10,962	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	7	36.8%	1,160	28.7%	14.9%	13.1%	12.0%
Middle	8	42.1%	1,250	30.9%	65.0%	56.1%	51.9%
Upper	4	21.1%	1,633	40.4%	20.1%	30.8%	36.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	19	100.0%	4,043	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	500	89.3%	14.9%	11.3%	9.8%
Middle	1	50.0%	60	10.7%	65.0%	53.0%	47.7%
Upper	0	0.0%	0	0.0%	20.1%	35.7%	42.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	560	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	28.4%	46.2%	22.7%
Middle	0	0.0%	0	0.0%	42.8%	50.0%	76.1%
Upper	0	0.0%	0	0.0%	28.8%	3.8%	1.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	21	28.0%	4,507	29.0%	14.9%	15.0%	14.4%
Middle	47	62.7%	8,628	55.4%	65.0%	56.5%	52.4%
Upper	7	9.3%	2,430	15.6%	20.1%	28.5%	33.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	75	100.0%	15,565	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	14	41.2%	3,098	34.1%	14.9%	17.7%	17.3%
Middle	16	47.1%	4,477	49.3%	65.0%	57.4%	52.8%
Upper	4	11.8%	1,503	16.6%	20.1%	25.0%	29.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	34	100.0%	9,078	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	9	50.0%	2,104	45.3%	14.9%	14.2%	13.0%
Middle	6	33.3%	1,035	22.3%	65.0%	57.0%	52.5%
Upper	3	16.7%	1,501	32.3%	20.1%	28.8%	34.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	18	100.0%	4,640	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.9%	10.3%	10.5%
Middle	0	0.0%	0	0.0%	65.0%	61.1%	57.8%
Upper	0	0.0%	0	0.0%	20.1%	28.6%	31.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	500	100.0%	28.4%	50.0%	62.8%
Middle	0	0.0%	0	0.0%	42.8%	40.6%	31.0%
Upper	0	0.0%	0	0.0%	28.8%	9.4%	6.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	500	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	24	45.3%	5,702	40.1%	14.9%	15.9%	16.3%
Middle	22	41.5%	5,512	38.8%	65.0%	57.2%	52.3%
Upper	7	13.2%	3,004	21.1%	20.1%	26.9%	31.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	53	100.0%	14,218	100.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	129	40.4%	\$17,514	50.1%	18.9%	16.7%	18.4%
Middle	116	36.4%	\$8,248	23.6%	60.5%	56.4%	53.8%
Upper	74	23.2%	\$9,214	26.3%	20.6%	26.0%	27.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.8%	0.6%
TOTAL	319	100.0%	\$34,976	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
Moderate	120	46.3%	\$30,317	66.2%	18.9%	16.6%	21.3%
Middle	84	32.4%	\$7,128	15.6%	60.2%	56.7%	53.3%
Upper	55	21.2%	\$8,355	18.2%	20.9%	25.4%	25.2%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.2%	0.2%
TOTAL	259	100.0%	\$45,800	100.0%	100.0%	100.0%	100.0%

