

PUBLIC DISCLOSURE

September 6, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Simmons Bank
RSSD #663245**

**501 South Main Street
Pine Bluff, Arkansas 71601**

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.

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: Simmons bank is rated SATISFACTORY.

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

Simmons 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 adequate responsiveness to the credit needs of its assessment areas.
- A high percentage of loans are made within the bank's assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout 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 bank makes an adequate level of community development loans.
- The bank makes use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.
- The bank makes a significant level of community development investments and grants and is occasionally in a leadership position.
- Service delivery systems are reasonably accessible to the bank's assessment areas, the bank's record of opening and closing branches has not adversely impacted the accessibility of its service delivery systems, and services do not vary in a way that inconveniences the needs of its assessment areas, particularly in low- and moderate-income (LMI) geographies.
- The bank provides a relatively high level of community development services.

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INSTITUTION

DESCRIPTION OF INSTITUTION

Simmons Bank is a large, interstate retail bank headquartered in Pine Bluff, Arkansas. The bank is a wholly owned, state-chartered subsidiary of Simmons First National Corporation, also headquartered in Pine Bluff, Arkansas. The bank has 19 direct and 3 indirect subsidiaries; none of the bank's subsidiaries are credit granting. The bank is a full-service financial institution offering an array of commercial and consumer loan and deposit products across an extensive branch network consisting of 230 branches spread across six states.

Since the previous evaluation on January 6, 2020, the bank has experienced significant growth through four acquisitions that have expanded its geographic footprint into several new markets and expanded its existing presence in others. A summary of these acquisitions is as follows.

- February 2020 – Landmark Bank. This acquisition added six branches in the Columbia, Missouri metropolitan statistical area (MSA) and four branches in the Sherman-Denison, Texas MSA, both of which are new assessment areas for the bank. Additional branches were added in existing assessment areas in the Dallas-Fort Worth, Texas MSA (1), nonMSA Missouri (4), nonMSA Oklahoma (8), and nonMSA Texas (1).
- October 2021 – Triumph Bank. This acquisition added four branches in the Memphis, Tennessee MSA and one branch in the Nashville, Tennessee MSA, both of which were existing assessment areas for the bank.
- October 2021 – Landmark Community Bank. This acquisition added three branches in the Memphis, Tennessee MSA and two branches in the Nashville, Tennessee MSA.
- April 2022 – Spirit of Texas Bank. This acquisition added 34 branches to the bank's network throughout the MSA and nonMSA portions of Texas, creating six new assessment areas. However, as these branches were acquired shortly before the examination start date, the new assessment areas will not be included in this examination. Additional detail is provided in the Texas state conclusions that follow later in this report.

The bank's geographic footprint has also changed due to the closing of branches. During the exam period, the bank closed its branches in Colorado and the Illinois portion of the St. Louis multistate MSA, thereby exiting those two states.

For the review period (and excluding the new Texas markets), the bank's most significant presence remains in its home state of Arkansas, specifically the Little Rock MSA, which includes the bank's main office and the largest share of the bank's branches, deposits, and loan volume of any of the bank's assessment areas. Though not as extensive as in Arkansas, the bank also maintains significant operations throughout Tennessee and Missouri. In total, the bank has designated 37 separate assessment areas. However, several of these assessment areas were combined for analysis

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purposes in instances where contiguous MSA or nonMSA assessment areas shared similar economic and demographic characteristics. The composition of each assessment area, including assessment areas that were combined, 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 June 30, 2022, the bank reported total assets of \$27.2 billion. As of the same date, loans and leases outstanding were \$15.1 billion (55.8 percent of total assets), and deposits totaled \$22.2 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of June 30, 2022		
Credit Category	Amount \$ (000s)	Percentage of Total Loans
Construction and Development	\$2,064,871	13.6%
Commercial Real Estate	\$6,132,151	40.5%
Multifamily Residential	\$530,194	3.5%
1–4 Family Residential	\$2,354,198	15.5%
Farmland	\$470,210	3.1%
Farm Loans	\$219,157	1.5%
Commercial and Industrial	\$2,592,034	17.1%
Loans to Individuals	\$295,375	2.0%
Total Other Loans	\$490,602	3.2%
TOTAL	\$15,148,792	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, 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 5,428 loans in 2020; 4,303 in 2021; and 2,167 from January 1, 2022 through September 5, 2022.

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 several of the bank's assessment areas and are thus included for review where applicable.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on January 6, 2020.

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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 consist of three tests: Lending, Investment, and Service. The bank's performance under these tests is rated at the institution, multistate MSA, and state levels. The bank maintains operations in six states and one multistate MSA 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 deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. 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, 2021, except where otherwise noted.

State/ Multistate MSA	Offices		Deposits as of June 30, 2021		Assessment Area Reviews		
	#	%	\$ (000s)	%	Full Scope	Limited Scope	TOTAL
Arkansas	64	27.8%	\$6,827,111	36.8%	4	3	7
Tennessee	43	18.7%	\$2,765,266	14.9%	2	4	6
Missouri	44	19.1%	\$3,938,782	21.3%	2	3	5
Oklahoma	19	8.3%	\$2,312,383	12.5%	2	2	4
Texas	54*	23.5%	\$2,212,245	11.9%	2	0	2
Kansas	4	1.7%	\$275,171	1.5%	1	1	2
Kansas City MSA	2	0.9%	\$197,865	1.1%	1	0	1
OVERALL	230	100.0%	\$16,531,992	100.0%	14	13	27

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

The bank's overall institution rating is a composite of these seven 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 Arkansas, Tennessee, and Missouri, with the other rated areas receiving less weight toward the overall institution rating. As shown in the table above, Arkansas, Tennessee, and Missouri account for a combined 65.7 percent of the bank's total branches and 73.0 percent of total deposits.

To augment this evaluation, 38 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.

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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 Review	Time Period
Level of Lending Activity	<ul style="list-style-type: none"> Loans reported under the Home Mortgage Disclosure Act (HMDA) Small business and small farm loans reported under the CRA 	January 1, 2019 – December 31, 2020
Assessment Area Concentration		
Geographic Distribution of Loans		
Loan Distribution by Borrower's Profile		
Community Development Lending Activities		January 6, 2020 – June 30, 2022
Product Innovation ¹		

In assessment areas where the bank entered the market through acquisition during the review period, loan activity reported under the HMDA and CRA is only analyzed for the acquisition year. Thus, for the Columbia, Missouri MSA and Sherman-Denison, Texas MSA assessment areas, loan activity is assessed for the period covering January 1, 2020 through December 31, 2020. Additionally, community development lending activities did not include lending by acquired institutions prior to the acquisition.

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 lending performance varied based on loan demand, credit needs, and the bank's business strategy and is discussed at the rated area and assessment area level. In assessment areas in which the Lending Test analysis includes lending activity from both 2019 and 2020, equal emphasis is placed on performance in each year.

Under the Lending Test, the bank's performance is evaluated using the following criteria, as applicable.

- Level of lending activity
- Assessment areas concentration²
- Geographic distribution of loans
- Distribution of loans by borrower's income/revenue profile
- Community development lending activities
- Product innovation

¹ Unlike other large bank CRA performance criteria, a lack of innovative and/or flexible lending practices does not necessarily impact the bank's performance negatively. These activities are largely used to augment consideration given to an institution's performance under the quantitative criteria, resulting in a higher performance rating. This distinction also applies to the use of innovative or complex investments under the Investment Test.

² This criterion is applicable at the institution level only.

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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. 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 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 June 30, 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 June 30, 2022, were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and community development needs of the bank's assessment areas.

Service Test

The review period for retail and community development services includes activity from the date of the bank's previous CRA evaluation through June 30, 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.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance under the Lending Test is rated Low Satisfactory. The rating reflects an aggregation of the ratings for each rated area shown in the table below, with Arkansas, Tennessee, and Missouri carrying the most weight toward the overall rating. The following table reflects the bank's Lending Test ratings by state/multistate MSA 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
Arkansas	High Satisfactory
Tennessee	Low Satisfactory
Missouri	High Satisfactory
Oklahoma	Low Satisfactory
Texas	Low Satisfactory
Kansas	Low Satisfactory
Kansas City Multistate MSA	Low Satisfactory
OVERALL	LOW SATISFACTORY

Lending Activity

Rated Area	Lending Activity
Arkansas	Excellent
Tennessee	Good
Missouri	Adequate
Oklahoma	Adequate
Texas	Adequate
Kansas	Adequate
Kansas City Multistate MSA	Adequate
OVERALL	ADEQUATE

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

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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 2019 and 2020, combined.

Lending Inside and Outside of Assessment Areas January 1, 2019 through December 31, 2020						
Loan Type	Inside Assessment Areas		Outside Assessment Areas		TOTAL	
HMDA	11,576	89.0%	1,435	11.0%	13,011	100%
	\$2,200,204	86.4%	\$345,529	13.6%	\$2,545,733	100%
Small Business	18,157	89.6%	2,097	10.4%	20,254	100%
	\$2,363,657	84.8%	\$425,103	15.2%	\$2,788,760	100%
Small Farm	3,324	87.0%	498	13.0%	3,822	100%
	\$319,014	87.2%	\$47,493	13.0%	\$366,507	100%
TOTAL LOANS	33,057	89.1%	4,030	10.9%	37,087	100%
	\$4,882,875	85.6%	\$818,125	14.4%	\$5,701,000	100%

As shown above, 89.1 percent of the bank's total HMDA, small business, and small farm loans were made inside the bank's combined assessment areas, representing 85.6 percent of loans by dollar volume. Therefore, a high percentage of loans were made inside the bank's assessment areas.

Geographic and Borrower Distribution

The overall geographic distribution of loans reflects adequate penetration throughout the assessment areas, as displayed below. None of the rated areas were considered below adequate for the bank's lending to LMI geographies.

Rated Area	Geographic Distribution of Loans
Arkansas	Adequate
Tennessee	Adequate
Missouri	Good
Oklahoma	Good
Texas	Adequate
Kansas	Good
Kansas City Multistate MSA	Adequate
OVERALL	ADEQUATE

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Overall, performance by borrower's income or revenue profile is good, as shown in the following table. The bank's borrower distribution of loans varied only slightly between rated areas, with none considered less than adequate.

Rated Area	Loan Distribution by Borrower's Profile
Arkansas	Good
Tennessee	Good
Missouri	Good
Oklahoma	Adequate
Texas	Adequate
Kansas	Adequate
Kansas City Multistate MSA	Adequate
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
Arkansas	Leader in Making
Tennessee	Adequate Level
Missouri	Relatively High Level
Oklahoma	Adequate Level
Texas	Relatively High Level
Kansas	Adequate Level
Kansas City Multistate MSA	Low Level
OVERALL	ADEQUATE LEVEL

Overall, the bank made 185 community development loans within its assessment areas, totaling \$480.3 million during the review period. Included in these figures are 61 Paycheck Protection Program (PPP) loans totaling \$125.4 million that had a community development purpose. While the bank was a leader in Arkansas and had a relatively high level of loans in Missouri, the bank's adequate performance in Kansas and Tennessee, along with low levels of community development lending in Oklahoma and the Kansas City Multistate MSA brought the overall performance level to adequate.

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.³ As a result, the bank also received credit for two community development loans totaling

³ 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.

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\$3.3 million originated outside of any assessment or rated area. Both of these were PPP loans to businesses in LMI geographies that helped retain employees.

Product Innovation

Overall, Simmons 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

- *100% Advantage Mortgage Product:* This portfolio loan product is designed to increase mortgage lending in LMI and majority-minority communities, in addition to LMI applicants in designated communities. The program is intended to serve customers who do not meet standard secondary market—as well as grant and bond—loan program guidelines or lack the required down payment funds. During the review period, the bank originated 295 100% Advantage Mortgage loans totaling \$50.8 million.
- *Affordable Advantage Home Improvement Product:* In August 2017, the bank introduced an affordable home improvement product in response to feedback from community groups pointing to the need for home improvement loans in LMI geographies. The product features flexible underwriting criteria and is targeted to individuals living in LMI areas. During the review period, the bank originated 11 Affordable Advantage Home Improvement Loans totaling \$668,810. These loans were spread among the Missouri, Tennessee, Oklahoma, and Texas assessment areas.
- *Affordable Advantage Mortgage Product:* This portfolio loan product is designed to meet the need for affordable housing for LMI individuals and areas in select markets across Arkansas, Kansas, Missouri, Oklahoma, Texas, and Tennessee. Applicants must meet certain income requirements to be eligible for the product, which features flexible underwriting guidelines, low down payment requirements, and no private mortgage insurance (PMI). During the review period, the bank originated 61 Affordable Advantage Mortgage loans totaling \$6.9 million.
- *Arkansas Development Finance Authority (ADFA):* The bank is an approved lender with the ADFA. Through the Homeownership and Down Payment Assistance Program, the ADFA provides down payment assistance and lower interest rates for LMI borrowers in the state of Arkansas. During the review period, the bank originated 70 loans, providing \$536,956 in down payment assistance.
- *CRA Greenlight:* This product is designed to assist LMI or minority individuals with home repairs. During the review period, the bank originated eight loans totaling \$101,200, all in St. Louis, Missouri.

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- *Federal Housing Administration/U.S. Department of Veterans Affairs Insured Loan Programs:* These government-insured loan programs offer flexible, long-term financing to eligible borrowers with low or no down payments and are offered throughout all of the bank's assessment areas. During the review period, the bank originated 933 loans totaling \$182.1 million through these programs.
- *Tennessee Housing Development Agency (THDA):* The bank is an approved lender with the THDA and is able to provide low interest rate mortgage loans and down payment assistance to first-time homebuyers in Tennessee through the Homeownership program. During the review period, the bank originated two loans, providing \$13,500 in down payment assistance.
- *U.S. Department of Agriculture (USDA) Rural Development Loan Program:* This loan program is designed to assist LMI individuals in purchasing affordable housing in rural areas and features no down payment or mortgage insurance requirements. During the review period, the bank originated 393 loans for \$54.7 million.

Consumer Non-Real Estate

- *CRA Credit Builder:* This program is designed to assist LMI individuals in building credit by offering small, low-cost loans. During the review period, the bank originated 30 loans of \$1,000 each in the St. Louis, Missouri-Illinois MSA.
- *CRA Neighborhood Helper:* This program is designed to assist LMI or minority consumers with family emergencies. Borrowers must own their home, but it is not held for collateral. During the review period, the bank originated 21 loans totaling \$90,082.20, all in the St. Louis, Missouri-Illinois MSA.
- *Foundation Secured Credit Card:* This credit card product is designed to build or repair credit. The card is secured by a Simmons Bank savings account or certificate of deposit. Credit limits run from \$300 to \$5,000, with no minimum credit score requirements. During the review period, the bank opened over 2,000 Foundation credit card accounts totaling \$1.3 million in approved credit.

Partnerships with the Federal Home Loan Bank (FHLB) of Dallas

- *Affordable Housing Program:* Through this program, the FHLB provides funds to member banks to purchase, construct, or rehabilitate housing for the benefit of LMI borrowers. During the review period, the bank provided one grant totaling \$78,800; this grant provided funds for the rehabilitation of 15 affordable housing units in Arkansas.
- *Disaster Rebuilding Assistance:* This program provides grant funds for the repair and rehabilitation of housing affected by a disaster within the FHLB of Dallas district. During the review period, the bank awarded one grant of \$10,000 to a borrower in Fayetteville, Arkansas.

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- *Homebuyer Equity Leverage Partnership:* This program provides funds that assist low-income, first-time homebuyers with down payment assistance and closing costs. During the review period, the bank awarded 88 grants totaling \$459,475 throughout each of its rated areas.
- *Housing Assistance for Veterans Program:* This program provides grant funds for home repairs or modifications for U.S. veterans and active-duty personnel disabled by active military service since September 11, 2011. During the review period, the bank awarded one grant for \$10,000 in St. Louis, Missouri.
- *Partnership Grant Program:* Through this program, the FHLB matches grant funds from member banks to help promote relationships between community-based organizations and financial institutions. The bank provided four grants to four affordable housing organizations in Arkansas totaling \$8,500 each.
- *Special Needs Assistance Program:* This program provides grant funds for housing rehabilitation to LMI individuals with special needs. During the review period, the bank administered ten grants totaling \$59,549, all in the state of Arkansas.

Small Business

- *Small Business Administration (SBA):* The bank offers SBA products that provide small businesses access to capital with more flexible terms than conventional commercial financing.

PPP Lending

PPP loans are 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. The bank took quick, extensive measures to put new systems and processes in place to offer these loans. From 2020 through 2021, the bank originated 7,453 PPP loans totaling over \$970.0 million across the nation, with a significant majority of these loans originated in its assessment areas. As previously discussed in the *Community Development Lending Activities* section, a portion of these loans also received credit as qualified community development loans.

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INVESTMENT TEST

Overall, the bank is rated high satisfactory under the Investment Test. The table below provides the Investment Test rating for each rated area.

Rated Area	Investment Test Rating
Arkansas	High Satisfactory
Tennessee	High Satisfactory
Missouri	Outstanding
Oklahoma	Low Satisfactory
Texas	High Satisfactory
Kansas	Outstanding
Kansas City Multistate MSA	High Satisfactory
OVERALL	HIGH SATISFACTORY

During the review period, the bank made total investment and grants of \$321.1 million and total donations of \$1.9 million. Of the bank's total qualified investments, \$207.0 million were made during the current review period, while \$114.1 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 primarily 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 infrastructure projects in LMI areas in the bank's assessment areas.

While not included in the totals above, the bank also made \$148.7 million in investments benefitting a broader regional area that included multiple rated areas; as these investments benefit more than one rated area, they are discussed at the institution level only. These include one \$300,000 investment during the current period to a small business investment company (SBIC) operating in and around Williamson County, Texas; the remainder are prior-period investments that are still outstanding. The largest of these is an investment of \$140.0 million in mortgage revenue bonds issued to provide financing for affordable housing throughout the state of Texas.

Finally, the bank makes grants through its Simmons First Foundation, a nonprofit organization funded by the bank with at least 50 percent of grant funds distributed to CRA eligible entities. The bank has invested \$5 million in the fund and operates it like an endowment, with interest earned annually to be used to fund community enhancement grants. Details regarding Simmons First Foundation grants that qualified for CRA consideration during this evaluation are noted in the applicable assessment areas' investment test summaries.

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SERVICE TEST

The bank's performance is rated high satisfactory under the Service Test. The following table reflects the bank's Service Test ratings by state performance.

Rated Area	Service Test Rating
Arkansas	High Satisfactory
Tennessee	Outstanding
Missouri	High Satisfactory
Oklahoma	High Satisfactory
Texas	High Satisfactory
Kansas	Outstanding
Kansas City Multistate MSA	High Satisfactory
OVERALL	HIGH SATISFACTORY

The bank's delivery systems are 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 or individuals. Furthermore, services do not vary in a way that inconveniences the needs of its assessment area, particularly LMI geographies or individuals. Lastly, the bank provides a relatively high level of community development services within the combined assessment areas.

In response to the global pandemic, the bank began offering consumer and commercial loan modifications in March 2020. In total, the bank approved and closed 1,100 consumer loan modifications and 2,940 commercial loan modifications. The bank also waived overdraft fees for any individuals receiving pandemic payments.

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.

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KANSAS CITY, MISSOURI-KANSAS MULTISTATE MSA

CRA RATING FOR THE KANSAS CITY MULTISTATE MSA: SATISFACTORY⁴

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

Factors supporting the institution's ratings for the Kansas City multistate MSA include:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the Kansas City assessment area.
- The geographic distribution of loans reflects adequate penetration throughout the Kansas City assessment area.
- The distribution of loans by borrower's income or revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The bank makes a low level of community development loans throughout the Kansas City assessment area.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position in the Kansas City assessment area.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Kansas City assessment area, and changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals. Business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Kansas City assessment area are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. However, as demand for small farm loans and the bank's small farm loan activity are minimal in the assessment area, small farm lending was not assessed and did not impact the evaluation of lending performance in the assessment area. Based on loan demand and the bank's

⁴ This rating reflects performance within the multistate MSA. The Kansas and Missouri statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the Kansas City Multistate MSA.

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lending volume, performance in the CRA small business lending category received primary emphasis when evaluating the bank's lending performance. In light of the bank's limited branch presence in the Kansas City assessment area, the multistate assessment area carried minimal weight toward the bank's overall rating.

The Kansas City assessment area was reviewed under full-scope examination procedures and included information obtained from one community contact. This interview was 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 community contact interview is included in the next section.

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

Bank Structure

The bank operates 2 of its 230 branches (0.9 percent) in the Kansas City assessment area and are distributed as follows.

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

The bank has not opened or closed any branches in the assessment area during the review period. Based on the size and population of the assessment area, the competitiveness of the banking market within, and the location of the bank's branches, the bank may have to more heavily rely on digital delivery channels and outreach to deliver financial services to certain parts of the assessment area. In particular, the bank's branches are outside the urban core of Kansas City, where a majority of the LMI population resides.

General Demographics

The bank's Kansas City assessment area is composed of Johnson (Kansas) and Jackson (Missouri) counties, 2 of the 14 counties in the full Kansas City, Missouri-Kansas multistate MSA. Jackson County, with a population of 680,905, contains the core of Kansas City and is more populous than Johnson County, with a population of 566,814.

The banking market in the assessment area is highly competitive, with 82 FDIC-insured depository institutions operating 413 branches throughout the assessment area. Simmons Bank ranks 31st out of these institutions, with 0.3 percent of the deposit market share.

The assessment area is large and diverse, both economically and demographically. As such, credit needs include a wide array of consumer and commercial loan and deposit products. Other particular credit needs, as noted by a community contact, include small dollar business loans and financial literacy training for consumers and businesses. Additionally, Kansas City is a market

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with ample opportunity for community development involvement, with numerous active community development, nonprofit, and government assistance entities operating throughout the assessment area.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	51	15.5%	26,470	8.5%
Moderate	66	20.1%	57,327	18.4%
Middle	96	29.2%	101,222	32.4%
Upper	106	32.2%	126,505	40.5%
Unknown	10	3.0%	744	0.2%
TOTAL	329	100%	312,268	100%

As shown, 35.6 percent of census tracts in the assessment area are designated as LMI, though the percentage of assessment area families residing in those census tracts (26.9 percent) is much lower. The vast majority of these LMI census tracts are located in the core area of Kansas City in western and northern Jackson County. The concentration of the LMI population in Jackson County is evidenced by the disparity in the poverty level between Jackson County (13.5 percent) and Johnson County (4.0 percent).

According to 2015 ACS data, the median family income for the assessment area (\$76,092) exceeded the same figure for Missouri (\$60,809) and Kansas (\$66,389) as a whole. More recently, the FFIEC estimates the median family income for the Kansas City MSA to be \$82,400 in 2019 and \$85,900 in 2020. The following table displays the percentages of assessment area families by income level compared to Kansas and Missouri as a whole.

Family Population by Income Level						
	Assessment Area		Kansas		Missouri	
Low	63,711	20.4%	137,650	18.9%	327,271	21.4%
Moderate	51,877	16.6%	128,930	17.7%	274,380	17.9%
Middle	61,022	19.5%	154,601	21.2%	319,267	20.9%
Upper	135,658	43.4%	308,287	42.2%	609,088	39.8%
TOTAL	312,268	100%	729,468	100%	1,530,006	100%

When comparing the preceding table with the first table in this section, a higher percentage of families in the assessment area are LMI (37.0 percent) than reside in LMI census tracts (26.9 percent). The LMI family percentage for the assessment area is in line with the figure for all of Kansas (36.6 percent) and below the figure for Missouri (39.3 percent). Additionally, poverty

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levels for the assessment area (8.9 percent) are similar to the poverty levels in Kansas (9.1 percent) but below statewide Missouri levels (11.1 percent). Based on the data, the assessment area as a whole is similarly affluent to the state of Kansas and more affluent than Missouri.

Housing Demographics

The following table displays housing demographics for the assessment area, the state of Kansas, and the state of Missouri. These demographics include the affordability ratio, which measures the extent to which a family earning the median household income for the assessment area can afford a median-priced home in the assessment area.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$168,855	34.8%	\$859
Kansas	\$132,000	39.6%	\$757
Missouri	\$138,400	34.8%	\$746

Based on these housing demographics, housing in the assessment area is similarly affordable to housing in Missouri statewide but less affordable than in Kansas. While the median housing value for the assessment area is higher than in Missouri, higher income levels relative to housing costs make housing similarly affordable, as evidenced by the respective affordability ratios. While not shown in the table above, the median age of housing stock in the assessment area (46 years) is slightly higher than in Kansas (43 years) and Missouri (40 years) and likely require repairs or updates. Thus, homeownership and the ongoing cost of home maintenance may be a challenge for many LMI individuals in the assessment area.

Rental costs in the assessment area are higher than the statewide Kansas and Missouri figures but are generally comparable when accounting for income levels. The percentage of renters with rental costs exceeding 30.0 percent of their income in the assessment area (44.5 percent) is in line with the same figure for the state of Missouri (44.4 percent) and slightly higher than in Kansas (41.0 percent).

Industry and Employment Demographics

The assessment area economy supports a diverse business community and strong small business sector. County business patterns data indicate that there are 710,499 paid employees in the assessment area, with the three largest job categories by number of paid employees being healthcare and social assistance (14.2 percent), government (11.9 percent), and professional and technical services (10.6 percent). A community contact indicated that Honeywell, Hallmark, Children's Hospital, and the University of Missouri – Kansas City are the largest employers in the area. Construction of a new airport has also added construction jobs. In addition to the major employers, small businesses play a significant role in the regional economy, as evidenced by the fact that 90.1 percent of businesses recorded annual revenues of \$1 million or less.

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The following table details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for both counties in the assessment area, the assessment area as a whole, the state of Kansas, and the state of Missouri.

Unemployment Levels for the Assessment Area			
Dataset	2019	2020	2021
Jackson County	3.6%	7.2%	5.5%
Johnson County	2.7%	4.9%	2.7%
Assessment Area Average	3.2%	6.1%	4.1%
Kansas	3.1%	5.7%	3.2%
Missouri	3.1%	6.1%	4.4%

As shown above, unemployment levels were consistently higher in Jackson County than in the other datasets throughout the review period. On average, unemployment in the assessment area was generally in line with statewide Kansas and Missouri levels. Finally, all data sets reflect the effects of the global pandemic on unemployment figures in 2020. While Johnson County and the state of Kansas overall have returned to pre-pandemic levels, Jackson County and the state of Missouri continue to feel some residual effects.

Community Contact Information

A community contact interview was conducted with an individual knowledgeable regarding the Kansas City MSA's economic conditions and small business environment. The contact noted that overall economic development in the MSA is good, with improvements to education, workforce, entertainment, and cultural opportunities. Small businesses, particularly start-ups, often struggle to find financing and have looked to non-bank options, as many local banks have more stringent underwriting criteria for new small businesses or businesses without significant capital. Often, a lack of credit—as opposed to poor credit—affects the small business owner's ability to qualify for a bank loan. Thus, personal financial assistance is an urgent need in the community. Other needs include business plan development services and education on running a business. As with many areas, the lack of available workforce has affected small businesses in the market. Finally, small dollar loans are a need for local small businesses.

Ample opportunity exists for banks to participate in community development activities, and their willingness to do so was evident by the number of lenders participating in the PPP loan program during the pandemic. The contact noted that Simmons Bank has been actively involved in many of these efforts, including creating special funds and programs for the previously underserved and working with local community development advocacy groups.

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

LENDING TEST

The bank's Lending Test performance in the Kansas City assessment area is rated low satisfactory. The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank makes a low level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	0	0.0%	0	0.0%
Home Purchase	28	13.2%	6,771	18.5%
Multifamily Housing	1	0.5%	448	1.2%
Refinancing	28	13.2%	4,259	11.6%
Other Purpose Line of Credit (LOC)	7	3.3%	371	1.0%
Other Purpose Closed/Exempt	1	0.5%	120	0.3%
Total HMDA	65	30.7%	11,969	32.7%
Small Business	145	68.4%	24,519	67.0%
Small Farm	2	0.9%	129	0.4%
TOTAL LOANS	212	100.0%	36,617	100.0%

Lending activity in this assessment area represents 1.2 percent of total 2019 and 2020 HMDA and CRA loans made within the bank's combined assessment areas. In comparison, this lending activity is in line with the share of total bank branches inside this assessment area (0.9 percent) and, as of June 30, 2020, the percentage of total bank deposits held in the assessment area (0.7 percent). Considering these factors and the bank's limited branch presence in the assessment area, the bank's lending activity reflects adequate responsiveness to the assessment area's credit needs.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans reflects an adequate penetration of geographies of different income levels overall, with primary emphasis placed on small business lending performance based on overall loan volume by product.

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HMDA Lending

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

Performance in low-income census tracts was particularly strong in 2019, when the bank far outpaced both aggregate lenders and demographic figures, reflecting excellent performance. The bank originated 11.4 percent of its total HMDA loans in low-income tracts, while aggregate lenders originated 3.2 percent, and census demographics indicate that 6.2 percent of owner-occupied housing in the assessment area is in low-income tracts. The bank's HMDA lending in 2020 dropped off slightly in low-income census tracts (3.3 percent), but performance was considered good when compared to other lenders (2.6 percent) and the demographic figure (6.2 percent).

The bank's level of lending in moderate-income census tracts in 2019 (11.4 percent) and 2020 (10.0 percent) is considered adequate, as it was slightly below peer lending (13.4 percent in 2019 and 11.1 percent in 2020) and the percentage of owner-occupied housing in moderate-income census tracts (16.1 percent).

Small Business Lending

The distribution of the bank's small business loans revealed adequate penetration of LMI geographies.

The level of lending in low-income census tracts in 2019 (7.9 percent) reflects excellent penetration compared to aggregate lenders (6.5 percent) and the number of small businesses located in low-income census tracts (7.4 percent). Performance in 2020 was even better (14.0 percent) compared to other lenders (6.6 percent) and the demographic figure (7.5 percent), reflecting excellent penetration.

Small business lending in moderate-income census tracts was poor in both 2019 (5.3 percent) and 2020 (6.5 percent) when compared to aggregate performance (14.6 percent in 2019 and 15.3 percent in 2020) and demographic figures (16.9 percent in 2019 and 17.1 percent in 2020).

Lastly, based on an analysis of the dispersion of both loan products reviewed, no conspicuous lending gaps were identified, particularly in LMI areas. In 2019, the bank had loan activity in 15.2 percent of all assessment area census tracts and 7.7 percent of all LMI census tracts. The bank's loan dispersion was better in 2020, with loan activity in 25.2 percent of all assessment area census tracts and 15.4 percent of all LMI census tracts. While the bank's overall loan dispersion and loan dispersion in LMI geographies was low, it is consistent with the bank's limited presence in the assessment area. The bank's loan dispersion supports the conclusion that the distribution of loans by geography income level is adequate overall.

Loan Distribution by Borrower's Profile

The bank's borrower distribution in the Kansas City assessment area is adequate.

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HMDA Lending

The distribution of the bank's HMDA loans by borrower's income level is good.

In 2019, the bank originated 17.1 percent of its HMDA loans to low-income borrowers, which far exceeded the aggregate lending level (7.3 percent). Assessment area demographics indicate that 20.4 percent of families in the assessment area are low-income, though a significant portion of this population is unlikely to qualify for a home loan based on poverty levels and other economic factors. Given this context and the bank's lending levels relative to peer institutions in the assessment area, the bank's performance in 2019 is considered excellent. The bank's distribution of HMDA loans to low-income borrowers decreased in 2020 (6.7 percent) but is considered good, as it exceeded the aggregate lending level (5.6 percent) and was below the demographic figure (20.4).

In 2019, the bank originated 11.4 percent of its HMDA loans to moderate-income borrowers, which was below both aggregate performance (17.2 percent) and the demographic figure (16.6) and is considered poor. Bank performance improved in 2020 to 13.3 percent, which approached both aggregate levels (16.3 percent) and the demographic figure (16.6 percent), representing adequate performance.

Small Business Lending

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

In 2019, the bank made 57.9 percent of its small business loans to businesses with annual revenues of \$1 million or less. This level of lending outpaced aggregate lending performance (46.3 percent) but was below the demographic figure (89.9 percent), reflecting good performance. The bank's small business loan distribution decreased in 2020, with 41.1 percent of loans made to businesses with annual revenues of \$1 million or less. This lending level exceeded aggregate performance (37.7 percent) but was well below the demographic figure (90.1 percent), reflecting adequate performance.

Community Development Lending Activities

During the review period, the bank made a low level of community development loans in the assessment area. The bank made one loan of \$1.6 million to a small business in an SBA Historically Underutilized Business Zone (HUBZone) that creates LMI jobs in the assessment area.

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INVESTMENT TEST

The bank is rated high satisfactory under the Investment Test in the Kansas City assessment area.

The bank made a significant level of community development investments and grants in the assessment area. Qualified community development investments in the assessment area totaled \$6.7 million, of which \$4.1 million were new investments made during the current review period and \$2.6 million were prior-period investments that were still outstanding. All of these investments were in MBS providing affordable housing loans to LMI individuals in the assessment area. While not particularly innovative, these investments are responsive to the need for affordable home loans in the assessment area noted by community contacts. In addition to these investments, the bank made six donations for \$12,000 benefitting various organizations supporting community development purposes throughout the assessment area.

SERVICE TEST

The bank is rated high satisfactory under the Service Test in the Kansas City assessment area. The bank's service delivery systems are reasonably accessible in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates two full-service branches in the Kansas City 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	0	1	0	2
	0.0%	50.0%	0.0%	50.0%	0.0%	100%
Census Tracts	15.5%	20.1%	29.2%	32.2%	3.0%	100%
Household Population	10.2%	20.5%	33.4%	35.5%	0.4%	100%

As shown above, the bank operates one, or 50.0 percent, of its branches in a moderate-income census tract. By comparison, 35.6 percent of census tracts in the assessment area are designated as LMI, and 30.7 percent of the assessment area household population resides within those census tracts. The bank's branch distribution compares favorably to this comparison data. Therefore, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels.

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Changes in Branch Locations

The bank has not opened or closed any branches in the Kansas City 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 bank's business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Both bank branches in the assessment area operate lobby hours from 9 a.m. to 5 p.m. Monday through Friday, in addition to drive-through facilities that operate extended hours Monday through Friday and on Saturdays from 9 a.m. to noon.

Community Development Services

The bank provided a relatively high level of community development services in the assessment area. During the review period, two bank employees provided 45 community development services to four different organizations. These services included adult financial literacy classes and technical assistance to local community service organizations.

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Arkansas

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ARKANSAS

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 Arkansas include:

- The bank's lending levels reflect excellent responsiveness to the credit needs of the Arkansas assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the Arkansas assessment areas.
- 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 is a leader in making community development loans throughout the Arkansas assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position in Arkansas.
- Delivery systems are accessible to geographies and individuals of different income levels in the Arkansas assessment areas. Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank makes a relatively high level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Arkansas assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. Small farm lending was analyzed for each of the assessment areas reviewed under full-scope procedures. In the Little Rock, Fayetteville, and Pine Bluff assessment areas, small farm lending received less weight in the analysis, given the lower volume of small farm loans and loan demand in these assessment areas. However, all three products were weighted equally in nonMSA Arkansas based on loan volume and credit needs of the assessment area.

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Arkansas

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The bank operates in eight assessment areas throughout Arkansas, located in six MSAs and two noncontiguous nonMSA portions of the state. Performance in the nonMSA assessment areas was combined for analysis, resulting in one set of performance conclusions for all of nonMSA Arkansas. Based on the bank's branch structure and loan and deposit activity, CRA performance in the Little Rock and nonMSA assessment areas received primary consideration when determining statewide performance conclusions, with the Fayetteville and Pine Bluff full-scope assessment areas given less weight.

To augment the evaluation of the four full-scope assessment areas, 13 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 ARKANSAS

The bank operates 64 branches throughout the seven 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 6/30/21)	Deposits %	CRA Review Procedures
Little Rock-North Little Rock-Conway MSA	19	29.7%	\$2,285,224	33.5%	Full-Scope
Arkansas nonMSA Statewide Area	17	26.6%	\$1,051,264	15.4%	Full-Scope
Pine Bluff MSA	8	12.5%	\$2,062,214	30.2%	Full-Scope
Fayetteville-Springdale Rogers MSA	8	12.5%	\$452,534	6.6%	Full-Scope
Fort Smith MSA	5	7.8%	\$256,529	3.7%	Limited-Scope
Hot Springs MSA	3	4.7%	\$257,710	3.8%	Limited-Scope
Jonesboro Combined Statistical Area (CSA)	4	6.3%	\$461,636	6.8%	Limited-Scope
OVERALL	64	100%	\$6,827,111	100%	4 Full-Scope

The bank's deposits in Arkansas total approximately \$6.8 billion, which represents 36.8 percent of total bank deposits. The majority of the bank's branches and deposits in Arkansas are concentrated in the Little Rock and nonMSA Arkansas assessment areas, both of which were reviewed under full-scope procedures. During the review period, the bank closed 13 branches in Arkansas. Most of the closures were the result of consolidation following the period of heavy acquisitions.

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Arkansas

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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 performance under the following criteria.

Lending Activity

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

Limited-Scope Review Areas	Lending Activity
Fort Smith MSA	Below
Hot Springs MSA	Below
Jonesboro CSA	Below

The bank's Arkansas lending levels reflect excellent 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 area. Performance in the limited scope assessment areas was below those in the full scope areas but still was not considered less than satisfactory.

Geographic and Borrower Distribution

The bank's geographic distribution of loans reflects adequate penetration overall in the Arkansas assessment areas. No conspicuous lending gaps were identified.

Full-Scope Review Areas	Geographic Distribution of Loans
Fayetteville MSA	Adequate
Little Rock MSA	Adequate
Pine Bluff MSA	Adequate
NonMSA Arkansas	Good
OVERALL	ADEQUATE

Simmons Bank
Pine Bluff, Arkansas

Arkansas

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Limited-Scope Review Areas	Geographic Distribution of Loans
Fort Smith MSA	Consistent
Hot Springs MSA	Consistent
Jonesboro CSA	Consistent

Performance by borrower's income or revenue profile is good overall in the state of Arkansas, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution By Borrower's Profile
Fayetteville MSA	Good
Little Rock MSA	Good
Pine Bluff MSA	Good
NonMSA Arkansas	Good
OVERALL	GOOD

Limited-Scope Review Areas	Loan Distribution By Borrower's Profile
Fort Smith MSA	Exceeds
Hot Springs MSA	Consistent
Jonesboro CSA	Consistent

Community Development Lending Activities

Overall, the bank was a leader in making community development loans in the state of Arkansas, as displayed below.

Full-Scope Review Areas	Community Development Lending
Fayetteville MSA	Adequate
Little Rock MSA	Leader
Pine Bluff MSA	Relatively High
NonMSA Arkansas	Leader
OVERALL	LEADER

Limited-Scope Review Areas	Community Development Lending
Fort Smith MSA	Consistent
Hot Springs MSA	Below
Jonesboro CSA	Below

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Arkansas

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During the review period, the bank originated or renewed 107 community development loans in its Arkansas assessment areas totaling \$259.0 million.

INVESTMENT TEST

Overall, the bank's performance in Arkansas is rated high satisfactory under the Investment Test. The following tables display investment and grant activity performance in Arkansas.

Full-Scope Review Areas	Investment and Grant Activity
Fayetteville MSA	Significant
Little Rock MSA	Significant
Pine Bluff MSA	Significant
NonMSA Arkansas	Excellent
OVERALL	SIGNIFICANT

Limited-Scope Review Areas	Investment and Grant Activity
Fort Smith MSA	Consistent
Hot Springs MSA	Consistent
Jonesboro CSA	Exceeds

During the review period, the bank made a total of \$128.8 million in qualified community development investments and \$703,101 in donations and grants in the Arkansas assessment areas. Of the total statewide investments, \$83.1 million were made in the current review period, while \$45.7 million were made prior to the review period but were still outstanding. Additionally, the bank had \$3.8 million in investments in the broader statewide Arkansas area from a prior period but still outstanding.

SERVICE TEST

The bank's performance in Arkansas is rated high satisfactory under the Service Test, based on performance under the following criteria.

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Accessibility of Delivery Systems

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

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

Limited-Scope Review Areas	Accessibility of Delivery Systems
Fort Smith MSA	Consistent
Hot Springs MSA	Consistent
Jonesboro CSA	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches in the Arkansas assessment areas has not adversely affected the accessibility of its service delivery systems, as shown in the following tables.

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

Limited-Scope Review Areas	Changes in Branch Locations
Fort Smith MSA	Consistent
Hot Springs MSA	Consistent
Jonesboro CSA	Consistent

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Pine Bluff, Arkansas

Arkansas

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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 Arkansas assessment areas, particularly LMI geographies and individuals, as displayed in the following tables.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Fayetteville MSA	Do Not Vary/Inconvenience
Little Rock MSA	Do Not Vary/Inconvenience
Pine Bluff MSA	Do Not Vary/Inconvenience
NonMSA Arkansas	Do Not Vary/Inconvenience
OVERALL	DO NOT VARY/INCONVENIENCE

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Fort Smith MSA	Consistent
Hot Springs MSA	Consistent
Jonesboro CSA	Consistent

Community Development Services

Throughout the Arkansas assessment areas, the bank provides a relatively high level of community development services, as displayed in the following tables.

Full-Scope Review Areas	Community Development Services
Fayetteville MSA	Relatively High
Little Rock MSA	Relatively High
Pine Bluff MSA	Relatively High
NonMSA Arkansas	Relatively High
OVERALL	RELATIVELY HIGH

Limited-Scope Review Areas	Community Development Services
Fort Smith MSA	Consistent
Hot Springs MSA	Below
Jonesboro CSA	Consistent

During the review period, 73 bank employees provided 614 community development services to 66 different organizations.

Simmons Bank
Pine Bluff, Arkansas

Fayetteville MSA

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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 assessment area, representing 3.5 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	0	5	3

During the review period, the bank closed one branch in a middle-income census tract. Based on this branch network and other service delivery systems, such as online and mobile banking, the bank is positioned to deliver financial services to substantially all of the Fayetteville assessment area.

General Demographics

The assessment area is composed of Washington and Benton counties, two of the three counties in the Fayetteville-Springdale-Rogers, Arkansas MSA. The assessment area has a total population of 454,630, which is about evenly split between the two counties. Located in Washington County is The University of Arkansas – Fayetteville, whose enrollment as of 2021 is 29,068, while the corporate headquarters of Walmart is in Benton County.

The Fayetteville assessment area hosts a competitive banking market, with 33 institutions operating 187 branches. Of these institutions, the bank ranks eighth in deposit market share with 2.9 percent of all assessment area deposit dollars. Competition for HMDA and CRA loans is high. An analysis of 2020 HMDA-reportable loans shows that 427 institutions had loan activity in the assessment area, of which Simmons Bank ranked 25th with 1.1 percent of total HMDA loans. Out of 127 institutions with CRA loan activity, Simmons Bank ranked third with 5.8 percent of total CRA loan activity.

As the assessment area covers a wide, diverse metropolitan area, credit needs are varied and include a blend of consumer and business credit products. In addition, community contacts stressed the need for financial literacy training for consumers and business planning education for businesses. Additional opportunities for community development involvement include partnerships with various nonprofit agencies and government assistance entities.

Simmons Bank
Pine Bluff, Arkansas

Fayetteville MSA

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Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	2	2.5%	1,973	1.7%
Moderate	15	18.5%	21,601	18.9%
Middle	39	48.2%	51,079	44.6%
Upper	25	30.9%	39,767	34.8%
Unknown	0	0.0%	0	0.00%
TOTAL	81	100%	114,420	100%

As shown above, 21.0 percent of the census tracts in the assessment area are low or moderate income, and 20.6 percent of the family population in the assessment area resides in those tracts.

Based on 2015 ACS data, the median family income for the assessment area is \$61,497, which exceeds the median family income for the state of Arkansas as a whole (\$51,782). More recently, the FFIEC estimated the median family income for the Fayetteville MSA to be \$66,400 in 2019 and \$69,000 in 2020. 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	22,813	19.9%	164,346	21.6%
Moderate	21,158	18.5%	134,818	17.7%
Middle	23,272	20.3%	149,580	19.7%
Upper	47,177	41.2%	311,180	41.0%
TOTAL	114,420	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 (38.4 percent) than reside in LMI geographies (21.0 percent). While the percentage of low-income families in the assessment area is slightly lower than state levels, the percentage of moderate-income families is slightly higher. Overall, the poverty level in the Fayetteville assessment area (10.9 percent) is below the statewide figure (14.3 percent). However, poverty levels are much higher in Washington County (13.4 percent) than Benton County (8.9 percent). Overall, when considering income and poverty levels, the Fayetteville assessment area is slightly more affluent than the state of Arkansas as a whole.

Simmons Bank
Pine Bluff, Arkansas

Fayetteville MSA

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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	\$151,265	33.2%	\$746
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 two counties that comprise the Fayetteville assessment area. While median housing values are similar in each county, relative to incomes, Benton County has a much higher affordability ratio (37.3 percent) than Washington County (28.7 percent). Additionally, median gross rents for both counties (\$796 for Benton County and \$704 for Washington County) exceed the median gross rent for Arkansas. Thus, housing is less affordable in the assessment area than the state overall.

Industry and Employment Demographics

The assessment area economy is large and diverse and supports a strong small business sector in addition to medical facilities, large businesses, and the state's largest university. County business patterns indicate that there are 236,698 paid employees in the assessment area. By number of paid employees, the three largest industries are manufacturing (11.3 percent), healthcare and social assistance (11.2 percent), and retail trade (10.8 percent). Of all businesses operating in the assessment area, 91.7 percent reported annual revenues of \$1 million or less, indicating that small businesses play an important role in the assessment area economy. Additionally, according to a community contact, the local economy is driven by large businesses headquartered in the Fayetteville MSA such as JB Hunt, Tyson Foods, Walmart, and the University of Arkansas.

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

Unemployment Levels for the Assessment Area			
Dataset	2019	2020	2021
Benton County	2.6%	4.5%	2.8%
Washington County	2.4%	4.5%	2.9%
Assessment Area Average	2.5%	4.6%	2.9%
Arkansas	3.5%	6.1%	4.0%

Simmons Bank
Pine Bluff, Arkansas

Fayetteville MSA

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As shown, the unemployment level for the assessment area overall is lower than statewide unemployment levels over the period, and both counties in the assessment area are closely aligned. While there was a slight uptick in 2020 due to the pandemic, levels had nearly returned to pre-pandemic levels by the end of 2021. According to a community contact, large businesses in the area fared okay during the pandemic overall, while many small businesses felt significant impacts.

Community Contact Information

A community contact interview was conducted with a member of an organization that supports small business entrepreneurs. The contact described the economies in Benton and Washington counties as strong, with consistent growth that drives much of the state's economy. This is aided by the presence of several large anchor businesses and consistent population growth. Residents are drawn to the area's quality of life, including bike trails and other outdoor activities, as well as an airport with many direct flights to bigger cities around the country.

The contact noted that banking conditions in the assessment area are good, with good accessibility and enough banks to promote healthy competition. One area of concern is the lack of banking services available to Spanish-speaking residents and small business owners as the Hispanic population has grown considerably over the last few years. The contact further noted that local community banks seemed to be more receptive to working with customers and non-customers affected by the pandemic, while many larger banks appeared less receptive. Currently, the contact indicated that there is demand for small dollar business loans in the area, and that small business owners often seek these loans from nontraditional lenders as they have less stringent underwriting requirements and are more willing to lend in small amounts. The contact noted that start-ups and existing small businesses often lack enough working capital or sufficient collateral to qualify for a bank loan and that many banks do not offer SBA loans due to the time and resources needed to make and monitor these loans.

According to the contact, sufficient community development opportunities exist for banks in the assessment area. Outreach is critical to make local small business owners aware of the products and services available at local banks. Financial and technical assistance is an ongoing need, and banks can work with local community groups and community development organizations to provide educational services. Finally, the contact noted that Simmons Bank is particularly involved in the community, especially with small businesses.

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Pine Bluff, Arkansas

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect good responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank makes an adequate level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	31	1.8%	2,183	0.8%
Home Purchase	408	23.1%	91,991	34.1%
Multifamily Housing	4	0.2%	5,633	2.1%
Refinancing	204	11.6%	42,498	15.8%
Other Purpose LOC	19	1.1%	826	0.3%
Other Purpose Closed/Exempt	12	0.7%	1,579	0.6%
Total HMDA	678	38.4%	144,710	53.7%
Small Business	1,019	57.7%	118,854	44.1%
Small Farm	69	3.9%	5,872	2.2%
TOTAL LOANS	1,766	100.0%	269,436	100.0%

The bank's lending activity in the assessment area represents 5.1 percent of total 2019 and 2020 HMDA and CRA loans made in the bank's combined assessment areas. By comparison, the bank operates 3.5 percent of its total branches and, as of June 30, 2020, holds 2.2 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, the bank's level of lending reflects good responsiveness to assessment area credit needs.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate, with primary emphasis placed on HMDA and small business lending.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is adequate.

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The percentage of HMDA loans originated in low-income census tracts in 2019 (1.6 percent) was in line with aggregate lending levels (0.7 percent) and the percentage of owner-occupied housing in low-income census tracts (0.7 percent), reflecting good performance. The bank did not originate any HMDA loans in low-income census tracts in 2020, compared to 0.4 percent for peer lenders and the demographic figure of 0.7 percent, reflecting poor performance. However, given the low levels of both aggregate lending and the percentage of owner-occupied housing in low-income census tracts, opportunities for lending are scarce, and minimal consideration is given to bank performance in low-income census tracts when reaching overall geographic distribution conclusions for the assessment area.

In 2019, the bank originated 10.4 percent of HMDA loans in moderate-income geographies in the assessment area, which was in line with aggregate performance (11.2 percent) but below demographic levels (15.4 percent), reflecting adequate performance. Similarly, in 2020, the percentage of HMDA loans in moderate-income geographies (9.2 percent) was in line with aggregate lending levels (10.2 percent) and below the demographic figure (15.4 percent) and is also considered adequate.

Small Business Lending

The bank's distribution of small business loans in LMI geographies is adequate.

The bank did not originate any small businesses loans in low-income census tracts in 2019, compared to an aggregate level of 1.5 percent and a demographic of 1.9 percent, reflecting poor performance. In 2020, the bank originated 1.3 percent of small business loans in low-income census tracts, which was slightly below both aggregate performance and the demographic (1.9 percent for each), reflecting adequate performance. However, given limited opportunities for small business lending in low-income census tracts, minimal weight is given to lending in low-income census tracts in determining overall small business lending performance. In moderate-income census tracts, the bank's level of lending in 2019 (13.4 percent) and 2020 (13.9 percent) was generally in line with aggregate lending levels (15.0 percent in 2019 and 15.4 percent in 2020) and slightly below the percentage of small businesses in moderate-income tracts (17.0 percent in 2019 and 16.9 percent in 2020), reflecting adequate performance.

Small Farm Lending

The distribution of small farm loans in LMI geographies is adequate.

As with small business lending, the bank did not originate any small farm loans in low-income census tracts in either 2019 or 2020. But, also like small businesses, opportunities are limited, as demographic figures indicate that only 1.0 percent of small farms were in low-income census tracts in 2019 and less than 1.0 percent in 2020, and aggregate lenders also did not originate any small farm loans in low-income census tracts in 2019 and 2020. Thus, the bank's performance is considered adequate.

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In 2019, the bank originated 5.6 percent of its small farm loans in moderate-income census tracts, which is in line with aggregate performance (7.9 percent) and below demographic levels (11.0 percent), reflecting adequate performance. In 2020, the bank originated 9.1 percent of its small farm loans in moderate-income tracts, which is in line with aggregate performance (7.1 percent) and the demographic figure (10.9 percent), also reflecting adequate performance.

Lastly, based on an analysis of the dispersion of all three loan products, no conspicuous lending gaps were noted, particularly in LMI areas. In 2019, the bank had loan activity in all but one of its assessment area census tracts and all LMI census tracts. In 2020, the bank made loans in all assessment area census tracts. The dispersion of the bank's loans was consistent with its branch structure in the assessment area and supports the conclusion that the bank's distribution of loans by geography income level is adequate.

Loan Distribution by Borrower's Profile

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

HMDA Lending

The distribution of HMDA loans by borrower's income level is adequate.

The distribution of HMDA loans to low-income borrowers is considered adequate in 2019 (5.3 percent) and in 2020 (3.3 percent), as the bank's performance was in line with that of peer institutions in the assessment area in 2019 (5.6 percent) and in 2020 (4.8 percent) while below the demographic figure (19.9 percent).

The bank originated 14.8 percent of HMDA loans to moderate-income borrowers in 2019, which is in line with aggregate lending levels (15.5 percent) and slightly below the percentage of assessment area families who are moderate income (18.5 percent), reflecting adequate performance. Similarly, the bank's level of lending to moderate-income borrowers in 2020 (11.9 percent) was in line with aggregate performance (13.3 percent) and slightly below demographic levels (18.5 percent) and is also considered adequate.

Small Business Lending

The distribution of small business loans by business revenue profile is good. In 2019, the bank originated 61.0 percent of its small business loans to businesses with annual revenues of \$1 million or less, which far exceeded aggregate lending levels (43.5 percent) but was below the demographic figure (91.5 percent), reflecting good performance. The bank's level of lending in 2020 was likewise good, as the percentage of small business loans to businesses with annual revenues of \$1 million or less (55.8 percent) again exceeded aggregate performance (31.8 percent) but was below the demographic figure (91.7 percent). In addition, as noted by community contacts, small dollar business loans are a need in the assessment area, and the bank originated 79.6 percent of its small business loans in 2019 and 78.4 percent in 2020 in amounts of \$100,000 or less, which addresses this need and further supports the good rating.

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Pine Bluff, Arkansas

Fayetteville MSA

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Small Farm Lending

The bank's level of lending to small farms is good.

According to assessment area demographics, 96.9 percent of farms had annual revenues of \$1 million or less in 2019 and 97.2 percent in 2020. Of the bank's 2019 small farm loans, 88.9 percent were made to farms with annual revenues of \$1 million or less, which exceeded the performance of peer institutions in the assessment area (72.0 percent) and is considered good. Similarly, in 2020, the bank originated 90.9 percent of its farms loans to small farms, compared to 73.1 percent for aggregate lenders, also reflecting good performance.

Community Development Lending Activities

The bank makes an adequate level of community development loans in the Fayetteville assessment area. During the review period, the bank originated four community development loans totaling \$9.9 million.

- Two PPP loans with a community development purpose were originated totaling \$6.4 million.
- One loan for \$2.7 million was made to a small business operating in a moderate-income census tract and providing LMI jobs.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. During the review period, the bank made \$5.3 million in newly qualified investments and received credit for \$3.3 million in investments that were made prior to the review period but are still outstanding. Of the total investments, \$6.5 million were MBS supporting affordable housing for LMI individuals in the assessment area, while the remaining \$2.1 million were municipal bonds for school districts with a majority of students coming from LMI families.

The bank also made 18 donations totaling \$28,750 to various organizations throughout the assessment area. These donations predominantly benefitted organizations providing community services to LMI families and in LMI geographies. Additionally, four grants totaling \$19,850 were made through the Simmons First Foundation.

SERVICE TEST

The bank's service delivery systems are reasonably accessible in the MSA assessment area, and the bank's record of opening and closing branch offices has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and individuals. Reasonableness of business hours and services do not vary in a way that inconveniences certain portions of the MSA assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services within the MSA assessment area.

Simmons Bank
Pine Bluff, Arkansas

Fayetteville MSA

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Accessibility of Delivery Systems

The bank operates eight branches in the Fayetteville assessment area, and the following table illustrates the distribution of these offices by geography income level as compared to the distribution of assessment area census tracts and household population by income level of geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0	0	5	3	0	8
	0.0%	0.0%	62.5%	37.5%	0.0%	100%
Census Tracts	2.5%	18.5%	48.2%	30.9%	0.0%	100%
Household Population	1.7%	18.9%	44.6%	34.8%	0.0%	100%

The bank does not operate any branches in low- or moderate-income geographies in the assessment area. However, five of its branches are located less than one mile from the nearest LMI census tract. Based on its branch structure and other service 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.

Changes in Branch Locations

During the review period, the bank closed one branch in a middle-income census tract. Therefore, the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours, products, and services are generally consistent across all branches in the assessment area. All assessment area branches have extended Friday drive-through hours, and three branches have Saturday hours. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and individuals.

Community Development Services

The bank provides a relatively high level of community development services in the Fayetteville assessment area. During the review period, nine employees provided 83 community development services to seven different organizations throughout the assessment area. Most of these activities provided technical assistance to organizations providing community services to LMI residents or in LMI communities. One employee provided financial education at a youth financial literacy workshop.

Simmons Bank
Pine Bluff, Arkansas

Little Rock MSA

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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 bank operates 19 branches in the Little Rock assessment area, representing 8.3 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
1	2	6	10

During the review period, the bank closed three branches in middle-income census tracts and four branches in upper-income census tracts. Based on its branch network and other service delivery systems, such as online and mobile banking, the bank is positioned to deliver financial services to substantially all of the Little Rock assessment area.

General Demographics

The assessment area is composed of five of the six counties in the Little Rock MSA: Faulkner, Lonoke, Pulaski, White, and Saline counties. The assessment area has a total population of 772,990 and is most heavily concentrated in Pulaski County (390,463), which contains the city of Little Rock. While the assessment area is largely urban, Lonoke and White counties are more rural, with populations of 70,691 and 78,660, respectively.

The Little Rock assessment area hosts a competitive banking market, with 40 institutions operating 321 branches. Of these institutions, the bank ranks sixth in deposit market share, with 7.1 percent of all assessment area deposit dollars. Competition for HMDA and CRA loans is high. An analysis of 2020 HMDA-reportable loans shows that 418 institutions had loan activity in the assessment area, of which Simmons Bank ranked eighth, with 3.5 percent of total HMDA loans. Out of 149 institutions with CRA loan activity, Simmons Bank ranked second, with 9.6 percent of total CRA loan activity.

The assessment area covers a wide, diverse metropolitan area, with credit needs including consumer, business, and agricultural credit products. Furthermore, community contacts noted the need for financial literacy for both individuals and small businesses. Finally, contacts noted that opportunities for community development involvement are available through partnerships with local community development organizations and government assistance entities.

Simmons Bank
Pine Bluff, Arkansas

Little Rock MSA

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Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	11	6.5%	6,383	3.3%
Moderate	38	22.4%	32,048	16.7%
Middle	64	37.7%	78,549	40.9%
Upper	55	32.4%	74,446	38.8%
Unknown	2	1.2%	698	0.4%
TOTAL	170	100%	192,124	100%

Of the census tracts in the assessment area, 28.9 percent are low or moderate income, while 20.0 percent of the family population in the assessment area resides in those tracts. These LMI geographies are primarily concentrated in the area south of Interstate 630 in Little Rock.

Based on 2015 ACS data, the median family income for the assessment area is \$60,806, which exceeds the median family income for the state of Arkansas as a whole (\$51,782). More recently, the FFIEC estimates the median family income for the Little Rock MSA to be \$69,800 in 2019 and \$72,300 in 2020. 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	40,082	20.9%	164,346	21.6%
Moderate	32,687	17.0%	134,818	17.7%
Middle	37,760	19.7%	149,580	19.7%
Upper	81,595	42.5%	311,180	41.0%
TOTAL	191,647	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 (37.9 percent) than reside in LMI geographies (20.0 percent). As shown in the preceding table, the distribution of families by income level in the assessment area is closely aligned with the state of Arkansas. Overall, the poverty level in the Little Rock assessment area (10.9 percent) was below the statewide figure (14.3 percent). However, poverty levels are higher in White County, at 14.8 percent. When considering income and poverty levels, the Little Rock assessment area is slightly more affluent than the state of Arkansas as a whole.

Simmons Bank
Pine Bluff, Arkansas

Little Rock MSA

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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	\$137,950	35.2%	\$759
Arkansas	\$111,400	37.1%	\$677

Housing costs in the assessment area are slightly less affordable than the state of Arkansas as a whole when adjusting for income levels. Additionally, affordability ratios varied within the assessment area, with Lonoke County being the most affordable (42.3 percent) and Pulaski County being the least affordable (32.4 percent).

Additionally, median gross rents are higher in the assessment area than statewide levels but are similar when accounting for income levels. The percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (43.9 percent) is just slightly above the statewide figure (42.7 percent), indicating that rental costs in the assessment area are similarly affordable to the state.

Industry and Employment Demographics

The assessment area economy is large and diverse and supports a strong small business sector in addition to several prominent universities, medical facilities, and large businesses. County business patterns indicate that there are 346,517 paid employees in the assessment area. By number of paid employees, the three largest industries are government (17.8 percent), healthcare and social assistance (15.8 percent), and retail trade (11.8 percent). Of all businesses operating in the assessment area, 90.7 percent reported annual revenues of \$1 million or less, indicating that small businesses play an important role in the assessment area economy.

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

Unemployment Levels for the Assessment Area			
Dataset	2019	2020	2021
Faulkner County	2.9%	5.5%	3.5%
Lonoke County	3.2%	5.6%	3.3%
Pulaski County	3.4%	7.4%	4.9%
Saline County	2.8%	5.1%	3.1%
White County	4.4%	6.3%	4.0%
Assessment Area Average	3.3%	6.5%	4.2%
Arkansas	3.5%	6.1%	4.0%

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As shown, the unemployment level for the assessment area overall is similar to the state of Arkansas, though more heavily affected by the pandemic, particularly in Pulaski County.

Community Contact Information

Three community contact interviews were referenced with individuals knowledgeable about local economic development, affordable housing, and the small business environment in Little Rock. The contacts agreed that the local economy has been strong and growing overall but that some areas have fared better than others. While the city of Little Rock has benefitted from strong business growth and low tax rates, pockets of LMI areas exist and have not seen the same growth. Additionally, LMI areas and residents were more negatively impacted by the pandemic. While large businesses were able to maintain operations, many LMI individuals who struggled before the pandemic have lost jobs because of the pandemic. Also, the service sector, such as restaurants and hotels, has struggled economically since the onset of the pandemic.

The contact specializing in affordable housing noted that there is not enough affordable single-family housing stock in livable condition to meet the demands of the LMI population. Most of the available affordable housing is located along the 12th Street corridor (where the majority of the LMI population is located) and due to the age of the homes, many need repairs or renovations. Homes in this area also generally receive low appraisal values compared to the purchase price, making it difficult for buyers to qualify under loan-to-value credit standards. Affordable rental units are also in scarce supply in the area and are not sufficient to meet local demand. Additionally, many renters were negatively impacted by the pandemic, with lack of employment leading to evictions. Financial barriers preventing LMI renters from transitioning to homeownership include insufficient income and poor credit history. Local banks can assist by providing financial education programs in LMI areas, offering home renovation and repair loans to allow seniors to remain in their homes, and working with local affordable housing organizations.

Contacts noted that small businesses are located throughout the Little Rock area and benefit from a relatively low cost of doing business. Barriers faced by new or existing small business owners include lack of collateral and working capital, personal capital, and poor credit. Opportunities for banks include offering flexible small business loans, partnering with local community development organizations, and providing financial and technical assistance to small business owners.

The contacts noted that while banking services are generally readily available, there are some areas that have a smaller bank presence, particularly in LMI areas along the 12th Street corridor. Two of the contacts noted that banks could be more proactive in meeting area needs, and all three noted that Simmons Bank is active in the community.

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

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank is a leader in making community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	86	1.7%	5,278	0.6%
Home Purchase	1,365	26.2%	281,964	33.2%
Multifamily Housing	2	0.0%	1,163	0.1%
Refinancing	875	16.8%	194,520	22.9%
Other Purpose LOC	48	0.9%	2,429	0.3%
Other Purpose Closed/Exempt	46	0.9%	7,775	0.9%
Total HMDA	2,422	46.5%	493,129	58.0%
Small Business	2,624	50.4%	342,810	40.3%
Small Farm	158	3.0%	14,268	1.7%
TOTAL LOANS	5,204	100.0%	850,207	100.0%

The bank's lending activity in the assessment area represents 15.1 percent of total 2019 and 2020 HMDA and CRA loans made in the bank's combined assessment areas. By comparison, the bank operates 8.3 percent of its total branches and, as of June 30, 2020, holds 11.1 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 excellent responsiveness to assessment area credit needs.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate, with primary emphasis placed on HMDA and small business lending.

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HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is poor.

The percentage of HMDA loans originated in low-income census tracts in 2019 (1.1 percent) and 2020 (0.7 percent) is in line with aggregate lending levels (1.2 percent in 2019 and 1.0 percent in 2020) but slightly below the percentage of owner-occupied housing in low-income census tracts (2.3 percent in both 2019 and 2020). This reflects adequate performance lending in low-income geographies for both years.

In 2019, the bank originated 5.3 percent of HMDA loans in moderate-income geographies in the assessment area, which trails aggregate performance (10.1 percent) and demographic levels (15.0 percent), reflecting poor performance. In 2020, the percentage of HMDA loans in moderate-income geographies (5.1 percent) was again below aggregate lending levels (8.8 percent) and the demographic figure (15.0 percent) and is also considered poor.

Small Business Lending

The bank's distribution of small business loans in LMI geographies is adequate.

In 2019, the percentage of small business loans originated in low-income geographies (4.8 percent) was in line with aggregate performance (4.5 percent) and the percentage of small businesses in low-income census tracts (4.5 percent), reflecting adequate performance. In 2020, the bank originated 3.1 percent of its small business loans in low-income geographies, slightly trailing aggregate lending levels (4.3 percent) and the demographic figure (4.5 percent), which reflects adequate performance.

The bank's small business lending in moderate-income tracts for 2019 (16.4 percent) was equal to aggregate performance (16.4 percent) and slightly below demographic levels (19.3 percent) and is considered adequate. Similarly, the bank's lending in 2020 (14.0 percent) was in line with aggregate lending levels (16.7 percent) and approached the demographic figure (19.4 percent) and reflects adequate performance.

Small Farm Lending

The distribution of small farm loans in LMI geographies is excellent.

While assessment area demographics indicate that less than 1.0 percent of farms in the assessment area are in low-income geographies, the bank originated 2.3 percent of small farm loans in low-income geographies in 2019 and 1.4 percent in 2020. These figures slightly exceeded aggregate lending levels in 2019 (0.5 percent) and 2020 (0.4 percent) and are considered good.

The bank's performance in moderate-income geographies carried more weight toward the overall conclusion based on the limited opportunities in low-income geographies. In 2019, the percentage of farm loans in moderate-income geographies (19.3 percent) exceeded aggregate lending levels

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(7.8 percent) and the percentage of assessment area farms in moderate-income geographies (13.7 percent), reflecting excellent performance. The bank's distribution of farm loans in moderate-income geographies in 2020 (20.0 percent) was again well above aggregate lending levels (10.7 percent) and exceeded the demographic figure (13.9 percent) and is also considered excellent.

Lastly, based on an analysis of the dispersion of all three loan products, no conspicuous lending gaps were noted, particularly in LMI areas. In 2019, the bank had loan activity in 94.7 percent of all assessment area census tracts and 89.8 percent of all LMI census tracts. In 2020, the bank made loans in 97.1 percent of all assessment area census tracts and 93.9 percent of all LMI census tracts. The dispersion of the bank's loans was consistent with its branch structure in the assessment area and supports the conclusion that the bank's distribution of loans by geography income level is adequate overall.

Loan Distribution by Borrower's Profile

The bank's borrower distribution in the Little Rock assessment area is good.

HMDA Lending

The distribution of HMDA loans by borrower's income level is adequate overall. The distribution of HMDA loans to low-income borrowers is considered adequate in 2019 (6.7 percent) and 2020 (4.9 percent), as it is comparable to aggregate levels (5.9 percent in 2019 and 5.3 percent in 2020) but trailed demographic levels (20.9 percent for both years).

The bank originated 15.5 percent of its HMDA loans to moderate-income borrowers in 2019, which was in line with aggregate lending levels (16.9 percent) and the percentage of assessment area families who are moderate income (17.0 percent), reflecting adequate performance. Similarly, the bank's level of lending to moderate-income borrowers in 2020 (13.5 percent) is comparable to aggregate levels (14.4 percent) and demographic levels (17.0 percent) and is also considered adequate.

Small Business Lending

The distribution of small business loans by business revenue profile is good. In 2019, the bank originated 50.6 percent of its small business loans to businesses with annual revenues of \$1 million or less, which exceeded aggregate lending levels (42.4 percent) but was below the demographic figure (90.4 percent), reflecting good performance. The bank's level of lending in 2020 was likewise good, as the percentage of small business loans to businesses with annual revenues of \$1 million or less (42.0 percent) again exceeded aggregate performance (34.7 percent) but was below the demographic figure (90.7 percent).

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Small Farm Lending

The bank's level of lending to small farms is good.

According to assessment area demographics, 98.0 percent of farms had annual revenues of \$1 million or less in 2019 and 2020. Of the bank's 2019 small farm loans, 85.2 percent were made to farms with annual revenues of \$1 million or less, which exceeded the performance of peer institutions in the assessment area (64.4 percent) and is considered good. The percentage of farm loans to small farms in 2020 (91.4 percent) also exceeded aggregate lending levels (62.1 percent) and is considered good.

Community Development Lending Activities

The bank is a leader in making community development loans in the Little Rock assessment area. During the review period, the bank originated 30 community development loans totaling \$151.7 million. These loans supported economic development (7), revitalization and stabilization of LMI or distressed middle-income geographies (22), and affordable housing (1). The most impactful of these loans are described below.

- PPP loans with a community development purpose were made to 14 small businesses totaling \$36.2 million.
- Four loans totaling \$90.0 million were made to a community development financial institution (CDFI) that finances business expansion in underserved communities leveraging new market tax credits.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. During the review period, the bank made \$11.4 million in newly qualified investments and received credit for \$20.4 million in investments that were made prior to the review period but are still outstanding. All investments made during the review period were MBS supporting affordable housing for LMI individuals in the assessment area; prior-period investments outstanding included MBS and municipal bonds for school districts with a majority of students coming from LMI families. The investments in MBS, though not particularly innovative, support affordable housing, a need specifically mentioned by community contacts in the assessment area.

The bank also made 59 donations totaling \$112,875 to various organizations throughout the assessment area. These donations predominantly benefitted organizations providing community services to LMI families and in LMI geographies. Of these donations, the bank made 8 donations totaling \$43,250 to local affordable housing organizations. Finally, the bank made \$76,356 in qualifying Simmons First Foundation grants.

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SERVICE TEST

Simmons Bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the Little Rock assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of these delivery systems, particularly to LMI geographies or individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Lastly, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 19 branches in the Little Rock 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	2	6	10	0	19
	5.3%	10.5%	31.6%	52.6%	0.0%	100%
Census Tracts	6.5%	22.4%	37.7%	32.4%	1.2%	100%
Household Population	3.3%	16.7%	40.9%	38.8%	0.4%	100%

The bank operates three, or 15.8 percent, of its branches in the Little Rock assessment area in LMI geographies. By comparison, 28.9 percent of geographies in the assessment area are LMI, and 20.0 percent of households reside in LMI geographies. Of the bank's branches in middle- and upper-income census tracts, eight are within one mile of LMI geographies and are accessible to residents of those census tracts. 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 mentioned previously, the bank closed three branches in middle-income census tracts and four branches in upper-income census tracts during the review period. However, several branches remain throughout the assessment area, with many located in or within close proximity to LMI geographies. Therefore, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and individuals.

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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 the assessment area, particularly LMI geographies and individuals. Saturday hours are offered at 14 locations, while 18 locations offer extended Friday hours, including all three of the branches in LMI census tracts.

Community Development Services

The bank provides a relatively high level of community development services in the Little Rock assessment area. During the review period, 19 employees provided 81 community development services to 15 different organizations throughout the assessment area. Several of these services consisted of financial literacy training delivered at various schools, nonprofit organizations, and community service organizations throughout the assessment area. As noted by community contacts, the assessment area has a need for financial literacy efforts, especially among LMI individuals. Bank employees also served on the boards of directors or provided technical assistance to various organizations providing community services in the assessment area.

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PINE BLUFF, ARKANSAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PINE BLUFF ASSESSMENT AREA

Bank Structure

The bank operates eight branches in the Pine Bluff assessment area, representing 3.5 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	2	4	2

During the review period, the bank closed one branch in a moderate-income census tract. Based on its branch network and other service delivery systems, such as online and mobile banking, the bank is positioned to deliver financial services to substantially all of the Pine Bluff assessment area.

General Demographics

The assessment area is composed of two of the three counties in the Pine Bluff MSA: Jefferson and Lincoln. The assessment area has a total population of 87,610 and is most heavily concentrated in Jefferson County (73,548), which contains the city of Pine Bluff.

The Pine Bluff assessment area hosts a small banking market, with seven institutions operating 27 branches. Of these institutions, the bank ranks first in deposit market share, with 70.9 percent of all assessment area deposit dollars. Competition for HMDA and CRA loans is higher. An analysis of 2020 HMDA-reportable loans shows that 138 institutions had loan activity in the assessment area, of which Simmons Bank ranked second, with 8.0 percent of total HMDA loans. Out of 60 institutions with CRA loan activity, Simmons Bank ranked first, with 46.9 percent of total CRA loan activity.

Assessment area credit needs are varied and include a blend of consumer and business credit products. In addition, a community contact stressed the dire need for affordable housing and financial literacy training for consumers. Further, the contact indicated that opportunities for community development involvement are available through partnerships with various nonprofit agencies and government assistance entities.

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Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	1	3.6%	526	2.6%
Moderate	8	28.6%	3,835	18.9%
Middle	15	53.6%	11,695	57.6%
Upper	3	10.7%	4,235	20.8%
Unknown	1	3.6%	9	0.0%
TOTAL	28	100%	20,300	100%

As shown above, 32.2 percent of the census tracts in the assessment area are low or moderate income, while 21.5 percent of the family population in the assessment area resides in those tracts. These LMI geographies are primarily concentrated in the city of Pine Bluff.

Based on 2015 ACS data, the median family income for the assessment area is \$47,412, which is below the median family income for the state of Arkansas as a whole (\$51,782). More recently, the FFIEC estimates the median family income for the Pine Bluff MSA to be \$51,000 in 2019 and \$52,600 in 2020. 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	5,091	25.1%	164,346	21.6%
Moderate	3,076	15.2%	134,818	17.7%
Middle	3,635	17.9%	149,580	19.7%
Upper	8,498	41.9%	311,180	41.0%
TOTAL	20,300	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 (40.3 percent) than reside in LMI geographies (21.7 percent). As shown in the table, the percentage of low-income families in the assessment area (25.1 percent) is greater than that of the state of Arkansas (21.6 percent). Additionally, the poverty level in the Pine Bluff assessment area (19.9 percent) is much higher than the statewide figure (14.3 percent). As indicated by a community contact, chronic disinvestment in the area has led to declining job opportunities and wages. Therefore, when considering income and poverty levels, the Pine Bluff assessment area is less affluent than the state of Arkansas as a whole.

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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	\$79,148	45.6%	\$663
Arkansas	\$111,400	37.1%	\$677

Based on the information in the table above, housing costs in the assessment area are more affordable than the state of Arkansas as a whole when adjusting for income levels. However, the median age of housing stock in the assessment area (46 years) is higher than statewide (32 years), and, as indicated by a community contact, many need significant repairs or improvements, which adds to the cost of homeownership. Additionally, the community contact suggested that affordable housing options are limited in the assessment area, with many units vacant and in very poor condition. Between low wages and a lack of available affordable housing, homeownership is likely out of reach for many LMI residents in the area.

Additionally, while median gross rents are lower in the assessment area than statewide levels, the percentage of renters in the assessment area with rental costs exceeding 30.0 percent of their income (45.2 percent) is higher than the statewide figure (42.7 percent), indicating that rental costs in the assessment area are less affordable than statewide. As with single family homes, affordable rental units are also scarce, and many are in poor condition, according to a community contact.

Industry and Employment Demographics

The assessment area economy is small but diverse. County business patterns indicate that there are 28,213 paid employees in the assessment area. By number of paid employees, the three largest industries are government (26.5 percent), manufacturing (16.5 percent), and retail trade (10.6 percent). Of the 2,379 businesses operating in the assessment area, 91.2 percent reported annual revenues of \$1 million or less, indicating that small businesses play an important role in the assessment area economy. According to a community contact, major employers in the area include Jefferson Medical Center; the University of Arkansas at Pine Bluff; Evergreen Packaging, Inc.; and Tyson Foods.

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

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Unemployment Levels for the Assessment Area			
Dataset	2019	2020	2021
Jefferson County	5.3%	8.1%	6.6%
Lincoln County	4.2%	6.0%	4.6%
Assessment Area Average	5.2%	7.8%	6.3%
Arkansas	3.5%	6.1%	4.0%

As shown, the unemployment level for the assessment area has consistently been higher than statewide levels and was more heavily impacted by the global pandemic in 2020. Additionally, unemployment rates are higher in Jefferson County than Lincoln County over the period.

Community Contact Information

An interview was referenced with an individual knowledgeable about economic conditions and revitalization efforts in the city of Pine Bluff. The contact noted that the area suffers from chronic disinvestment and high crime rates, resulting in the exodus of businesses and residents from the area. This, in turn, has led to a decrease in tax revenues needed to fund basic services, including infrastructure and schools. There is a significant volume of vacant properties—both commercial and residential, with many in extreme disrepair. Recent efforts to revitalize the area include the development of 3.2 acres of downtown space into rentals units with modern amenities, adoption of a new strategy to improve the qualifications and training of teachers in local schools, implementation of specialized workforce training, and development of a small business incubator through the University of Arkansas at Pine Bluff.

The contact noted that LMI residents are more reliant on credit unions than local banks for their credit needs, due to their more flexible and affordable products. Further, the contact contends that banks seem less willing to lend in Pine Bluff due to the lack of economic opportunities. The primary barrier to accessing credit for LMI borrowers is poor credit histories due to low wages, lack of discretionary income, lack of job opportunities, and prior defaults.

Affordable housing is an urgent need in the Pine Bluff area, both single family and multifamily. In addition to a lack of available housing options, LMI families are often hindered by a lack of income and poor credit. Additionally, many existing LMI homeowners need home improvement loans to update aging property but often cannot qualify for typical loans. Thus, flexible small dollar loans for weatherization and other rehabilitation are an ongoing need.

Ample opportunities exist for bank involvement, according to the contact. In addition to more flexible and affordable credit products, banks can provide down payment assistance, financial education, and revolving loans funds for home improvements. The contact noted that Simmons Bank has been the most active among banks in the Pine Bluff area when it comes to large community development initiatives.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PINE BLUFF ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank makes a relatively high level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	13	1.0%	861	0.7%
Home Purchase	152	11.9%	16,270	13.5%
Refinancing	72	5.6%	13,854	11.5%
Other Purpose LOC	5	0.4%	320	0.3%
Other Purpose Closed/Exempt	10	0.8%	1,306	1.1%
Total HMDA	252	19.7%	32,611	27.1%
Small Business	764	59.8%	58,301	48.4%
Small Farm	261	20.4%	29,487	24.5%
TOTAL LOANS	1,277	100.0%	120,399	100.0%

The bank's lending activity in the assessment area represents 3.7 percent of total 2019 and 2020 HMDA and CRA loans made in the bank's combined assessment areas. By comparison, the bank operates 3.5 percent of its total branches and, as of June 30, 2020, holds 12.1 percent of total bank deposits in the assessment area. It should be noted that the large percentage of deposits is due to the bank having its headquarters in Pine Bluff. Moreover, in 2019 and 2020, the bank ranked first and second, respectively, in HMDA originations and first in CRA originations for both years in the Pine Bluff assessment area. Considering the bank's lending levels and importance to the assessment area, lending activity is considered excellent.

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Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate, with primary emphasis placed on HMDA and small business lending.

HMDA Lending

The bank's distribution of HMDA loans in LMI geographies is good.

The bank did not originate any HMDA loans in low-income geographies in 2019 and originated 0.7 percent in 2020; however, aggregate lending was similarly low (0.5 percent in 2019 and 0.4 percent in 2020), and demographic figures indicate that in 2019 and 2020, only 2.2 percent of owner-occupied homes are in low-income census tracts. Thus, while performance in 2019 is poor, it was adequate for 2020. Given the limited lending opportunities and activity, lending in low-income tracts was given minimal weight toward the overall geographic distribution performance for HMDA lending.

In 2019, the bank originated 10.3 percent of HMDA loans in moderate-income geographies in the assessment area, which exceeded aggregate performance (7.3 percent) but was below demographic levels (15.2 percent), reflecting good performance, particularly considering barriers to credit noted by community contacts, including poor credit histories and limited assets. In 2020, the percentage of HMDA loans in moderate-income geographies remained at 10.3 percent, which was again above aggregate lending levels (5.5 percent) and below the demographic figure (15.2 percent) and is considered good.

Small Business Lending

The bank's distribution of small business loans in LMI geographies is adequate.

In 2019, the percentage of small business loans originated in low-income (3.8 percent) geographies was in line with aggregate performance (2.7 percent) and was also generally aligned with the demographic figure for low-income geographies (5.2 percent), reflecting adequate performance. In 2020, the bank originated 2.9 percent of small business loans in low-income geographies, which is also in line with aggregate lending levels (3.2 percent) and the demographic figure (5.2 percent) and is also considered adequate.

The bank's small business lending in moderate-income census tracts in 2019 (19.7 percent) was in line with aggregate lenders (18.5 percent) and the percentage of small businesses located in moderate-income geographies (22.2 percent), reflecting adequate performance. In 2020, the bank originated 18.8 percent of its small business loans in moderate-income census tracts, compared to 18.9 percent for aggregate lenders and a demographic percentage of 21.9 percent, again reflecting adequate performance.

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Small Farm Lending

The distribution of small farm loans in LMI geographies is adequate.

According to assessment area demographics, only 1.1 percent of farms in the assessment area are in low-income geographies, indicating that opportunities for lending to farms in these geographies are limited. The bank did not originate any small farm loans in low-income census tracts in either 2019 or 2020. However, aggregate lenders originated 0.5 percent of small farm loans in low-income geographies and none in 2020. Thus, the bank's performance in 2019 is considered poor, while 2020 is considered adequate.

In 2019, the percentage of small farm loans in moderate-income geographies (28.9 percent) was comparable to aggregate lending levels (28.2 percent) and was slightly higher than the percentage of assessment area farms in moderate-income geographies (25.0 percent), reflecting good performance. The bank's distribution of small farm loans in moderate-income geographies in 2020 (21.8 percent) was also in line with aggregate lending levels (23.2 percent) and the demographic figure (24.4 percent) and is considered adequate.

Lastly, based on an analysis of the dispersion of all three loan products, no conspicuous lending gaps were noted, particularly in LMI areas. In 2019 and 2020, the bank had loan activity in 96.4 percent of all assessment area census tracts and all LMI census tracts. The dispersion of the bank's loans supports the conclusion that the bank's distribution of loans by geography income level is adequate.

Loan Distribution by Borrower's Profile

The bank's borrower distribution in the Pine Bluff assessment area is good.

HMDA Lending

The distribution of HMDA loans by borrower's income level is adequate.

The distribution of HMDA loans to low-income borrowers is considered adequate in 2019 (4.3 percent) and 2020 (3.7 percent), as the bank's performance was in line with peer institutions in the assessment area in 2019 (3.9 percent) and in 2020 (3.7 percent). While comparable to peer institutions in the assessment area, the bank's performance was below the demographic figure (25.1 percent in 2019 and 2020); however, a significant portion of this demographic is unlikely to qualify for a mortgage loan, as evidenced by the overall poverty level of 19.9 percent in the assessment area.

The bank originated 10.3 percent of HMDA loans to moderate-income borrowers in 2019, which was comparable to aggregate lending levels (10.7 percent) and below the percentage of assessment area families who are moderate income (15.2 percent), reflecting adequate performance. The bank's level of lending to moderate-income borrowers in 2020 (15.4 percent) was above aggregate lenders (13.2 percent) and the demographic level (15.2 percent) and is considered excellent.

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Small Business Lending

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

In 2019, the bank originated 55.5 percent of its small business loans to businesses with annual revenues of \$1 million or less, which exceeded aggregate lending levels (34.0 percent) but was below the demographic figure (91.0 percent), reflecting good performance. The bank's level of lending in 2020 was likewise good, as the percentage of small business loans to businesses with annual revenues of \$1 million or less (48.9 percent) exceeded aggregate performance (34.3 percent) but was below the demographic figure (91.2 percent).

Small Farm Lending

The bank's level of lending to small farms is good.

According to assessment area demographics, over 97.0 percent of farms had annual revenues of \$1 million or less in 2019 and 2020. Of the bank's 2019 small farm loans, 73.2 percent were made to farms with annual revenues of \$1 million or less, which exceeded the performance of peer institutions in the assessment area (59.0 percent) and is considered good. The percentage of farm loans to small farms was similar in 2020 at 72.3 percent—again exceeding aggregate lending levels (60.0 percent)—and is considered good.

Community Development Lending Activities

The bank makes a relatively high level of community development loans in the Pine Bluff assessment area. During the review period, the bank originated 19 community development loans totaling \$21.4 million. These loans supported economic development (seven) and revitalization and stabilization of LMI or distressed middle-income geographies (twelve), many of which were to small businesses or farms supporting LMI jobs. Three PPP loans with a community development purpose totaling \$4.4 million were made to small businesses in the assessment area.

INVESTMENT TEST

The bank makes a significant level of qualified community development investments and grants in the assessment area and is occasionally in a leadership position. During the review period, the bank made \$13.2 million in newly qualified investments. Three of the investments were in MBS supporting affordable housing in the assessment area, an urgent need identified by community contacts, and one investment of \$12.9 million was in an SBIC.

The bank also made 15 donations totaling \$29,000 to various organizations throughout the assessment area. These donations predominantly benefitted organizations providing community services to LMI families and in LMI geographies and affordable housing organizations. Additionally, the bank made 11 qualifying grants of \$128,863 through the Simmons First Foundation.