NEW YORK

New York MSA

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	31.4%	1.0%	0.6%
Moderate	0	0.0%	0	0.0%	16.1%	6.0%	2.5%
Middle	0	0.0%	0	0.0%	15.7%	17.3%	10.3%
Upper	0	0.0%	0	0.0%	36.8%	62.0%	71.1%
Unknown	0	0.0%	0	0.0%	0.0%	13.8%	15.6%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	31.4%	1.6%	1.1%
Moderate	0	0.0%	0	0.0%	16.1%	5.4%	2.7%
Middle	0	0.0%	0	0.0%	15.7%	16.9%	10.2%
Upper	0	0.0%	0	0.0%	36.8%	65.5%	71.6%
Unknown	0	0.0%	0	0.0%	0.0%	10.5%	14.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	31.4%	2.0%	1.0%
Moderate	0	0.0%	0	0.0%	16.1%	5.8%	2.8%
Middle	0	0.0%	0	0.0%	15.7%	16.4%	9.6%
Upper	0	0.0%	0	0.0%	36.8%	71.2%	70.5%
Unknown	0	0.0%	0	0.0%	0.0%	4.6%	16.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	31.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.1%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	15.7%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	36.8%	0.1%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	99.8%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	0	0.0%	0	0.0%	31.4%	1.3%	0.6%
Moderate	0	0.0%	0	0.0%	16.1%	5.2%	1.8%
Middle	0	0.0%	0	0.0%	15.7%	15.7%	7.0%
Upper	0	0.0%	0	0.0%	36.8%	59.9%	49.6%
Unknown	0	0.0%	0	0.0%	0.0%	17.9%	41.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family Income %	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	31.4%	1.0%	0.5%
Moderate	0	0.0%	0	0.0%	16.1%	6.0%	2.5%
Middle	0	0.0%	0	0.0%	15.7%	16.6%	9.5%
Upper	0	0.0%	0	0.0%	36.8%	63.5%	73.6%
Unknown	0	0.0%	0	0.0%	0.0%	12.9%	13.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	31.4%	1.8%	1.3%
Moderate	0	0.0%	0	0.0%	16.1%	6.8%	3.6%
Middle	0	0.0%	0	0.0%	15.7%	18.9%	12.4%
Upper	0	0.0%	0	0.0%	36.8%	61.3%	68.9%
Unknown	0	0.0%	0	0.0%	0.0%	11.2%	13.9%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	31.4%	2.5%	1.3%
Moderate	0	0.0%	0	0.0%	16.1%	7.1%	3.5%
Middle	0	0.0%	0	0.0%	15.7%	15.9%	9.8%
Upper	0	0.0%	0	0.0%	36.8%	70.0%	74.3%
Unknown	0	0.0%	0	0.0%	0.0%	4.6%	11.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	31.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.1%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	15.7%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	36.8%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	100.0%	100.0%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	0	0.0%	0	0.0%	31.4%	1.5%	0.7%
Moderate	0	0.0%	0	0.0%	16.1%	6.2%	2.3%
Middle	0	0.0%	0	0.0%	15.7%	17.0%	8.2%
Upper	0	0.0%	0	0.0%	36.8%	60.0%	54.4%
Unknown	0	0.0%	0	0.0%	0.0%	15.3%	34.5%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	1	9.1%	34.0%	\$21	2.9%	17.3%	90.1%
	Over \$1 Million/ Unknown	10	90.9%	66.0%	\$705	97.1%	82.7%	9.9%
	TOTAL	11	100.0%	100.0%	\$726	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	9	81.8%	88.7%	\$253	34.8%	33.9%	
	\$100,001–\$250,000	1	9.1%	6.8%	\$200	27.5%	21.6%	
	\$250,001–\$1 Million	1	9.1%	4.5%	\$273	37.6%	44.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	11	100.0%	100.0%	\$726	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	1	100.0%		\$21	100.0%		
	\$100,001–\$250,000	0	0.0%		\$0	0.0%		
	\$250,001–\$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	1	100.0%		\$21	100.0%		

Distribution of 2021 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2021						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	1	50.0%	35.0%	\$9	56.3%	16.8%	90.2%
	Over \$1 Million/ Unknown	1	50.0%	65.0%	\$7	43.8%	83.2%	9.8%
	TOTAL	2	100.0%	100.0%	\$16	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	2	100.0%	92.5%	\$16	100.0%	39.6%	
	\$100,001–\$250,000	0	0.0%	4.5%	\$0	0.0%	19.2%	
	\$250,001–\$1 Million	0	0.0%	3.0%	\$0	0.0%	41.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	2	100.0%	100.0%	\$16	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	1	100.0%		\$9	100.0%		
	\$100,001–\$250,000	0	0.0%		\$0	0.0%		
	\$250,001–\$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	1	100.0%		\$9	100.0%		