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SERVICE TEST

The bank's service delivery systems are accessible in the assessment area, and the bank's record of opening and closing branch offices has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. Reasonableness of business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and/or LMI individuals. Finally, the bank provides a relatively high level of community development services within the MSA assessment area.

Accessibility of Delivery Systems

The bank operates eight branches in the MSA, and the following table illustrates the distribution of these offices by geography income level, as compared to the distribution of MSA assessment area census tracts and household population by income level of geography.

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0	2	4	2	0	8
	0.0%	25.0%	50.0%	25.0%	0.0%	100%
Census Tracts	3.6%	28.6%	53.6%	10.7%	3.6%	100%
Household Population	2.6%	18.9%	57.6%	20.9%	0.0%	100%

As shown in the previous table, the bank operates two branches (25.0 percent) in low- or moderate-income geographies, which is in line with demographic data used for comparison. Overall, the bank's service delivery systems are accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank closed one branch in a moderate-income census tract during the review period. However, the bank continues to operate two branches in moderate-income census tracts and three others branches that are near LMI geographies. Therefore, the bank's record of opening and closing branches in the assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and/or LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours, products, and services are generally consistent across all branches in the assessment area. All locations have drive-through services and extended Friday hours. Five branches have Saturday hours, including one in a moderate-income census tract. Therefore, the bank's services do not vary in a way that inconveniences its assessment area, particularly LMI geographies and/or LMI individuals.

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Community Development Services

The bank provides a relatively high level of community development services in the Pine Bluff assessment area. During the review period, 14 employees provided 137 community development services to 15 different organizations throughout the assessment area. Most of these services consisted of financial literacy training for students and adults and technical assistance provided to various community service organizations in the assessment area. Additionally, the bank provided financial literacy training on two separate occasions at one of its assessment area branches. As noted by community contacts, the assessment area has a need for financial literacy efforts, especially among LMI individuals.

Simmons Bank
Pine Bluff, Arkansas

Fort Smith MSA

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FORT SMITH, ARKANSAS-OKLAHOMA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FORT SMITH ASSESSMENT AREA

The Fort Smith assessment area is composed of Crawford, Sebastian, and Franklin counties in Arkansas, which comprise the full Arkansas portion of the Fort Smith, Arkansas-Oklahoma multistate MSA. The bank operates five branches in the assessment area and did not open or close any branches during the review period. The tables below detail key demographic information relating to the Fort Smith assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
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	1,961	3,134	1,980	0	7,075
	0.0%	27.7%	44.3%	28.0%	0.0%	100%
Agricultural Institutions	0	8	81	38	0	127
	0.0%	6.3%	63.8%	29.9%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				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%

Simmons Bank
Pine Bluff, Arkansas

Fort Smith MSA

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

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance for the state of Arkansas, as displayed 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
Geographic Distribution of Loans	Consistent
Distribution of Loans by Borrower's Profile	Exceeds
Community Development Lending Activities	Consistent
OVERALL	CONSISTENT

The bank made three community development loans totaling \$25.8 million during the review period.

INVESTMENT TEST

The bank's performance in this assessment area is consistent with the investment test performance in the state of Arkansas. The bank made new investments in MBS totaling \$3.1 million in addition to \$500,000 in school bonds made prior to this review period but still outstanding. The bank also made 19 donations and grants totaling \$70,650 during the review period.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test 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	Consistent
OVERALL	CONSISTENT

During the review period, four employees provided 54 services to four different organizations.

Simmons Bank
Pine Bluff, Arkansas

Fort Smith MSA

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HOT SPRINGS, ARKANSAS MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HOT SPRINGS ASSESSMENT AREA

The Hot Springs assessment area consists of Garland County, which comprises the entirety of the Hot Springs, Arkansas MSA. The bank operates three full-service branches in the assessment area and did not open or close any branches during the review period. The tables below detail key demographic information related to the Hot Springs MSA.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	2	4	9	5	0	20
	10.0%	20.0%	45.0%	25.0%	0.0%	100%
Family Population	1,111	3,355	12,371	9,114	0	25,951
	4.3%	12.9%	47.7%	35.1%	0.0%	100%
Household Population	2,348	6,237	18,857	12,848	0	40,290
	5.8%	15.5%	46.8%	31.9%	0.0%	100%
Business Institutions	310	842	1,984	1,340	0	4,476
	6.9%	18.8%	44.3%	29.9%	0.0%	100%
Agricultural Institutions	1	4	22	24	0	51
	2.0%	7.8%	43.1%	47.1%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	6,024	4,346	5,091	10,490	25,951
	23.2%	16.7%	19.6%	40.4%	100%
Household Population	9,870	6,307	6,790	17,323	40,290
	24.5%	15.7%	16.9%	43.0%	100%

Simmons Bank
Pine Bluff, Arkansas

Hot Springs MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HOT SPRINGS ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance for the state of Arkansas, as displayed 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
Geographic Distribution of Loans	Consistent
Distribution of Loans by Borrower's Profile	Consistent
Community Development Lending Activities	Below
OVERALL	CONSISTENT

The bank did not make any community development loans in the Hot Springs assessment area during the review period.

INVESTMENT TEST

The bank's performance in this assessment area is consistent with the investment test performance in the state of Arkansas. The bank made new investments totaling \$3.4 million, in addition to \$1.7 million in investments made prior to this review period but still outstanding. The bank also made donations totaling \$10,125.

SERVICE TEST

The bank's performance in this assessment area is below the service test 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	BELOW

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

Simmons Bank
Pine Bluff, Arkansas

Jonesboro CSA

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JONESBORO, ARKANSAS CSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JONESBORO ASSESSMENT AREA

The Jonesboro assessment area is composed of the entirety of the Jonesboro-Paragould, Arkansas CSA, which includes Craighead, Poinsett, and Greene counties. The bank operates four full-service branches in the assessment area. 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 Jonesboro CSA.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	2	7	17	7	0	33
	6.1%	21.2%	51.5%	21.2%	0.0%	100%
Family Population	1,568	7,061	23,124	11,970	0	43,723
	3.6%	16.2%	52.9%	27.4%	0.0%	100%
Household Population	3,518	11,918	33,543	15,713	0	64,692
	5.4%	18.4%	51.9%	24.3%	0.0%	100%
Business Institutions	358	1,036	2,755	1,218	0	5,367
	6.7%	19.3%	51.3%	22.7%	0.0%	100%
Agricultural Institutions	3	112	301	167	0	583
	0.5%	19.2%	51.6%	28.6%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	9,050	7,337	8,754	18,582	43,723
	20.7%	16.8%	20.0%	42.5%	100%
Household Population	15,273	10,207	11,072	28,140	64,692
	23.6%	15.8%	17.1%	43.5%	100%

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Pine Bluff, Arkansas

Jonesboro CSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JONESBORO ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is below the Lending Test performance for the state of Arkansas, as displayed 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
Geographic Distribution of Loans	Consistent
Distribution of Loans by Borrower's Profile	Consistent
Community Development Lending Activities	Below
OVERALL	BELOW

During the review period, the bank made 13 community development loans totaling \$13.0 million in the assessment area.

INVESTMENT TEST

The bank's investment test performance in this assessment area exceeds the performance in the state of Arkansas. Qualified community development investments included \$24.7 million in new investments and \$6.3 million in investments made prior to this review period but still outstanding. The bank also made donations and grants totaling \$84,939.

SERVICE TEST

The bank's performance in this assessment area is consistent the service test 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	Consistent
OVERALL	CONSISTENT

During the review period, three employees provided 71 community development services to four different organizations in the assessment area.

Simmons Bank
Pine Bluff, Arkansas

NonMSA Arkansas

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ARKANSAS NONMETROPOLITAN STATEWIDE AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMSA ARKANSAS ASSESSMENT AREA

Bank Structure

The bank operates 17 of its 230 branches (7.4 percent) in the nonMSA Arkansas assessment area, which are distributed as follows.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	2	12	3

The bank closed two branches in middle-income census tracts and two branches in upper-income census tracts during the review period. Based on its branch, ATM network, and other service delivery systems such as online and mobile banking, the bank is well positioned to deliver financial services to the vast majority of the assessment area. However, the bank does not operate any branches in Sharp County in northern Arkansas and might struggle to serve portions of the county, given its distance from the nearest branch location.

General Demographics

The nonMSA Arkansas assessment area is composed of four separate, noncontiguous assessment areas in southern, western, north-central, and northern Arkansas. Given similar demographic characteristics, economic conditions, and credit needs in these areas, these nonMSA assessment areas are combined for analysis as a single nonMSA Arkansas assessment area. The counties making up each of these four separate assessment areas are listed in the following table.

Composition of the NonMSA Arkansas Assessment Area	
North NonMSA	Fulton, Sharp
Western NonMSA	Johnson, Pope
North-Central NonMSA	Searcy, Stone, Van Buren
Southern NonMSA	Ashley, Chicot, Desha, Drew, Union

The assessment area has a total population of 259,852; Pope County and Union County are the most populous counties in the assessment area, with populations of 62,830 and 40,633, respectively. While the assessment area is largely rural, several larger cities, such as El Dorado in Union County and Russellville in Pope County, serve as regional hubs for commercial and banking activity in the surrounding counties. As a whole, the assessment area demographic makeup is relatively homogenous.

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While rural, the assessment area hosts a relatively competitive banking market, with 38 financial institutions operating 129 branches. Simmons Bank is the leader in deposit market share, accounting for 16.1 percent of all deposit dollars in the assessment area.

The bank plays an important role in meeting the credit needs of the nonMSA Arkansas assessment area. An analysis of 2020 HMDA-reportable loans reveals that there were 256 financial institutions with HMDA loan activity in the assessment area; Simmons Bank ranked fourth out of these institutions, with 4.3 percent of total HMDA loan activity. Out of 82 institutions with reported CRA loan activity in the assessment area, Simmons Bank ranked first, with 25.8 percent of total CRA loans.

As the assessment area encompasses a broad nonmetropolitan area, credit needs are varied and include a blend of consumer, commercial, and agricultural loan products. Other credit needs identified by community contacts include a greater supply of affordable housing, flexible small business and small farm loan products, and low down payment guaranteed home loans. While the availability of community development intermediaries, such as nonprofit agencies and government assistance entities, is somewhat limited in the assessment area, community contacts noted that community development opportunities are available for financial institutions.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	2	3.1%	1,191	1.7%
Moderate	12	18.5%	11,282	16.4%
Middle	41	63.1%	42,619	62.0%
Upper	10	15.4%	13,681	19.9%
Unknown	0	0.0%	0	0.0%
TOTAL	65	100%	68,773	100%

As shown in the table above, LMI geographies represent 21.6 percent of all census tracts, while the percentage of total families residing in those tracts (18.1 percent) is slightly lower. Both low-income census tracts are in Desha County in southeastern Arkansas, while the 12 moderate-income census tracts are dispersed throughout the assessment area. The majority of census tracts in the assessment area are middle income, and a majority of assessment area families reside within those tracts.

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As of 2020, 27 out of 41 middle-income census tracts were designated as distressed, underserved, or both during the review period, as detailed below.

- Seven census tracts designated as underserved due to their remote rural location in Ashley and Searcy counties.
- Nineteen census tracts designated as distressed due to poverty in Chicot, Desha, Fulton, Johnson, Searcy, Sharp, and Stone counties.
- Five census tracts designated as distressed due to population loss in Chicot and Desha counties.

According to 2015 ACS data, the median family income for the assessment area was \$44,395, which is slightly below the \$45,047 figure for nonMSA Arkansas as a whole. More recently, the FFIEC estimated the median family income for nonMSA Arkansas to be \$49,100 in 2019 and \$50,800 in 2020. The following table displays the distribution of assessment area families by income level compared to nonMSA Arkansas as a whole.

Family Population by Income Level				
	Assessment Area		NonMSA Arkansas	
Low	15,383	22.4%	63,831	21.4%
Moderate	12,409	18.0%	53,700	18.0%
Middle	12,949	18.8%	58,267	19.5%
Upper	28,032	40.8%	123,066	41.2%
TOTAL	68,773	100%	298,864	100%

When compared with the data in the first table in this section, a significantly higher percentage of families in the assessment area are LMI (40.4 percent) than reside in LMI census tracts (18.1 percent). The percentage of assessment area families that are LMI is in line with the percentage of LMI families in nonMSA Arkansas as a whole (39.4 percent), and the poverty level in the assessment area (17.7 percent) is closely aligned with the statewide nonMSA figure (16.6 percent). Overall, the assessment area is similarly affluent to nonMSA Arkansas as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and nonMSA Arkansas as a whole.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$86,367	40.5%	\$598
NonMSA Arkansas	\$85,869	41.0%	\$588

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Based on the information in the table above, housing in the assessment area is similarly affordable to housing in nonMSA Arkansas as a whole. Median housing values, median gross rents, and the affordability ratio in the assessment area are comparable to statewide nonMSA levels. Additionally, while not shown in the table above, the percentage of assessment area renters with rental costs exceeding 30.0 percent of income (41.4 percent) is also in line with nonMSA Arkansas as a whole (41.1 percent). Despite these similarities, affordability levels in the assessment area varied by county, with housing being most affordable in Ashley County (52.2 percent) and least affordable in Stone County (31.6 percent).

Finally, community contacts have noted that there is a shortage of affordable housing in the assessment area, and what affordable housing is present needs repairs. Thus, there is a need for home improvement loans, but for some LMI residents the cost of needed repairs will likely be unaffordable.

Industry and Employment Demographics

County business patterns indicate that there are 80,163 paid employees in the assessment area. By percentage of employees, the three largest job categories in the assessment area are government (16.5 percent), manufacturing (15.5 percent), and retail trade (13.1 percent). While not captured in county business patterns data, the assessment area economy is also heavily dependent on agriculture, particularly the production of soybeans, rice, and corn. Cattle and poultry are also significant commodities in northern nonMSA Arkansas. Large employers in northern nonMSA Arkansas include Tyson Foods, ConAgra Foods, Kimberly Clark, and Arkansas Nuclear One power plant and in southern nonMSA Arkansas, Georgia Pacific, Murphy Oil, and the University of Arkansas at Monticello. According to 2020 Dunn & Bradstreet data, there were a total of 655 farms operating throughout the assessment area. Additionally, based on assessment area demographics, small businesses and small farms play an important role in the assessment area economy, as 89.6 percent of businesses and 95.9 percent of farms reported annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Arkansas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Arkansas
2019	4.7%	3.5%
2020	7.0%	6.1%
2021	5.1%	4.0%

Unemployment levels in the assessment area were higher than in the state of Arkansas throughout the review period and were more heavily impacted by the global pandemic. Unemployment levels varied somewhat by county in the assessment area, with the highest levels in Chicot County (including a high of 10.5 percent in 2020) and the lowest levels in Fulton County.

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Community Contact Information

Eight interviews were conducted with local community contacts who specialize in the following areas:

- Agriculture
- Affordable housing (three)
- Economic development (three)
- Small business

Contacts in northern nonMSA Arkansas describe the economy as stable to improving, while in southern nonMSA Arkansas, economic growth has stagnated. Manufacturing and agriculture are the primary industries throughout nonMSA Arkansas. In northern nonMSA Arkansas, cattle, poultry, soybeans, and hay are most prevalent, while in southern nonMSA Arkansas, timber, catfish farms, corn, cotton, and rice are the prevailing commodities. Contacts in southern nonMSA Arkansas note the closure of lumber mills and poultry plants as being a driver behind the current economic conditions. Plans are underway to build a new casino in Russellville, Arkansas, located in Pope County, that should improve the economic outlook in northern Arkansas through job creation and increased tax revenue.

The individual specializing in agriculture indicated that there has been an overall decline in small family farms, with large or mid-size farms being most common. Additionally, many small farmers work full time jobs and farm on the side. Access to credit is good, and small farmers generally have positive relationships with local banks. The affordable housing contacts noted a lack of quality rental stock in many areas due to aging properties and a lack of incentive for landlords to improve their properties. Pope County in northern Arkansas is noted for having better affordability and overall available housing stock. Barriers to homeownership throughout nonMSA Arkansas include the increased cost of lumber (for new homes and rehabilitations), rising home prices, poor credit, insufficient ability to repay loans, low wages, and a lack of down payment funds. Finally, contacts specializing in economic development and small business indicate that due to the preponderance of agriculture in the rural areas, small businesses are less common or attract less attention. Restaurants and retail shops are the most common small businesses, and relief funds during the pandemic were critical in keeping these businesses operational. However, extended unemployment insurance payments hindered these establishments from hiring new workers. In northern nonMSA Arkansas, technical start-ups make up most new businesses. Barriers to new businesses include lack of capital and poor or limited credit history.

All contacts indicated that the availability of banking services meets the needs of area residents. Opportunities for bank involvement include offering guaranteed farm loan products or other farm loans with more flexible lending criteria, offering USDA home loans with low down payment requirements, working with area affordable housing organizations, conducting outreach to area small businesses, participating in micro loan funds or offering small dollar business loans, and working with local SBA contacts and offering SBA loans. Four of the contacts noted that Simmons Bank is particularly active in the assessment area.

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

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income and revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank is a leader in making community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	45	1.4%	1,544	0.6%
Home Purchase	325	10.0%	38,571	13.8%
Multifamily Housing	2	0.1%	1,157	0.4%
Refinancing	211	6.5%	25,602	9.2%
Other Purpose LOC	30	0.9%	1,295	0.5%
Other Purpose Closed/Exempt	20	0.6%	1,567	0.6%
Total HMDA	633	19.5%	69,736	25.0%
Small Business	1,851	57.1%	141,604	50.7%
Small Farm	758	23.4%	67,838	24.3%
TOTAL LOANS	3,242	100.0%	279,178	100.0%

The bank's lending levels in the assessment area reflect excellent responsiveness to assessment area credit needs. Lending activity in the assessment area represents 9.4 percent of the total HMDA and CRA loans made in the bank's combined assessment areas in 2019 and 2020. The bank's level of lending activity in the assessment area exceeds the percentage of total bank branches in the assessment area (7.4 percent) and the percentage of total bank deposits as of June 30, 2020, held within the assessment area (5.7 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 fourth in total HMDA originations and first in total CRA loan originations in 2020, which further demonstrates the bank's commitment to meeting the credit needs of the nonMSA Arkansas assessment area.

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Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good based on all three loan products reviewed. As noted in the *Income and Wealth Demographics* section, the assessment area contains only two low-income census tracts; therefore, heavier emphasis is placed on the bank's performance lending in moderate-income census tracts. Equal emphasis was placed on performance in all three loan products reviewed, as small farm loans are in high demand in nonMSA Arkansas in addition to HMDA and small business loans.

HMDA Lending

The bank's distribution of HMDA loans by geography income level is good.

The percentage of HMDA loans originated in low-income census tracts in 2019 (0.3 percent) and 2020 (0.7 percent) was in line with aggregate lending levels in both years (0.3 percent and 0.4 percent, respectively) and was in line with the percentage of owner-occupied housing in low-income tracts (1.2 percent in 2019 and 2020). This reflects adequate performance.

In 2019, the bank originated 16.5 percent of HMDA loans in moderate-income geographies, which exceeded aggregate performance (11.9 percent) and demographic levels (14.6 percent), reflecting excellent performance. Lending in moderate-income geographies is considered good in 2020, with the bank's level of lending (14.4 percent) again outpacing aggregate performance (13.0 percent) and in line with demographic levels (14.6 percent).

Small Business Lending

The geographic distribution of small business loans is good.

Demographic data for the assessment area reveals that just over 1.0 percent of businesses in the assessment area are in low-income census tracts. When combined with low aggregate lending levels in low-income geographies in 2019 (1.5 percent) and 2020 (1.2 percent), this indicates that opportunities for small business lending are limited in these census tracts. Nevertheless, the percentage of the bank's small business loans in low-income geographies in 2019 (1.4 percent) and 2020 (1.8 percent) is in line with these figures and is considered adequate for both years.

Small business lending in moderate-income geographies in 2019 is considered good. In 2019, the bank made 18.1 percent of small business loans in moderate-income geographies compared to an aggregate lending level of 16.0 percent and a demographic of 17.0 percent. Similarly, the bank's percentage of small business loans in moderate-income geographies in 2020 (17.7 percent) was again in line with peer institutions (18.3 percent) and the demographic figure (16.9 percent) and is also considered good.

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Small Farm Lending

Small farm lending in LMI geographies is good.

The bank made 0.5 percent of small farm loans in low-income geographies in 2019, which was below aggregate lending levels (1.2 percent) and demographic levels (4.2 percent) and is considered adequate. In 2020, the bank made 2.4 percent of its small farm loans in low-income geographies. This is considered adequate when compared with aggregate lending levels (2.5 percent) and the demographic figure (4.6 percent).

Small farm lending in moderate-income geographies is considered excellent in both 2019 and 2020. In both years, the bank's level of lending in moderate-income geographies (25.9 percent in 2019 and 16.4 percent in 2020) exceeded both the percentage of assessment area farms in those geographies (10.1 percent in 2019 and 9.3 percent in 2020) and aggregate performance (15.5 percent and 12.2 percent).

Lastly, based on an analysis of the dispersion of all three loan products, no conspicuous lending gaps were noted, particularly in LMI areas. The bank had loan activity in 96.9 percent of all assessment area census tracts in 2019, 98.5 percent of all census tracts in 2020, and all LMI census tracts in both years. The dispersion of the bank's loans was consistent with its branch structure in the assessment area and supports the conclusion that the bank's distribution of loans by geography income level is good.

Loan Distribution by Borrower's Profile

Overall, the bank's borrower distribution in the nonMSA Arkansas assessment area is good.

HMDA Lending

The distribution of HMDA loans by borrower's income level is adequate.

The bank's percentage of HMDA loans to low-income borrowers in 2019 (5.5 percent) was comparable to aggregate lending levels (5.0 percent) but below the percentage of low-income families in the assessment area (22.4 percent) and is considered adequate. Similarly, the bank's percentage of HMDA loans to low-income borrowers in 2020 (5.6 percent) was again in line with aggregate lenders (4.5 percent) but below demographic levels (22.4 percent) and is also considered adequate. As noted by community contacts in the assessment area, LMI borrowers encounter several barriers to homeownership, including expensive home prices, poor credit histories, and lack of income and/or assets. Thus, while the bank's level of lending did not meet the demographic figure, given these constraints, its performance is nonetheless adequate.

The bank's lending to moderate-income borrowers in 2019 (15.6 percent) was in line with aggregate lenders (14.9 percent) and demographic levels (18.0 percent) and is considered adequate. Lending to moderate-income borrowers in 2020 comprised 15.0 percent of all HMDA loans, which

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exceeded aggregate lending levels (12.4 percent) and was in line with the demographic (18.0 percent) and is considered good.

Small Business Lending

The bank's level of lending to small businesses is good.

In 2019, the bank originated 70.1 percent of small business loans to businesses with annual revenues of \$1 million or less. While below demographic levels (89.5 percent), the bank's performance is considered good when compared with aggregate lending levels (40.2 percent). The bank's performance in 2020 is also considered good, as the bank's level of lending to businesses with annual revenues of \$1 million or less (55.0 percent) again exceeded aggregate levels (37.5 percent) but was below the demographic figure (89.6 percent).

Small Farm Lending

Lastly, the bank's distribution of farm loans by revenue size is good.

In both 2019 and 2020, the bank's percentage of small farm loans to farms with annual revenues of \$1 million or less (86.5 percent and 78.8 percent, respectively) exceeded aggregate levels (69.2 percent and 67.5 percent, respectively). While the bank's level of lending was below the percentage of assessment area farms with annual revenues of \$1 million or less (96.1 percent in 2019 and 95.9 percent in 2020), this performance is nevertheless considered good when considering the bank's performance relative to aggregate lending levels.

Community Development Lending Activities

The bank is a leader in providing community development loans in nonMSA Arkansas. During the review period, the bank originated 38 community development loans totaling \$37.2 million. These loans qualified for economic development (12), revitalization and stabilization of LMI or distressed middle-income geographies (24), affordable housing (1), and community service (1). The majority of these loans provided funds to farms in the assessment area and are responsive to credit needs, as agriculture is a key sector of the assessment area economy. One noteworthy loan of \$1.6 million was to a nonprofit healthcare clinic offering services to the LMI population at reduced rates.

INVESTMENT TEST

The bank made an excellent level of qualified community development investments and grants in the nonMSA Arkansas assessment area. During the review period, the bank made \$22.1 million in new investments and received credit for \$13.5 million in investments that were made prior to the review period but are still outstanding. Of the new investments, \$18.8 million were municipal bonds for school districts with a majority of students coming from LMI families, while the remaining \$3.3 million were MBS financing affordable home loans for LMI borrowers.

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Additionally, the bank made 47 donations to various organizations supporting community development purposes throughout the nonMSA Arkansas assessment area totaling \$62,575. These donations predominantly benefitted organizations providing community services to LMI families and in LMI geographies, as well as to affordable housing organizations. Finally, \$79,118 was made in qualifying Simmons First Foundation grants.

SERVICE TEST

The bank's service delivery systems are accessible to the nonMSA Arkansas 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 individuals. Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies or individuals. Lastly, the bank provides a relatively high level of community development services throughout the assessment area.

Accessibility of Delivery Systems

The bank operates 17 branches in nonMSA Arkansas. 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	12	3	0	17
	0.0%	11.8%	70.6%	17.6%	0.0%	100%
Census Tracts	3.1%	18.5%	61.2%	15.4%	0.0%	100%
Family Population	1.7%	16.4%	62.0%	19.9%	0.0%	100%

The bank operates two branches in moderate-income census tracts, representing 11.8 percent of total branches in the assessment area. By comparison, 21.6 percent of census tracts in the assessment area are LMI, and 18.1 percent of families reside in those tracts. Additionally, seven of the bank branches are within one mile of LMI geographies. While the bank operates no branches in the assessment area's low-income census tracts, these tracts account for only 1.7 percent of the family population. Based on its current branch structure and additional delivery systems such as mobile and online banking, service delivery systems are accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank closed two branches in middle-income census tracts and two in upper-income census tracts during the review period. However, as noted above, the bank's services remain accessible to most of the assessment area. Therefore, the accessibility of the bank's service delivery systems was not adversely affected by the branch closures.

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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 assessment area, particularly LMI geographies and individuals. While neither branch in a moderate-income census tract offers extended Friday or Saturday hours, eight of the branches located within one mile of LMI geographies do offer these options.

Community Development Services

The bank provides a relatively high level of community development services in nonMSA Arkansas. During the review period, 24 employees provided 186 community development services to 21 different organizations. Several of these services consisted of financial literacy training delivered at various schools, nonprofit organizations, and community service organizations throughout the assessment area. As noted by community contacts, the assessment area has a need for financial literacy efforts, especially among LMI individuals. Other community development services included bank employees serving on the boards of directors or providing technical assistance to various organizations providing community services such as education, housing, and healthcare to LMI individuals and geographies.

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KANSAS

CRA RATING FOR KANSAS: SATISFACTORY

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

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

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

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Kansas assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. Due to overall low loan volumes, small farm lending was not reviewed in the Kansas assessment areas. Given the bank's limited operations in the state, performance in Kansas carried minimal weight toward the bank's overall rating.

The bank operates two assessment areas in Kansas: the Wichita assessment area and the nonMSA Kansas assessment area. The Wichita assessment area was reviewed under full-scope examination procedures, and, as such, performance conclusions for the state of Kansas reflect the bank's performance in that assessment area.

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To augment the evaluation of the full-scope assessment area, two community contact interviews were utilized. 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 KANSAS

The bank operates four offices throughout its assessment areas in Kansas. The following table gives additional detail regarding the bank's operations in Kansas.

Review Area	Branches #	Branches %	Deposits \$ 000s (as of 6/30/21)	Deposits %	CRA Review Procedures
Wichita MSA	3	75.0%	\$183,079	66.5%	Full-Scope
Kansas nonMSA Statewide Area	1	25.0%	\$92,092	33.5%	Limited-Scope
OVERALL	4	100%	\$275,171	100%	1 Full-Scope

Deposits held in the state of Kansas total approximately \$275.2 million, which represents 1.5 percent of total bank deposits. During the review period, the bank acquired four branches and closed one branch in the Kansas assessment areas.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

Bank's performance under the Lending Test is rated low satisfactory. The test considers the bank's performance under the following criteria.

Lending Activity

Full-Scope Review Areas	Lending Activity
Wichita MSA	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Lending Activity
NonMSA Kansas	Consistent

The bank's Kansas 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 the assessment area.

Geographic and Borrower Distribution

The bank's geographic distribution of loans reflects good penetration in the state of Kansas, as shown below. No conspicuous lending gaps were identified in the Kansas assessment areas.

Full-Scope Review Areas	Geographic Distribution of Loans
Wichita MSA	Good
OVERALL	GOOD

Limited-Scope Review Areas	Geographic Distribution of Loans
NonMSA Kansas	Consistent

Performance by borrower's income or revenue profile is adequate in the state of Kansas, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution By Borrower's Profile
Wichita MSA	Adequate
OVERALL	ADEQUATE

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Limited-Scope Review Areas	Loan Distribution By Borrower's Profile
NonMSA Kansas	Consistent

Community Development Lending Activities

The bank makes an adequate level of community development loans in the state of Kansas.

Full-Scope Review Areas	Community Development Lending
Wichita MSA	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Community Development Lending
NonMSA Kansas	Below

During the review period, the bank made four community development loans totaling \$10.2 million.

INVESTMENT TEST

The bank's performance in Kansas is rated outstanding under the Investment Test.

Full-Scope Review Areas	Investment and Grant Activity
Wichita MSA	Excellent
OVERALL	EXCELLENT

Limited-Scope Review Areas	Investment and Grant Activity
NonMSA Kansas	Consistent

The bank made a total of \$12.9 million in qualified community development investments and \$14,000 in donations and grants in the Kansas assessment areas. Of the total statewide investments, \$9.4 million were made in the current review period, while \$3.5 million were made prior to the review period but were still outstanding.

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SERVICE TEST

The bank's performance in Kansas is rated outstanding under the Service Test.

Accessibility of Delivery Systems

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

Full-Scope Review Areas	Accessibility of Delivery Systems
Wichita MSA	Accessible
OVERALL	ACCESSIBLE

Limited-Scope Review Areas	Accessibility of Delivery Systems
NonMSA Kansas	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 in Kansas.

Full-Scope Review Areas	Changes in Branch Locations
Wichita MSA	Not Adversely Affected
OVERALL	NOT ADVERSELY AFFECTED

Limited-Scope Review Areas	Changes in Branch Locations
NonMSA Kansas	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 Kansas assessment areas, particularly LMI geographies and individuals.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Wichita MSA	Do Not Vary/Inconvenience
OVERALL	DO NOT VARY/INCONVENIENCE

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
NonMSA Kansas	Consistent

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Community Development Services

The bank is a leader in providing development services in Kansas.

Full-Scope Review Areas	Community Development Services
Wichita MSA	Leader
OVERALL	LEADER

Limited-Scope Review Areas	Community Development Services
NonMSA Kansas	Below

During the review period, eight bank employees provided 135 community development services to ten different organizations, all of which were in the Wichita assessment area.

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Wichita MSA

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WICHITA, KANSAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WICHITA ASSESSMENT AREA

Bank Structure

The bank operates three branches in the Wichita assessment area, accounting for 1.3 percent of total bank branches. The distribution of these branches by geography income level is displayed in the table below.

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

No branching activity occurred during the review period. Based on its branch network and other service delivery systems such as online and mobile banking, the bank is adequately positioned to deliver financial services throughout the assessment area.

General Demographics

The bank's Wichita assessment area is composed of Sedgwick County in its entirety, one of the four counties in the full Wichita, Kansas MSA. Sedgwick County contains the city of Wichita and has a population of 506,529. While the core area of the city of Wichita is urban and densely populated, the outlying areas of Sedgwick County are more rural. As such, the assessment area has a need for a variety of consumer and commercial loan and deposit products. Other particular credit needs noted by community contacts include funding for new small businesses and home improvement loans to repair aging otherwise affordable housing.

The assessment area hosts an active banking market, with 37 FDIC-insured depository institutions operating 156 branches throughout the assessment area. Of these institutions, Simmons Bank ranks 14th, with 1.0 percent of the total deposit market share. An analysis of 2020 HMDA-reportable loans indicates that there were 325 financial institutions with loan activity in the assessment area, of which Simmons Bank ranked 64th, with less than 1.0 of total HMDA loans. Additionally, of the 123 financial institutions with CRA loan activity in the assessment area, Simmons Bank ranked 17th, with 1.6 percent of all CRA loans.

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Income and Wealth Demographics

The following table displays the distribution of assessment area census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	15	12.1%	10,259	8.2%
Moderate	36	29.0%	28,087	22.5%
Middle	34	27.4%	34,841	28.0%
Upper	39	31.5%	51,458	41.3%
Unknown	0	0.0%	0	0.0%
TOTAL	124	100%	124,645	100%

As shown above, 41.1 percent of census tracts in the assessment area are designated as LMI, while 30.7 percent of families in the assessment area reside within those tracts. Nearly all of the LMI census tracts in the assessment area are concentrated in the city of Wichita in the central-eastern portion of Sedgwick County.

According to 2015 ACS data, the median family income for the Wichita assessment area was \$63,779, which was below the statewide figure for Kansas of \$66,389. More recently, the FFIEC estimates the median family income for the Wichita MSA to be \$69,500 in 2019 and \$71,800 in 2020. The following table displays the distribution of assessment area families by income level compared to all Kansas families.

Family Population by Income Level				
	Assessment Area		Kansas	
Low	26,674	21.4%	137,650	18.9%
Moderate	21,878	17.6%	128,930	17.7%
Middle	25,983	20.9%	154,601	21.2%
Upper	50,110	40.2%	308,287	42.3%
TOTAL	124,645	100%	729,468	100%

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (39.0 percent) than reside in LMI census tracts (30.7 percent). This LMI family population is higher than in the state of Kansas as a whole (36.6 percent). While not shown in the preceding table, poverty levels in the assessment area (11.0 percent) are higher than statewide levels (9.1 percent). Taken together, these figures point to the fact that the assessment area is less affluent than the state of Kansas as a whole.

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Housing Demographics

The following table displays housing demographics for the assessment area and the state of Kansas as a whole.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$126,477	40.0%	\$731
Kansas	\$132,000	39.6%	\$757

Based on the data in the preceding table, housing in the assessment area is similarly affordable to housing in Kansas as a whole, as evidenced by similar affordability ratios. While rental costs in the assessment area are nominally below statewide levels, the percentage of renters with rental costs exceeding 30.0 percent of their income in the assessment area (42.3 percent) is higher than the statewide figure (41.0 percent), indicating that rental costs are slightly more expensive in the assessment area when accounting for income levels.

Industry and Employment Demographics

The assessment area economy supports strong manufacturing and small business sectors. According to county business patterns data, there are 245,229 paid employees in the assessment area. The three largest industries by number of paid employees are manufacturing (16.3 percent), healthcare and social assistance (14.0 percent), and government (11.7 percent). In addition, assessment area demographics indicate that 89.0 percent of assessment area businesses reported annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Kansas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Kansas
2019	3.4%	3.1%
2020	8.5%	5.7%
2021	4.6%	3.2%

As shown in the table, unemployment levels in the assessment area were higher than statewide levels throughout the review period and more heavily affected by the global pandemic.

Community Contact Information

Two community contact interviews were referenced with individuals with knowledge of the Wichita MSA's economic conditions and credit needs. One of these individuals specializes in economic development, while the second contact specializes in housing.

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The economic development contact noted that aerospace is the largest industry in the Wichita area and that there was tremendous job loss in 2020 due to issues with the 737 Max airplane, with many local suppliers struggling to recover. The contact further noted that while several local business owners had bank accounts, many did not have established relationships with lenders, which made obtaining PPP funding during the pandemic particularly challenging for many area small businesses, with minority-owned businesses being most impacted. Thus, there is a need for outreach by banks to local small businesses. While the contact feels that existing businesses are generally well served by local banks, start-ups often encounter difficulties, as many banks are reluctant to lend to companies that lack a successful history of operations. The contact feels that grants, funding, and financing for start-ups could be improved.

The housing contact noted that local economic conditions were significantly affected by the pandemic, including several large layoffs in the manufacturing sector. Housing stock in the assessment area varies; new construction is taking place in the suburbs of Wichita, but prices make these homes unaffordable for many first-time buyers. Most of the affordable housing is located in the city of Wichita, but much of this stock is aging and needs repairs. This further hinders the ability for LMI residents to afford homeownership, as many lack the additional funds needed to improve these properties.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WICHITA ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes an adequate level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	3	0.7%	133	0.1%
Home Purchase	73	18.2%	17,382	19.0%
Refinancing	52	13.0%	12,586	13.8%
Total HMDA	128	31.9%	30,101	33.0%
Small Business	265	66.1%	59,215	64.9%
Small Farm	8	2.0%	1,994	2.2%
TOTAL LOANS	401	100.0%	91,310	100.0%

Loans made in the Wichita assessment area represent 1.2 percent of all 2019 and 2020 HMDA and CRA loans made inside the bank's combined assessment areas. By comparison, the bank operates 1.3 percent of its total branches in the assessment area, and as of June 30, 2020, 1.1 percent of total bank deposits are held within the assessment area. As the bank's level of lending aligns closely with the percentage of branches and deposits, the bank's lending activity reflects adequate responsiveness to the credit needs of the assessment area.

Geographic Distribution of Loans

Based on both products reviewed, the overall geographic distribution of loans is good, with primary emphasis placed on small business lending.

HMDA Lending

The bank's distribution of HMDA loans by geography income level is poor.

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The percentage of the bank's HMDA loans made in low-income census tracts in 2019 (1.8 percent) and 2020 (1.4 percent) was below aggregate lending levels (3.2 percent in 2019 and 2.3 percent in 2020) and below the demographic figure (5.8 percent for both years); these lending levels reflect a poor penetration of low-income geographies.

In 2019, the bank originated 14.3 percent of its HMDA loans in moderate-income census tracts. This was closely aligned with the performance of peer institutions in the assessment area (15.6 percent) but below the demographic figure (19.6 percent), reflecting adequate performance. Conversely, the bank's penetration of moderate-income geographies in 2020 (6.9 percent) was below aggregate lending levels (13.7 percent) and the demographic figure (19.6 percent) and is considered poor.

Small Business Lending

The bank's performance lending to small businesses in LMI geographies is good.

In 2019, the bank originated 4.0 percent of its small business loans in low-income geographies, which is in line with aggregate lending levels (5.8 percent) and slightly below the percentage of small businesses in low-income census tracts (6.4 percent), reflecting adequate performance. In 2020, the bank did not originate any small business loans in low-income geographies compared to 6.3 percent for aggregate lenders and 6.4 percent for the demographic; thus, this performance is considered very poor.

In 2019, the bank originated 39.4 percent of its small business loans in moderate-income census tracts, compared to 27.1 percent for aggregate lenders and a demographic of 29.1 percent, reflecting excellent performance. In 2020, the bank's percentage of small business lending in moderate-income geographies dropped to 29.5 percent but nevertheless slightly exceeded both aggregate lenders (28.0 percent) and the demographic (29.3 percent), reflecting good performance.

Lastly, based on an analysis of the dispersion of both loan products reviewed, no conspicuous lending gaps were identified, particularly in LMI areas. In 2019, the bank had loan activity in 41.9 percent of all assessment area census tracts and 35.3 percent of all LMI census tracts. In 2020, the bank had loan activity in 45.2 percent of all assessment area census tracts and 25.5 percent of all LMI census tracts. The overall dispersion of the bank's loans was consistent with the bank's limited branch presence in the assessment area.

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Loan Distribution by Borrower's Profile

The bank's overall loan distribution by borrower's income or business revenue profile is adequate.

HMDA Lending

The bank's HMDA lending to LMI borrowers reflects adequate performance.

In 2019, the bank originated 1.8 percent of its HMDA loans to low-income borrowers compared to aggregate lenders at 7.1 percent and a 21.4 percent demographic level, reflecting poor performance. Lending performance improved in 2020, with 5.6 percent of HMDA loans to low-income borrowers, which was in line with aggregate lenders (6.0 percent) and below the demographic figure (21.4 percent), reflecting adequate performance.

The bank's lending to moderate-income borrowers for 2019 (16.1 percent) and 2020 (16.7 percent) was comparable to aggregate lenders (18.1 percent in 2019 and 17.2 percent in 2020) and the demographic of moderate-income families in the assessment area (17.6 percent) and is considered adequate.

Small Business Lending

The bank's distribution of small business loans by business revenue profile is adequate. Of its total small business loans, the bank originated 44.4 percent to businesses with annual revenues of \$1 million or less in 2019; this figure was in line with the performance of peer institutions in the assessment area (40.5 percent) but below the demographic figure (88.7 percent) and is considered adequate. Similarly, the percentage of the bank's small business loans made to businesses with annual revenues of \$1 million or less in 2020 (39.2 percent) was comparable to aggregate lending levels (40.1 percent) but was below the demographic figure, reflecting adequate performance.

Community Development Lending Activities

The bank made an adequate level of community development loans in the Wichita assessment area. During the review period, the bank made four community development loans totaling \$10.2 million. All four loans were PPP loans with a community development purpose to small businesses in the assessment area.

INVESTMENT TEST

The bank's investment and grant activity in the assessment area is excellent. During the review period, the bank made qualified community development investments totaling \$11.4 million. This total included \$8.2 million in new investments made during the current review period and \$3.2 million in investments that were made in a prior review period but are still outstanding. All qualified community development investments were in MBS that financed affordable home loans for LMI residents in the assessment area, which is responsive to a need stated by community contacts.

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In addition to these investments, the bank made five donations totaling \$9,000 to various organizations supporting a community development purpose throughout the assessment area. These organizations provided a variety of community service and affordable housing initiatives in the assessment area. Additionally, the bank provided two grants totaling \$3,500 through the Simmons First Foundation.

SERVICE TEST

Service delivery systems are accessible in the assessment area, and 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. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates three full-service branches and one stand-alone ATM in the Wichita 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	0	2	0	3
	0.0%	33.3%	0.0%	66.7%	0.0%	100%
Census Tracts	12.1%	29.0%	27.4%	31.5%	0.0%	100%
Household Population	8.2	22.5%	28.0%	41.3%	0.0%	100%

As shown in the previous table, the bank operates one branch (33.3 percent) in a moderate-income geography. This percentage is below the percentage of assessment area census tracts that are LMI (41.1 percent) but is slightly above demographic data used for comparison (30.7 percent). Based on its branch structure and other delivery systems such as online and mobile banking, the bank's service delivery systems are accessible to geographies and individuals of different income levels.

Changes in Branch Locations

During the 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 has not adversely affected the accessibility of its service delivery systems.

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Wichita MSA

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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 assessment area, particularly LMI geographies and individuals. Hours are generally the same for all branches, with one branch in an upper-income census tract offering Saturday drive-through hours.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, eight bank employees provided 135 community development services to ten different organizations. These services included providing financing literacy education to adults and children and technical assistance to the boards of directors of local community development organizations.

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NonMSA Kansas

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KANSAS NONMETROPOLITAN STATEWIDE AREA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMSA KANSAS ASSESSMENT AREA

The bank's nonMSA Kansas assessment area is composed of Reno County in its entirety, a county in the nonMSA portion of the state just west of the Wichita MSA. The bank operates one full-service branch in the assessment area; the bank closed one branch in a middle-income census tract in the assessment area during the review period. The tables below details key demographics relating to the nonMSA Kansas assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	4	10	3	0	17
	0.0%	23.5%	58.8%	17.7%	0.0%	100%
Family Population	0	4,031	7,932	4,379	0	16,342
	0.0%	24.7%	48.5%	26.8%	0.0%	100%
Household Population	0	6,650	12,161	6,286	0	25,097
	0.0%	26.5%	48.5%	25.1%	0.0%	100%
Business Institutions	0	444	1,354	481	0	2,279
	0.0%	19.5%	59.4%	21.1%	0.0%	100%
Agricultural Institutions	0	3	215	25	0	243
	0.0%	1.2%	88.5%	10.3%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	2,823	3,398	3,743	6,378	16,342
	17.3%	20.8%	22.9%	39.0%	100%
Household Population	5,405	4,216	5,086	10,390	25,097
	21.5%	16.8%	20.3%	41.4%	100%

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NonMSA Kansas

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NONMSA KANSAS ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is below the overall Lending Test performance in Kansas largely due to the low level of community development loans in the assessment area, as displayed 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	Below
OVERALL	CONSISTENT

The bank did not make any community development loans in the assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance in the state of Kansas. The bank made qualified community development investments totaling \$1.2 million in current-period investments, \$321,919 in prior-period investments, and one donation totaling \$1,500.

SERVICE TEST

The bank's performance in this assessment area is below the service test performance in the state of Kansas primarily due to a lack of community development services performed in the assessment area, 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	BELOW

The bank did not provide any community development services in the assessment area during the review period.

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Missouri

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MISSOURI

CRA RATING FOR MISSOURI: **SATISFACTORY**

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

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

- The bank's lending levels reflect adequate responsiveness to the credit needs of the Missouri assessment areas.
- The geographic distribution of loans reflects good penetration throughout the Missouri assessment areas.
- 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 makes a relatively high level of community development loans throughout the Missouri assessment areas.
- The bank makes an excellent level of qualified community development investments and grants and is often in a leadership position in Missouri.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Missouri assessment areas. Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Missouri assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section.

The bank operates six assessment areas throughout Missouri located in four MSAs and two noncontiguous nonMSA portions of the state. Performance in the nonMSA assessment areas was combined for analysis, resulting in one set of performance conclusions for all of nonMSA Missouri. Two of the bank's Missouri assessment areas were reviewed under full-scope examination procedures. Based on the bank's branch structure and loan and deposit activity, CRA

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performance in the St. Louis assessment area received slightly more consideration than the nonMSA assessment area when determining statewide performance conclusions.

To augment the evaluation of the full-scope assessment areas, eight 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 MISSOURI

The bank operates 44 offices throughout its assessment areas in Missouri. The following table gives additional detail regarding the bank's operations in Missouri.

Review Area	Branches #	Branches %	Deposits \$ 000s (as of 6/30/21)	Deposits %	CRA Review Procedures
St. Louis MSA	17	38.6%	\$1,618,113	41.1%	Full-Scope
Missouri nonMSA Statewide Area	13	29.5%	\$824,808	20.9%	Full-Scope
Springfield MSA	7	15.9%	\$443,616	11.3%	Limited-Scope
Columbia MSA	6	13.6%	\$912,203	23.2%	Limited-Scope
Joplin MSA	1	2.3%	\$140,042	3.5%	Limited-Scope
OVERALL	44	100%	\$3,938,782	100%	2 Full-Scope

As shown above, deposits held in the state of Missouri total approximately \$3.9 billion, which represents 21.3 percent of total bank deposits. The bank acquired 13 branches and closed 17 branches in the Missouri assessment areas during the review period.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

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

Full-Scope Review Areas	Lending Activity
St. Louis MSA	Poor
NonMSA Missouri	Excellent
OVERALL	ADEQUATE

Limited-Scope Review Areas	Lending Activity
Columbia MSA	Consistent
Joplin MSA	Consistent
Springfield MSA	Consistent

The bank's Missouri 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.

Geographic and Borrower Distribution

The bank's geographic distribution of loans reflects good penetration in the state of Missouri, as shown below. No conspicuous lending gaps were identified in the Missouri assessment areas.

Full-Scope Review Areas	Geographic Distribution of Loans
St. Louis MSA	Excellent
NonMSA Missouri	Adequate
OVERALL	GOOD

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Limited-Scope Review Areas	Geographic Distribution of Loans
Columbia MSA	Consistent
Joplin MSA	Consistent
Springfield MSA	Consistent

Performance by borrower's income or revenue profile is good in the state of Missouri, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution By Borrower's Profile
St. Louis MSA	Good
NonMSA Missouri	Good
OVERALL	GOOD

Limited-Scope Review Areas	Loan Distribution By Borrower's Profile
Columbia MSA	Consistent
Joplin MSA	Consistent
Springfield MSA	Consistent

Community Development Lending Activities

The bank makes a relatively high level of community development loans in the state of Missouri.

Full-Scope Review Areas	Community Development Lending
St. Louis MSA	Adequate
NonMSA Missouri	Leader
OVERALL	RELATIVELY HIGH

Limited-Scope Review Areas	Community Development Lending
Columbia MSA	Consistent
Joplin MSA	Consistent
Springfield MSA	Consistent

The bank's level of community development lending varied between the two full-scope assessment areas. The bank made an adequate level of community development loans in the St. Louis

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assessment area, while the bank was a leader in making community development loans in nonMSA Missouri. During the review period, the bank made 25 community development loans totaling \$67.8 million.

INVESTMENT TEST

The bank's performance in Missouri is rated outstanding under the Investment Test.

Full-Scope Review Areas	Investment and Grant Activity
St. Louis MSA	Excellent
NonMSA Missouri	Excellent
OVERALL	EXCELLENT

Limited-Scope Review Areas	Investment and Grant Activity
Columbia MSA	Below
Joplin MSA	Below
Springfield MSA	Consistent

The bank made a total of \$55.7 million in qualified community development investments and \$464,392 in donations and grants in the Missouri assessment areas. Of the total statewide investments, \$41.3 million were made in the current review period, while \$14.4 million were made in the prior review period but were still outstanding.

SERVICE TEST

The bank's performance in Missouri is rated high satisfactory under the Service Test.

Accessibility of Delivery Systems

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

Full-Scope Review Areas	Accessibility of Delivery Systems
St. Louis MSA	Accessible
NonMSA Missouri	Readily Accessible
OVERALL	ACCESSIBLE

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Limited-Scope Review Areas	Accessibility of Delivery Systems
Columbia MSA	Exceeds
Joplin MSA	Consistent
Springfield MSA	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 in Missouri.

Full-Scope Review Areas	Changes in Branch Locations
St. Louis MSA	Not Adversely Affected
NonMSA Missouri	Not Adversely Affected
OVERALL	NOT ADVERSELY AFFECTED

Limited-Scope Review Areas	Changes in Branch Locations
Columbia MSA	Consistent
Joplin MSA	Consistent
Springfield 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 Missouri assessment areas, particularly LMI geographies and individuals.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
St. Louis MSA	Do Not Vary/Inconvenience
NonMSA Missouri	Do Not Vary/Inconvenience
OVERALL	DO NOT VARY/INCONVENIENCE

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Columbia MSA	Consistent
Joplin MSA	Consistent
Springfield MSA	Consistent

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Community Development Services

The bank provided a relatively high level of community development services in Missouri.

Full-Scope Review Areas	Community Development Services
St. Louis MSA	Leader
NonMSA Missouri	Relatively High
OVERALL	RELATIVELY HIGH

Limited-Scope Review Areas	Community Development Services
Columbia MSA	Exceeds
Joplin MSA	Consistent
Springfield MSA	Consistent

During the review period, 82 bank employees provided 830 community development services to 61 different organizations throughout the state of Missouri.

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St. Louis MSA

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ST. LOUIS, MISSOURI-ILLINOIS MULTISTATE MSA *(Full-Scope Review)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ST. LOUIS ASSESSMENT AREA

Bank Structure

The bank operates 17 full-service branches in the St. Louis assessment area, which represents 7.4 percent of total bank branches. The table below displays the bank's branch distribution by geography income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
1	4	4	8

The bank closed three branches in middle-income census tracts and five branches in upper-income census tracts and exited operations in the Illinois portions of the MSA during the review period. As such, the St. Louis assessment area is no longer being reviewed as a multistate MSA but rather as part of the Missouri rated area. Based on its branch and ATM network and other service delivery systems, such as online and mobile banking, the bank is adequately positioned to deliver financial services to the assessment area.

General Demographics

The bank's assessment area is composed of St. Charles and St. Louis counties, as well as the independent city of St. Louis. These counties represent three of the seven counties that make up the Missouri portion of the St. Louis MSA. The total population of the assessment area is 1,693,982, with most of the assessment area's population concentrated in St. Louis County (1,001,327).

The banking industry in the St. Louis assessment area is highly competitive, with 70 FDIC-insured depository institutions operating 516 branches throughout the assessment area. Of these institutions, Simmons Bank ranks 13th, with 1.7 percent of the deposit market share. Competition for HMDA and CRA loans is similarly high. An analysis of 2020 HMDA-reportable loans shows that 574 institutions had loan activity in the assessment area, of which Simmons Bank ranked 87th, with less than 1.0 percent of total HMDA loans. Simmons Bank ranked 20th out of 202 institutions with CRA loan activity in the assessment area, accounting for 1.4 percent of total CRA loan activity.

The assessment area covers a large metropolitan area with a diverse population and demographic composition. As such, there are numerous credit needs in the assessment area, in addition to the standard blend of consumer and commercial loan and deposit products. Particular credit needs noted by community contacts include down payment assistance for consumers, affordable home purchase and home improvement loans, and flexible small business loans. Furthermore, the St. Louis assessment area has a great need for community development activity and supports a large network of community development organizations, including government assistance entities, nonprofit

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organizations, and community service and economic development organizations. Consequently, opportunities for involvement in community development projects by financial institutions are ample.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	57	14.8%	37,150	8.7%
Moderate	77	20.1%	75,267	17.6%
Middle	108	28.1%	126,687	29.7%
Upper	138	35.9%	186,651	43.7%
Unknown	4	1.0%	1,439	0.3%
TOTAL	384	100%	427,194	100%

As shown in the table above, 34.9 percent of census tracts in the assessment area are designated as LMI, while 26.3 percent of assessment area families reside within those tracts. The majority of these LMI census tracts are concentrated in the city of St. Louis, specifically the area north of downtown St. Louis.

Based on 2015 ACS data, the median family income for the assessment area was \$74,677. This income figure was higher than the median family income for the state of Missouri (\$60,809) as a whole. More recently, the FFIEC estimated the median family income for the St. Louis MSA to be \$81,200 in 2019 and \$82,600 in 2020. The following table displays the distribution of assessment area families by income level compared to the state of Missouri as a whole.

Family Population by Income Level				
	Assessment Area		Missouri	
Low	89,209	20.9%	327,271	21.4%
Moderate	68,914	16.1%	274,380	17.9%
Middle	81,149	19.0%	319,267	20.9%
Upper	187,922	44.0%	609,088	39.8%
TOTAL	427,194	100%	1,530,006	100%

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (37.0 percent) than reside in LMI census tracts (26.3 percent). Overall, the distribution of families by income level in the assessment area is slightly below statewide Missouri levels (39.3 percent). Additionally, the percentage of families below the poverty level in the assessment area (9.3 percent) is lower than in Missouri (11.1 percent). Therefore, considering income levels and family demographics, the assessment area is slightly more affluent than Missouri as a whole.

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Housing Demographics

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

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$170,793	33.2%	\$841
Missouri	\$138,400	34.8%	\$746

While median housing values and rental costs varied between the assessment area and the state of Missouri, higher income levels in the assessment area make housing slightly less affordable than for the entire state, as evidenced by the affordability ratio. Within the assessment area, housing is most affordable in St. Charles County (38.5 percent) and least affordable in the city of St. Louis (29.6 percent), with affordability in St. Louis County (34.5 percent) falling between the two.

Rental affordability is similarly comparable between the assessment area and the state of Missouri. In the assessment area, 46.7 percent of renters have rental costs that exceed 30 percent of their income compared to 44.4 percent of renters in the state of Missouri overall. Within the assessment area, 40.2 percent of renters in St. Charles County have rents exceeding 30 percent of their income compared to 45.9 percent in St. Louis County and 50.4 percent in the city of St. Louis.

Thus, housing costs for both homeowners and renters are slightly higher in the assessment area compared to the state but significantly higher in the city of St. Louis. This is further exacerbated by the median age of housing stock in the city of St. Louis at 76 years compared to 48 years in St. Louis County, 24 years in St. Charles County, and 40 years in Missouri. Altogether, housing is likely not affordable for many LMI residents in the city of St. Louis, where the largest concentration of LMI residents are located.

Industry and Employment Demographics

The St. Louis assessment area supports a large and diverse business community. County business patterns indicate that there are 944,314 paid employees in the assessment area, with the three largest industries by number of paid employees being healthcare and social assistance (17.4 percent), retail trade (9.1 percent), and government (8.9 percent). The assessment area also supports a strong small business sector, with 89.4 percent of assessment area businesses having annual revenues of \$1 million or less. Major employers in the area, as noted by community contacts, include Centene, Edward Jones, Worldwide Technology, Bayer, Enterprise, and area universities such as Washington University and Saint Louis University.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Missouri.

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Unemployment Levels for the Assessment Area			
Dataset	2019	2020	2021
St. Charles County	2.4%	5.2%	3.5%
St. Louis County	2.9%	6.3%	4.5%
City of St. Louis	3.7%	8.7%	6.4%
Assessment Area Average	2.9%	6.4%	4.6%
Missouri	3.1%	6.1%	4.4%

Unemployment levels in the assessment area were generally in line with that of Missouri throughout the review period. Unemployment rates in the city of St. Louis were highest over the period and were most impacted by the global pandemic with its recovery also being slowest among the entities comprising the assessment area.

Community Contact Information

Two community contact interviews were referenced from individuals specializing in affordable housing and small business development in the assessment area.

The small business contact noted that while much of the area has prospered due to factors like the growing biotech and IT industries and large corporate mergers and acquisitions, this growth has not benefitted traditionally underserved areas of the St. Louis metropolitan area, including north St. Louis city and north St. Louis County. These neighborhoods continue to have challenges with crime, persistent poverty, and lack of job opportunities. They also were the areas most impacted by the pandemic, as many residents worked in the service industry. The contact noted that while there are plenty of banks in the area, many do not have products designed to meet the needs of poor urban communities and instead residents rely on alternative high-interest lending.

The affordable housing contact reiterated that areas of disinvestment exist within the St. Louis metropolitan area and noted that a struggling school system and negative stigma around public safety have made it difficult to attract and retain employers in these areas. While the contact believes that housing in these areas is technically affordable, low wages and a lack of financial stability often render housing unaffordable to many LMI residents. Further, vacancy and abandonment rates are high, leaving many properties unlivable or beyond repair, and there is not enough suitable affordable housing to meet demand. According to the contact, the primary barrier to homeownership for many LMI residents is low wages and the inability to save. Banking services are readily available, but the contact noted that outreach by banks is critical. Financial needs for LMI residents in the assessment area include home repair loans, down payment/subsidy assistance, and rental assistance. Nonfinancial needs include job support, reliable transportation, and affordable daycare.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE ST. LOUIS ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect poor responsiveness to assessment area credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. The bank makes an adequate level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	50	4.1%	3,105	1.3%
Home Purchase	188	15.6%	35,327	15.1%
Multifamily Housing	7	0.6%	17,405	7.4%
Refinancing	142	11.7%	32,605	13.9%
Other Purpose LOC	14	1.2%	1,063	0.5%
Other Purpose Closed/Exempt	5	0.4%	483	0.2%
Total HMDA	406	33.6%	89,988	38.5%
Small Business	802	66.3%	143,774	61.5%
Small Farm	1	0.1%	52	0.0%
TOTAL LOANS	1,209	100.0%	233,814	100.0%

Loans made in the St. Louis assessment area represent 3.5 percent of total 2019 and 2020 HMDA and CRA loans made within the bank's combined assessment areas. This is below the percentage of total branches in the assessment area (7.4 percent) and, as of June 30, 2020, the percentage of total deposits in the assessment area (8.1 percent). Despite being ranked 13th in terms of market share among banks serving the area, the bank originated less than 1.0 percent of HMDA loans in the market and just over 1.0 percent of CRA loans. Given these factors, the bank's performance reflects poor responsiveness to assessment area credit needs.

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Geographic Distribution of Loans

The bank's overall geographic distribution of loans is excellent, based on both loan products reviewed, with primary emphasis placed on small business lending.

HMDA Lending

The distribution of HMDA loans by geography income level is excellent.

In 2019, the bank originated 8.3 percent of its HMDA loans in low-income geographies, which exceeded both aggregate lending performance (2.0 percent) and the percentage of owner-occupied housing in the assessment area (5.6 percent), reflecting excellent performance. The bank's percentage of lending in low-income census tracts was even higher in 2020 (13.8 percent) and again exceeded both the aggregate (1.6 percent) and demographic levels (5.6 percent), which is also considered excellent.

HMDA lending in moderate-income geographies is excellent in both 2019 and 2020. In both years, the bank's level of lending in moderate-income geographies (23.0 percent in 2019 and 16.9 percent in 2020) exceeded aggregate lending levels (10.8 percent in 2019 and 8.8 percent in 2020) and the demographic figure (16.2 percent in both 2019 and 2020).

Small Business Lending

The bank's record of lending to small businesses in LMI geographies is excellent.

The bank made 9.3 percent of its 2019 small business loans in low-income geographies, which is considered excellent when compared to aggregate lending levels (5.5 percent) and the demographic figure (6.4 percent). Likewise, small business lending in low-income geographies in 2020 (7.4 percent) is excellent when compared with aggregate lending levels (5.7 percent) and the demographic figure (6.4 percent).

The bank originated 18.7 percent of its small business loans in moderate-income census tracts, which was higher than peer institutions in the assessment area (16.2 percent) and the demographic figure (16.7 percent), reflecting excellent performance. Performance in 2020 is considered good, as the bank's lending in moderate-income geographies (16.7 percent) was slightly higher than aggregate lending levels (15.7 percent) but below the demographic figure (16.9 percent).

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. In 2019, the bank had loan activity in 53.9 percent of the total census tracts in the assessment area and in 44.8 percent of LMI census tracts. In 2020, these figures improved to 69.5 percent of all assessment area census tracts and 64.2 percent of LMI census tracts. In general, the bank's loans were most concentrated in the census tracts located near branch locations. As noted above, the assessment area contains a highly competitive banking environment, with the bank holding less than 2.0 percent of the total market share of deposits. Finally, as noted by community

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contacts, significant credit barriers exist in LMI geographies within the assessment area, making lending in those areas particularly difficult.

Loan Distribution by Borrower's Profile

The bank's distribution of loans by income or revenue profile is good.

HMDA Lending

Overall, the bank's borrower distribution of HMDA loans is excellent.

In 2019, the bank originated 15.2 percent of its HMDA loans to low-income borrowers, which was well above aggregate lending levels (7.5 percent) and approaching the demographic figure (20.9 percent). Considering barriers to homeownership for many LMI people noted by community contacts, including poor credit histories, lack of down payment funds, and insufficient affordable housing stock, this performance is considered good. HMDA lending to low-income borrowers was similarly good in 2020 (18.5 percent), remaining significantly above aggregate lending levels (5.7 percent) and just below the demographic figure (20.9 percent).

The bank's HMDA lending to moderate-income borrowers was excellent for both 2019 and 2020. In 2019, the bank originated 19.8 percent of its HMDA loans to moderate-income borrowers, compared to 16.8 percent for aggregate lenders and a demographic of 16.1 percent. Similarly, the bank's lending to moderate-income borrowers in 2020 (19.6 percent) again exceeded both aggregate levels (15.6 percent) and the demographic level (16.1 percent).

Small Business Lending

The bank's record of lending to businesses of different sizes is adequate.

The bank originated 41.5 percent of its small business loans to businesses with annual revenues of \$1 million or less in 2019; this performance is considered adequate when compared with aggregate lending levels (47.1 percent) and the demographic figure (89.1 percent). Lending to businesses with annual revenues of \$1 million or less in 2020 (31.5 percent) was in line with aggregate lending levels (39.7 percent) and below the demographic level (89.4 percent), reflecting adequate performance. During the review period, 57.4 percent of the bank's small business loans were in amounts of \$100,000 or less, which are amounts typically requested by small businesses and indicates a willingness to lend to businesses of different sizes.

Community Development Lending Activities

The bank makes an adequate level of community development loans in the St. Louis assessment area. During the review period, the bank made seven community development loans totaling \$25.5 million. These community development loans supported various community development purposes, including affordable housing (two), economic development (one), community service (one), and revitalization and stabilization of a moderate-income census tract (three). One loan for

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\$12.7 million was made for the construction of a hotel in a moderate-income census tract and creating LMI jobs. One loan for \$5.4 million was for the construction of a 60-unit low-income housing tax credit project, which addresses the need for affordable housing as noted by community contacts. Finally, three PPP loans totaling \$3.7 million were made to businesses in LMI census tracts.

INVESTMENT TEST

The bank makes an excellent level of investments and grants in the St. Louis assessment area. The bank made new qualified community development investments of \$13.9 million in addition to \$6.4 million in investments made prior to this review period but still outstanding. The new investments were MBS providing affordable housing loans to LMI borrowers in the assessment area, which is responsive to assessment area credit needs, according to community contacts.

In addition to these investments, the bank made 52 qualifying community development donations totaling \$142,625. Most of these donations were to organizations providing community services in the assessment area. Additionally, the bank made two grants totaling \$8,080 through the Simmons First Foundation.

SERVICE TEST

The bank's service delivery systems are accessible in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 17 branches in the St. Louis 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	4	4	8	0	17
	5.9%	23.5%	23.5%	47.1%	0.0%	100%
Census Tracts	14.8%	20.1%	28.1%	35.9%	1.0%	100%
Family Population	8.7%	17.6%	29.7%	43.7%	0.3%	100%

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Based on data in the preceding table, the bank operates 29.4 percent of its assessment area branches in LMI census tracts. This distribution is slightly below the percentage of assessment area census tracts that are LMI (34.9 percent) and above the household population in LMI census tracts (26.3 percent). Based on its branch structure and other service delivery systems such as online and mobile banking, the bank's service delivery systems are accessible to individuals and geographies of different income levels.

Changes in Branch Locations

During the review period, the bank closed three branches in middle-income census tracts and five in upper-income census tracts. The closures were primarily the result of consolidation of branches acquired over recent years. The bank's record of opening and closing branches in the assessment area did not adversely affect the accessibility of its service delivery systems, particularly to LMI individuals and geographies.

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 assessment area. Branch hours are generally the same, with 15 branches offering Saturday hours, including four branches located in LMI geographies.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, 38 bank employees provided 380 community development services to 16 different organizations in the St. Louis assessment area. These community development services included adult and youth financial literacy education, technical assistance to an affordable housing organization, and serving on the boards of directors of numerous organizations providing community development services.

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Columbia MSA

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COLUMBIA, MISSOURI MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA ASSESSMENT AREA

The bank's Columbia assessment area is composed of Boone County in its entirety, one of three counties in the Columbia, Missouri MSA. The bank entered the market through acquisition in February 2020 and operates six full-service branches in the assessment area; the bank subsequently closed one branch in a middle-income census tract in the assessment area after the acquisition. The tables below details key demographics relating to the Columbia assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	3	4	12	7	3	29
	10.3%	13.8%	41.4%	24.1%	10.3%	100%
Family Population	1,048	3,894	20,802	12,194	297	38,235
	2.7%	10.2%	54.4%	31.9%	0.8%	100%
Household Population	3,119	7,892	33,524	19,621	2,824	66,980
	4.7%	11.8%	50.1%	29.3%	4.2%	100%
Business Institutions	823	801	3,189	2,110	414	7,337
	11.2%	10.9%	43.5%	28.8%	5.6%	100%
Agricultural Institutions	3	9	164	31	0	207
	1.4%	4.3%	79.2%	15.0%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	7,626	6,128	8,232	16,249	38,235
	20.0%	16.0%	21.5%	42.5%	100%
Household Population	17,641	9,754	10,636	28,949	66,980
	26.3%	14.6%	15.9%	43.2%	100%

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBIA ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the overall Lending Test performance in Missouri, as displayed 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

The bank made one community development loan for \$6.8 million in the assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in this assessment area is below the investment performance in the state of Missouri. The bank made 34 qualified community development investments totaling \$6.9 million and 17 donations totaling \$34,500.

SERVICE TEST

The bank's performance in this assessment area exceeds the service test performance in the state of Missouri, 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	Exceeds
OVERALL	EXCEEDS

Six bank employees provided 91 community development services to seven organizations in the assessment area during the review period.

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Joplin MSA

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JOPLIN, MISSOURI MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JOPLIN ASSESSMENT AREA

The bank has designated the entire Joplin MSA as an assessment area, which includes Jasper and Newton counties. The bank operates one full-service branch in the assessment area and has closed two branches in middle-income census tracts during the review period. The tables below detail key demographics relating to the Joplin MSA assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	6	23	5	0	34
	0.0%	17.7%	67.7%	14.7%	0.0%	100%
Family Population	0	5,739	31,783	7,957	0	45,479
	0.0%	12.6%	69.9%	17.5%	0.0%	100%
Household Population	0	10,304	46,142	11,169	0	67,615
	0.0%	15.2%	68.2%	16.5%	0.0%	100%
Business Institutions	0	1,216	4,360	858	0	6,434
	0.0%	18.9%	67.8%	13.3%	0.0%	100%
Agricultural Institutions	0	5	216	11	0	232
	0.0%	2.2%	93.1%	4.7%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	9,062	8,307	9,655	18,455	45,479
	19.9%	18.3%	21.2%	40.6%	100%
Household Population	14,973	11,679	12,723	28,240	67,615
	22.1%	17.3%	18.8%	41.8%	100%

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JOPLIN ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in Missouri, as displayed 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

The bank made two community development loans totaling \$1.2 million in the assessment area during the review period.

INVESTMENT TEST

The bank's performance in this assessment area is below the investment test performance in the state of Missouri. During the review period, the bank made qualified community development investments totaling \$4.7 million; of these investments, \$3.3 million were made during the review period and \$1.4 million were prior-period investments still outstanding. In addition to these investments, the bank made 11 community development donations totaling \$14,687.

SERVICE TEST

The bank's performance in this assessment area is consistent the service test performance in the state of Missouri, 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, six bank employees provided 43 community development services to six different organizations.

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Springfield MSA

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SPRINGFIELD, MISSOURI MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD ASSESSMENT AREA

The bank's Springfield assessment area includes Greene, Christian, and Webster counties, three of the five counties that comprise the Springfield, Missouri MSA. The bank operates seven full-service branches in the assessment area and closed two branches during the review period, one in a middle-income census tract and one in an upper-income census tract. The tables below detail key demographics relating to the Springfield MSA assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	5	21	44	13	1	84
	6.0%	25.0%	52.4%	15.5%	1.2%	100%
Family Population	3,596	16,454	61,698	20,307	41	102,096
	3.5%	16.1%	60.4%	19.9%	0.0%	100%
Household Population	7,611	32,763	90,537	28,951	644	160,506
	4.7%	20.4%	56.4%	18.0%	0.4%	100%
Business Institutions	440	4,493	9,701	3,234	53	17,921
	2.5%	25.1%	54.1%	18.0%	0.3%	100%
Agricultural Institutions	2	34	276	55	0	367
	0.5%	9.3%	75.2%	15.0%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	20,082	18,801	21,646	41,567	102,096
	19.7%	18.4%	21.2%	40.7%	100%
Household Population	35,221	27,960	28,939	68,386	160,506
	21.9%	17.4%	18.0%	42.6%	100%

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Springfield MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in Missouri, as displayed 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

The bank made seven community development loans totaling \$10.4 million in the assessment area during the review period.

INVESTMENT TEST

The bank's performance in this assessment area is consistent with the investment test performance in the state of Missouri. During the review period, the bank made qualified community development investments totaling \$15.0 million; of these investments, \$10.6 million were made during the current period and \$4.4 million were made during a prior period and are still outstanding. In addition to these investments, the bank made 29 community development donations and grants totaling \$96,500.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test performance in the state of Missouri, 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, 16 bank employees provided 87 community development services to 11 different organizations.

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NonMSA Missouri

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MISSOURI NONMETROPOLITAN STATEWIDE AREA *(Full-Scope Review)*

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NONMSA MISSOURI ASSESSMENT AREA

Bank Structure

The bank operates 13 full-service branches in the nonMSA assessment area, which represents 5.7 percent of total bank branches. The table below displays the bank's branch distribution by geography income level.

Branch Locations by Census Tract Income Level			
Low-Income	Moderate-Income	Middle-Income	Upper-Income
0	3	9	1

The bank acquired two branches in moderate-income census tracts and four branches in middle-income census tracts and closed four branches in middle-income census tracts during the review period. Based on its branch and ATM network and other service delivery systems, such as online and mobile banking, the bank is well positioned to deliver financial services to the assessment area.

General Demographics

The nonMSA Missouri assessment area is composed of three separate, noncontiguous assessment areas in southwestern and central Missouri. These assessment areas include the central nonMSA assessment area (Pettis County), south-central nonMSA assessment area (Oregon, Howell, Texas, and Shannon counties), and southwest nonMSA Missouri assessment area (Cedar, Dade, Lawrence, Stone, and Taney counties). Howell, Shannon, and Texas counties are new to the assessment area since the last examination and were added as a result of acquisition activity during the review period. Given the similar demographic characteristics, economic conditions, and credit needs, these assessment areas are combined for analysis as a single nonMSA Missouri assessment area. The assessment area is largely rural and has a total population of 272,256. Taney County in the southwestern portion of Missouri is the most populous county in the assessment area (53,555) and contains the city of Branson, a renowned tourist destination and regional commercial and banking hub for the surrounding counties.

While rural, the assessment area hosts a competitive banking market, with 39 FDIC-insured depository institutions operating 110 branches throughout the assessment area. Simmons Bank is the deposit market leader, with 13.7 percent of total deposit dollars in the assessment area and also has the most significant branch presence of any institution in the assessment area.

While only 39 financial institutions operate a branch in the assessment area, a much higher number of institutions reported HMDA and CRA loan activity. An analysis of 2020 HMDA-reportable loans shows that 405 financial institutions had HMDA loan activity in the assessment area, of which Simmons Bank ranked third, with 4.9 percent of total loan activity, outpaced only by

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Quicken Loans, LLC and U.S. Bank NA. Simmons Bank ranked first out of 106 institutions with CRA loan activity in the assessment area with 27.7 percent of total loan activity.

As the assessment area covers a wide nonmetropolitan area, credit needs include a blend of consumer, business, and farm credit products. In addition, community contacts pointed to the need for affordable housing development, as well as down payment assistance, financial literacy training for consumers and businesses, and flexible underwriting for small businesses and farms. Lastly, the contacts noted that opportunities for community development involvement are available to banks, especially through partnerships with local community development organizations.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	1	1.8%	494	0.7%
Moderate	7	12.5%	8,801	12.2%
Middle	45	80.4%	57,987	80.5%
Upper	3	5.4%	4,725	6.6%
Unknown	0	0.0%	0	0.0%
TOTAL	56	100%	72,007	100%

As shown in the table above, 14.3 percent of census tracts in the assessment area are designated as LMI, and 12.9 percent of assessment area families reside within those tracts. The single low-income census tract is in Pettis County, with the moderate-income census tracts distributed throughout the assessment area. Most census tracts in the assessment area are middle income, and most assessment area families reside within those tracts.

In 2020, 15 out of 45 middle-income census tracts were designated as distressed, underserved, or both, as detailed in the following list.

- Two census tracts were designated as underserved due to a remote rural location in Dade County.
- Two census tracts were designated as underserved due to remote rural location and distressed due to poverty in Oregon County.
- Nine census tracts were designated as distressed due to poverty in Howell and Texas counties.
- Two census tracts were designated as underserved due to remote rural location and distressed due to unemployment in Shannon County.

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Based on 2015 ACS data, the median family income for the assessment area was \$46,696. This income figure was lower than the median family income for the state of Missouri (\$60,809) as a whole. More recently, the FFIEC estimates the median family income for nonMSA Missouri to be \$52,400 in 2019 and \$54,400 in 2020. The following table displays the distribution of assessment area families by income level compared to the state of Missouri as a whole.

Family Population by Income Level				
	Assessment Area		Missouri	
Low	15,413	21.4%	327,271	21.4%
Moderate	13,444	18.7%	274,380	17.9%
Middle	15,859	22.0%	319,267	20.9%
Upper	27,291	37.9%	609,088	39.8%
TOTAL	72,007	100%	1,530,006	100%

When compared with the data in the first table in this section, a significantly higher percentage of families in the assessment area are LMI (40.1 percent) than reside in LMI census tracts (12.9 percent). Overall, the distribution of families by income level in the assessment area is aligned with statewide Missouri levels (39.3 percent). However, the percentage of families below the poverty level in the assessment area (14.8 percent) is higher than in Missouri (11.1). Poverty levels are particularly elevated in Cedar County (21.4 percent), Oregon County (20.1 percent), and Howell County (19.5 percent). Overall, considering income levels and family demographics, the assessment area is less affluent than Missouri as a whole.

Housing Demographics

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

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$107,203	34.6%	\$633
Missouri	\$138,400	34.8%	\$746

While median housing values and rental costs varied between the assessment area and the state of Missouri, income levels in the assessment area make housing similarly affordable compared to the entire state, as evidenced by the affordability ratio. Nonetheless, within the assessment area, housing values and affordability ratios vary significantly. Housing values are highest in Stone County (\$153,100) and lowest in Oregon County (\$79,400), while affordability is greatest in Dade County (46.4 percent) and least in Stone County (26.5 percent).

Rental affordability is slightly better in the assessment area than the state of Missouri. In the assessment area, 42.8 percent of renters have rental costs that exceed 30 percent of their income compared to 44.4 percent of renters in the state of Missouri overall. Within the assessment area,

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the percentage of renters with rents exceeding 30 percent of their income ranged from a low of 32.6 percent in Shannon County to a high of 49.6 in Cedar County.

Industry and Employment Demographics

The assessment area supports a strong small business sector driven primarily by the tourism and service-related industries associated with the city of Branson. According to assessment area demographics, 91.5 percent of businesses and 99.4 percent of farms in the assessment area reported annual revenues of \$1 million or less. County business patterns indicate that there are 89,835 paid employees in the assessment area. By number of paid employees, the three largest job categories are accommodation and food services (17.2 percent), retail trade (14.6 percent), and government (13.5 percent). While not captured in county business patterns data, agriculture is also a significant industry in the assessment area.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Missouri.

Unemployment Levels for the Assessment Area			
Dataset	2019	2020	2021
Cedar County	3.5%	4.4%	3.7%
Dade County	3.0%	4.3%	3.3%
Howell County	3.8%	6.7%	4.8%
Lawrence County	3.3%	6.0%	4.0%
Oregon County	3.8%	6.8%	5.3%
Pettis County	3.3%	6.7%	4.7%
Shannon County	5.2%	7.2%	5.6%
Stone County	4.7%	9.5%	6.6%
Taney County	4.9%	12.6%	7.5%
Texas County	4.3%	5.7%	4.6%
Assessment Area Average	4.0%	8.0%	5.4%
Missouri	3.1%	6.1%	4.4%

As shown in the table above, unemployment levels in the assessment area remained higher than statewide levels throughout the review period. Taney and Stone counties were particularly impacted by the global pandemic, largely due to its reliance on the tourism industry. Neither county had fully recovered as of 2021. In addition to the pandemic effects on unemployment, Shannon County had consistently higher levels of unemployment than the other counties in the assessment area throughout the period.

Community Contact Information

Six community contact interviews were utilized with individuals knowledgeable of the nonMSA Missouri assessment area's economic conditions and credit needs. Three of these contacts specialize in affordable housing, two specialize in small business, and one specializes in agriculture.

One contact operating in Pettis County in the central portion of nonMSA Missouri described the economy as stable. Small farms are common, and the main commodities are corn, wheat, and beans. Effects of the pandemic included worker shortages, particularly teachers, and the temporary closure of some small businesses; however, most have since re-opened. Housing in the area consists primarily of aging properties with minimal new construction. There is a lack of affordable housing, and rents have been increasing over the last several years. Primary barriers to homeownership noted by the contact are lack of income and rising interest rates.

Contacts in south-central nonMSA Missouri described the area as being very rural, with long commutes to the nearest larger cities. Small farms are common but often are supplemented by additional non-farm jobs. The area also suffers from a lack of infrastructure, making it difficult for small farms to get their products to larger markets. Additionally, the high cost of complying with dairy and pork regulations has further affected income of local small farmers. Credit barriers for many small farms include insufficient collateral and equity, along with poor or limited credit history and lack of disposable income. One contact noted a significant LMI population in Oregon County along with limited job opportunities. Small businesses generally include restaurants and small retail shops. Affordable housing is in short supply, and rising rents have further exacerbated the situation. Primary barriers to homeownership, according to contacts, are poor credit and lack of down payment funds.

Economic conditions in southwest nonMSA Missouri are primarily driven by tourist activities in Branson, Missouri, in Taney County and Silver Dollar City in Stone County. Both were heavily affected by the global pandemic, and unemployment varies widely by seasons. Joplin, Missouri, has more manufacturing, with primary employers being Owens Corning and Pillsbury. The areas suffer from an overall shortage of housing stock, especially affordable housing. Barriers to homeownership include low wages and the aforementioned lack of inventory.

In all three areas, there is sufficient bank presence to meet the needs of the local population, including LMI residents. One contact noted that small farms often do not use local banks for their credit needs, as they generally do not qualify under typical credit standards. Opportunities for bank participation in communities include more flexible financing terms for small farms, financial literacy services, collaborations with nonprofit community development organizations, and offering SBA and USDA products.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NONMSA MISSOURI ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. The bank is a leader in making community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	56	1.8%	2,645	0.9%
Home Purchase	434	13.9%	56,963	20.2%
Multifamily Housing	5	0.2%	2,596	0.9%
Refinancing	291	9.3%	39,879	14.1%
Other Purpose LOC	28	0.9%	1,105	0.4%
Other Purpose Closed/Exempt	14	0.4%	1,992	0.7%
Total HMDA	828	26.4%	105,180	37.3%
Small Business	1,358	43.4%	107,360	38.0%
Small Farm	946	30.2%	69,705	24.7%
TOTAL LOANS	3,132	100.0%	282,245	100.0%

Loans made in the nonMSA Missouri assessment area represent 9.1 percent of total 2019 and 2020 HMDA and CRA loans made within the bank's combined assessment areas. Compared to the percentage of total bank branches in the assessment area (5.7 percent) and, as of June 30, 2020, the percentage of total deposits (5.0 percent), the bank's lending activity reflects excellent responsiveness to the credit needs of the assessment area. The bank ranked second and third in 2019 and 2020, respectively, among all HMDA lenders in the assessment area based on number of loans originated, and fourth in 2019 and first in 2020 among CRA lenders, further demonstrating excellent responsiveness to assessment area credit needs.

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Geographic Distribution of Loans

The bank's overall geographic distribution of loans is adequate based on both loan products reviewed. HMDA and small business lending were weighted equally in determining overall conclusions.

HMDA Lending

The distribution of HMDA loans by geography income level is adequate.

In 2019, the bank originated 0.3 percent of its HMDA loans in the assessment area's low-income geography, which equaled peer performance and was just below the demographic level (0.5 percent), reflecting adequate performance. The bank did not originate any HMDA loans in the low-income geography in 2020 compared to 0.2 percent for aggregate lenders, reflecting poor performance. With only one low-income census tract in the assessment area, opportunities for lending are limited. As such, minimal weight is given to activity in the single low-income tract in determining the bank's overall performance.

The bank originated 4.0 percent of its HMDA loans in moderate-income geographies in 2019 compared to 8.9 percent for aggregate lenders and a demographic level of 11.0 percent, reflecting poor performance. In 2020, the percentage of the bank's HMDA loans in moderate-income census tracts improved to 8.6 percent, which was in line with aggregate lenders (7.8 percent) and just below the demographic level (11.0 percent), reflecting adequate performance.

Small Business Lending

The bank's record of lending to small businesses in LMI geographies is adequate.

The bank made 0.4 percent of its 2019 small business loans in the assessment area's low-income geography, which is comparable to aggregate lending levels (0.5 percent) and the demographic figure (0.5 percent), reflecting adequate performance. Likewise, small business lending in the low-income geography in 2020 (0.4 percent) equaled aggregate lending levels and was in line with the demographic figure (0.5 percent), also reflecting adequate performance. As noted above for HMDA lending, the assessment area includes only one low-income census tract, so performance in this tract is given minimal weight in determining overall performance conclusions for the bank.

In 2019, the bank originated 5.5 percent of its small business loans in moderate-income census tracts, which was below both peer institutions in the assessment area (10.4 percent) and the demographic figure (13.0 percent) and is considered poor. Performance in 2020 improved considerably, as the bank's lending in moderate-income geographies (17.1 percent) was higher than aggregate lending levels (11.9 percent) and the demographic figure (12.9 percent), reflecting excellent performance.

Lastly, no conspicuous lending gaps were identified in the distribution of the bank's loans in the assessment area. In 2019, the bank had loan activity in 85.7 percent of the total census tracts in the

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assessment area and in 75.0 percent of the LMI geographies in the assessment area. In 2020, the bank had loan activity in 98.2 percent of the total census tracts in the assessment area and all of the LMI geographies.

Loan Distribution by Borrower's Profile

The bank's distribution of loans by income or revenue profile is good.

HMDA Lending

The bank's borrower distribution of HMDA loans is good.

In 2019, the bank originated 7.7 percent of its HMDA loans to low-income borrowers, which was above aggregate lending levels (5.6 percent) but significantly below the demographic figure (21.4 percent), reflecting good performance particularly considering barriers to homeownership noted by community contacts such as lack of affordable housing supply, poor credit history, and lack of sufficient income. HMDA lending to low-income borrowers improved slightly in 2020 (8.4 percent) and was again higher than aggregate lending levels (4.7 percent) but below the demographic figure (21.4 percent), also reflecting good performance.

The bank made 16.0 percent of its HMDA loans to moderate-income borrowers in 2019, reflecting good performance when compared to peer institutions in the assessment area (14.4 percent) and the demographic level (18.7 percent). In 2020, the bank originated 14.2 percent of its HMDA loans to moderate-income borrowers, which was in line with aggregate lenders (13.5 percent) and below the demographic level (18.7 percent), reflecting adequate performance.

Small Business Lending

The bank's record of lending to businesses of different sizes is good. The bank originated 72.1 percent of its small business loans to businesses with annual revenues of \$1 million or less in 2019; this performance is considered good when compared with aggregate lending levels (51.8 percent) and the demographic figure (91.4 percent). Lending to businesses with annual revenues of \$1 million or less in 2020 (65.7 percent) was again above aggregate lending levels (44.6 percent) and below the demographic figure (91.5 percent), reflecting good performance.