Distribution of 2020 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner- Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	4.0%	4.6%	4.0%
Moderate	0	0.0%	0	0.0%	18.1%	17.9%	15.4%
Middle	0	0.0%	0	0.0%	34.2%	31.4%	25.7%
Upper	0	0.0%	0	0.0%	43.5%	45.9%	54.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	4.0%	5.1%	4.8%
Moderate	0	0.0%	0	0.0%	18.1%	17.7%	15.0%
Middle	0	0.0%	0	0.0%	34.2%	30.9%	23.6%
Upper	0	0.0%	0	0.0%	43.5%	46.2%	56.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	4.0%	4.3%	3.1%
Moderate	0	0.0%	0	0.0%	18.1%	17.8%	15.4%
Middle	0	0.0%	0	0.0%	34.2%	32.9%	28.3%
Upper	0	0.0%	0	0.0%	43.5%	44.8%	53.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.0%	15.9%	13.0%
Moderate	0	0.0%	0	0.0%	27.1%	33.9%	27.7%
Middle	0	0.0%	0	0.0%	17.0%	16.8%	13.7%
Upper	0	0.0%	0	0.0%	35.5%	33.0%	45.1%
Unknown	0	0.0%	0	0.0%	0.4%	0.4%	0.4%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	4.0%	5.3%	6.9%
Moderate	0	0.0%	0	0.0%	18.1%	18.6%	18.8%
Middle	0	0.0%	0	0.0%	34.2%	30.9%	21.3%
Upper	0	0.0%	0	0.0%	43.5%	44.9%	52.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2021 Home Mortgage Lending By Income Level of Geography							
Census Tract Income Level	Bank Loans				% of Owner-Occupied Units	Aggregate HMDA Data	
	#	#%	\$	\$%		#%	\$ %
Home Purchase Loans							
Low	0	0.0%	0	0.0%	4.0%	4.4%	3.8%
Moderate	0	0.0%	0	0.0%	18.1%	17.6%	14.8%
Middle	0	0.0%	0	0.0%	34.2%	28.0%	22.5%
Upper	0	0.0%	0	0.0%	43.5%	49.7%	58.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	4.0%	5.4%	5.5%
Moderate	0	0.0%	0	0.0%	18.1%	19.2%	17.6%
Middle	0	0.0%	0	0.0%	34.2%	31.6%	25.9%
Upper	0	0.0%	0	0.0%	43.5%	43.6%	50.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	4.0%	5.5%	5.3%
Moderate	0	0.0%	0	0.0%	18.1%	18.6%	17.9%
Middle	0	0.0%	0	0.0%	34.2%	32.5%	27.1%
Upper	0	0.0%	0	0.0%	43.5%	43.3%	49.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	20.0%	16.1%	17.5%
Moderate	0	0.0%	0	0.0%	27.1%	34.8%	33.8%
Middle	0	0.0%	0	0.0%	17.0%	17.5%	17.4%
Upper	0	0.0%	0	0.0%	35.5%	31.5%	31.1%
Unknown	0	0.0%	0	0.0%	0.4%	0.1%	0.1%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	4.0%	5.3%	7.6%
Moderate	0	0.0%	0	0.0%	18.1%	19.0%	20.1%
Middle	0	0.0%	0	0.0%	34.2%	29.6%	22.3%
Upper	0	0.0%	0	0.0%	43.5%	45.8%	49.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	0	0.0%	0	0.0%	100.0%	100.0%	100.0%

Distribution of 2020 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	8.5%	9.0%	7.0%
Moderate	2	18.2%	\$68	9.4%	20.3%	20.3%	15.8%
Middle	0	0.0%	\$0	0.0%	19.7%	19.9%	15.3%
Upper	9	81.8%	\$658	90.6%	48.4%	47.7%	56.4%
Unknown	0	0.0%	\$0	0.0%	3.1%	3.1%	5.6%
TOTAL	11	100.0%	\$726	100.0%	100.0%	100.0%	100.0%

Distribution of 2021 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	#%	\$ 000s	\$ %		%	\$ %
Low	0	0.0%	\$0	0.0%	8.6%	9.5%	7.5%
Moderate	1	50.0%	\$9	56.3%	20.4%	22.6%	17.3%
Middle	0	0.0%	\$0	0.0%	19.8%	22.5%	17.4%
Upper	1	50.0%	\$7	43.8%	48.0%	42.8%	52.8%
Unknown	0	0.0%	\$0	0.0%	3.2%	2.7%	5.0%
TOTAL	2	100.0%	\$16	100.0%	100.0%	100.0%	100.0%

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.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely, depending on 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 contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals (LMI); (2) community services targeted to LMI individuals; (3) 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; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the

previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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

Low-income: Individual 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.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

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

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

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

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

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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.

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.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution’s record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

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

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, “small business loans” are included in “loans to small businesses” as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either 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): That is, “small farm loans” are included in “loans to small farms” as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area’s population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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