Community Development Lending Activities

The bank is a leader in providing community development loans in the nonMSA Missouri assessment area. During the review period, the bank made eight community development loans totaling \$23.9 million. These community development loans supported economic development (two), and revitalization and stabilization of a moderate-income census tract (six). Additionally, these loans supported local businesses located in LMI geographies and/or HUBZones, many of which create LMI jobs.

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INVESTMENT TEST

The bank made an excellent level of qualified community development investments and grants in the assessment area. The bank made new qualified community development investments of \$6.6 million in addition to \$2.2 million in investments made prior to this review period but still outstanding. The new investments made during this review period were MBS providing affordable housing loans to LMI borrowers in the assessment area.

In addition to these investments, the bank made 67 qualifying community development donations totaling \$118,000. These donations supported community service organizations providing educational and health services, as well as affordable housing organizations operating throughout the assessment area. Additionally, three Simmons First Foundation grants were made totaling \$50,000.

SERVICE TEST

The bank's service delivery systems are readily accessible in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 13 branches in the nonMSA Missouri 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	3	9	1	0	13
	0.0%	23.1%	69.2%	7.7%	0.0%	100%
Census Tracts	1.8%	12.5%	80.4%	5.4%	0.0%	100%
Household Population	0.7%	12.2%	80.5%	6.6%	0.0%	100%

Based on data in the preceding table, the bank operates 23.1 percent of its assessment area branches in moderate-income census tracts. This distribution is well above the percentage of assessment area census tracts that are LMI (14.3 percent) and the household population in LMI census tracts (12.9 percent). Therefore, the bank's service delivery systems are readily accessible to individuals and geographies of different income levels.

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Changes in Branch Locations

During the review period, the bank acquired two branches in the assessment area in moderate-income census tracts and closed four branches in middle-income census tracts. Therefore, the bank's record of opening and closing branches in the assessment area did not adversely affect the accessibility of its service delivery systems, particularly to LMI individuals and geographies.

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 assessment area. Eight branches offer extended Friday hours, including one in a moderate-income census tract. Ten branches offer Saturday hours, including two in moderate-income census tracts.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, 16 bank employees provided 229 community development services to 21 different organizations in the nonMSA Missouri assessment area. These community services included adult and youth literacy initiatives and technical assistance as members of the boards of directors of various community service organizations.

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OKLAHOMA

CRA RATING FOR OKLAHOMA: SATISFACTORY

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

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

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

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Oklahoma assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. Small farm lending was analyzed only in the Southern nonMSA Oklahoma assessment area, as it was not a significant product in the bank's other assessment areas in Oklahoma.

The bank operates four assessment areas in Oklahoma located in two MSAs and two nonMSA portions of the state. The two nonMSA assessment areas were not combined for this examination. The Southern Oklahoma nonMSA assessment area was reviewed under full-scope examination procedures, and the Payne County nonMSA assessment area was reviewed under limited-scope

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procedures. The Oklahoma City assessment area was also reviewed under full-scope examination procedures. Based on the bank's branch structure and loan and deposit activity, CRA performance in the Southern Oklahoma nonMSA assessment area received slightly more consideration when determining statewide performance conclusions.

To augment the evaluation of the full-scope assessment areas, two 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 OKLAHOMA

The bank operates 19 offices throughout its assessment areas in Oklahoma. The following table gives additional detail regarding the bank's operations in Oklahoma.

Review Area	Branches #	Branches %	Deposits \$ 000s (as of 6/30/21)	Deposits %	CRA Review Procedures
Oklahoma City MSA	6	31.6%	\$577,430	25.0%	Full-Scope
Southern Oklahoma nonMSA	8	42.1%	\$967,750	41.9%	Full-Scope
Tulsa MSA	1	5.3%	\$220,745	9.5%	Limited- Scope
Payne County NonMSA	4	21.1%	\$546,458	23.6%	Limited- Scope
OVERALL	19	100%	\$2,312,383	100%	2 Full-Scope

Deposits held in the state of Oklahoma total approximately \$2.3 billion, which represents 12.5 percent of total bank deposits. During the review period, the bank acquired 12 branches and closed 7 branches in the Oklahoma assessment areas.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Lending Activity

Full-Scope Review Areas	Lending Activity
Oklahoma City MSA	Adequate
Southern NonMSA Oklahoma	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Lending Activity
Tulsa MSA	Consistent
Payne County NonMSA	Consistent

The bank's Oklahoma 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.

Geographic and Borrower Distribution

The bank's geographic distribution of loans reflects good penetration in the state of Oklahoma, as shown below. No conspicuous lending gaps were identified.

Full-Scope Review Areas	Geographic Distribution of Loans
Oklahoma City MSA	Adequate
Southern NonMSA Oklahoma	Excellent
OVERALL	GOOD

Limited-Scope Review Areas	Geographic Distribution of Loans
Tulsa MSA	Consistent
Payne County NonMSA	Consistent

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Performance by borrower's income or revenue profile is adequate in the state of Oklahoma, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution By Borrower's Profile
Oklahoma City MSA	Adequate
Southern NonMSA Oklahoma	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Loan Distribution By Borrower's Profile
Tulsa MSA	Consistent
Payne County NonMSA	Consistent

Community Development Lending Activities

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

Full-Scope Review Areas	Community Development Lending
Oklahoma City MSA	Adequate
Southern NonMSA Oklahoma	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Community Development Lending
Tulsa MSA	Exceeds
Payne County NonMSA	Consistent

During the review period, the bank made 14 community development loans totaling \$68.6 million.

INVESTMENT TEST

The bank's performance in Oklahoma is rated low satisfactory under the Investment Test. The following tables display investment and grant activity performance in Oklahoma.

Full-Scope Review Areas	Investment and Grant Activity
Oklahoma City MSA	Significant
Southern NonMSA Oklahoma	Adequate
OVERALL	LOW SATISFACTORY

Limited-Scope Review Areas	Investment and Grant Activity
Tulsa MSA	Consistent
Payne County NonMSA	Below

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The bank made a total of \$25.9 million in qualified community development investments and \$169,500 in donations and grants in Oklahoma. Of the total statewide investments, \$10.5 million were made in the current review period, while \$15.4 million were made in the prior review period but were still outstanding.

SERVICE TEST

The bank's performance in Oklahoma is rated high satisfactory under the Service Test.

Accessibility of Delivery Systems

The bank's service delivery systems are readily accessible to geographies and individuals of different income levels in Oklahoma, as displayed in the following tables.

Full-Scope Review Areas	Accessibility of Delivery Systems
Oklahoma City MSA	Readily Accessible
Southern NonMSA Oklahoma	Readily Accessible
OVERALL	READILY ACCESSIBLE

Limited-Scope Review Areas	Accessibility of Delivery Systems
Tulsa MSA	Below
Payne County NonMSA	Consistent

Changes in Branch Locations

The bank's record of opening and closing branches in Oklahoma has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals, as shown below.

Full-Scope Review Areas	Changes in Branch Locations
Oklahoma City MSA	Not Adversely Affected
NonMSA Oklahoma	Not Adversely Affected
OVERALL	NOT ADVERSELY AFFECTED

Limited-Scope Review Areas	Changes in Branch Locations
Tulsa MSA	Consistent
Payne County NonMSA	Consistent

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's business hours and banking services do not vary in a way that inconveniences certain portions of the Oklahoma assessment areas, particularly LMI geographies and individuals, as displayed in the following tables.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Oklahoma City MSA	Do Not Vary/Inconvenience
NonMSA Oklahoma	Do Not Vary/Inconvenience
OVERALL	DO NOT VARY/INCONVENIENCE

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Tulsa MSA	Consistent
Payne County NonMSA	Below

Community Development Services

The bank provides a relatively high level of community development services throughout Oklahoma, as shown in the tables below.

Full-Scope Review Areas	Community Development Services
Oklahoma City MSA	Leader
Southern NonMSA Oklahoma	Adequate
OVERALL	RELATIVELY HIGH LEVEL

Limited-Scope Review Areas	Community Development Services
Tulsa MSA	Consistent
Payne County NonMSA	Exceeds

During the review period, 26 bank employees provided 492 community development services to 23 different organizations throughout Oklahoma.

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OKLAHOMA CITY, OKLAHOMA MSA

(Full-Scope Review)

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

Bank Structure

The bank operates six branches in the Oklahoma City assessment area, representing 2.6 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	Unknown-Income
2	1	2	1	0

During the review period, the bank closed four branches: one in a moderate-income census tract, two in upper-income census tracts, and one in an unknown-income census tract. Based on its branch network and other service delivery systems, such as online and mobile banking, the bank is positioned to deliver financial services to the Oklahoma City assessment area.

General Demographics

The bank has designated the entirety of Canadian, Cleveland, Grady, McClain, and Oklahoma counties as its Oklahoma City assessment area, which represents five of the seven counties in the full Oklahoma City MSA. The assessment area has a total population of 1,239,411, the majority of which is concentrated in Oklahoma (754,480) and Cleveland (268,614) counties.

The assessment area hosts a competitive banking market, with 69 FDIC-insured depository institutions operating 371 branches. Of these institutions, Simmons Bank ranked 14th, with 1.2 percent of the deposit market share. Competition for HMDA and CRA loans is also high. An analysis of 2020 HMDA-reportable loans shows that 512 institutions had loan activity in the assessment area, of which Simmons Bank ranked 66th, with less than 1.0 percent of total HMDA loans. Simmons Bank ranked 14th out of 177 institutions with CRA loan activity in the assessment area, accounting for 2.0 percent of total CRA loan activity.

Credit needs in the assessment area are varied and include a mix of consumer and commercial loan and deposit products. A credit need specifically noted by a community contact includes flexible underwriting practices for newer small businesses. Moreover, opportunities for community development involvement for financial institutions are widespread, as the assessment area contains a variety of community development, nonprofit, and government assistance entities.

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Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	29	8.3%	17,305	5.7%
Moderate	101	29.0%	65,898	21.7%
Middle	128	36.8%	123,756	40.8%
Upper	81	23.3%	95,974	31.7%
Unknown	9	2.6%	340	0.1%
TOTAL	348	100%	303,273	100%

As shown above, 37.3 percent of census tracts in the assessment area are designated as LMI, and 27.4 percent of assessment area families reside within those tracts. These LMI census tracts are primarily concentrated within Oklahoma County in the area surrounding downtown Oklahoma City.

According to 2015 ACS data, the median family income for the Oklahoma City assessment area was \$64,037, while the same figure for the state of Oklahoma as a whole was \$58,029. More recently, the FFIEC estimates the median family income for the Oklahoma City MSA to be \$73,100 in 2019 and \$74,000 in 2020. The following table displays the distribution of assessment area families by income level compared to all Oklahoma families.

Family Population by Income Level				
	Assessment Area		Oklahoma	
Low	64,680	21.3%	208,222	21.6%
Moderate	52,539	17.3%	170,327	17.6%
Middle	62,099	20.5%	195,424	20.2%
Upper	123,955	40.9%	392,036	40.6%
TOTAL	303,273	100%	966,009	100%

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (38.6 percent) than reside in LMI geographies (27.4 percent). As displayed in the second table, the percentage of assessment area families who are LMI closely aligns with the same figure for the state of Oklahoma as a whole (39.2 percent). Furthermore, poverty levels in the assessment area (11.2 percent) are slightly lower than statewide levels (12.4 percent). Therefore, considering these figures and income levels, the assessment area is slightly more affluent than the state of Oklahoma as a whole.

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Housing Demographics

The following table displays housing demographics for the assessment area and the state of Oklahoma as a whole.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$138,007	37.4%	\$789
Oklahoma	\$117,900	39.8%	\$727

Housing in the assessment area is slightly less affordable than in the state of Oklahoma overall, as evidenced by a lower affordability ratio. By county, housing is least affordable in Oklahoma County (35.6 percent) and most affordable in Grady County (47.0 percent). Additionally, rental costs in the assessment area are higher than statewide levels. In addition, the percentage of assessment area renters with rental costs exceeding 30.0 percent of their income (44.6 percent) is higher than the statewide figure (41.1 percent).

Industry and Employment Demographics

The assessment area economy is well diversified and supports a strong business environment and hosts a significant number of government jobs. The Oklahoma City economy is bolstered by a strong energy sector and several prominent oil and gas companies, most notably Chesapeake Energy, and hosts several universities and colleges such as the University of Oklahoma, a public university with a total enrollment of approximately 28,500. Oklahoma County contains the core Oklahoma City metro area and thus has the largest concentration of industry; meanwhile, Cleveland County is home to Tinker Air Force Base and the University of Oklahoma, both of which are key employers in the assessment area.

County business patterns data indicate that there are 590,890 paid employees in the assessment area. The three largest sectors of the assessment area economy by number of paid employees are government (18.0 percent), healthcare and social assistance (13.1 percent), and retail trade (11.2 percent). The assessment area also includes a prominent professional, scientific, and technical services sector, which accounts for only 6.0 percent of paid employees but 14.4 percent of business establishments. While the main employers in the assessment area are large medical, educational, and energy institutions, the vast majority of businesses in the assessment area (91.5 percent) have annual revenues of \$1 million or less, which points to a strong small business sector.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Oklahoma.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Oklahoma
2019	2.9%	3.1%
2020	6.2%	6.2%
2021	3.7%	3.8%

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As demonstrated in the previous table, unemployment levels in the assessment area were generally consistent with statewide levels throughout the review period and were similarly impacted by and recovered from the global pandemic.

Community Contact Information

For the Oklahoma City assessment area, a community contact interview conducted with an individual knowledgeable of the area's economic conditions and credit needs was referenced. The contact characterized the area economy as strong, with an influx of businesses to Oklahoma City hiring young professionals to fill positions. Additionally, many workers from surrounding counties commute to Oklahoma City for employment. The aerospace industry has a significant presence, along with other professional, scientific, and technical jobs. Housing stock has kept pace with the influx of population, price increases have not been as extreme as other areas of the country, according to the contact, and the city has been recognized for its affordability. The contact believes there are plenty of banking options in the assessment area and describes a need for flexible lending options for local entrepreneurs.

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

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes a low level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	17	1.4%	1,881	0.8%
Home Purchase	201	16.1%	54,245	23.3%
Multifamily Housing	1	0.1%	400	0.2%
Refinancing	132	10.6%	36,262	15.6%
Other Purpose LOC	10	0.8%	618	0.3%
Other Purpose Closed/Exempt	7	0.6%	1,136	0.5%
Total HMDA	368	29.6%	94,542	40.6%
Small Business	871	70.0%	138,280	59.3%
Small Farm	6	0.5%	210	0.1%
TOTAL LOANS	1,245	100.0%	233,032	100.0%

As a percentage of the 2019 and 2020 loans made inside the bank's combined assessment areas, the bank originated 3.6 percent of its HMDA and CRA loans in the Oklahoma City assessment area. This level of lending is in line with the percentage of total bank deposits held in the assessment area (3.5 percent) as of June 30, 2020, and is slightly above the percentage of total bank branches located in the assessment area (2.6 percent). Therefore, the bank's level of lending represents adequate responsiveness to the credit needs of the Oklahoma City assessment area.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate, with more weight placed on performance in small business lending than HMDA lending based on overall loan volumes.

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HMDA Lending

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

The bank did not originate any loans in low-income census tracts in 2019, reflecting poor performance, particularly compared to aggregate lenders (2.0 percent) and assessment area demographics (3.6 percent). The bank originated one HMDA loan (or 0.5 percent of total HMDA loans) in a low-income census tract in 2020, which was again below the aggregate (1.6 percent) and demographic levels (3.6 percent), also reflecting poor performance.

In 2019, the bank originated 13.7 percent of its HMDA loans in moderate-income geographies, which was in line with aggregate lenders (13.2 percent) and below demographic levels (18.2 percent), reflecting adequate performance. The bank's level of lending in moderate-income census tracts in 2020 decreased to 7.3 percent, which trailed aggregate (11.3 percent) and demographic levels (18.2 percent), reflecting poor performance.

Small Business Lending

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

In 2019, the bank's level of lending to businesses in low-income census tracts (3.6 percent) was in line with aggregate lending levels (4.4 percent) and the demographic estimate of assessment area businesses located in low-income census tracts (4.6 percent), reflecting adequate performance. Similarly, in 2020, the bank's level of lending to businesses in low-income census tracts (3.5 percent) was again in line with aggregate levels (4.4 percent) and the demographic (4.7 percent), also reflecting adequate performance.

In 2019, the bank's level of lending to businesses in moderate-income census tracts (19.1 percent) was in line with aggregate lending levels (18.4 percent) and the demographic figure (22.2 percent) and is considered good. In 2020, the bank's performance in moderate-income tracts (22.3 percent) was above aggregate lending levels (19.7 percent) and equaled the demographic level, reflecting good performance.

Lastly, based on an analysis of the dispersion of HMDA and small business loans, no conspicuous lending gaps were noted, particularly in LMI areas. In 2019, the bank had loan activity in 43.7 percent of all assessment area census tracts and 27.7 percent of all LMI census tracts. In 2020, loan activity grew to include 59.8 percent of all assessment area census tracts and 47.7 percent of LMI census tracts. When considering the competitiveness of this banking market, the dispersion of the bank's loans was consistent with its branch structure and supports the conclusion that the bank's distribution of loans by geography income level is adequate overall.

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Loan Distribution by Borrower's Profile

The bank's loan distribution by borrower's profile is adequate in the Oklahoma City assessment area.

HMDA Lending

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

In 2019, the bank originated 5.1 percent of its HMDA loans to low-income borrowers, which is in line with the performance of peer institutions in the assessment area (6.3 percent), while below the demographic level (21.3 percent). Considering the percentage of families living below the poverty level in the assessment area (11.2 percent) who likely face financial struggles impeding homeownership, this performance is considered adequate. The bank's level of lending to low-income borrowers decreased in 2020 to 2.4 percent, which trailed aggregate levels (4.7 percent) and remained well below the demographic figure of 21.3 percent, reflecting poor performance.

The bank's level of HMDA lending to moderate-income borrowers was poor in both 2019 (8.6 percent) and 2020 (9.3 percent) when compared to aggregate lenders (17.2 percent in 2019 and 15.0 percent in 2020) and the demographic figure (17.3 percent in both 2019 and 2020).

Small Business Lending

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

In 2019, the bank originated 48.6 percent of its loans to businesses with annual revenues of \$1 million or less. This figure is in line with aggregate lending performance in the assessment area (45.1 percent) but below the demographic figure of businesses with this revenue profile (91.4 percent), reflecting adequate performance. While bank performance remained relatively stable in 2020 (46.9 percent), aggregate lending levels dropped off to 29.2 percent, making the bank's performance good.

Community Development Lending Activities

The bank made an adequate level of community development loans in the assessment area. During the review period, the bank made five community development loans totaling \$7.4 million, four of which were PPP loans with a community development purpose, and one that provided funds to purchase a 40-unit apartment complex in a moderate-income census tract designated by the state as a HUBZone. While adequate, this was a significant decrease from the dollar volume of community development loans at the 2020 examination of \$39.4 million.

INVESTMENT TEST

The bank made a significant level of community development investments and grants in the Oklahoma City assessment area. Qualified investments made during the review period totaled \$4.9

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million and were composed entirely of MBS providing affordable housing loans for LMI individuals in the assessment area. While not particularly innovative, these investments do provide funding for homeownership for LMI residents, which community contacts noted as being a challenge in the assessment area. The bank also made \$9.0 million in investments prior to this review period but still outstanding; these were also all MBS.

In addition to these investments, the bank made 25 donations to community development organizations totaling \$50,000. These donations benefitted various affordable housing and community service organizations providing an array of services targeted to LMI geographies and individuals. Two Simmons First Foundation grants totaling \$2,000 were also made during the review period.

SERVICE TEST

Service delivery systems are readily accessible in the assessment area, and the bank's record of opening and closing branches has not adversely impacted the accessibility of its service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates six full-service branches in the Oklahoma City 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	1	2	1	0	6
	33.3%	16.7%	33.3%	16.7%	0.0%	100%
Census Tracts	8.3%	29.0%	36.8%	23.3%	2.6%	100%
Household Population	5.7%	21.7%	40.8%	31.7%	0.1%	100%

As shown, the bank operates 50.0 percent of its assessment area branches in LMI census tracts. This exceeds the percentage of census tracts that are LMI (37.3 percent), as well as the household population in LMI census tracts (31.1 percent). As a result, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels.

Simmons Bank
Pine Bluff, Arkansas

Oklahoma City MSA

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Changes in Branch Locations

The bank closed four branches in this assessment area during the review period: one in a moderate-income census tract, two in upper-income census tracts, and one in an unknown-income census tract. Nevertheless, the bank continues to operate three branches LMI geographies. Moreover, the three branches located in middle- and upper-income census tracts are less than one mile away from LMI geographies. Therefore, the bank's record of opening and closing branches in the assessment area has not adversely impacted the accessibility of its service delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services are consistent across the assessment area and do not vary in a way that inconveniences certain portions of the assessment area. All branches have extended hours Monday through Friday and Saturday drive-through services.

Community Development Services

The bank is a leader in providing community development services to the Oklahoma City assessment area. During the review period, 11 bank employees provided 337 community development services to 11 different organizations. The bank's community development service efforts included bank employees serving on the boards of directors and providing technical assistance to various community service organizations and providing youth and adult financial literacy education.

Simmons Bank
Pine Bluff, Arkansas

Tulsa MSA

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TULSA, OKLAHOMA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TULSA ASSESSMENT AREA

The bank has designated all of Tulsa County as its Tulsa assessment area, which represents one of the seven counties in the full Tulsa, Oklahoma MSA. The bank operates one full-service branch in the assessment area, and the bank closed one branch in the assessment area in an upper-income census tract during the review period. The tables below detail key demographics relating to the Tulsa assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	17	54	51	53	0	175
	9.7%	30.9%	29.1%	30.3%	0.0%	100%
Family Population	10,765	39,165	49,004	57,640	0	156,574
	6.9%	25.0%	31.3%	36.8%	0.0%	100%
Household Population	18,973	66,727	79,675	80,705	0	246,080
	7.7%	27.1%	32.4%	32.8%	0.0%	100%
Business Institutions	1,572	8,714	13,777	15,560	0	39,623
	4.0%	22.0%	34.8%	39.3%	0.0%	100%
Agricultural Institutions	8	41	124	179	0	352
	2.3%	11.6%	35.2%	50.9%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	34,488	26,498	30,724	64,864	156,574
	22.0%	16.9%	19.6%	41.4%	100%
Household Population	59,952	40,496	43,600	102,032	246,080
	24.4%	16.5%	17.7%	41.5%	100%

Simmons Bank
Pine Bluff, Arkansas

Tulsa MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance for the state of Oklahoma, as displayed 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	Exceeds
OVERALL	CONSISTENT

The bank made six community development loans totaling \$56.4 million in the assessment area during the review period. While this is a significant amount, since the bank's presence in the market is very limited, this performance does not affect the overall state rating.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance for the state of Oklahoma. During the review period, the bank made qualified community development investments totaling \$9.0 million, of which \$3.1 million were made during the current period and \$6.0 million in prior-period investments that are still outstanding. In addition to these investments, the bank made 20 donations and grants totaling \$32,750.

SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance for the state of Oklahoma area, 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, eight bank employees conducted 24 community development services for five different organizations.

Simmons Bank
Pine Bluff, Arkansas

NonMSA Oklahoma

CRA Performance Evaluation
September 6, 2022

OKLAHOMA NONMETROPOLITAN STATEWIDE AREA

(Full-Scope Review)⁵

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SOUTHERN OKLAHOMA ASSESSMENT AREA

Bank Structure

The bank operates eight branches in the Southern Oklahoma assessment area, representing 3.5 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	Unknown-Income
0	2	4	2	0

During the review period, the bank entered the market by acquiring nine branches from Landmark Bank in February 2020; one middle-income branch was subsequently closed. Based on its branch network and other service delivery systems, such as online and mobile banking, the bank is well positioned to deliver financial services to the Southern Oklahoma assessment area.

General Demographics

The bank has designated the entirety of Bryan, Carter, Garvin, Johnston, Marshall, Murray, and Pontotoc counties as its Southern Oklahoma assessment area. The assessment area has a total population of 198,724, most of which is concentrated in Carter (48,442), Bryan (44,003), and Pontotoc (38,055) counties, and is largely rural.

The assessment area includes 23 FDIC-insured depository institutions operating 91 branches. Of these institutions, Simmons Bank ranked second, with 12.0 percent of the deposit market share. An analysis of 2020 HMDA-reportable loans shows that 245 institutions had loan activity in the assessment area, of which Simmons Bank ranked 16th, with 1.4 percent of total HMDA loans. Simmons Bank ranked third out of 86 institutions with CRA loan activity in the assessment area, accounting for 11.8 percent of total CRA loan activity.

Credit needs in the assessment area are varied and include a mix of consumer and commercial loan and deposit products. Opportunities for community development involvement for financial institutions are limited but are available particularly in participation with local community development and affordable housing organizations.

⁵ There are two assessment areas in the nonMSA Oklahoma review area: the Southern Oklahoma assessment area (full-scope review) and the Payne County assessment area (limited-scope review).

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Pine Bluff, Arkansas

NonMSA Oklahoma

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Income and Wealth Demographics

The following table reflects the number of census tracts by geography income level and the family population of those census tracts in the assessment area.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	8	15.7%	5,112	10.5%
Middle	33	64.7%	32,383	66.2%
Upper	10	19.6%	11,395	23.3%
Unknown	0	0.0%	0	0.0%
TOTAL	51	100%	48,890	100%

There are no low-income census tracts in the assessment area, and 15.7 percent of census tracts in the assessment area are designated as moderate income, with 10.5 percent of assessment area families residing within those tracts. Most census tracts in the assessment area are middle-income tracts, and most families reside in those tracts. None of the middle-income tracts were designated as distressed or underserved during the review period.

According to 2015 ACS data, the median family income for the Southern Oklahoma assessment area was \$52,634, while the same figure for the state of Oklahoma as a whole was \$58,029. More recently, the FFIEC estimates the median family income for the nonMSA Oklahoma to be \$55,800 in 2019 and \$57,500 in 2020. The following table displays the distribution of assessment area families by income level compared to all Oklahoma families.

Family Population by Income Level				
	Assessment Area		Oklahoma	
Low	9,802	20.1%	208,222	21.6%
Moderate	8,593	17.6%	170,327	17.6%
Middle	9,952	20.4%	195,424	20.2%
Upper	20,543	42.0%	392,036	40.6%
TOTAL	48,890	100%	966,009	100%

When compared with the data in the first table in this section, a much higher percentage of families in the assessment area are LMI (37.7 percent) than reside in LMI geographies (10.5 percent). As displayed in the second table, the percentage of assessment area families who are LMI closely aligns with the same figure for the state of Oklahoma as a whole (39.2 percent). Furthermore, poverty levels in the assessment area (12.8 percent) are also in line with statewide levels (12.4 percent). Therefore, considering these figures and income levels, the assessment area is similarly affluent to the state of Oklahoma as a whole.

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Housing Demographics

The following table displays housing demographics for the assessment area and the state of Oklahoma as a whole.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$92,530	45.1%	\$646
Oklahoma	\$117,900	39.8%	\$727

Housing in the assessment area is more affordable than in the state of Oklahoma overall, as evidenced by a lower affordability ratio. By county, housing is least affordable in Pontotoc County (40.1 percent) and most affordable in Murray County (53.2 percent). Additionally, rental costs in the assessment area are lower than statewide levels. In addition, the percentage of assessment area renters with rental costs exceeding 30.0 percent of their income (36.6 percent) is below the statewide figure (41.1 percent).

Industry and Employment Demographics

County business patterns data indicate that there are 80,882 paid employees in the assessment area. The three largest sectors of the assessment area economy by number of paid employees are government (29.3 percent), manufacturing (11.3 percent), and retail trade (11.2 percent). The assessment area also supports a strong small business sector, with the vast majority of businesses in the assessment area (89.6 percent) having annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Oklahoma.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Oklahoma
2019	3.1%	3.1%
2020	6.1%	6.2%
2021	3.7%	3.8%

As demonstrated in the table above, unemployment levels in the assessment area were generally consistent with statewide levels throughout the review period and were similarly impacted by and recovered from the global pandemic.

Community Contact Information

One community contact interview conducted with an individual knowledgeable regarding assessment area economic conditions was utilized for this examination. The contact characterized the local economy as poor, as it is a very rural area with a large population of low-income residents. Garvin County is also home to the Chickasaw Nation, so there is a significant Native American population. Most residents commute outside the area for employment, as there are few

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employment opportunities within the assessment area. As a result, there is not a lot of influx of population to the assessment area. The contact notes that the oil and gas industry has resulted in some “overnight millionaires” with the leasing of oil and mineral rights, but that typical credit needs include small dollar consumer loans and auto loans. There is also a shortage of affordable housing to meet the needs of a significant level of low-income residents. Bank presence is limited but serves the entire area. Opportunities for bank involvement include participation in affordable housing initiatives.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SOUTHERN OKLAHOMA ASSESSMENT AREA

LENDING TEST

As noted above, the bank did not enter the Southern Oklahoma market until 2020, thus the lending test only included loans originated in 2020. The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes a low level of community development loans in 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, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	8	1.2%	395	0.7%
Home Purchase	29	4.3%	2,956	5.0%
Refinancing	37	5.5%	4,150	7.0%
Other Purpose Closed/Exempt	1	0.1%	50	0.1%
Total HMDA	75	11.2%	7,551	12.7%
Small Business	443	66.2%	42,858	71.8%
Small Farm	151	22.6%	9,276	15.5%
TOTAL LOANS	669	100.0%	59,685	100.0%

As a percentage of the 2020 loans made inside the bank's combined assessment areas, the bank originated 1.9 percent of its HMDA and CRA loans in the NonMSA Oklahoma assessment area. This level of lending is below the percentage of total bank deposits held in the assessment area (4.9 percent) as of June 30, 2020, and the percentage of total bank branches located in the assessment area (3.5 percent). While the bank's level of HMDA lending is not significant compared to other lenders in the assessment area, the bank originated 11.2 percent of all CRA loans in the assessment area in 2020. Therefore, the bank's level of lending represents adequate responsiveness to the credit needs of the Southern Oklahoma assessment area.

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Geographic Distribution of Loans

The bank's geographic distribution of loans in the assessment area is excellent. Based on overall lending volumes for each product, primary emphasis was placed on performance in small business lending, with small farm and HMDA lending receiving less weight. Additionally, there are no low-income census tracts in the assessment area, so bank performance is based solely on activity in moderate-income census tracts.

HMDA Lending

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

In 2020, the bank originated 21.3 percent of its HMDA loans in the assessment area in moderate-income geographies, which exceeded both aggregate lending levels (7.7 percent) and the percentage of owner-occupied housing in moderate-income tracts (8.2 percent).

Small Business Lending

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

In 2020, the bank originated 21.2 percent of its small business loans in moderate-income census tracts, which exceeded both aggregate lending levels (14.0 percent) and the demographic figure (15.5 percent).

Small Farm Lending

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

In 2020, the bank originated 15.2 percent of its small farm loans in moderate-income census tracts, which exceeded both aggregate lending levels (5.7 percent) and the demographic figure (4.6 percent).

Lastly, based on an analysis of the dispersion of HMDA loans, small business loans, and small farm loans, no conspicuous lending gaps were noted, particularly in LMI areas. In 2020, the bank had loan activity in 98.0 percent of all assessment area census tracts and 87.5 percent of all LMI census tracts. The high penetration rate of the bank's loans supports the conclusion that the bank's distribution of loans by geography income level is excellent.

Loan Distribution by Borrower's Profile

The bank's loan distribution by borrower's profile is adequate in the Southern Oklahoma assessment area.

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HMDA Lending

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

In 2020, the bank originated 6.7 percent of its HMDA loans to low-income borrowers, which exceeded the aggregate lending level (3.0 percent) but was well below the percentage of low-income families living in the assessment area (20.0 percent). Considering the lack of affordable housing in the assessment area, as noted by a community contact, the bank's level of lending is considered good.

In 2020, the bank originated 6.7 percent of its HMDA loans to moderate-income borrowers, which trails both aggregate performance (11.7 percent) and the demographic level (17.6 percent) and is considered poor.

Small Business Lending

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

In 2020, the bank originated 48.8 percent of its loans to businesses with annual revenues of \$1 million or less. This figure exceeds aggregate lending performance in the assessment area (38.0 percent) but is below the demographic figure of businesses with this revenue profile (89.6 percent), reflecting good performance.

Small Farm Lending

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

In 2020, the bank originated 89.4 percent of its loans to farms with annual revenues of \$1 million or less. This figure is in line with aggregate lending performance in the assessment area (88.2 percent) but below the demographic figure of farms with this revenue profile (98.8 percent), reflecting adequate performance.

Community Development Lending Activities

The bank made an adequate level of community development loans in the assessment area, given its recent entry into the market and the deposit funds available for such lending. During the review period, the bank made two community development loans totaling \$3.7 million. One was a PPP loan with a community development purpose, and the other provided funds to an office in a moderate-income census tract that would create 16 LMI jobs.

INVESTMENT TEST

The bank made an adequate level of community development investments and grants in the Southern Oklahoma assessment area. Qualified investments made during the review period totaled \$2.2 million and were composed entirely of MBS providing affordable housing loans for LMI

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individuals in the assessment area. The bank also made \$170,743 in investments prior to this review period but still outstanding.

In addition to these investments, the bank made 24 donations to community development organizations totaling \$47,250. These donations benefitted various affordable housing and community service organizations providing an array of services targeted to LMI geographies and individuals.

SERVICE TEST

Service delivery systems are readily accessible in the assessment area, and the bank's record of opening and closing branches has not adversely impacted the accessibility of its service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides an adequate level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates eight full-service branches in the Southern nonMSA Oklahoma 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	2	4	2	0	8
	0.0%	25.0%	50.0%	25.0%	0.0%	100%
Census Tracts	0.0%	15.7%	64.7%	19.6%	0.0%	100%
Household Population	0.0%	10.5%	66.2%	23.3%	0.0%	100%

The bank operates 25.0 percent of its assessment area branches in LMI census tracts. This exceeds the percentage of census tracts that are LMI (15.7 percent), as well as the household population in LMI census tracts (10.5 percent). As a result, the bank's service delivery systems are readily accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank acquired nine branches during the review period and closed one in a middle-income census tract. Therefore, the bank's record of opening and closing branches in the assessment area has not adversely impacted the accessibility of its service delivery systems.

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NonMSA Oklahoma

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services are consistent across the assessment area and do not vary in a way that inconveniences certain portions of the assessment area. Four locations have extended Friday drive-through hours, including two in moderate-income census tracts. Three locations offer Saturday drive-through hours, two of which are in moderate-income census tracts.

Community Development Services

The bank provides an adequate level of community development services to the Southern Oklahoma assessment area. During the review period, two bank employees provided 23 community development services to three different organizations. These services consisted of bank employees serving on the boards of directors of community development organizations providing community services to the assessment area.

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NonMSA Oklahoma

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DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PAYNE COUNTY ASSESSMENT AREA

The assessment area is composed of the entirety of Payne County in nonMSA Oklahoma. The bank operates four branches in the assessment area. The bank acquired three branches during the review period and closed one in a low-income census tract. The tables below detail key demographic information relating to the Payne County assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	2	5	6	4	0	17
	11.8%	29.4%	35.3%	23.5%	0.0%	100%
Family Population	404	3,719	7,072	5,373	0	16,568
	2.4%	22.5%	42.7%	32.4%	0.0%	100%
Household Population	2,240	8,503	10,966	8,455	0	30,164
	7.4%	28.2%	36.4%	28.0%	0.0%	100%
Business Institutions	309	863	985	809	0	2,966
	10.4%	29.1%	33.2%	27.3%	0.0%	100%
Agricultural Institutions	1	10	61	42	0	114
	0.9%	8.8%	53.5%	36.8%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	3,275	2,905	3,106	7,282	16,568
	19.8%	17.5%	18.8%	44.0%	100%
Household Population	9,153	4,339	4,995	11,677	30,164
	30.3%	14.4%	16.6%	38.7%	100%

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Pine Bluff, Arkansas

NonMSA Oklahoma

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE PAYNE COUNTY ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with performance in the full-scope review, southern Oklahoma nonMSA assessment area, as displayed 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

The bank made one community development loan totaling \$1.1 million during the review period.

INVESTMENT TEST

The bank's performance in this assessment area is below the investment test performance in the full-scope review, southern Oklahoma nonMSA assessment area. The bank made two new investments totaling \$318,000 in addition to \$258,003 in investments made prior to this review period but still outstanding. The bank also made 15 donations and grants totaling \$37,500 during the review period.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test performance in the full-scope review, southern Oklahoma nonMSA assessment area, 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	Below
Community Development Services	Exceeds
OVERALL	CONSISTENT

During the review period, five employees provided 108 services to four different organizations.

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Pine Bluff, Arkansas

Tennessee

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TENNESSEE

CRA RATING FOR TENNESSEE: SATISFACTORY

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

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

- The bank's lending levels reflect good responsiveness to the credit needs of the Tennessee assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the Tennessee assessment areas.
- 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 makes an adequate level of community development loans throughout the Tennessee assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position in Tennessee.
- Delivery systems are reasonably accessible to geographies and individuals of different income levels in the Tennessee assessment areas. Changes in branch locations have generally not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank is a leader in providing community development services in Tennessee.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Tennessee assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. However, small farm lending was only analyzed in the Western nonMSA Tennessee assessment area. Small farm lending was not analyzed and did not play a role in assessing the lending performance in the remaining Tennessee assessment areas, as the bank's primary focus in these assessment areas is HMDA and small business lending, and demand for small farm loans is limited. In the Western nonMSA Tennessee assessment area, small farm lending received less weight in the analysis relative to HMDA and small business lending, given the lower volume of small farm loans and loan demand in the assessment area.

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Tennessee

CRA Performance Evaluation
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The bank operates six assessment areas throughout Tennessee located in four MSAs and two noncontiguous nonMSA portions of the state. Two of the bank's Tennessee assessment areas were reviewed under full-scope examination procedures, including one of the two nonMSA assessment areas. Based on the bank's branch structure and loan and deposit activity, CRA performance in the Western nonMSA Tennessee assessment area received slightly more consideration when determining statewide performance conclusions, followed by the Nashville assessment area.

To augment the evaluation of the two full-scope assessment areas, seven community contact interviews were utilized. 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 TENNESSEE

The bank operates 43 offices throughout its assessment areas in Tennessee. The following table gives additional detail regarding the bank's operations in Tennessee.

Review Area	Branches #	Branches %	Deposits \$ 000s (as of 6/30/21)	Deposits %	CRA Review Procedures
Western Tennessee nonMSA	11	25.6%	\$909,280	32.9%	Full-Scope
Nashville MSA	11	25.6%	\$695,459	25.1%	Full-Scope
Memphis MSA	10	23.3%	\$206,689	7.5%	Limited-Scope
Eastern Tennessee nonMSA	5	11.6%	\$472,838	17.1%	Limited-Scope
Jackson MSA	4	9.3%	\$357,708	12.9%	Limited-Scope
Knoxville MSA	2	4.7%	\$123,292	4.5%	Limited-Scope
OVERALL	43	100%	\$2,765,266	100%	2 Full-Scope

Deposits held in the state of Tennessee total approximately \$2.8 billion, which represents 14.9 percent of total bank deposits. The bank acquired 10 branches in Tennessee, four in the Nashville MSA and six in the Memphis MSA, and closed 11 branches throughout its Tennessee assessment areas, primarily due to consolidation of branches added through mergers and acquisitions.

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Pine Bluff, Arkansas

Tennessee

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

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

Lending Activity

Full-Scope Review Areas	Lending Activity
Nashville MSA	Adequate
Western NonMSA Tennessee	Excellent
OVERALL	GOOD

Limited-Scope Review Areas	Lending Activity
Jackson MSA	Consistent
Knoxville MSA	Consistent
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Below

The bank's Tennessee lending levels reflect good 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.

Simmons Bank
Pine Bluff, Arkansas

Tennessee

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Geographic and Borrower Distribution

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

Full-Scope Review Areas	Geographic Distribution of Loans
Nashville MSA	Adequate
Western NonMSA Tennessee	Adequate
OVERALL	ADEQUATE

Limited-Scope Review Areas	Geographic Distribution of Loans
Jackson MSA	Consistent
Knoxville MSA	Consistent
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Consistent

Performance by borrower's income or revenue profile is good in the state of Tennessee, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution By Borrower's Profile
Nashville MSA	Good
Western NonMSA Tennessee	Good
OVERALL	GOOD

Limited-Scope Review Areas	Loan Distribution By Borrower's Profile
Jackson MSA	Exceeds
Knoxville MSA	Consistent
Memphis MSA	Exceeds
Eastern NonMSA Tennessee	Consistent

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Community Development Lending Activities

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

Full-Scope Review Areas	Community Development Lending
Nashville MSA	Adequate
Western NonMSA Tennessee	Low
OVERALL	ADEQUATE

Limited-Scope Review Areas	Community Development Lending
Jackson MSA	Consistent
Knoxville MSA	Below
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Consistent

During the review period, the bank made 15 community development loans totaling \$29.3 million in its Tennessee assessment areas.

INVESTMENT TEST

The bank's performance in Tennessee is rated high satisfactory under the Investment Test. The following tables display investment and grant activity performance in Tennessee.

Full-Scope Review Areas	Investment and Grant Activity
Nashville MSA	Significant
Western NonMSA Tennessee	Adequate
OVERALL	HIGH SATISFACTORY

Limited-Scope Review Areas	Investment and Grant Activity
Jackson MSA	Consistent
Knoxville MSA	Exceeds
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Consistent

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The bank made a total of \$40.2 million in qualified community development investments and \$302,813 in donations and grants in the Tennessee assessment areas. Of the total statewide investments, \$21.1 million were made in the current review period, while \$19.0 million were made prior to the review period but were still outstanding.

SERVICE TEST

The bank's performance in Tennessee is rated outstanding under the Service Test.

Accessibility of Delivery Systems

The bank's service delivery systems are accessible to geographies and individuals of different income levels in Tennessee, as displayed in the following tables.

Full-Scope Review Areas	Accessibility of Delivery Systems
Nashville MSA	Reasonably Accessible
Western NonMSA Tennessee	Accessible
OVERALL	REASONABLY ACCESSIBLE

Limited-Scope Review Areas	Accessibility of Delivery Systems
Jackson MSA	Consistent
Knoxville MSA	Consistent
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Exceeds

Changes in Branch Locations

The bank's record of opening and closing branches in Tennessee has generally not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals, as shown below.

Full-Scope Review Areas	Changes in Branch Locations
Nashville MSA	Not Adversely Affected
Western NonMSA Tennessee	Generally Not Adversely Affected
OVERALL	GENERALLY NOT ADVERSELY AFFECTED

Limited-Scope Review Areas	Changes in Branch Locations
Jackson MSA	Consistent
Knoxville MSA	Consistent
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Consistent

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's business hours and banking services do not vary in a way that inconveniences certain portions of the Tennessee assessment areas, particularly LMI geographies and individuals, as displayed in the following tables.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Nashville MSA	Do Not Vary/Inconvenience
Western NonMSA Tennessee	Do Not Vary/Inconvenience
OVERALL	DO NOT VARY/INCONVENIENCE

Limited-Scope Review Areas	Reasonableness of Business Hours and Services
Jackson MSA	Consistent
Knoxville MSA	Consistent
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Consistent

Community Development Services

The bank is a leader in providing community development services throughout the Tennessee assessment areas, as shown in the tables below.

Full-Scope Review Areas	Community Development Services
Nashville MSA	Relatively High Level
Western NonMSA Tennessee	Leader
OVERALL	LEADER

Limited-Scope Review Areas	Community Development Services
Jackson MSA	Consistent
Knoxville MSA	Consistent
Memphis MSA	Consistent
Eastern NonMSA Tennessee	Below

During the review period, 78 bank employees provided 718 community development services to 55 different organizations.

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NASHVILLE-DAVIDSON-MURFREESBORO- FRANKLIN, TENNESSEE MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NASHVILLE ASSESSMENT AREA

Bank Structure

The bank operates 11 of its 230 branches (4.8 percent) in the Nashville assessment area, which are distributed as follows.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
0	0	5	6	0

During the review period, the bank acquired four branches (one in a middle-income census tract and three in upper-income census tracts) and closed three branches located in upper-income census tracts. Based on the bank's branch network and other service delivery systems, such as online and mobile banking, the bank is likely able to deliver financial services to all of the Nashville assessment area.

General Demographics

The bank has designated the Nashville assessment area to include 5 of the 13 counties in the full Nashville MSA: Davidson, Maury, Robertson, Sumner, and Williamson. The table below details population demographics for each of the counties in the assessment area and the assessment area as a whole.

County	Population
Davidson	658,506
Maury	84,089
Robertson	67,426
Sumner	169,623
Williamson	199,456
ASSESSMENT AREA	1,179,100

The majority of the assessment area population resides in Davidson County, which encompasses the city of Nashville, as well as Vanderbilt University and Belmont University, two major private universities. Nashville is an extremely competitive banking market, with 51 FDIC-insured depository institutions operating 400 branches in the assessment area. Of these institutions, Simmons Bank ranks 18th in deposit market share, with 0.9 percent of all assessment area deposit dollars. Competition for HMDA and CRA loans is similarly high. An analysis of 2020 HMDA-

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reportable loans shows that 832 institutions had loan activity in the assessment area, of which Simmons Bank ranked 69th, with less than 1.0 percent of total HMDA loans. Simmons Bank ranked 20th out of 244 institutions with CRA loan activity in the assessment area, accounting for 1.0 percent of total CRA loan activity.

The Nashville assessment area covers a wide metropolitan area with a diverse demographic composition. Credit needs include a standard blend of commercial and consumer loan products. Specifically, as noted by a community contact, there is a need for more affordable housing and flexible home loans tailored to the needs of LMI residents. Finally, the contact noted that numerous opportunities exist for banks to work with local community development organizations and government assistance programs.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	31	11.4%	22,061	7.6%
Moderate	58	21.4%	57,788	20.0%
Middle	98	36.2%	107,892	37.4%
Upper	80	29.5%	100,730	34.9%
Unknown	4	1.5%	319	0.1%
TOTAL	271	100%	288,790	100%

As shown in the table above, 32.8 percent of census tracts in the assessment area are LMI, but only 27.6 percent of the family population resides in those tracts. The vast majority of these LMI geographies are located in Davidson County in the downtown Nashville area.

Based on 2015 ACS data, the median family income for the assessment area was \$68,115, which exceeds the figure for the state of Tennessee (\$56,110). More recently, the FFIEC estimates the median family income for the Nashville MSA to be \$73,100 in 2019 and \$76,500 in 2020.

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The following table displays the distribution of assessment area families by income level compared to the entire Nashville MSA and the state of Tennessee as a whole.

Family Population by Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Assessment Area	60,439	48,484	56,693	123,174	288,790
	20.9%	16.8%	19.6%	42.7%	100%
Nashville MSA	89,844	76,574	88,452	177,876	432,746
	20.8%	17.7%	20.4%	41.1%	100%
State of Tennessee	363,187	288,774	326,437	687,047	1,665,445
	21.8%	17.3%	19.6%	41.3%	100%

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (37.7 percent) than reside in LMI geographies (27.6 percent). The percentage of families in the assessment area that are LMI is slightly lower than the entire Nashville MSA (38.5 percent) and the state of Tennessee as a whole (39.1 percent). Furthermore, poverty levels in the assessment area (10.4 percent) are in line with the entire Nashville MSA (10.0) and below statewide levels (13.2 percent). Altogether, this points to the assessment area being roughly as affluent as the entire Nashville MSA and more affluent than the state of Tennessee as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area, the entire Nashville MSA, and the state of Tennessee.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$188,966	29.0%	\$880
Nashville MSA	\$176,076	30.9%	\$870
Tennessee	\$142,100	31.8%	\$764

Housing is slightly less affordable in the assessment area than the Nashville MSA in its entirety and in the state of Tennessee. This holds true even when accounting for income levels, as evidenced by a lower affordability ratio in the assessment area. Affordability varied slightly between counties in the assessment area, with Robertson County being the most affordable (34.1 percent) and Williamson County being the least affordable (27.7 percent).

Industry and Employment Demographics

The assessment area economy is extremely diverse and buoyed by the tourism industry, major medical research facilities, universities, and several large national corporations. Major

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corporations with headquarters in Nashville include Amazon, iHeartMedia, Mitsubishi Motors, and Nissan North America. County business patterns indicate that there are 766,165 paid employees in the assessment area, with the three largest job categories being healthcare and social assistance (13.9 percent), government (10.3 percent), and accommodation and food services (9.7 percent). The assessment area also supports a strong small business sector, with demographic data indicating that 90.8 percent of businesses in the assessment area have annual revenues of \$1 million or less.

The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Tennessee.

Unemployment Levels for the Assessment Area			
Time Period (Annual Average)	Assessment Area	Nashville MSA	Tennessee
2019	2.6%	2.6%	3.4%
2020	7.2%	7.0%	7.4%
2021	3.8%	3.6%	4.3%

Unemployment levels in the assessment area were comparable to the entire Nashville MSA and remained lower than the state of Tennessee throughout the review period, and all were similarly impacted by the global pandemic.

Community Contact Information

A community contact interview conducted with an individual knowledgeable of the Nashville assessment area's economic conditions and credit needs was referenced for this examination. The contact noted that while unemployment has returned to pre-pandemic levels, the lower middle class is suffering. The contact characterized Davidson County as being very unaffordable and surrounding rural areas as experiencing social challenges. Hospitality jobs are widespread but offer low pay. Overall, there is a workforce shortage in most local industries. Nonetheless, industries continue to move to the area, including Amazon and Oracle. The contact describes the availability of banking services as sufficient, though some of the most rural areas lack bank branches.

The contact notes that many older homes are being torn down and replaced with luxury apartments and that affordable housing stock does not meet current demand. Barriers to homeownership include high sales prices and interest rates coupled with low wages. Additionally, agriculture in the area has diminished, and many small family farms have sold their land to real estate developers. Finally, the contact indicated that opportunities for bank involvement in community development activities are numerous, but banks need to be more proactive in these efforts.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NASHVILLE ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes an adequate level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	55	5.2%	4,785	2.5%
Home Purchase	168	16.0%	50,885	26.8%
Multifamily Housing	1	0.1%	230	0.1%
Refinancing	228	21.7%	55,119	29.1%
Other Purpose LOC	45	4.3%	4,384	2.3%
Other Purpose Closed/Exempt	4	0.4%	1,073	0.6%
Total HMDA	501	47.8%	116,476	61.4%
Small Business	544	51.9%	72,637	38.3%
Small Farm	4	0.4%	529	0.3%
TOTAL LOANS	1,049	100.0%	189,642	100.0%

Loans made in the Nashville assessment area represent 3.0 percent of total 2019 and 2020 HMDA and CRA loans made within the bank's combined assessment areas. This level of lending is slightly below the percentage of total bank branches in the assessment area (4.8 percent) and in line with the percentage of total bank deposits as of June 30, 2020 held in the assessment area (2.8 percent). Therefore, the bank's lending activity reflects adequate responsiveness to the credit needs of the Nashville assessment area.

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Geographic Distribution of Loans

Based on both products reviewed, the overall geographic distribution of loans is adequate.

HMDA Lending

The bank's record of making HMDA loans in LMI geographies is adequate.

The bank originated 6.8 percent of its HMDA loans in low-income geographies in 2019, which is excellent when compared to the performance of peer institutions in the assessment area (6.1 percent) and demographic levels (4.7 percent). The percentage of bank HMDA loans in low-income geographies in 2020 was lower (3.4 percent), which trailed both aggregate performance (5.8 percent) and the demographic figure (4.7 percent), reflecting poor performance.

The bank's level of lending in moderate-income geographies in 2019 (11.4 percent) is generally in line with aggregate lenders in the assessment area (14.4 percent) and below the demographic figure of 16.0 percent, reflecting adequate performance. In 2020, the bank's level of lending in moderate-income geographies (10.9 percent) was comparable to aggregate lending levels (12.6 percent) and below demographic levels (16.0 percent) and is considered adequate.

Small Business Lending

The bank's distribution of small business loans by geography income level is adequate.

The bank made 8.0 percent of its small business loans in low-income geographies in 2019, compared to 9.0 percent for aggregate lenders and a demographic level of 8.8 percent, reflecting adequate performance. The bank's small business lending in low-income geographies in 2020 (6.7 percent) was generally in line with aggregate lending levels (8.8 percent) and demographic levels (8.8 percent) and is also considered adequate.

Lending in moderate-income geographies was adequate in 2019, as the bank's performance (16.1 percent), aggregate performance (17.3 percent), and the demographic level (18.4 percent) were closely aligned. Similarly, the bank's level of small business lending in moderate-income tracts in 2020 (15.3 percent) was in line with aggregate levels (17.0 percent) and the demographic (18.3 percent), reflecting adequate performance.

Lastly, no conspicuous lending gaps were identified in the dispersion of the bank's HMDA and CRA loans, particularly in LMI geographies. In 2019, the bank had loan activity in 56.5 percent of all assessment area census tracts and 47.2 percent of all LMI census tracts. In 2020, the bank's loan dispersion improved, with loan activity in 66.4 percent of all assessment area census tracts and 53.9 percent of all LMI census tracts. The dispersion of the bank's loans was consistent with its branch structure in the assessment area. The bank's loan dispersion supports the conclusion that the bank's distribution of loans by geography income level is adequate overall.

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Loan Distribution by Borrower's Profile

Overall, the bank's distribution of loans by income or revenue profile is good. Small business lending received primary weight in determining overall performance.

HMDA Lending

The bank's distribution of HMDA loans by borrower's income level is adequate.

In 2019, the bank originated 3.4 percent of HMDA loans to low-income borrowers, which aligned with aggregate performance (4.6 percent) and trailed the demographic figure of low-income families in the assessment area (20.9 percent). Considering the lack of affordable housing in the assessment area, as noted by a community contact, this performance is considered adequate. The bank's performance in 2020 was similar (3.8 percent) and again in line with aggregate lenders in the assessment area (4.2 percent) and the demographic figure (20.9 percent) and is also considered adequate.

The bank's level of HMDA lending to moderate-income borrowers (19.1 percent) in 2019 exceeded both aggregate lenders (15.4 percent) and the demographic level (16.8 percent), reflecting excellent performance. The bank's percentage of lending to moderate-income borrowers decreased in 2020 (14.0 percent) but remained in line with aggregate lenders (14.5 percent) and the demographic comparator (16.8 percent), and is therefore considered adequate.

Small Business Lending

The borrower distribution of small business loans is good.

The percentage of bank loans to businesses with annual revenues of \$1 million or less in 2019 (55.4 percent) and 2020 (53.0 percent) exceeded aggregate lending levels (48.6 percent in 2019 and 41.5 percent in 2020) and trailed the demographic figure (90.3 percent in 2019 and 90.8 percent in 2020), reflecting good performance.

Community Development Lending Activities

The bank makes an adequate level of community development loans in the Nashville assessment area. During the review period, the bank made one community development loan for \$9.7 million for a retail/office space development in a moderate-income census tract.

INVESTMENT TEST

The bank makes a significant level of community development investments and grants in the assessment area. The bank made qualified investments totaling \$11.3 million, \$5.8 million of which were investments made during the review period and \$5.4 million of which were made prior to the current review period but still outstanding. Investments made during the current review

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period were composed entirely of MBS supporting affordable housing for LMI borrowers, which is responsive to a need stated by a community contact in the assessment area.

In addition to these investments, the bank made 40 donations totaling \$62,563 to various community service and affordable housing organizations throughout the assessment area

SERVICE TEST

The bank's service delivery systems are reasonably accessible in the assessment area, and the bank's record of opening and closing branches has not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 11 branches in the Nashville 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	5	6	0	11
	0.0%	0.0%	45.5%	54.5%	0.0%	100%
Census Tracts	11.4%	21.4%	36.2%	29.5%	1.5%	100%
Household Population	7.6%	20.0%	37.4%	34.9%	0.1%	100%

The bank does not operate any branches in LMI geographies, while 32.8 percent of geographies are LMI and 27.6 percent of assessment area households are in LMI geographies. Despite not operating a branch in an LMI census tract, the bank's service delivery systems are reasonably accessible in the assessment area, as three branches are within one mile of LMI census tracts and one is within two miles.

Changes in Branch Locations

As mentioned previously, the bank acquired one branch in a middle-income census tract and three branches in upper-income census tracts during the review period; three branches in upper-income census tracts were subsequently closed. As such, this record of opening and closing branches has not adversely affected the accessibility of the bank's service delivery systems in the Nashville assessment area, particularly in LMI geographies.

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services are generally uniform throughout the assessment area. Therefore, business hours and services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals.

Community Development Services

The bank provides a relatively high level of community development services in the Nashville assessment area. During the review period, 21 bank employees provided 74 community development services to eight different organizations. Many of these community development services consisted of financial literacy education to children and adults.

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Jackson MSA

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JACKSON, TENNESSEE MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSON ASSESSMENT AREA

The bank's Jackson assessment area consists of Madison and Gibson counties, which represents two of the four counties in the Jackson, Tennessee MSA. The bank operates four full-service branches in the assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to the Tulsa assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	3	10	16	10	2	41
	7.3%	24.4%	39.0%	24.4%	4.9%	100%
Family Population	1,533	9,411	14,375	12,483	128	37,930
	4.0%	24.8%	37.9%	32.9%	0.3%	100%
Household Population	2,602	14,999	21,023	17,046	545	56,215
	4.6%	26.7%	37.4%	30.3%	1.0%	100%
Business Institutions	104	1,562	1,780	1,419	309	5,174
	2.0%	30.2%	34.4%	27.4%	6.0%	100%
Agricultural Institutions	1	21	111	45	0	178
	0.6%	11.8%	62.4%	25.3%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	8,055	6,706	7,118	16,051	37,930
	21.2%	17.7%	18.8%	42.3%	100%
Household Population	13,392	8,767	9,936	24,120	56,215
	23.8%	15.6%	17.7%	42.9%	100%

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Jackson MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSON ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance for the state of Tennessee, as displayed 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	Exceeds
Community Development Lending Activities	Consistent
OVERALL	CONSISTENT

The bank made six community development loans totaling \$4.4 million in the assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance for the state of Oklahoma. During the review period, the bank had qualified community development investments totaling \$2.8 million, of which \$1.7 million were made during the current period and \$1.1 million were made in prior-period investments and are still outstanding. In addition to these investments, the bank made 19 donations and grants totaling \$39,125.

SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance for the state of Oklahoma area, 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, 14 bank employees conducted 118 community development services for 11 different organizations.

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Pine Bluff, Arkansas

Knoxville MSA

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KNOXVILLE, TENNESSEE MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KNOXVILLE ASSESSMENT AREA

The bank's Knoxville assessment area consists of Anderson, Blount, Knox, Loudon, and Roane counties, which represents five of the eight counties in the Knoxville, Tennessee MSA. The bank operates two full-service branches throughout the assessment area and closed two branches in the assessment area during the review period, one in a moderate-income census tract and one in a middle-income census tract. The tables below detail key demographics relating to the Knoxville assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	11	32	81	49	6	179
	6.1%	17.9%	45.2%	27.4%	3.4%	100%
Family Population	8,359	27,442	99,570	57,865	14	193,250
	4.3%	14.2%	51.5%	29.9%	0.0%	100%
Household Population	15,654	51,493	151,467	83,554	102	302,270
	5.2%	17.0%	50.1%	27.6%	0.0%	100%
Business Institutions	1,299	4,419	13,550	11,459	202	30,929
	4.2%	14.3%	43.8%	37.0%	0.7%	100%
Agricultural Institutions	3	51	203	117	1	375
	0.8%	13.6%	54.1%	31.2%	0.3%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	41,487	31,576	38,713	81,474	193,250
	21.5%	16.3%	20.0%	42.2%	100%
Household Population	71,854	48,232	49,589	132,595	302,270
	23.8%	16.0%	16.4%	43.9%	100%

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Knoxville MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KNOXVILLE ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the state of Tennessee, as displayed 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	Below
OVERALL	CONSISTENT

The bank did not make any community development loans in the Knoxville assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in the Knoxville assessment area exceeds the investment performance in the state of Tennessee. The bank made \$8.4 million in total qualified investments, \$2.8 million of which was made during the current review period and \$5.6 million of which was made in a prior review period but is still outstanding. The bank also made 17 donations totaling \$43,000 during the review period.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test performance in the Tennessee full-scope review assessment areas, 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, four bank employees provided 87 community development services to six different organizations.

Simmons Bank
Pine Bluff, Arkansas

Memphis MSA

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MEMPHIS, TENNESSEE-MISSISSIPPI-ARKANSAS MSA (Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MEMPHIS ASSESSMENT AREA

The bank has designated the entireties of Shelby and Tipton counties as the Memphis assessment area, which represents two of the three counties in the Tennessee portion of the Memphis, Tennessee-Mississippi-Arkansas multistate MSA. The bank operates ten branches in the assessment area; six branches were acquired during the review period and one was closed. The acquired and closed branches were all located in upper-income census tracts. The tables below detail key demographics relating to the Memphis assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	66	49	40	73	6	234
	28.2%	20.9%	17.1%	31.2%	2.6%	100%
Family Population	45,546	47,068	41,874	101,923	404	236,815
	19.2%	19.9%	17.7%	43.0%	0.2%	100%
Household Population	78,048	74,106	65,069	150,768	808	368,799
	21.2%	20.1%	17.6%	40.9%	0.2%	100%
Business Institutions	5,798	6,383	6,547	19,160	397	38,285
	15.1%	16.7%	17.1%	50.0%	1.0%	100%
Agricultural Institutions	17	20	60	185	4	286
	5.9%	7.0%	21.0%	64.7%	1.4%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	61,327	36,409	38,939	100,140	236,815
	25.9%	15.4%	16.4%	42.3%	100%
Household Population	98,598	57,578	58,572	154,051	368,799
	26.7%	15.6%	15.9%	41.8%	100%

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Pine Bluff, Arkansas

Memphis MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance for the state of Tennessee, as displayed 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	Exceeds
Community Development Lending Activities	Consistent
OVERALL	CONSISTENT

The bank made four community development loans totaling \$10.7 million during the review period.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance in the full-scope review Tennessee assessment areas. The bank made qualified community development investments totaling \$11.1 million, of which \$6.3 million were made in the current review period and \$4.8 million were made prior to the current review period but are still outstanding. In addition to these investments, the bank made 27 donations and grants totaling \$78,375 to various organizations throughout the assessment area.

SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance in the full-scope review Tennessee assessment areas, 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, 12 bank employees provided 91 community development services to seven different organizations in the Memphis assessment area.

Simmons Bank
Pine Bluff, Arkansas

NonMSA Tennessee

CRA Performance Evaluation
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TENNESSEE NONMETROPOLITAN STATEWIDE AREA

(Full-Scope Review)⁶

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WESTERN TENNESSEE ASSESSMENT AREA

Bank Structure

The bank operates 11 branches in the Western nonMSA Tennessee assessment area, which represents 4.8 percent of total bank branches. The table below displays the bank's branch distribution by geography income level.

Branch Locations by Census Tract Income Level				
Low-Income	Moderate-Income	Middle-Income	Upper-Income	Unknown-Income
0	1	9	1	0

The bank closed five branches during the review period: one in a moderate-income census tract and four in middle-income census tracts. Based on its branch and ATM network and other service delivery systems such as online and mobile banking, the bank is positioned to deliver financial services to substantially all of the assessment area.

General Demographics

The assessment area consists of six Tennessee nonMSA counties in their entirety: Dyer, Hardeman, Haywood, Henderson, Obion, and Weakley. Gibson County was part of the assessment area at the last examination but has been moved to the Jackson, Tennessee, assessment area, as it abuts the MSA. The assessment area has a total population of 176,112 and is largely rural. Additionally, the University of Tennessee at Martin, a public university with a total enrollment of approximately 7,300 students, is located in Weakley County in the city of Martin.

The assessment area is served by 20 FDIC-insured depository institutions operating 70 branches throughout the assessment area. Of these institutions, Simmons Bank ranked first in deposit market share, with 24.1 percent of all assessment area deposit dollars. Moreover, the bank operates the most branches of any institution operating in the assessment area.

While only 20 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 2020 HMDA-reportable loans shows that there were 223 financial institutions with HMDA loan activity, of which Simmons Bank ranked second, with 8.0 percent of total loan activity. Of the 80 financial institutions with CRA loan activity in the assessment area, Simmons Bank again ranked second, with 21.5 percent of total CRA loan activity.

⁶ There are two assessment areas in the nonMSA Tennessee review area: the western Tennessee assessment area (full-scope review) and the eastern Tennessee assessment area (limited-scope review).

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Credit needs in the Western nonMSA Tennessee assessment area include a standard blend of consumer, business, and farm credit products. Other particular credit needs in the assessment area pointed out by community contacts include small dollar home improvement loans to address needed repairs to aging housing stock and flexible small business loan products including government guaranteed products. Opportunities exist for bank participation in local community development efforts, and there is a specific need for financial education in local schools as well as workforce development and financial education programs to LMI adults.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	4	8.5%	4,117	8.9%
Middle	33	70.2%	32,300	70.0%
Upper	9	19.2%	9,711	21.0%
Unknown	1	2.1%	42	0.1%
TOTAL	47	100%	46,170	100%

There are no low-income census tracts in the assessment area and only four moderate-income census tracts, representing 8.5 percent of total census tracts. Three of these moderate-income census tracts are located in Hardeman County, with the remaining moderate-income census tract located in Obion County. Most census tracts are middle income, with 70.2 percent of assessment area families residing in those tracts. Despite the low number of LMI geographies in the assessment area, poverty remains an issue, as evidenced by the fact that 9 out of 33 middle-income census tracts in the assessment area were designated as distressed due to poverty in 2020. Three of these tracts are in Hardeman County and six are in Haywood County.

Based on 2015 ACS data, the median family income for the assessment area was \$48,692, which is above the median family income for nonMSA Tennessee as a whole (\$46,066). More recently, the FFIEC estimates the median family income for nonMSA Tennessee to be \$50,100 in 2019 and \$52,200 in 2020. The following table displays the percentages of assessment area families by income level compared to nonMSA Tennessee as a whole.

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Family Population by Income Level				
	Assessment Area		NonMSA Tennessee	
Low	9,073	19.7%	81,163	20.9%
Moderate	7,959	17.2%	70,532	18.1%
Middle	8,974	19.4%	77,971	20.0%
Upper	20,164	43.7%	159,460	41.0%
TOTAL	46,170	100%	389,126	100%

While the data in the first table revealed that only 8.9 percent of families in the assessment area reside in LMI census tracts, the table above shows that a much higher percentage of assessment area families are LMI (36.9 percent). This figure is slightly lower than the percentage of families that are LMI in nonMSA Tennessee as a whole (39.0 percent). The percentage of families below the poverty level in the assessment area (15.3 percent) is in line with levels in the entire nonMSA (15.4 percent). Based on these demographics, the assessment area is slightly more affluent than nonMSA Tennessee as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and nonMSA Tennessee as a whole.

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$92,394	41.0%	\$590
NonMSA Tennessee	\$106,819	34.0%	\$601

Housing is more affordable in the assessment area than in nonMSA Tennessee as a whole, as evidenced by lower median housing values and gross rents and a higher affordability ratio. Within the assessment area, affordability levels varied slightly, with Obion County having the highest affordability ratio (45.9 percent) and Haywood County having the lowest affordability ratio (34.5 percent).

Industry and Employment Demographics

The assessment area supports a moderately diverse business community, including a strong small business sector. According to assessment area demographics, 89.5 percent of businesses and 97.2 percent of farms have annual revenues of \$1 million or less. County business patterns indicate that there are 55,725 paid employees in the assessment area and that the three largest job categories by number of paid employees are manufacturing (25.4 percent), government (20.6 percent), and retail trade (12.0 percent). Major employers in the area include Tyson Foods, Thyssenkrupp Elevator Manufacturing, and General Electric.

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The table below details unemployment statistics from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Tennessee.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Tennessee
2019	4.6%	3.4%
2020	7.3%	7.4%
2021	4.7%	4.3%

Unemployment levels in the assessment area were higher than in the state of Tennessee in 2019 and 2021 but were comparable in 2020 during the pandemic. Hardest hit by the pandemic were Haywood County (8.6% in 2020) and Henderson County (8.0 percent), while Weakley County (5.7 percent) and Obion County (6.7 percent) were less affected.

Community Contact Information

Six community contact interviews were referenced for this evaluation. The contacts include individuals knowledgeable regarding the economic conditions of the assessment area, with expertise in the following areas:

- Small business (three)
- Affordable housing (two)
- Economic development

Contacts noted that food production is the biggest industry in the area, including two Tyson poultry processing plants. Contacts from Haywood, Hardeman, and Henderson counties describe the economy as lagging behind other areas of the state. Haywood County has witnessed an outflow of population for better opportunities in other areas of the state, according to one contact. While Haywood, Hardeman, and Henderson are rural, Obion, Weakley, and Dyer counties have higher concentrations of population and benefit from more industry and low unemployment; however, contacts noted that several manufacturers have left the area in recent years, and many of the remaining jobs are low-paying service-related positions.

One contact described the small business environment as generally friendly but cautious, particularly toward entrepreneurs without a history of successful operations. Area banks serve existing businesses well, according to the contact, but many new business owners cannot meet banks' underwriting requirements. The contact noted that banks could offer guaranteed loans through the SBA and the USDA but that many choose not to as they are more work and more costly. The contact did note that Simmons Bank has worked well with local small businesses in the area to offer flexible small business loans. Another contact noted that some parts of the assessment area are not attractive to businesses due to the high crime rate and lack of skilled workforce. Additionally, many businesses suffer from a lack of collateral and poor or no credit histories. Thus, small business credit needs

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include flexible loan products with low interest rates. Non-credit needs include financial education and outreach to local schools.

Affordable housing is a need throughout the assessment area according to contacts. Much of the housing stock is older and in need of repair. Thus, small dollar home-improvement loans are a stated need. However, several barriers to homeownership exist in the assessment area, including lack of sufficient income, low property values, and poor credit histories. Banks can meet the needs of the community by offering low-down-payment guaranteed mortgage loans through the USDA, streamlining the application process, and conducting outreach to the LMI population through workforce development and financial literacy programs.

Agriculture remains an important part of the assessment area, with many small family farms in operations for several generations. Access to credit at local banks is good, according to one contact, and sufficient infrastructure exists for farmers to get their products to market.

According to the contacts, bank branches are accessible to all of the assessment area and are sufficient to meet basic banking needs but are often conservative in their available loan products. Despite the prevalence of available banks, much of the LMI community relies on alternative lenders with high interest rates and onerous repayment terms. Simmons Bank was noted by several contacts as being particularly responsive in the assessment area.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WESTERN TENNESSEE ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank makes a low level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	55	2.8%	2,300	1.3%
Home Purchase	263	13.4%	32,547	17.7%
Multifamily Housing	2	0.1%	592	0.3%
Refinancing	302	15.4%	30,761	16.8%
Other Purpose LOC	69	3.5%	3,281	1.8%
Other Purpose Closed/Exempt	11	0.6%	635	0.3%
Total HMDA	702	35.7%	70,116	38.2%
Small Business	998	50.8%	83,478	45.5%
Small Farm	266	13.5%	29,871	16.3%
TOTAL LOANS	1,966	100.0%	183,465	100.0%

Lending activity in this assessment area represents 5.7 percent of total HMDA and CRA loans made within the bank's combined assessment areas. In comparison, the share of total bank branches inside this assessment area is 4.8 percent, and the percentage of total bank deposits held in the assessment area as of June 30, 2020 is 5.1 percent. Moreover, the bank ranked first in 2019 in percentage of total HMDA loans compared to all lenders with HMDA loans in the assessment area and second in 2020. The bank ranked second in small business and small farm loans in the assessment area for both 2019 and 2020. Considering these factors, the bank's lending activity in the assessment area reflects excellent responsiveness to assessment area credit needs.

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Geographic Distribution of Loans

Considering all three loan products reviewed, the bank's overall geographic distribution of loans in the assessment area is adequate, with primary emphasis placed on HMDA and small business lending. As noted in the *Income and Wealth Demographics* section, there are no low-income census tracts in the assessment area, so performance is based on activity in moderate-income census tracts only.

HMDA Lending

The geographic distribution of HMDA loans is poor.

The bank's percentage of HMDA loans made in moderate-income census tracts in 2019 (2.3 percent) was below aggregate lending performance (7.1 percent) and demographic levels (8.3 percent) and is considered poor. While the bank's performance in 2020 improved slightly (3.7 percent), it is nevertheless still poor when considering aggregate lending performance (6.5 percent) and the percentage of owner-occupied housing in moderate-income census tracts (8.3 percent).

Small Business Lending

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

In 2019, the bank made 3.0 percent of its small business loans in moderate-income geographies, which trailed aggregate lenders (5.1 percent) and the demographic level (6.8 percent), reflecting poor performance. In 2020, the bank's performance improved with 3.5 percent of its small business loans being made in moderate-income census tracts, which was in line with aggregate lenders (4.1 percent) and considered adequate.

Small Farm Lending

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

In 2019, the bank originated 1.4 percent of its small farm loans in moderate-income census tracts, which was below aggregate lenders (3.1 percent) and the demographic level (4.4 percent), reflecting poor performance. In 2020, small farm lending in moderate-income geographies improved to 2.4 percent, which was in line with aggregate lenders (2.7 percent) and considered adequate.

Lastly, the bank made loans in 95.7 percent of all assessment area census tracts in 2019 and 97.9 percent of all assessment area census tracts in 2020. In both years, the bank made loans in 75 percent of all moderate-income census tracts in the assessment area. Thus, no conspicuous lending gaps were identified.

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Loan Distribution by Borrower's Profile

The bank's borrower distribution in the Western nonMSA Tennessee assessment area is good.

HMDA Lending

The bank's borrower distribution of HMDA loans is good.

The distribution of HMDA loans to low-income borrowers is good in both 2019 and 2020. The bank originated 8.1 percent of HMDA loans to low-income borrowers in 2019 and 5.6 percent in 2020, which exceeded aggregate performance (5.5 percent in 2019 and 4.4 percent in 2020) but was below demographic levels (19.7 percent) for both years of data reviewed. While not reaching demographic levels, the bank's performance is good considering the barriers to credit noted by community contacts.

The bank's HMDA lending to moderate-income borrowers is also good for both 2019 and 2020. The bank originated 15.9 percent of its HMDA loans to moderate-income borrowers in 2019, which exceeded aggregate lenders (14.4 percent) and approached demographic levels (17.2 percent). Similarly, in 2020, the bank originated 15.4 percent of its HMDA loans to moderate-income borrowers, again exceeding aggregate levels (13.6 percent) and just below the demographic level (17.2 percent).

Small Business Lending

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

The bank made 70.1 percent of small business loans to businesses with annual revenues of \$1 million or less in 2019. While below the percentage of total assessment area businesses with annual revenues of \$1 million or less (89.5 percent), this level of lending exceeded peer institutions in the assessment area (51.9 percent) and is considered good. Performance in 2020 is likewise considered good, as the bank originated a higher percentage of small business loans to businesses with annual revenues of \$1 million or less (61.4 percent) than did peer institutions (54.3 percent).

Small Farm Lending

Lastly, the bank's distribution of farm loans by farm revenue size is good.

In both 2019 and 2020, the bank's percentage of small farm loans to farms with annual revenues of \$1 million or less (79.6 percent and 79.0 percent, respectively) exceeded aggregate levels (68.8 percent in 2019 and 67.4 percent in 2020). While the bank's level of lending was below the percentage of assessment area farms with annual revenues of \$1 million or less (97.1 percent in 2019 and 97.2 percent in 2020), this performance is nevertheless considered good when considering the bank's performance relative to aggregate lending levels.

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Community Development Lending Activities

The bank makes a low level of community development loans in the Western nonMSA Tennessee assessment area. During the review period, the bank made two community development loans totaling \$1.3 million in the assessment area. One loan was made to a small farm and one to a small business, both of which provide jobs to LMI workers in the assessment area.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants in the assessment area. New investments totaled \$2.6 million, while the bank also received credit for \$788,495 in investments made prior to the current review period but still outstanding. Current- and prior-period investments consisted entirely of MBS providing affordable housing for LMI borrowers, which is responsive to assessment area needs noted by community contacts.

In addition to these investments, the bank made 31 donations totaling \$42,000 during the review period. These donations benefitted various community service and affordable housing organizations operating in the Western nonMSA Tennessee assessment area. Additionally, a Simmons First Foundation grant of \$25,000 was made to an organization serving LMI children in the assessment area.

SERVICE TEST

The bank's service delivery systems are accessible in the assessment area, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 11 branches in the Western nonMSA Tennessee assessment area. The following table details the distribution of assessment area branches, 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	9	1	0	11
	0.0%	9.1%	81.8%	9.1%	0.0%	100%
Census Tracts	0.0%	8.5%	70.2%	19.2%	2.1%	100%
Household Population	0.0%	8.9%	70.0%	21.0%	0.1%	100%

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The bank operates one, or 9.1 percent, of its assessment area branches in moderate-income census tracts, as shown in the preceding table. This is in line with the percentage of assessment area census tracts that are moderate income (8.5 percent) and the household population in those census tracts (8.9 percent). Based on this information, 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 within the assessment area has generally not adversely affected the accessibility of its service delivery systems. As previously described, the bank closed five branches during the review period, one of which was in a moderate-income census tract. Two remaining locations in middle-income census tracts are less than a mile from moderate tracts and are accessible to consumers in those geographies.

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 assessment area, particularly LMI geographies and individuals. Four branches offer extended Friday hours, including the branch located in a moderate-income census tract.

Community Development Services

Simmons Bank is a leader in providing community development services in the assessment area. During the review period, 21 bank employees provided 287 community development services to 17 different organizations. Many of these services consisted of youth and adult financial literacy education, as well as serving on the boards of directors of local community development organizations.

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DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EASTERN TENNESSEE ASSESSMENT AREA

The bank has designated the entireties of McMinn and Monroe counties as the Eastern nonMSA Tennessee assessment area. The bank operates five full-service branches in the assessment area; during the review period, the bank did not open or close any branches in the assessment area. The tables below detail key demographics relating to the Eastern nonMSA Tennessee assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Census Tracts	0	1	15	1	0	17
	0.0%	5.9%	88.2%	5.9%	0.0%	100%
Family Population	0	1,346	23,269	1,476	0	26,091
	0.0%	5.2%	89.2%	5.7%	0.0%	100%
Household Population	0	2,388	32,553	2,230	0	37,171
	0.0%	6.4%	87.6%	6.0%	0.0%	100%
Business Institutions	0	401	2,465	205	0	3,071
	0.0%	13.1%	80.3%	6.7%	0.0%	100%
Agricultural Institutions	0	1	95	2	0	98
	0.0%	1.0%	96.9%	2.0%	0.0%	100%

Assessment Area Demographics by Population Income Level					
Demographic Type	Population Income Level				TOTAL
	Low-	Moderate-	Middle-	Upper-	
Family Population	5,405	4,811	5,102	10,773	26,091
	20.7%	18.4%	19.6%	41.3%	100%
Household Population	8,944	6,119	6,145	15,963	37,171
	24.1%	16.5%	16.5%	43.0%	100%

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EASTERN TENNESSEE ASSESSMENT AREA

LENDING TEST

The bank's performance in this assessment area is consistent with the Lending Test performance in the full-scope review, Western Tennessee nonMSA assessment area, as displayed 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
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 two community development loans \$3.2 million in the assessment area.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance in the full-scope review, Western Tennessee nonMSA assessment area. During the review period, the bank made qualified investments totaling \$3.1 million, of which \$1.8 million were made during the current period and \$1.4 million were made during a prior period but were still outstanding. In addition to these investments, the bank made 11 donations totaling \$12,750.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test performance in the full-scope review, Western Tennessee nonMSA assessment area, 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	Below
OVERALL	CONSISTENT

During the review period, six bank employees provided 61 community development services to six different organizations in the assessment area.

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Texas

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TEXAS

CRA RATING FOR TEXAS: SATISFACTORY

The Lending Test is rated: **Low 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 Texas include:

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

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Texas assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. However, small farm lending was not analyzed and did not play a role in assessing the lending performance in the Texas assessment areas, as the bank had minimal farm lending activity and is primarily focused on HMDA and small business lending. Given loan demand and the bank's lending activity, small business lending performance carried more weight toward the bank's lending performance conclusions throughout the state.

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The bank operates in ten assessment areas in Texas, located in nine MSAs and one nonMSA portion of the state. At the time of the last evaluation as of January 2020, the bank was operating in four assessment areas in Texas. During the current review period, the bank exited the San Antonio and Austin assessment areas through sale of its branches. In February 2020, the bank acquired branches in the Sherman-Denison, Texas MSA and added this as an additional assessment area. In April 2022, the bank re-entered the San Antonio and Austin markets through acquisition activity. At the same time, it expanded its footprint in Texas to include the additional MSA assessment areas of Fort Worth, Tyler, College Station, Corpus Christi, and Houston. Since the 2022 acquisition activity occurred shortly before the start of this evaluation, these assessment areas were not included in this evaluation. The Dallas and Sherman-Denison assessment areas were reviewed under full-scope examination procedures, with primary consideration given to performance in the Dallas assessment area when determining overall state ratings. Lending tests in the Sherman-Denison assessment area included only lending activity in 2020 when it became a new designated assessment area for the bank.

To augment the evaluation of the two full-scope assessment areas, three 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 for which the community contacts interviews were conducted.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS

The bank operates 33 offices throughout its Dallas and Sherman-Denison assessment areas in Texas, including branches acquired in April 2022. The following table gives additional detail regarding the bank's operations in Texas.

Review Area	Branches #	Branches %	Deposits \$ 000s (as of 6/30/21)	Deposits %	CRA Review Procedures
Dallas CSA	27	81.8%	\$1,638,314	74.1%	Full-Scope
Sherman MSA	6	18.2%	\$573,931	25.9%	Full-Scope
OVERALL	33	100%	\$2,212,245	100%	2 Full-Scope

The vast majority of the bank's operations in Texas are concentrated in the Dallas assessment area. Deposits held in the state of Texas total approximately \$2.2 billion, which represents 11.9 percent of total bank deposits. The bank added 23 branches in Texas during the review period through acquisition activity. The bank closed eight branches during the review period.

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Pine Bluff, Arkansas

Texas

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

Bank's performance under the Lending Test is rated low satisfactory. The test considers the bank's performance under the following criteria.

Lending Activity

Full-Scope Review Areas	Lending Activity
Dallas MSA	Adequate
Sherman MSA	Adequate
OVERALL	ADEQUATE

The bank's Texas 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 within the Texas assessment areas.

Geographic and Borrower Distribution

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

Full-Scope Review Areas	Geographic Distribution of Loans
Dallas MSA	Adequate
Sherman MSA	Good
OVERALL	ADEQUATE

Performance by borrower's income or revenue profile is adequate in the state of Texas, as shown in the following tables.

Full-Scope Review Areas	Loan Distribution By Borrower's Profile
Dallas MSA	Poor
Sherman MSA	Good
OVERALL	ADEQUATE

Community Development Lending Activities

Overall, the bank makes a relatively high level of community development loans in the state of Texas, as displayed below.

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Full-Scope Review Areas	Community Development Lending
Dallas MSA	Relatively High
Sherman MSA	Adequate
OVERALL	RELATIVELY HIGH

During the review period, the bank made 19 community development loans totaling \$43.9 million throughout the Texas assessment areas. An additional two PPP loans with a community development purpose were made in the greater statewide area totaling \$3.3 million.

INVESTMENT TEST

The bank is rated high satisfactory under the Investment Test. The following tables display investment and grant activity performance for the Texas assessment areas.

Full-Scope Review Areas	Investment and Grant Activity
Dallas MSA	Excellent
Sherman MSA	Adequate
OVERALL	SIGNIFICANT

The bank made a total of \$51.0 million in qualified community development investments and \$197,875 in donations and grants in the Texas assessment areas. Of the total statewide investments, \$37.6 million were made in the current review period, while \$13.4 million were made prior to the review period but were still outstanding.

SERVICE TEST

The bank's performance in Texas is rated high satisfactory under the Service Test.

Accessibility of Delivery Systems

As displayed in the following table, the bank's service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in Texas assessment areas.

Full-Scope Review Areas	Accessibility of Delivery Systems
Dallas MSA	Reasonably Accessible
Sherman MSA	Reasonably Accessible
OVERALL	REASONABLY ACCESSIBLE

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Changes in Branch Locations

The bank's record of opening and closing branches in the Texas assessment areas has not adversely affected the accessibility of its service delivery systems, as shown in the table below.

Full-Scope Review Areas	Changes in Branch Locations
Dallas MSA	Not Adversely Affected
Sherman MSA	Not Adversely Affected
OVERALL	NOT ADVERSELY AFFECTED

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 Texas assessment areas, particularly LMI geographies and individuals. The bank's performance under this criteria is displayed by assessment area in the following table.

Full-Scope Review Areas	Reasonableness of Business Hours and Services
Dallas MSA	Do Not Vary/Inconvenience
Sherman MSA	Do Not Vary/Inconvenience
OVERALL	DO NOT VARY/INCONVENIENCE

Community Development Services

Throughout the Texas assessment areas, the bank provided a relatively high level of community development services.

Full-Scope Review Areas	Community Development Services
Dallas MSA	Relatively High
Sherman MSA	Limited
OVERALL	RELATIVELY HIGH

During the review period, 39 bank employees provided 198 community development services to 25 different organizations.

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Dallas MSA

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DALLAS-FORT WORTH-ARLINGTON, TEXAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DALLAS ASSESSMENT AREA

Bank Structure

The bank operates 27 branches in the Dallas assessment area, representing 11.7 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	Unknown-Income
0	6	10	10	1

During the review period, the bank acquired three branches in moderate-income census tracts, seven branches in middle-income census tracts, and six branches in upper-income census tracts. The bank also closed two branches in middle-income census tracts and four branches in upper-income census tracts. Based on its branch locations and other service delivery systems, such as online and mobile banking, and considering its reduced presence in the assessment area since the last examination, the bank may have to more heavily rely on digital delivery channels and outreach to deliver financial services to certain parts of the assessment area, particularly in southern Johnson County and northern Denton County.

General Demographics

The Dallas assessment area is composed of nine counties in the Dallas-Fort Worth-Arlington, Texas-Oklahoma CSA; including four of seven counties in the Dallas-Plano-Irving, Texas metropolitan division (Collin, Dallas, Denton, and Kaufman), three of four counties in the Fort-Worth-Arlington-Grapevine, Texas metropolitan division (Johnson, Parker, and Tarrant), and Palo Pinto and Henderson Counties located in micropolitan divisions in the CSA. While the bank has designated these as separate assessment areas, they are combined as the Dallas assessment area for the purposes of this evaluation and represent an expanded assessment area delineation since the last examination, when only Dallas, Johnson, and Tarrant counties comprised the Dallas assessment area.

The banking market in the assessment area is highly competitive, with 155 FDIC-insured depository institutions operating 1,587 branches. Of these institutions, Simmons Bank ranks 26th in deposit market share, with 0.2 percent of all assessment area deposit dollars.

Competition for HMDA and CRA loans is similarly high. An analysis of 2020 HMDA-reportable loans shows that 1,060 institutions had loan activity in the assessment area, of which Simmons Bank ranked 116th, with less than 1.0 percent of total HMDA loans. Simmons Bank ranked 29th out of 377 institutions with CRA loan activity in the assessment area, accounting for less than 1.0 percent of total CRA loan activity.

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The assessment area covers a large metropolitan area with a diverse population and demographic composition. As such, credit needs in the assessment area are varied and include a blend of consumer and commercial loan and deposit products. Particular credit needs noted by community contacts include micro loans for small business with flexible underwriting requirements and financial literacy and business management training for new small businesses. Finally, as a large metropolitan area with a diverse population, there are numerous opportunities for banks to participate in community development efforts.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	163	12.9%	147,943	9.4%
Moderate	331	26.2%	368,416	23.3%
Middle	353	27.9%	476,831	30.2%
Upper	412	32.5%	586,322	37.1%
Unknown	7	0.6%	1,488	0.1%
TOTAL	1,266	100%	1,581,100	100%

As displayed in the preceding table, 39.1 percent of census tracts in the assessment area are designated as low- or moderate-income tracts, with 32.7 percent of all assessment area families residing in those census tracts. The majority of LMI census tracts are concentrated in southern Dallas County and central Tarrant County.

According to 2015 ACS data, the median family income for the Dallas assessment area was \$69,711, while the same figure for the state of Texas as a whole was \$62,717. More recently, the FFIEC estimates the median family income for the Dallas metropolitan division (MD) to be \$83,100 in 2019 and \$86,200 in 2020. The estimated median family income levels for the Fort Worth MD was \$75,300 in 2019 and \$81,100 in 2020. The following table displays the distribution of assessment area families by income level compared to all Texas families.

Family Population by Income Level								
	Assessment Area		Texas		Dallas-Plano-Irving, Texas (MD)		Fort Worth-Arlington, Texas (MD)	
Low	369,736	23.4%	1,474,125	23.2%	260,862	23.7%	124,263	22.4%
Moderate	261,587	16.6%	1,068,177	16.8%	181,196	16.5%	92,202	16.6%
Middle	286,144	18.1%	1,162,520	18.3%	193,268	17.6%	108,109	19.5%
Upper	663,533	42.0%	2,659,282	41.8%	463,554	42.2%	231,139	41.6%
TOTAL	1,581,000	100%	6,364,104	100%	1,098,880	100%	555,713	100%

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Based on the information in the preceding table, 40.0 percent of families in the assessment area are LMI; this figure equals the percentage of families who are in LMI in the state of Texas as a whole (40.0 percent) and is comparable to the LMI family percentage in the Dallas and Fort Worth MDs individually. While not shown in the table above, poverty levels in the assessment area (11.5 percent) are below that of the state of Texas as a whole (13.5 percent) and comparable to poverty levels in the Dallas MD (11.5 percent) and Fort Worth MD (11.0 percent). Overall, this data points to the assessment area being slightly more affluent than the state of Texas as a whole but comparable to the full Dallas and Fort Worth MDs.

Housing Demographics

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

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$156,286	38.0%	\$938
Texas	\$136,000	39.1%	\$882

Overall, housing costs in the assessment area are slightly less affordable than the state of Texas as a whole. Affordability within the assessment area varies, with Johnson County being the most affordable, with a ratio of 48.8 percent, and Dallas County being the least affordable at 37.9 percent.

Industry and Employment Demographics

The assessment area economy is large and well diversified. The assessment area is highly urban and has a total population of 6,486,689, the overwhelming majority of which is split between Dallas County (2,485,003) and Tarrant County (1,914,526). The assessment area hosts strong technology, financial and banking, and manufacturing sectors, and serves as the headquarters for numerous large national and multinational corporations such as AT&T, ExxonMobil, McKesson, and American Airlines. The assessment area also includes several universities and colleges, most notably Texas Christian University, Southern Methodist University, and the University of Texas at Dallas.

County business patterns data indicate that there are 3,501,863 paid employees in the assessment area, with the largest industries by number of paid employees being healthcare and social assistance (10.7 percent), retail trade (10.2 percent), and government (10.0 percent). Furthermore, professional, scientific, and technical services are a key industry in the assessment area, accounting for 16.0 percent of all private business establishments. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 92.3 percent of businesses have annual revenues of \$1 million or less.

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The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Texas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Texas
2019	3.3%	3.5%
2020	7.2%	7.7%
2021	5.1%	5.7%

Unemployment levels in the assessment area remained lower than statewide levels throughout the review period, including during the pandemic. Counties within the assessment area showed relatively similar unemployment levels over the period, with Parker County consistently having the lowest unemployment rate.

Community Contact Information

For the Dallas assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized.

Contacts describe Dallas overall as a thriving area, with strong business growth and opportunities. To this end, Dallas is home to nine Fortune 500 corporate headquarters, is a major transit hub, and the city continues to experience an influx of employers from other states. Nonetheless, the city can be divided into areas with varying economic conditions in each. West Dallas contains mixed-use developments, multifamily housing, and warehouses. It is also experiencing gentrification. East Dallas is characterized by smaller industries, such as tool and die companies. North Dallas and the downtown area are predominantly office and service-oriented jobs. South Dallas continues to have its challenges in achieving parity with the rest of Dallas, according to the contacts. Geographies south of Interstate 30 have less access to financial resources than those north of the interstate, and most census tracts in this area are LMI.

Housing barriers include rising costs due to high demand for both owner-occupied and rental housing. Affordable housing, particularly for first-time homebuyers, fails to meet area demand. Zoning and land use laws can also prevent redevelopment efforts, according to one contact.

Small business needs, according to one contact, include financial literacy and business management training. The contact noted that many new small businesses use nontraditional payment services, such as PayPal and Cash App, and do not establish deposit accounts with local banks. As a result, when credit needs arise, they lack the established relationships needed with many banks to procure financing. The contact noted the need for small dollar business loans and more flexible lending products for small business owners with minimal business history and/or low personal credit scores. The contact noted that most of the businesses in South Dallas fall into this category and thus struggle to obtain needed financing for their businesses.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects poor penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes a relatively high level of community development loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	6	0.2%	544	0.1%
Home Purchase	371	13.1%	114,413	17.7%
Multifamily Housing	9	0.3%	7,718	1.2%
Refinancing	534	18.9%	160,528	24.9%
Other Purpose LOC	6	0.2%	579	0.1%
Other Purpose Closed/Exempt	12	0.4%	4,033	0.6%
Total HMDA	938	33.2%	287,815	44.6%
Small Business	1,871	66.2%	354,861	55.0%
Small Farm	17	0.6%	2,451	0.4%
TOTAL LOANS	2,826	100.0%	645,127	100.0%

As a percentage of the 2019 and 2020 loans made inside the bank's combined assessment areas, the bank originated 8.2 percent of its HMDA and CRA loans in the Dallas assessment area. At the same time, the bank operates 11.7 percent of its total branches and, as of June 30, 2020, holds 8.9 percent of its total deposits in the assessment area. Considering this comparison data, the bank's level of lending represents adequate responsiveness to the credit needs of the Dallas assessment area.

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Geographic Distribution of Loans

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

HMDA Lending

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

The bank's level of HMDA lending in low-income geographies in 2019 (3.8 percent) is in line with the aggregate lending level (3.0 percent) and slightly below demographic levels (5.0 percent), reflecting adequate performance. In 2020, both bank (1.7 percent) and aggregate (2.5 percent) declined but remain comparable; this is considered adequate.

The bank originated 11.1 percent of its HMDA loans in moderate-income census tracts in 2019, compared to 13.1 percent for aggregate lenders and a demographic of 19.7 percent; this is considered adequate. The bank's percentage of HMDA loans in moderate-income census tracts in 2020 declined to 4.3 percent, which trailed aggregate (10.9 percent) and was again below demographic (19.7 percent), reflecting poor performance.

Small Business Lending

Overall, the bank's geographic distribution of small business loans is considered adequate.

The bank originated 6.5 percent of its small business loans in low-income census tracts in 2019, which was in line with aggregate performance (6.7 percent) and the demographic figure (7.3 percent) and is considered adequate. Similarly, in 2020, the bank originated 6.8 percent of its small business loans in low-income census tracts, which was again in line with aggregate lenders (7.1 percent) and the demographic (7.3 percent) and reflects adequate performance.

The bank's lending in moderate-income census tracts was also adequate for both 2019 and 2020. The bank originated 17.1 percent of its small business loans in moderate-income geographies in 2019 and 2020, compared to aggregate levels of 18.9 percent in 2019 and 19.0 percent in 2020 and a demographic level of 19.8 percent in 2019 and 19.7 percent in 2020.

The bank's loan dispersion supports the conclusion that the bank's distribution of loans by geography income level is adequate. In 2019, the bank had loan activity in 33.6 percent of all assessment area census tracts and 20.4 percent of all LMI census tracts. In 2020, the bank's loan dispersion improved, with loan activity in 47.9 percent of all assessment area census tracts and 33.6 percent of all LMI census tracts. While some lending gaps were identified in the dispersion of the bank's HMDA and CRA loans, including in LMI geographies, the dispersion of the bank's loans was consistent with its branch structure in the assessment area. Additionally, as noted above, the assessment area is a highly competitive banking market, with over 1,000 HMDA lenders and over 350 small business lenders in 2020, of which the bank originated less than 1.0 percent for both loan products.

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Loan Distribution by Borrower's Profile

The bank's distribution of loans by income or revenue profile is poor.

HMDA Lending

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

The bank originated 1.4 percent of its 2019 HMDA loans to low-income borrowers, which trails the level of lending to low-income borrowers by peer institutions in the assessment area (3.6 percent) and is well below the demographic figure (23.4 percent), reflecting poor performance. The bank's level of HMDA lending to low-income borrowers dropped to 0.5 percent in 2020, again trailing aggregate lenders (3.1 percent) and the demographic and reflects poor performance.

The bank's HMDA lending to moderate-income borrowers was also poor for both 2019 (8.3 percent) and 2020 (6.6 percent). This performance again trailed peers (13.9 percent in 2019 and 12.7 percent in 2020) and was below demographic levels (16.5 percent).

Small Business Lending

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

In 2019, the bank made 44.9 percent of its loans to businesses with annual revenues of \$1 million or less. This was in line with aggregate lending levels (47.0 percent) but below the demographic level (92.0 percent), reflecting adequate performance. In 2020, the bank originated 27.4 percent of its loans to businesses with annual revenues of \$1 million or less, which was below aggregate lenders (37.7 percent) and the demographic (92.3 percent) and is considered poor.

Community Development Lending Activities

The bank makes a relatively high level of community development loans in the Dallas assessment area. During the review period, the bank made 16 community development loans totaling \$39.6 million, which supported community development purposes of economic development (two), revitalization and stabilization of a moderate-income geography (ten), and affordable housing (four). These loans include ten PPP loans with a community development purpose totaling \$16.3 million, a \$13.7 million loan to construct a senior living apartment building to serve LMI residents, and a \$3.0 million participation loan to build affordable single-family loans. The PPP loans are responsive to the needs of small businesses during the pandemic, while the affordable housing loans address a need stated by community contacts.

INVESTMENT TEST

The bank made an excellent level of qualified community development investments and grants in the assessment area. Qualified community development investments held during the review period totaled \$35.6 million. Of this total, \$22.2 million was invested in school bonds, while the

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remaining \$13.4 million was made in MBS providing affordable housing loans to LMI individuals in the assessment area. The bank also received credit for \$13.4 million in investments in MBS that were made prior to the review period but are still outstanding.

In addition to these investments, the bank made 75 donations totaling \$175,875, including two Simmons First Foundation grants totaling \$26,000.

SERVICE TEST

Service delivery systems are accessible to portions of the assessment area. 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. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 27 branches in the Dallas 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	6	10	10	1	27
	0.0%	22.2%	37.0%	37.0%	3.7%	100%
Census Tracts	12.9%	26.2%	27.9%	32.5%	0.6%	100%
Household Population	9.4%	23.3%	30.2%	37.1%	0.1%	100%

The bank operates six, or 22.2 percent, of its assessment area branches in LMI census tracts. This branch distribution is below the percentage of assessment area census tracts that are LMI (39.1 percent) and the household population in LMI census tracts (32.7 percent). Of the bank's locations in middle- and upper-income geographies, 11 are within one mile of LMI census tracts and four are within two miles of these geographies. Therefore, the bank's service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank closed two branches in middle-income census tracts and four in upper-income census tracts. Nonetheless, as noted above, the bank maintains a significant presence throughout the assessment area. Therefore, the bank's record of opening and closing

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branches in this assessment area has not adversely impacted the accessibility of its service delivery systems.

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 assessment area, particularly LMI geographies and individuals. All branches have generally similar operating hours and services, and the same products are offered at each location.

Community Development Services

Simmons Bank employees provided a relatively high level of community development services in the assessment area. During the review period, 38 bank employees provided 188 community development services to 24 different organizations throughout the assessment area. Many of the bank's service efforts consisted of financial literacy training at various schools across the assessment area. Employees also served on the boards of directors of various community development organizations in the assessment area.

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Sherman MSA

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SHERMAN-DENISON, TEXAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SHERMAN-DENISON ASSESSMENT AREA

Bank Structure

The bank operates six branches in the Sherman-Denison assessment area, representing 2.6 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	Unknown-Income
0	0	3	2	1

This is a new assessment area for the bank. The bank gained five branches through the acquisition of Landmark Bank in February 2020, in addition to a branch it acquired in 2018; two branches were subsequently closed. Based on its branch locations and other service delivery systems, such as online and mobile banking, the bank may have to more heavily rely on digital delivery channels and outreach to deliver financial services to certain parts of the assessment area, particularly in Cooke County.

General Demographics

The assessment area is composed of the two contiguous Texas counties of Cooke and Grayson. Grayson County comprises the entirety of the Sherman-Denison MSA, while Cooke County is part of the Gainesville, Texas, micropolitan statistical area and lies directly west of Grayson County. The assessment area has a total population of 161,541, with most of the population residing in Grayson County (122,780). While the assessment area sits just north of the Dallas assessment area, it is much more rural and less populated.

The Sherman-Denison assessment area's banking market consists of 16 institutions operating 50 branches. Of these institutions, the bank ranks third in deposit market share, with 13.0 percent of all assessment area deposit dollars. Bank deposits held in branches in the assessment area represent 3.8 percent of the bank's total deposits. While there are only 16 institutions with branches in the assessment area, competition for HMDA and CRA loans is much higher. An analysis of 2020 HMDA-reportable loans shows that 405 institutions had loan activity in the assessment area, of which Simmons Bank ranked 23rd, with 1.1 percent of total HMDA loans. Out of 106 institutions with CRA loan activity, Simmons Bank ranked fifth, with 6.7 percent of total CRA loan activity.

Credit needs of the assessment area are varied and include a blend of consumer, business, and agricultural credit products. A community contact indicated a need for small business loans and affordable housing programs.

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Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	10	29.4%	8,109	19.0%
Middle	15	44.1%	20,477	47.9%
Upper	9	26.5%	14,128	33.1%
Unknown	0	0.0%	0	0.0%
TOTAL	34	100.0%	42,714	100.0%

There are no low-income census tracts in the assessment area, and 29.4 percent of the census tracts in the assessment area are moderate income, with 19.0 percent of the family population in the assessment area residing in those tracts.

Based on 2015 ACS data, the median family income for the assessment area is \$60,947, which is below the median family income for the state of Texas as a whole (\$62,717). More recently, the FFIEC estimated the median family income for the Sherman-Denison MSA to be \$67,500 in 2019 and \$76,000 in 2020. The following table compares the population of assessment area families by income level to the state of Texas.

Family Population by Income Level				
	Assessment Area		Texas	
Low	9,007	21.1%	1,474,125	23.2%
Moderate	7,246	17.0%	1,068,177	16.8%
Middle	8,154	19.1%	1,162,520	18.3%
Upper	18,307	42.9%	2,659,282	41.8%
TOTAL	42,714	100%	6,364,104	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 (38.1 percent) than reside in LMI geographies (19.0 percent). The percentage of LMI families in the assessment area is slightly below statewide levels (40.0 percent). Additionally, the poverty level in the assessment area (12.1 percent) is slightly below the statewide figure (13.5 percent). Overall, when considering income and poverty levels, the assessment area is slightly more affluent than the state of Texas as a whole.

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Sherman MSA

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Housing Demographics

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

Housing Demographics			
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)
Assessment Area	\$110,842	44.4%	\$766
Texas	\$136,000	39.1%	\$882

Housing costs in the assessment area are lower than the state of Texas and when adjusting for income levels render the assessment area more affordable. Additionally, the percentage of renters with rental costs in excess of 30 percent of their income in the assessment area (41.1 percent) is lower than statewide (44.7 percent). Thus, both homeownership and renting are more affordable in the assessment than statewide.

Industry and Employment Demographics

County business patterns indicate that there are 62,330 paid employees in the assessment area. By number of paid employees, the three largest industries are healthcare and social assistance (17.0 percent), government (16.1 percent), and manufacturing (13.2 percent). Of all businesses operating in the assessment area, 91.7 percent reported annual revenues of \$1 million or less, indicating that small businesses play an important role in the assessment area economy.

The following table displays unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for each county in the assessment area, the assessment area as a whole, and the state of Texas.

Unemployment Levels for the Assessment Area		
Time Period (Annual Average)	Assessment Area	Texas
2019	3.0%	3.5%
2020	6.2%	7.7%
2021	4.7%	5.7%

The unemployment level for the assessment area overall is lower than statewide unemployment levels over the period, and both counties in the assessment area are closely aligned. Cooke County appears to have been more heavily impacted by the pandemic, with an unemployment rate of 7.1 percent in 2020 compared to 5.9 percent for Grayson County, though both were still below statewide levels.

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Community Contact Information

A community contact interview was conducted with an individual familiar with economic development in the Sherman assessment area. The contact noted that the local economy is stable, with low unemployment. Local industry includes manufacturing and technology, along with a number of restaurants and small businesses. The contact further noted that infrastructure improvements are needed in some area to support the growth of larger industries. Restaurants and small businesses were most heavily impacted by the pandemic, but most recovered and been able to reopen. One residual effect includes a diminished workforce, as some individuals who could not work during the pandemic have chosen not to return to the workforce.

The contact noted that new home construction is strong in the assessment area but that these properties are not affordable. Additionally, many available rental units are also expensive. Affordable housing is scarce and does not meet demand. Barriers to homeownership, besides a lack of housing stock, include insufficient incomes, poor credit histories, and lack of financial education.

Small business opportunities exist, according to the contact, but are hampered by a lack of start-up capital, persistent supply chain issues, and lack of affordable rental space. Opportunities exist for banks to support small businesses by developing relationships and offering start-up and low interest loans.

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Sherman MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SHERMAN ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes an adequate level of community development loans in the assessment area.

As the bank entered the market in 2020, loan activity in 2019 was not included in the review. Finally, small business lending was given more weight in determining overall performance conclusions due to its relatively higher volume of loans in 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, 2019 through December 31, 2020				
Loan Type	#	%	\$ (000s)	%
Home Improvement	4	1.0%	272	0.5%
Home Purchase	52	13.2%	12,596	23.3%
Multifamily Housing	0	0.0%	0	0.0%
Refinancing	40	10.2%	10,502	19.4%
Other Purpose Closed/Exempt	1	0.3%	63	0.1%
Total HMDA	97	24.7%	23,433	43.3%
Small Business	275	70.0%	28,536	52.7%
Small Farm	21	5.3%	2,158	4.0%
TOTAL LOANS	393	100.0%	54,127	100.0%

As a percentage of the 2020 loans made inside the bank's combined assessment areas, the bank originated 1.1 percent of its HMDA and CRA loans in the Sherman assessment area. At the same time, the bank operates 2.6 percent of its total branches and as of June 30, 2020, holds 3.8 percent of its total deposits in the assessment area. Considering this comparison data and the bank's recent entry in this market, the bank's level of lending represents adequate responsiveness to the credit needs of the Sherman assessment area.

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Pine Bluff, Arkansas

Sherman MSA

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Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good. As noted in the *Income and Wealth Demographics* section, there are no low-income census tracts in the assessment area, so performance is based on activity in moderate-income census tracts only.

HMDA Lending

The geographic distribution of HMDA loans is poor. The bank's percentage of HMDA loans made in moderate-income census tracts in 2020 (7.2 percent) is below aggregate lending performance (11.5 percent) and demographic levels (17.2 percent).

Small Business Lending

The bank's geographic distribution of small business loans is excellent. In 2020, the bank made 29.2 percent of its small business loans in moderate-income geographies, which exceeds aggregate lenders (22.9 percent) and the demographic level (22.8 percent).

Lastly, the bank made loans in all assessment area census tracts. Thus, no conspicuous lending gaps were identified.

Loan Distribution by Borrower's Profile

The bank's borrower distribution in the Sherman-Denison assessment area is good.

HMDA Lending

The bank's borrower distribution of HMDA loans is good.

The bank originated 4.1 percent of its HMDA loans to low-income borrowers in 2020, which is in line with aggregate lenders (3.7 percent) and below demographic levels (21.1 percent), reflecting adequate performance.

The bank originated 17.5 percent of its HMDA loans to moderate-income borrowers in 2020, which exceeds aggregate lenders (13.6 percent) and the demographic (17.0 percent), reflecting excellent performance.

Small Business Lending

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

In 2020, the bank made 33.6 percent of small business loans to businesses with annual revenues of \$1 million or less. While below the percentage of total assessment area businesses with annual revenues of \$1 million or less (91.7 percent), this level of lending was in line with peer institutions in the assessment area (29.7 percent) and is considered adequate.

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Pine Bluff, Arkansas

Sherman MSA

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Community Development Lending Activities

The bank makes an adequate level of community development loans in the Sherman assessment area. During the review period, the bank made three community development loans totaling \$4.3 million, all of which were PPP loans with a community development purpose.

INVESTMENT TEST

The bank made an adequate level of qualified community development investments and grants in the assessment area. Qualified community development investments made during the review period totaled \$2.0 million, all of which consisted of MBS providing affordable housing loans to LMI individuals in the assessment area.

In addition to these investments, the bank made eight donations totaling \$22,000 to organizations serving the community service and affordable housing needs of the assessment area.

SERVICE TEST

Service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area. 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. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a limited level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates six branches in the Sherman 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	3	2	1	6
	0.0%	0.0%	50.0%	33.3%	16.7%	100%
Census Tracts	0.0%	29.4%	44.1%	26.5%	0.0%	100%
Household Population	0.0%	19.0%	47.9%	33.1%	0.0%	100%

The bank does not operate any branches in LMI geographies, while the percentage of assessment area census tracts that are LMI is 29.4 percent and the household population in LMI census tracts is 19.0 percent. Of the bank's locations in middle- and upper-income geographies, two are within one mile of LMI census tracts. Therefore, the bank's service delivery systems are reasonably

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accessible to the bank's geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank acquired two branches in middle-income census tracts, four branches in upper-income census tracts, and one branch in an unknown-income census tract. The bank also closed two branches in upper-income census tracts during the review period. Nonetheless, as noted earlier, the bank's remaining branches are reasonably accessible to assessment area consumers. Therefore, the bank's record of opening and closing branches in this assessment area has not adversely impacted the accessibility of its service delivery systems.

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 assessment area, particularly LMI geographies and individuals. All branches have generally similar operating hours and services, and the same products are offered at each location.

Community Development Services

Simmons Bank provides a limited level of community development services in the assessment area. During the review period, one bank employee provided ten community development services to an organization that provides services to LMI residents in the assessment area.

SCOPE OF EXAMINATION TABLES

Scope of Examination		
TIME PERIOD REVIEWED	January 1, 2019 to December 31, 2020 for HMDA, small business, and small farm lending January 6, 2020 to June 30, 2022 for community development loans, investment, and service activities	
FINANCIAL INSTITUTION	PRODUCTS REVIEWED	
Simmons Bank Pine Bluff, Arkansas	Small Business HMDA Small Farm	
AFFILIATES	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
N/A	N/A	N/A

Appendix A (continued)

Assessment Area – Examination Scope Details					
Assessment Area	Rated Area	# of Offices	Deposits (\$ 000s) (as of June 30, 2021)	Branches Visited	CRA Review Procedures
Kansas City Multistate MSA	Kansas City	2	\$197,865	-	Full-Scope
Fayetteville MSA	Arkansas	8	\$452,534	-	Full-Scope
Little Rock MSA	Arkansas	19	\$2,285,224	-	Full-Scope
Pine Bluff MSA	Arkansas	8	\$2,062,214	-	Full-Scope
Fort Smith MSA	Arkansas	5	\$256,529	-	Limited-Scope
Hot Springs MSA	Arkansas	3	\$257,710	-	Limited-Scope
Jonesboro MSA	Arkansas	4	\$461,636	-	Limited-Scope
Arkansas NonMSA	Arkansas	17	\$1,051,264	-	Full-Scope
Wichita MSA	Kansas	3	\$183,079	-	Full-Scope
Kansas NonMSA	Kansas	1	\$92,092	-	Limited-Scope
St. Louis MSA	Missouri	17	\$1,618,113	-	Full-Scope
Columbia MSA	Missouri	6	\$912,203	-	Limited-Scope
Joplin MSA	Missouri	1	\$140,042	-	Limited-Scope
Springfield MSA	Missouri	7	\$443,616	-	Limited-Scope
Missouri NonMSA	Missouri	13	\$824,808	-	Full-Scope
Oklahoma City MSA	Oklahoma	6	\$577,430	-	Full-Scope
Tulsa MSA	Oklahoma	1	\$220,745	-	Limited-Scope
Southern Oklahoma NonMSA	Oklahoma	8	\$967,750	-	Full-Scope
Payne County NonMSA	Oklahoma	4	\$546,458	-	Limited-Scope
Nashville MSA	Tennessee	11	\$695,459	-	Full-Scope
Jackson MSA	Tennessee	4	\$357,708	-	Limited-Scope
Knoxville MSA	Tennessee	2	\$123,292	-	Limited-Scope
Memphis MSA	Tennessee	10	\$206,689	-	Limited-Scope
Western Tennessee NonMSA	Tennessee	11	\$909,280	-	Full-Scope
Eastern Tennessee NonMSA	Tennessee	5	\$472,838	-	Limited-Scope
Dallas MSA	Texas	27	\$1,638,314	-	Full-Scope
Sherman MSA	Texas	6	\$573,931	-	Full-Scope
OVERALL		230	\$18,528.823	-	14 Full-Scope

Appendix B

SUMMARY OF STATE AND MULTISTATE METROPOLITAN RATINGS

State or Multistate MSA	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Kansas City MSA	Low Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Arkansas	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
Kansas	Low Satisfactory	Outstanding	Outstanding	Satisfactory
Missouri	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Oklahoma	Low Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Tennessee	Low Satisfactory	High Satisfactory	Outstanding	Satisfactory
Texas	Low Satisfactory	High Satisfactory	High 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
Kansas City MSA	6	4	4	14	Satisfactory
Arkansas	9	4	4	17	Satisfactory
Kansas	6	6	6	18	Satisfactory
Missouri	9	6	4	19	Satisfactory
Oklahoma	6	3	4	13	Satisfactory
Tennessee	6	4	6	16	Satisfactory
Texas	6	4	4	14	Satisfactory

Appendix C

LENDING PERFORMANCE TABLES BY FULL-SCOPE ASSESSMENT AREA

KANSAS CITY

Distribution of 2019 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	11.1%	317	7.4%	6.2%	4.0%	1.9%
Moderate	2	11.1%	148	3.4%	16.1%	15.8%	9.1%
Middle	7	38.9%	1,244	29.0%	33.3%	34.7%	28.9%
Upper	7	38.9%	2,584	60.2%	44.2%	45.3%	59.9%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	18	100.0%	4,293	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	18.2%	30	2.0%	6.2%	2.1%	1.2%
Moderate	0	0.0%	0	0.0%	16.1%	10.3%	5.9%
Middle	1	9.1%	191	12.9%	33.3%	31.2%	24.6%
Upper	8	72.7%	1,254	85.0%	44.2%	56.2%	68.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	11	100.0%	1,475	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	6.2%	1.6%	1.3%
Moderate	1	20.0%	20	11.0%	16.1%	9.2%	5.1%
Middle	0	0.0%	0	0.0%	33.3%	26.7%	19.9%
Upper	4	80.0%	162	89.0%	44.2%	62.5%	73.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	5	100.0%	182	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	6.2%	3.6%	2.4%
Moderate	1	100.0%	120	100.0%	16.1%	13.9%	7.8%
Middle	0	0.0%	0	0.0%	33.3%	33.3%	24.1%
Upper	0	0.0%	0	0.0%	44.2%	49.2%	65.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	1	100.0%	120	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner- Occupied Units		
Low	4	11.4%	347	5.7%		6.2%	3.2%
Moderate	4	11.4%	288	4.7%	16.1%	13.4%	8.6%
Middle	8	22.9%	1,435	23.6%	33.3%	33.0%	28.4%
Upper	19	54.3%	4,000	65.9%	44.2%	50.2%	60.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	35	100.0%	6,070	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	10.0%	30	1.2%	6.2%	4.4%	2.1%
Moderate	0	0.0%	0	0.0%	16.1%	15.8%	9.3%
Middle	2	20.0%	406	16.4%	33.3%	33.9%	28.6%
Upper	7	70.0%	2,042	82.4%	44.2%	45.7%	59.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	10	100.0%	2,478	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	6.2%	1.4%	0.8%
Moderate	2	11.8%	270	9.7%	16.1%	7.9%	4.5%
Middle	5	29.4%	735	26.4%	33.3%	29.1%	22.8%
Upper	10	58.8%	1,779	63.9%	44.2%	61.5%	71.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	17	100.0%	2,784	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	13.6%	20.2%	15.9%
Moderate	0	0.0%	0	0.0%	23.2%	30.3%	11.4%
Middle	1	100.0%	448	100.0%	36.0%	29.8%	48.2%
Upper	0	0.0%	0	0.0%	25.2%	19.3%	24.4%
Unknown	0	0.0%	0	0.0%	2.0%	0.5%	0.1%
TOTAL	1	100.0%	448	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	6.2%	1.5%	0.7%
Moderate	1	50.0%	40	21.2%	16.1%	9.4%	5.0%
Middle	0	0.0%	0	0.0%	33.3%	26.1%	19.0%
Upper	1	50.0%	149	78.8%	44.2%	62.7%	75.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.4%
TOTAL	2	100.0%	189	100.0%	100.0%	0.0%	0.0%
Total Home Mortgage Loans					% of Owner- Occupied Units		
Low	1	3.3%	30	0.5%	6.2%	2.6%	2.0%
Moderate	3	10.0%	310	5.3%	16.1%	11.1%	6.7%
Middle	8	26.7%	1,589	26.9%	33.3%	30.9%	26.2%
Upper	18	60.0%	3,970	67.3%	44.2%	55.2%	64.9%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	30	100.0%	5,899	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	7.9%	\$1,836	18.2%	7.4%	6.5%	8.8%
Moderate	2	5.3%	\$140	1.4%	16.9%	14.6%	14.6%
Middle	8	21.1%	\$589	5.8%	31.3%	28.0%	26.6%
Upper	23	60.5%	\$7,307	72.3%	42.4%	47.5%	44.4%
Unknown	2	5.3%	\$230	2.3%	2.0%	3.4%	5.6%
TOTAL	38	100.0%	\$10,102	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	15	14.0%	\$2,652	18.4%	7.5%	6.6%	8.5%
Moderate	7	6.5%	\$645	4.5%	17.1%	15.3%	15.2%
Middle	26	24.3%	\$1,457	10.1%	31.2%	28.5%	28.4%
Upper	54	50.5%	\$8,947	62.1%	42.2%	47.0%	42.6%
Unknown	5	4.7%	\$716	5.0%	2.0%	2.7%	5.4%
TOTAL	107	100.0%	\$14,417	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	11.1%	245	5.7%	20.4%	8.6%	4.3%
Moderate	4	22.2%	696	16.2%	16.6%	20.5%	14.8%
Middle	4	22.2%	406	9.5%	19.5%	22.3%	20.3%
Upper	6	33.3%	2,502	58.3%	43.4%	37.1%	50.0%
Unknown	2	11.1%	444	10.3%	0.0%	11.4%	10.6%
TOTAL	18	100.0%	4,293	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	18.2%	202	13.7%	20.4%	6.2%	3.1%
Moderate	0	0.0%	0	0.0%	16.6%	14.6%	9.7%
Middle	0	0.0%	0	0.0%	19.5%	20.5%	17.3%
Upper	6	54.5%	1,193	80.9%	43.4%	41.6%	53.3%
Unknown	3	27.3%	80	5.4%	0.0%	17.1%	16.7%
TOTAL	11	100.0%	1,475	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	20.0%	28	15.4%	20.4%	4.7%	2.6%
Moderate	0	0.0%	0	0.0%	16.6%	12.8%	8.1%
Middle	3	60.0%	75	41.2%	19.5%	21.7%	14.9%
Upper	1	20.0%	79	43.4%	43.4%	57.8%	70.8%
Unknown	0	0.0%	0	0.0%	0.0%	3.0%	3.5%
TOTAL	5	100.0%	182	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	100.0%	120	100.0%	20.4%	9.2%	6.8%
Moderate	0	0.0%	0	0.0%	16.6%	15.7%	9.5%
Middle	0	0.0%	0	0.0%	19.5%	20.7%	14.7%
Upper	0	0.0%	0	0.0%	43.4%	48.6%	60.8%
Unknown	0	0.0%	0	0.0%	0.0%	5.7%	8.2%
TOTAL	1	100.0%	120	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	6	17.1%	595	9.8%	20.4%	7.3%	3.4%
Moderate	4	11.4%	696	11.5%	16.6%	17.2%	11.4%
Middle	7	20.0%	481	7.9%	19.5%	21.1%	17.2%
Upper	13	37.1%	3,774	62.2%	43.4%	40.0%	47.3%
Unknown	5	14.3%	524	8.6%	0.0%	14.3%	20.7%
TOTAL	35	100.0%	6,070	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	10.0%	30	1.2%	20.4%	8.8%	4.4%
Moderate	0	0.0%	0	0.0%	16.6%	21.8%	15.9%
Middle	2	20.0%	578	23.3%	19.5%	21.9%	20.7%
Upper	7	70.0%	1,870	75.5%	43.4%	35.7%	47.9%
Unknown	0	0.0%	0	0.0%	0.0%	11.8%	11.0%
TOTAL	10	100.0%	2,478	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	5.9%	100	3.6%	20.4%	3.9%	1.9%
Moderate	3	17.6%	427	15.3%	16.6%	13.9%	9.3%
Middle	6	35.3%	1,035	37.2%	19.5%	21.3%	18.2%
Upper	7	41.2%	1,222	43.9%	43.4%	44.1%	53.8%
Unknown	0	0.0%	0	0.0%	0.0%	16.8%	16.8%
TOTAL	17	100.0%	2,784	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.4%	0.5%	0.0%
Moderate	0	0.0%	0	0.0%	16.6%	1.4%	0.1%
Middle	0	0.0%	0	0.0%	19.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	43.4%	4.6%	0.4%
Unknown	1	100.0%	448	100.0%	0.0%	93.6%	99.5%
TOTAL	1	100.0%	448	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.4%	3.8%	1.8%
Moderate	1	50.0%	40	21.2%	16.6%	13.1%	7.0%
Middle	0	0.0%	0	0.0%	19.5%	19.9%	14.4%
Upper	1	50.0%	149	78.8%	43.4%	60.5%	74.4%
Unknown	0	0.0%	0	0.0%	0.0%	2.8%	2.3%
TOTAL	2	100.0%	189	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	2	6.7%	130	2.2%	20.4%	5.6%	2.7%
Moderate	4	13.3%	467	7.9%	16.6%	16.3%	11.1%
Middle	8	26.7%	1,613	27.3%	19.5%	21.0%	18.0%
Upper	15	50.0%	3,241	54.9%	43.4%	40.9%	48.9%
Unknown	1	3.3%	448	7.6%	0.0%	16.2%	19.2%
TOTAL	30	100.0%	5,899	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	22	57.9%	46.3%	\$7,134	70.6%	31.2%	89.9%
	Over \$1 Million/ Unknown	16	42.1%	53.7%	\$2,968	29.4%	68.8%	10.1%
	TOTAL	38	100.0%	100.0%	\$10,102	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	19	50.0%	91.1%	\$955	9.5%	27.8%	
	\$100,001– \$250,000	7	18.4%	3.9%	\$1,175	11.6%	14.5%	
	\$250,001– \$1 Million	12	31.6%	5.0%	\$7,972	78.9%	57.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	38	100.0%	100.0%	\$10,102	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	10	45.5%		\$540	7.6%		
	\$100,001– \$250,000	3	13.6%		\$458	6.4%		
	\$250,001– \$1 Million	9	40.9%		\$6,136	86.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	22	100.0%		\$7,134	100.0%		

Appendix C (continued)

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	44	41.1%	37.7%	\$7,233	50.2%	21.2%	90.1%
	Over \$1 Million/ Unknown	63	58.9%	62.3%	\$7,184	49.8%	78.8%	9.9%
	TOTAL	107	100.0%	100.0%	\$14,417	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	70	65.4%	83.3%	\$2,583	17.9%	23.6%	
	\$100,001– \$250,000	23	21.5%	8.6%	\$3,444	23.9%	19.1%	
	\$250,001– \$1 Million	14	13.1%	8.1%	\$8,390	58.2%	57.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	107	100.0%	100.0%	\$14,417	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	32	72.7%		\$1,011	14.0%	
		\$100,001– \$250,000	4	9.1%		\$557	7.7%	
		\$250,001– \$1 Million	8	18.2%		\$5,665	78.3%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	44	100.0%		\$7,233	100.0%	

ARKANSAS

Fayetteville

Distribution of 2019 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	1.9%	813	1.7%	0.7%	0.7%	0.5%
Moderate	20	9.7%	3,869	8.0%	15.4%	10.6%	8.5%
Middle	90	43.5%	20,021	41.6%	46.2%	42.4%	39.0%
Upper	93	44.9%	23,377	48.6%	37.7%	46.3%	52.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	207	100.0%	48,080	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.7%	0.6%	0.3%
Moderate	9	13.2%	1,069	9.1%	15.4%	11.3%	8.3%
Middle	24	35.3%	4,057	34.7%	46.2%	41.6%	38.1%
Upper	35	51.5%	6,570	56.2%	37.7%	46.5%	53.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	68	100.0%	11,696	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.7%	0.9%	1.4%
Moderate	3	15.8%	278	19.5%	15.4%	12.2%	10.3%
Middle	11	57.9%	697	48.9%	46.2%	41.0%	34.9%
Upper	5	26.3%	450	31.6%	37.7%	45.9%	53.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	19	100.0%	1,425	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	1	33.3%	2,635	55.2%		11.4%	7.4%
Moderate	1	33.3%	350	7.3%	28.5%	34.2%	25.5%
Middle	1	33.3%	1,789	37.5%	30.4%	35.6%	48.8%
Upper	0	0.0%	0	0.0%	29.8%	22.8%	18.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	4,774	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.4%	12.7%	11.8%
Middle	11	68.8%	456	68.2%	46.2%	41.7%	38.8%
Upper	5	31.3%	213	31.8%	37.7%	45.6%	49.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	16	100.0%	669	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.7%	0.3%	0.4%
Moderate	0	0.0%	0	0.0%	15.4%	13.2%	10.1%
Middle	1	20.0%	103	13.6%	46.2%	41.1%	37.6%
Upper	4	80.0%	653	86.4%	37.7%	45.4%	51.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	756	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	5	1.6%	3,448	5.1%	0.7%	0.7%	1.2%
Moderate	33	10.4%	5,566	8.3%	15.4%	11.2%	10.3%
Middle	138	43.4%	27,123	40.2%	46.2%	42.1%	39.7%
Upper	142	44.7%	31,263	46.4%	37.7%	46.1%	48.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	318	100.0%	67,400	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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%	0.7%	0.5%	0.3%
Moderate	17	8.5%	3,091	7.0%	15.4%	10.7%	8.4%
Middle	106	52.7%	20,810	47.4%	46.2%	41.9%	38.9%
Upper	78	38.8%	20,010	45.6%	37.7%	47.0%	52.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	201	100.0%	43,911	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.7%	0.3%	0.2%
Moderate	11	8.1%	3,454	11.2%	15.4%	9.3%	7.1%
Middle	54	39.7%	10,591	34.4%	46.2%	37.8%	35.0%
Upper	71	52.2%	16,757	54.4%	37.7%	52.5%	57.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	136	100.0%	30,802	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.7%	0.3%	0.1%
Moderate	2	16.7%	140	18.5%	15.4%	9.2%	8.0%
Middle	4	33.3%	198	26.1%	46.2%	41.7%	41.3%
Upper	6	50.0%	420	55.4%	37.7%	48.8%	50.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	12	100.0%	758	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	11.4%	11.7%	10.2%
Moderate	1	100.0%	859	100.0%	28.5%	27.7%	19.1%
Middle	0	0.0%	0	0.0%	30.4%	41.3%	40.2%
Upper	0	0.0%	0	0.0%	29.8%	19.4%	30.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	859	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.7%	0.0%	0.0%
Moderate	1	33.3%	60	38.2%	15.4%	8.6%	6.1%
Middle	2	66.7%	97	61.8%	46.2%	35.4%	31.4%
Upper	0	0.0%	0	0.0%	37.7%	55.9%	62.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	157	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.7%	0.0%	0.0%
Moderate	1	14.3%	302	36.7%	15.4%	12.5%	7.9%
Middle	2	28.6%	100	12.2%	46.2%	43.1%	38.1%
Upper	4	57.1%	421	51.2%	37.7%	44.4%	54.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	7	100.0%	823	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.7%	0.4%	0.7%
Moderate	33	9.2%	7,906	10.2%	15.4%	10.2%	8.3%
Middle	168	46.7%	31,796	41.1%	46.2%	39.8%	37.0%
Upper	159	44.2%	37,608	48.6%	37.7%	49.5%	54.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	360	100.0%	77,310	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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%	1.9%	1.5%	2.8%
Moderate	42	13.4%	\$4,926	13.2%	17.0%	15.0%	16.3%
Middle	156	49.8%	\$16,634	44.4%	46.1%	44.4%	45.7%
Upper	115	36.7%	\$15,889	42.4%	34.9%	37.4%	34.5%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.7%	0.6%
TOTAL	313	100.0%	\$37,449	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	9	1.3%	\$1,635	2.0%	1.9%	1.9%	2.7%
Moderate	98	13.9%	\$11,012	13.5%	16.9%	15.4%	16.3%
Middle	330	46.7%	\$39,283	48.3%	45.8%	45.0%	43.9%
Upper	269	38.1%	\$29,475	36.2%	35.4%	37.5%	37.0%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.2%	0.1%
TOTAL	706	100.0%	\$81,405	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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%	0.0%	0.0%
Moderate	2	5.6%	\$46	1.5%	11.0%	7.9%	8.0%
Middle	26	72.2%	\$1,776	56.1%	60.3%	73.4%	70.6%
Upper	8	22.2%	\$1,345	42.5%	27.7%	18.3%	21.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.1%
TOTAL	36	100.0%	\$3,167	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%	0.8%	0.0%	0.0%
Moderate	3	9.1%	\$291	10.8%	10.9%	7.1%	8.4%
Middle	20	60.6%	\$1,520	56.2%	59.4%	75.7%	69.8%
Upper	10	30.3%	\$894	33.0%	28.9%	17.2%	21.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
TOTAL	33	100.0%	\$2,705	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	5.8%	1,353	2.8%	19.9%	5.2%	2.9%
Moderate	27	13.0%	4,334	9.0%	18.5%	17.0%	12.2%
Middle	27	13.0%	5,215	10.8%	20.3%	19.0%	16.4%
Upper	101	48.8%	27,640	57.5%	41.2%	43.2%	53.7%
Unknown	40	19.3%	9,538	19.8%	0.0%	15.5%	14.8%
TOTAL	207	100.0%	48,080	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	2.9%	159	1.4%	19.9%	6.8%	3.3%
Moderate	13	19.1%	1,393	11.9%	18.5%	13.5%	8.5%
Middle	9	13.2%	1,154	9.9%	20.3%	15.4%	11.9%
Upper	34	50.0%	6,920	59.2%	41.2%	44.5%	55.2%
Unknown	10	14.7%	2,070	17.7%	0.0%	19.8%	21.2%
TOTAL	68	100.0%	11,696	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	2	10.5%	80	5.6%	19.9%	5.2%	3.4%
Moderate	0	0.0%	0	0.0%	18.5%	13.4%	9.8%
Middle	1	5.3%	28	2.0%	20.3%	18.0%	14.4%
Upper	11	57.9%	729	51.2%	41.2%	52.8%	56.5%
Unknown	5	26.3%	588	41.3%	0.0%	10.6%	15.8%
TOTAL	19	100.0%	1,425	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	19.9%	0.7%	0.0%
Moderate	0	0.0%	0	0.0%	18.5%	0.7%	0.1%
Middle	0	0.0%	0	0.0%	20.3%	0.7%	0.1%
Upper	0	0.0%	0	0.0%	41.2%	8.1%	1.8%
Unknown	3	100.0%	4,774	100.0%	0.0%	89.9%	97.9%
TOTAL	3	100.0%	4,774	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	6.3%	16	2.4%	19.9%	3.9%	2.0%
Moderate	4	25.0%	150	22.4%	18.5%	12.2%	8.6%
Middle	2	12.5%	38	5.7%	20.3%	17.8%	12.6%
Upper	6	37.5%	353	52.8%	41.2%	57.1%	63.2%
Unknown	3	18.8%	112	16.7%	0.0%	8.9%	13.6%
TOTAL	16	100.0%	669	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	19.9%	6.4%	2.9%
Moderate	3	60.0%	453	59.9%	18.5%	17.2%	10.4%
Middle	0	0.0%	0	0.0%	20.3%	19.6%	16.1%
Upper	2	40.0%	303	40.1%	41.2%	47.5%	58.1%
Unknown	0	0.0%	0	0.0%	0.0%	9.2%	12.4%
TOTAL	5	100.0%	756	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	17	5.3%	1,608	2.4%	19.9%	5.6%	2.7%
Moderate	47	14.8%	6,330	9.4%	18.5%	15.5%	9.8%
Middle	39	12.3%	6,435	9.5%	20.3%	17.6%	13.4%
Upper	154	48.4%	35,945	53.3%	41.2%	43.6%	48.6%
Unknown	61	19.2%	17,082	25.3%	0.0%	17.7%	25.5%
TOTAL	318	100.0%	67,400	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2020 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families By Family	Aggregate HMDA Data	
	#	# %	\$	\$ %	Income %	# %	\$ %
Home Purchase Loans							
Low	8	4.0%	1,166	2.7%	19.9%	5.9%	3.4%
Moderate	25	12.4%	4,160	9.5%	18.5%	17.4%	12.8%
Middle	44	21.9%	8,751	19.9%	20.3%	20.3%	18.0%
Upper	87	43.3%	22,469	51.2%	41.2%	42.6%	52.5%
Unknown	37	18.4%	7,365	16.8%	0.0%	13.8%	13.3%
TOTAL	201	100.0%	43,911	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	1.5%	156	0.5%	19.9%	4.1%	1.9%
Moderate	15	11.0%	1,772	5.8%	18.5%	10.3%	6.4%
Middle	28	20.6%	4,837	15.7%	20.3%	14.9%	11.3%
Upper	80	58.8%	19,493	63.3%	41.2%	51.3%	60.7%
Unknown	11	8.1%	4,544	14.8%	0.0%	19.5%	19.7%
TOTAL	136	100.0%	30,802	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	8.3%	30	4.0%	19.9%	3.7%	2.3%
Moderate	2	16.7%	120	15.8%	18.5%	9.5%	5.7%
Middle	1	8.3%	18	2.4%	20.3%	15.9%	11.7%
Upper	6	50.0%	430	56.7%	41.2%	56.2%	63.6%
Unknown	2	16.7%	160	21.1%	0.0%	14.8%	16.7%
TOTAL	12	100.0%	758	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	19.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.5%	1.0%	0.3%
Middle	0	0.0%	0	0.0%	20.3%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	41.2%	6.3%	2.5%
Unknown	1	100.0%	859	100.0%	0.0%	92.7%	97.2%
TOTAL	1	100.0%	859	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	19.9%	2.1%	1.0%
Moderate	0	0.0%	0	0.0%	18.5%	10.0%	4.5%
Middle	1	33.3%	44	28.0%	20.3%	13.5%	8.3%
Upper	2	66.7%	113	72.0%	41.2%	61.1%	66.8%
Unknown	0	0.0%	0	0.0%	0.0%	13.3%	19.3%
TOTAL	3	100.0%	157	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	1	14.3%	35	4.3%	19.9%	8.3%	4.0%
Moderate	1	14.3%	65	7.9%	18.5%	16.3%	9.9%
Middle	1	14.3%	86	10.4%	20.3%	14.9%	9.2%
Upper	4	57.1%	637	77.4%	41.2%	52.4%	67.7%
Unknown	0	0.0%	0	0.0%	0.0%	8.0%	9.2%
TOTAL	7	100.0%	823	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	12	3.3%	1,387	1.8%	19.9%	4.8%	2.5%
Moderate	43	11.9%	6,117	7.9%	18.5%	13.3%	8.9%
Middle	75	20.8%	13,736	17.8%	20.3%	17.0%	13.7%
Upper	179	49.7%	43,142	55.8%	41.2%	46.7%	54.0%
Unknown	51	14.2%	12,928	16.7%	0.0%	18.1%	20.8%
TOTAL	360	100.0%	77,310	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	191	61.0%	43.5%	\$17,706	47.3%	40.1%	91.5%
	Over \$1 Million/ Unknown	122	39.0%	56.5%	\$19,743	52.7%	59.9%	8.5%
	TOTAL	313	100.0%	100.0%	\$37,449	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	222	70.9%	89.0%	\$8,417	22.5%	32.0%	
	\$100,001–\$250,000	45	14.4%	6.1%	\$7,961	21.3%	20.7%	
	\$250,001– \$1 Million	46	14.7%	4.9%	\$21,071	56.3%	47.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	313	100.0%	100.0%	\$37,449	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	152	79.6%		\$5,477	30.9%		
	\$100,001–\$250,000	21	11.0%		\$3,585	20.2%		
	\$250,001– \$1 Million	18	9.4%		\$8,644	48.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	191	100.0%		\$17,706	100.0%		

Appendix C (continued)

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	394	55.8%	31.8%	\$36,776	45.2%	29.7%	91.7%
	Over \$1 Million/ Unknown	312	44.2%	68.2%	\$44,629	54.8%	70.3%	8.3%
	TOTAL	706	100.0%	100.0%	\$81,405	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	507	71.8%	84.6%	\$15,406	18.9%	27.5%	
	\$100,001– \$250,000	103	14.6%	8.8%	\$16,942	20.8%	22.6%	
	\$250,001– \$1 Million	96	13.6%	6.5%	\$49,057	60.3%	49.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	706	100.0%	100.0%	\$81,405	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	309	78.4%		\$9,548	26.0%	
		\$100,001– \$250,000	48	12.2%		\$8,062	21.9%	
		\$250,001– \$1 Million	37	9.4%		\$19,166	52.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	394	100.0%		\$36,776	100.0%	

Appendix C (continued)

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	32	88.9%	72.0%	3,050	96.3%	83.1%	96.9%
	Over \$1 Million/ Unknown	4	11.1%	28.0%	117	3.7%	16.9%	3.1%
	TOTAL	36	100.0%	100.0%	3,167	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	26	72.2%	84.9%	931	29.4%	41.4%	
	\$100,001–\$250,000	7	19.4%	10.5%	1,110	35.0%	28.8%	
	\$250,001–\$500,000	3	8.3%	4.6%	1,126	35.6%	29.8%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	36	100.0%	100.0%	3,167	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	22	68.8%		814	26.7%	
		\$100,001–\$250,000	7	21.9%		1,110	36.4%	
		\$250,001– \$1 Million	3	9.4%		1,126	36.9%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	32	100.0%		3,050	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	30	90.9%	73.1%	2,668	98.6%	80.7%	97.2%
	Over \$1 Million/ Unknown	3	9.1%	26.9%	37	1.4%	19.3%	2.8%
	TOTAL	33	100.0%	100.0%	2,705	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	22	66.7%	83.8%	755	27.9%	42.8%	
	\$100,001–\$250,000	10	30.3%	12.5%	1,677	62.0%	34.4%	
	\$250,001–\$500,000	1	3.0%	3.7%	273	10.1%	22.8%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	33	100.0%	100.0%	2,705	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	19	63.3%		718	26.9%	
		\$100,001–\$250,000	10	33.3%		1,677	62.9%	
		\$250,001–\$1 Million	1	3.3%		273	10.2%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	30	100.0%		2,668	100.0%	

Appendix C (continued)

Little Rock

Distribution of 2019 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	6	0.9%	470	0.4%	2.3%	1.2%	0.8%
Moderate	31	4.7%	3,831	3.0%	15.0%	10.0%	6.7%
Middle	233	35.4%	37,896	29.6%	41.6%	42.1%	37.4%
Upper	389	59.0%	85,670	67.0%	40.9%	46.6%	55.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	659	100.0%	127,867	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	1.0%	150	0.4%	2.3%	0.8%	0.4%
Moderate	14	7.1%	952	2.4%	15.0%	8.6%	5.6%
Middle	56	28.3%	9,082	23.3%	41.6%	38.1%	33.4%
Upper	126	63.6%	28,827	73.9%	40.9%	52.5%	60.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	198	100.0%	39,011	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.3%	2.0%	0.8%
Moderate	4	7.4%	217	6.2%	15.0%	12.5%	9.1%
Middle	14	25.9%	592	17.0%	41.6%	34.9%	30.3%
Upper	36	66.7%	2,678	76.8%	40.9%	50.4%	59.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.3%	0.1%
TOTAL	54	100.0%	3,487	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	1	100.0%	1,020	100.0%	8.3%	13.0%	6.3%
Moderate	0	0.0%	0	0.0%	23.0%	28.8%	23.5%
Middle	0	0.0%	0	0.0%	29.5%	27.2%	23.2%
Upper	0	0.0%	0	0.0%	39.0%	31.0%	47.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	1	100.0%	1,020	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	3.2%	57	3.5%	2.3%	0.5%	0.3%
Moderate	2	6.5%	68	4.1%	15.0%	5.9%	4.0%
Middle	12	38.7%	733	44.6%	41.6%	35.7%	28.5%
Upper	16	51.6%	787	47.8%	40.9%	57.9%	67.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	31	100.0%	1,645	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	1	5.3%	77	2.2%	2.3%	1.6%	0.9%
Moderate	0	0.0%	0	0.0%	15.0%	9.7%	5.8%
Middle	3	15.8%	223	6.5%	41.6%	39.4%	27.0%
Upper	15	78.9%	3,143	91.3%	40.9%	49.4%	66.4%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	19	100.0%	3,443	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	11	1.1%	1,774	1.0%	2.3%	1.2%	1.2%
Moderate	51	5.3%	5,068	2.9%	15.0%	10.1%	8.3%
Middle	318	33.1%	48,526	27.5%	41.6%	40.8%	34.8%
Upper	582	60.5%	121,105	68.6%	40.9%	47.8%	55.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	962	100.0%	176,473	100.0%	100.0%	100.0%	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	7	1.0%	537	0.3%	2.3%	1.1%	0.7%
Moderate	37	5.2%	4,510	2.9%	15.0%	10.1%	6.8%
Middle	222	31.4%	45,793	29.7%	41.6%	40.3%	36.4%
Upper	440	62.3%	103,257	67.0%	40.9%	48.5%	56.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	706	100.0%	154,097	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	0.1%	100	0.1%	2.3%	0.6%	0.4%
Moderate	31	4.6%	4,680	3.0%	15.0%	6.2%	4.3%
Middle	161	23.8%	29,900	19.2%	41.6%	34.8%	30.3%
Upper	484	71.5%	120,829	77.7%	40.9%	58.4%	64.9%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	677	100.0%	155,509	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.3%	1.3%	0.9%
Moderate	3	9.4%	135	7.5%	15.0%	10.5%	8.1%
Middle	10	31.3%	561	31.3%	41.6%	38.6%	33.5%
Upper	19	59.4%	1,095	61.1%	40.9%	49.5%	57.4%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	32	100.0%	1,791	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units			
Low	0	0.0%	0	0.0%	8.3%	10.1%	4.5%	
Moderate	0	0.0%	0	0.0%	23.0%	35.4%	29.3%	
Middle	0	0.0%	0	0.0%	29.5%	25.4%	31.8%	
Upper	1	100.0%	143	100.0%	39.0%	28.6%	34.1%	
Unknown	0	0.0%	0	0.0%	0.2%	0.5%	0.2%	
TOTAL	1	100.0%	143	100.0%	100.0%	100.0%	100.0%	
Other Purpose LOC								
Low	1	5.9%	15	1.9%	2.3%	1.0%	0.5%	
Moderate	0	0.0%	0	0.0%	15.0%	7.2%	5.1%	
Middle	4	23.5%	75	9.6%	41.6%	35.9%	29.1%	
Upper	12	70.6%	694	88.5%	40.9%	55.9%	65.3%	
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%	
TOTAL	17	100.0%	784	100.0%	100.0%	100.0%	100.0%	
Other Purpose Closed/Exempt								
Low	1	3.7%	87	2.0%	2.3%	1.3%	0.4%	
Moderate	3	11.1%	328	7.6%	15.0%	12.6%	10.1%	
Middle	5	18.5%	506	11.7%	41.6%	30.2%	21.7%	
Upper	18	66.7%	3,411	78.7%	40.9%	55.8%	67.9%	
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%	
TOTAL	27	100.0%	4,332	100.0%	100.0%	100.0%	100.0%	
Total Home Mortgage Loans					% of Owner-Occupied Units			
Low	10	0.7%	739	0.2%	2.3%	1.0%	0.7%	
Moderate	74	5.1%	9,653	3.0%	15.0%	8.8%	6.8%	
Middle	402	27.5%	76,835	24.3%	41.6%	38.0%	33.5%	
Upper	974	66.7%	229,429	72.5%	40.9%	52.1%	58.9%	
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%	
TOTAL	1,460	100.0%	316,656	100.0%	100.0%	100.0%	100.0%	

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		%	\$ %
Low	34	4.8%	\$11,823	10.8%	4.5%	4.5%	7.8%
Moderate	117	16.4%	\$18,408	16.7%	19.3%	16.4%	18.4%
Middle	204	28.5%	\$25,661	23.3%	32.8%	32.8%	29.5%
Upper	360	50.3%	\$54,066	49.2%	43.3%	44.4%	43.6%
Unknown	0	0.0%	\$0	0.0%	0.1%	2.0%	0.6%
TOTAL	715	100.0%	\$109,958	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	60	3.1%	\$9,302	4.0%	4.5%	4.3%	6.3%
Moderate	268	14.0%	\$35,788	15.4%	19.4%	16.7%	19.5%
Middle	562	29.4%	\$55,854	24.0%	32.7%	33.5%	29.7%
Upper	1,019	53.4%	\$131,908	56.6%	43.1%	44.8%	44.2%
Unknown	0	0.0%	\$0	0.0%	0.2%	0.7%	0.3%
TOTAL	1,909	100.0%	\$232,852	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		# %	\$ %
Low	2	2.3%	\$244	2.9%	0.9%	0.5%	1.0%
Moderate	17	19.3%	\$2,284	27.0%	13.7%	7.8%	9.8%
Middle	34	38.6%	\$3,506	41.4%	47.0%	52.1%	52.5%
Upper	35	39.8%	\$2,425	28.7%	38.5%	38.1%	36.5%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.4%	0.2%
TOTAL	88	100.0%	\$8,459	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	1.4%	\$14	0.2%	0.9%	0.4%	0.2%
Moderate	14	20.0%	\$1,026	17.7%	13.9%	10.7%	8.7%
Middle	24	34.3%	\$2,645	45.5%	46.9%	52.5%	56.4%
Upper	31	44.3%	\$2,124	36.6%	38.3%	36.4%	34.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
TOTAL	70	100.0%	\$5,809	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	46	7.0%	4,640	3.6%	20.9%	6.3%	3.4%
Moderate	118	17.9%	16,605	13.0%	17.0%	20.1%	15.1%
Middle	143	21.7%	23,417	18.3%	19.7%	20.9%	19.3%
Upper	312	47.3%	74,292	58.1%	42.5%	34.5%	45.6%
Unknown	40	6.1%	8,913	7.0%	0.0%	18.2%	16.7%
TOTAL	659	100.0%	127,867	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	10	5.1%	731	1.9%	20.9%	5.4%	2.6%
Moderate	21	10.6%	2,205	5.7%	17.0%	11.5%	6.7%
Middle	32	16.2%	4,530	11.6%	19.7%	18.3%	14.7%
Upper	110	55.6%	26,612	68.2%	42.5%	41.8%	52.2%
Unknown	25	12.6%	4,933	12.6%	0.0%	23.1%	23.8%
TOTAL	198	100.0%	39,011	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	3.7%	51	1.5%	20.9%	7.3%	4.2%
Moderate	6	11.1%	281	8.1%	17.0%	15.5%	11.4%
Middle	9	16.7%	578	16.6%	19.7%	20.3%	15.8%
Upper	34	63.0%	2,457	70.5%	42.5%	47.1%	56.8%
Unknown	3	5.6%	120	3.4%	0.0%	9.8%	11.9%
TOTAL	54	100.0%	3,487	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.7%	1.1%	0.0%
Upper	0	0.0%	0	0.0%	42.5%	2.2%	0.2%
Unknown	1	100.0%	1,020	100.0%	0.0%	96.7%	99.7%
TOTAL	1	100.0%	1,020	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	5	16.1%	202	12.3%	20.9%	4.8%	2.3%
Moderate	1	3.2%	27	1.6%	17.0%	15.3%	7.6%
Middle	6	19.4%	334	20.3%	19.7%	19.0%	15.7%
Upper	17	54.8%	988	60.1%	42.5%	57.1%	67.7%
Unknown	2	6.5%	94	5.7%	0.0%	3.8%	6.7%
TOTAL	31	100.0%	1,645	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	1	5.3%	60	1.7%	20.9%	8.4%	4.8%
Moderate	3	15.8%	306	8.9%	17.0%	16.8%	10.8%
Middle	4	21.1%	651	18.9%	19.7%	24.2%	22.2%
Upper	11	57.9%	2,426	70.5%	42.5%	43.5%	55.1%
Unknown	0	0.0%	0	0.0%	0.0%	7.1%	7.2%
TOTAL	19	100.0%	3,443	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	64	6.7%	5,684	3.2%	20.9%	5.9%	2.8%
Moderate	149	15.5%	19,424	11.0%	17.0%	16.9%	11.0%
Middle	194	20.2%	29,510	16.7%	19.7%	19.5%	15.8%
Upper	484	50.3%	106,775	60.5%	42.5%	36.0%	42.3%
Unknown	71	7.4%	15,080	8.5%	0.0%	21.8%	28.1%
TOTAL	962	100.0%	176,473	100.0%	100.0%	100.0%	100.0%

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	53	7.5%	6,232	4.0%	20.9%	8.0%	4.7%
Moderate	136	19.3%	19,176	12.4%	17.0%	20.6%	16.0%
Middle	143	20.3%	26,807	17.4%	19.7%	21.4%	20.3%
Upper	330	46.7%	88,197	57.2%	42.5%	33.1%	43.3%
Unknown	44	6.2%	13,685	8.9%	0.0%	16.9%	15.6%
TOTAL	706	100.0%	154,097	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	17	2.5%	1,475	0.9%	20.9%	3.0%	1.5%
Moderate	52	7.7%	6,501	4.2%	17.0%	9.5%	6.1%
Middle	116	17.1%	20,187	13.0%	19.7%	16.5%	13.2%
Upper	432	63.8%	109,816	70.6%	42.5%	43.2%	52.0%
Unknown	60	8.9%	17,530	11.3%	0.0%	27.7%	27.3%
TOTAL	677	100.0%	155,509	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.9%	5.9%	3.4%
Moderate	4	12.5%	141	7.9%	17.0%	13.1%	8.6%
Middle	5	15.6%	232	13.0%	19.7%	18.9%	13.1%
Upper	20	62.5%	1,019	56.9%	42.5%	52.1%	58.6%
Unknown	3	9.4%	399	22.3%	0.0%	10.0%	16.2%
TOTAL	32	100.0%	1,791	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans							
Low	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.0%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.7%	1.1%	0.2%
Upper	0	0.0%	0	0.0%	42.5%	3.2%	0.7%
Unknown	1	100.0%	143	100.0%	0.0%	95.8%	99.1%
TOTAL	1	100.0%	143	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.9%	3.7%	2.3%
Moderate	1	5.9%	140	17.9%	17.0%	11.5%	8.1%
Middle	5	29.4%	211	26.9%	19.7%	20.1%	13.1%
Upper	8	47.1%	378	48.2%	42.5%	61.0%	72.7%
Unknown	3	17.6%	55	7.0%	0.0%	3.7%	3.7%
TOTAL	17	100.0%	784	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	3.7%	50	1.2%	20.9%	7.0%	3.1%
Moderate	4	14.8%	436	10.1%	17.0%	15.3%	9.6%
Middle	5	18.5%	441	10.2%	19.7%	23.9%	14.0%
Upper	17	63.0%	3,405	78.6%	42.5%	47.8%	60.4%
Unknown	0	0.0%	0	0.0%	0.0%	6.0%	12.9%
TOTAL	27	100.0%	4,332	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	71	4.9%	7,757	2.4%	20.9%	5.3%	2.8%
Moderate	197	13.5%	26,394	8.3%	17.0%	14.4%	10.2%
Middle	274	18.8%	47,878	15.1%	19.7%	18.2%	15.5%
Upper	807	55.3%	202,815	64.0%	42.5%	36.9%	44.7%
Unknown	111	7.6%	31,812	10.0%	0.0%	25.2%	26.8%
TOTAL	1,460	100.0%	316,656	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	362	50.6%	42.4%	\$44,629	40.6%	37.7%	90.4%
	Over \$1 Million/ Unknown	353	49.4%	57.6%	\$65,329	59.4%	62.3%	9.6%
	TOTAL	715	100.0%	100.0%	\$109,958	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	456	63.8%	90.7%	\$17,603	16.0%	33.3%	
	\$100,001– \$250,000	125	17.5%	5.0%	\$21,718	19.8%	18.3%	
	\$250,001– \$1 Million	134	18.7%	4.3%	\$70,637	64.2%	48.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	715	100.0%	100.0%	\$109,958	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	254	70.2%		\$8,813	19.7%	
		\$100,001– \$250,000	50	13.8%		\$7,748	17.4%	
		\$250,001– \$1 Million	58	16.0%		\$28,068	62.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	362	100.0%		\$44,629	100.0%	

Appendix C (continued)

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	802	42.0%	34.7%	\$73,893	31.7%	30.9%	90.7%
	Over \$1 Million/ Unknown	1107	58.0%	65.3%	\$158,959	68.3%	69.1%	9.3%
	TOTAL	1909	100.0%	100.0%	\$232,852	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	1338	70.1%	85.7%	\$43,183	18.5%	28.8%	
	\$100,001– \$250,000	293	15.3%	8.0%	\$48,011	20.6%	21.0%	
	\$250,001– \$1 Million	278	14.6%	6.3%	\$141,658	60.8%	50.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1909	100.0%	100.0%	\$232,852	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	642	80.0%		\$18,988	25.7%		
	\$100,001– \$250,000	80	10.0%		\$13,666	18.5%		
	\$250,001– \$1 Million	80	10.0%		\$41,239	55.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	802	100.0%		\$73,893	100.0%		

Appendix C (continued)

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	75	85.2%	64.4%	7,472	88.3%	70.2%	98.0%
	Over \$1 Million/ Unknown	13	14.8%	35.6%	987	11.7%	29.8%	2.0%
	TOTAL	88	100.0%	100.0%	8,459	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	63	71.6%	82.8%	2,579	30.5%	35.5%	
	\$100,001–\$250,000	16	18.2%	11.3%	2,750	32.5%	31.8%	
	\$250,001–\$500,000	9	10.2%	5.9%	3,130	37.0%	32.8%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	88	100.0%	100.0%	8,459	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	54	72.0%		2,193	29.3%	
		\$100,001–\$250,000	12	16.0%		2,149	28.8%	
		\$250,001– \$1 Million	9	12.0%		3,130	41.9%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	75	100.0%		7,472	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	64	91.4%	62.1%	4,811	82.8%	73.1%	98.0%
	Over \$1 Million/ Unknown	6	8.6%	37.9%	998	17.2%	26.9%	2.0%
	TOTAL	70	100.0%	100.0%	5,809	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	54	77.1%	82.9%	1,995	34.3%	38.4%	
	\$100,001–\$250,000	10	14.3%	11.9%	1,766	30.4%	30.6%	
	\$250,001–\$500,000	6	8.6%	5.3%	2,048	35.3%	31.0%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	70	100.0%	100.0%	5,809	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	52	81.3%		1,910	39.7%	
		\$100,001–\$250,000	8	12.5%		1,549	32.2%	
		\$250,001–\$1 Million	4	6.3%		1,352	28.1%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	64	100.0%		4,811	100.0%	

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Appendix C (continued)

Distribution of 2019 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%	2.2%	0.0%	0.0%
Moderate	9	12.3%	487	6.2%	15.2%	6.7%	3.2%
Middle	31	42.5%	3,055	38.6%	59.0%	57.9%	53.9%
Upper	33	45.2%	4,368	55.2%	23.6%	35.2%	42.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.1%
TOTAL	73	100.0%	7,910	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.2%	0.6%	0.4%
Moderate	0	0.0%	0	0.0%	15.2%	4.0%	1.8%
Middle	9	39.1%	1,089	16.3%	59.0%	51.2%	42.4%
Upper	14	60.9%	5,591	83.7%	23.6%	44.2%	55.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	23	100.0%	6,680	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.2%	4.5%	2.6%
Moderate	3	27.3%	52	6.9%	15.2%	25.0%	12.4%
Middle	6	54.5%	575	76.6%	59.0%	52.3%	58.5%
Upper	2	18.2%	124	16.5%	23.6%	18.2%	26.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	11	100.0%	751	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.2%	14.3%	9.3%
Middle	1	100.0%	22	100.0%	59.0%	57.1%	53.4%
Upper	0	0.0%	0	0.0%	23.6%	28.6%	37.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	22	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.2%	11.1%	4.6%
Middle	3	37.5%	504	42.7%	59.0%	48.1%	41.7%
Upper	5	62.5%	677	57.3%	23.6%	40.7%	53.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	8	100.0%	1,181	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner- Occupied Units		

Appendix C (continued)

Low	0	0.0%	0	0.0%	2.2%	0.5%	0.2%
Moderate	12	10.3%	539	3.3%	15.2%	7.3%	3.0%
Middle	50	43.1%	5,245	31.7%	59.0%	56.2%	49.6%
Upper	54	46.6%	10,760	65.0%	23.6%	35.9%	47.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.0%
TOTAL	116	100.0%	16,544	100.0%	100.0%	100.0%	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	1.3%	21	0.3%	2.2%	0.1%	0.0%
Moderate	12	15.2%	467	5.6%	15.2%	6.0%	3.3%
Middle	39	49.4%	3,904	46.7%	59.0%	55.3%	52.1%
Upper	27	34.2%	3,968	47.5%	23.6%	38.6%	44.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	79	100.0%	8,360	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.2%	0.0%	0.0%
Moderate	2	4.1%	344	4.8%	15.2%	2.7%	2.0%
Middle	23	46.9%	3,306	46.1%	59.0%	53.4%	51.4%
Upper	24	49.0%	3,524	49.1%	23.6%	43.9%	46.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	49	100.0%	7,174	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.2%	8.0%	3.8%
Moderate	0	0.0%	0	0.0%	15.2%	8.0%	6.4%
Middle	1	50.0%	75	68.2%	59.0%	32.0%	35.5%
Upper	1	50.0%	35	31.8%	23.6%	52.0%	54.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	110	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.2%	12.5%	2.3%
Middle	1	25.0%	123	41.3%	59.0%	12.5%	28.7%
Upper	3	75.0%	175	58.7%	23.6%	75.0%	68.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	298	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.2%	0.0%	0.0%

Appendix C (continued)

Moderate	0	0.0%	0	0.0%	15.2%	14.3%	6.4%
Middle	1	50.0%	70	56.0%	59.0%	57.1%	50.8%
Upper	1	50.0%	55	44.0%	23.6%	28.6%	42.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	125	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	0.7%	21	0.1%	2.2%	0.4%	0.5%
Moderate	14	10.3%	811	5.0%	15.2%	5.5%	3.1%
Middle	65	47.8%	7,478	46.5%	59.0%	54.7%	51.3%
Upper	56	41.2%	7,757	48.3%	23.6%	39.4%	45.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	136	100.0%	16,067	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		%	\$ %
Low	9	3.8%	\$252	1.3%	5.2%	2.7%	1.3%
Moderate	47	19.7%	\$2,388	12.0%	22.2%	18.5%	17.6%
Middle	130	54.6%	\$12,883	64.9%	53.0%	56.7%	62.4%
Upper	52	21.8%	\$4,326	21.8%	19.6%	20.3%	17.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.7%	1.0%
TOTAL	238	100.0%	\$19,849	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	15	2.9%	\$744	1.9%	5.2%	3.2%	2.6%
Moderate	99	18.8%	\$7,205	18.7%	21.9%	18.9%	18.5%
Middle	290	55.1%	\$22,755	59.2%	53.3%	55.9%	59.7%
Upper	122	23.2%	\$7,748	20.1%	19.5%	21.1%	18.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.8%	0.5%
TOTAL	526	100.0%	\$38,452	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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%	1.1%	0.5%	0.0%
Moderate	41	28.9%	\$5,082	33.6%	25.0%	28.2%	32.3%
Middle	85	59.9%	\$7,984	52.8%	66.0%	61.5%	54.6%
Upper	16	11.3%	\$2,056	13.6%	8.0%	9.7%	13.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
TOTAL	142	100.0%	\$15,122	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%	1.1%	0.0%	0.0%
Moderate	26	21.8%	\$3,673	25.6%	24.4%	23.2%	23.7%
Middle	83	69.7%	\$9,655	67.2%	66.7%	69.0%	69.0%
Upper	10	8.4%	\$1,037	7.2%	7.8%	7.7%	7.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
TOTAL	119	100.0%	\$14,365	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	4.1%	143	1.8%	25.1%	4.0%	2.2%
Moderate	7	9.6%	575	7.3%	15.2%	13.3%	9.5%
Middle	20	27.4%	1,982	25.1%	17.9%	23.1%	22.8%
Upper	34	46.6%	4,348	55.0%	41.9%	34.8%	42.3%
Unknown	9	12.3%	862	10.9%	0.0%	24.8%	23.2%
TOTAL	73	100.0%	7,910	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	25.1%	3.4%	1.8%
Moderate	4	17.4%	196	2.9%	15.2%	7.9%	4.4%
Middle	6	26.1%	454	6.8%	17.9%	21.6%	14.4%
Upper	10	43.5%	1,679	25.1%	41.9%	41.5%	40.5%
Unknown	3	13.0%	4,351	65.1%	0.0%	25.6%	38.9%
TOTAL	23	100.0%	6,680	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	18.2%	68	9.1%	25.1%	11.4%	9.4%
Moderate	1	9.1%	20	2.7%	15.2%	11.4%	9.3%
Middle	3	27.3%	154	20.5%	17.9%	29.5%	23.2%
Upper	4	36.4%	109	14.5%	41.9%	40.9%	32.8%
Unknown	1	9.1%	400	53.3%	0.0%	6.8%	25.3%
TOTAL	11	100.0%	751	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	25.1%	14.3%	8.7%
Moderate	0	0.0%	0	0.0%	15.2%	0.0%	0.0%
Middle	1	100.0%	22	100.0%	17.9%	28.6%	26.1%
Upper	0	0.0%	0	0.0%	41.9%	57.1%	65.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	22	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	25.1%	7.4%	1.8%
Moderate	0	0.0%	0	0.0%	15.2%	0.0%	0.0%
Middle	1	12.5%	42	3.6%	17.9%	14.8%	5.2%
Upper	7	87.5%	1,139	96.4%	41.9%	63.0%	76.7%
Unknown	0	0.0%	0	0.0%	0.0%	14.8%	16.3%
TOTAL	8	100.0%	1,181	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	5	4.3%	211	1.3%	25.1%	3.9%	1.9%
Moderate	12	10.3%	791	4.8%	15.2%	10.7%	6.8%
Middle	31	26.7%	2,654	16.0%	17.9%	21.1%	17.4%
Upper	55	47.4%	7,275	44.0%	41.9%	34.8%	37.3%
Unknown	13	11.2%	5,613	33.9%	0.0%	29.5%	36.6%
TOTAL	116	100.0%	16,544	100.0%	100.0%	100.0%	100.0%

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	5	6.3%	457	5.5%	25.1%	6.3%	3.7%
Moderate	11	13.9%	1,076	12.9%	15.2%	18.4%	13.5%
Middle	23	29.1%	1,884	22.5%	17.9%	22.1%	20.9%
Upper	32	40.5%	4,382	52.4%	41.9%	28.6%	37.1%
Unknown	8	10.1%	561	6.7%	0.0%	24.5%	24.8%
TOTAL	79	100.0%	8,360	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	25.1%	1.1%	0.8%
Moderate	9	18.4%	1,061	14.8%	15.2%	9.4%	5.9%
Middle	7	14.3%	1,000	13.9%	17.9%	11.7%	10.3%
Upper	23	46.9%	3,746	52.2%	41.9%	43.3%	45.9%
Unknown	10	20.4%	1,367	19.1%	0.0%	34.5%	37.2%
TOTAL	49	100.0%	7,174	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	25.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.2%	8.0%	4.5%
Middle	0	0.0%	0	0.0%	17.9%	12.0%	7.7%
Upper	2	100.0%	110	100.0%	41.9%	68.0%	76.6%
Unknown	0	0.0%	0	0.0%	0.0%	12.0%	11.2%
TOTAL	2	100.0%	110	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	25.1%	0.0%	0.0%
Moderate	1	25.0%	123	41.3%	15.2%	12.5%	28.7%
Middle	1	25.0%	30	10.1%	17.9%	37.5%	28.0%
Upper	2	50.0%	145	48.7%	41.9%	50.0%	43.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	298	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	25.1%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.2%	28.6%	39.6%
Middle	1	50.0%	70	56.0%	17.9%	14.3%	5.9%
Upper	1	50.0%	55	44.0%	41.9%	35.7%	43.9%
Unknown	0	0.0%	0	0.0%	0.0%	21.4%	10.6%
TOTAL	2	100.0%	125	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	5	3.7%	457	2.8%	25.1%	3.7%	2.1%
Moderate	21	15.4%	2,260	14.1%	15.2%	13.2%	9.1%
Middle	32	23.5%	2,984	18.6%	17.9%	16.0%	14.2%
Upper	60	44.1%	8,438	52.5%	41.9%	30.2%	35.5%
Unknown	18	13.2%	1,928	12.0%	0.0%	36.9%	39.0%
TOTAL	136	100.0%	16,067	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$(000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	132	55.5%	34.0%	\$7,275	36.7%	32.1%	91.0%
	Over \$1 Million/ Unknown	106	44.5%	66.0%	\$12,574	63.3%	67.9%	9.0%
	TOTAL	238	100.0%	100.0%	\$19,849	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	187	78.6%	92.7%	\$5,580	28.1%	39.9%	
	\$100,001– \$250,000	29	12.2%	4.2%	\$4,722	23.8%	18.9%	
	\$250,001– \$1 Million	22	9.2%	3.1%	\$9,547	48.1%	41.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	238	100.0%	100.0%	\$19,849	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	116	87.9%		\$3,423	47.1%		
	\$100,001– \$250,000	11	8.3%		\$1,609	22.1%		
	\$250,001– \$1 Million	5	3.8%		\$2,243	30.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	132	100.0%		\$7,275	100.0%		

Appendix C (continued)

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	257	48.9%	34.3%	\$11,709	30.5%	31.3%	91.2%
	Over \$1 Million/ Unknown	269	51.1%	65.7%	\$26,743	69.5%	68.7%	8.8%
	TOTAL	526	100.0%	100.0%	\$38,452	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	432	82.1%	88.9%	\$12,250	31.9%	34.3%	
	\$100,001– \$250,000	63	12.0%	6.7%	\$9,890	25.7%	21.3%	
	\$250,001– \$1 Million	31	5.9%	4.3%	\$16,312	42.4%	44.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	526	100.0%	100.0%	\$38,452	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	231	89.9%		\$6,132	52.4%	
		\$100,001– \$250,000	22	8.6%		\$3,419	29.2%	
		\$250,001–\$1 Million	4	1.6%		\$2,158	18.4%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	257	100.0%		\$11,709	100.0%	

Appendix C (continued)

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	104	73.2%	59.0%	11,054	73.1%	69.2%	97.9%
	Over \$1 Million/ Unknown	38	26.8%	41.0%	4,068	26.9%	30.8%	2.1%
	TOTAL	142	100.0%	100.0%	15,122	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	92	64.8%	73.3%	3,191	21.1%	23.9%	
	\$100,001–\$250,000	32	22.5%	17.4%	5,301	35.1%	35.0%	
	\$250,001–\$500,000	18	12.7%	9.2%	6,630	43.8%	41.1%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	142	100.0%	100.0%	15,122	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	70	67.3%		2,634	23.8%		
	\$100,001–\$250,000	21	20.2%		3,545	32.1%		
	\$250,001– \$1 Million	13	12.5%		4,875	44.1%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	104	100.0%		11,054	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	86	72.3%	60.0%	9,244	64.4%	59.4%	97.8%
	Over \$1 Million/ Unknown	33	27.7%	40.0%	5,121	35.6%	40.6%	2.2%
	TOTAL	119	100.0%	100.0%	14,365	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	72	60.5%	66.5%	2,925	20.4%	20.5%	
	\$100,001–\$250,000	30	25.2%	21.3%	5,056	35.2%	34.3%	
	\$250,001–\$500,000	17	14.3%	12.3%	6,384	44.4%	45.2%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	119	100.0%	100.0%	14,365	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	56	65.1%		2,120	22.9%		
	\$100,001–\$250,000	20	23.3%		3,283	35.5%		
	\$250,001–\$1 Million	10	11.6%		3,841	41.6%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	86	100.0%		9,244	100.0%		

Appendix C (continued)

NonMSA Arkansas

Distribution of 2019 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	0.6%	24	0.1%	1.2%	0.3%	0.1%
Moderate	28	16.1%	3,247	16.9%	14.6%	11.4%	11.0%
Middle	93	53.4%	8,892	46.2%	63.2%	60.2%	54.7%
Upper	52	29.9%	7,084	36.8%	21.0%	27.9%	34.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.3%
TOTAL	174	100.0%	19,247	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.2%	0.3%	0.4%
Moderate	17	19.5%	942	10.9%	14.6%	12.9%	11.3%
Middle	57	65.5%	5,492	63.8%	63.2%	57.4%	51.8%
Upper	13	14.9%	2,171	25.2%	21.0%	28.9%	35.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.6%	0.7%
TOTAL	87	100.0%	8,605	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.2%	0.5%	0.3%
Moderate	5	16.7%	172	19.7%	14.6%	14.0%	17.2%
Middle	15	50.0%	426	48.7%	63.2%	46.2%	40.6%
Upper	10	33.3%	277	31.7%	21.0%	38.7%	40.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.5%	1.3%
TOTAL	30	100.0%	875	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	1.2%	0.0%	0.0%
Moderate	3	13.6%	300	29.1%	14.6%	7.5%	9.4%
Middle	15	68.2%	555	53.8%	63.2%	57.5%	50.5%
Upper	4	18.2%	176	17.1%	21.0%	34.9%	40.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	22	100.0%	1,031	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	1.2%	0.0%	0.0%
Moderate	1	7.1%	29	3.8%	14.6%	11.9%	14.6%
Middle	9	64.3%	543	70.5%	63.2%	58.7%	49.2%
Upper	4	28.6%	198	25.7%	21.0%	29.4%	36.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	14	100.0%	770	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	0.3%	24	0.1%	1.2%	0.3%	0.4%
Moderate	54	16.5%	4,690	15.4%	14.6%	11.9%	11.3%
Middle	189	57.8%	15,908	52.1%	63.2%	58.9%	53.9%
Upper	83	25.4%	9,906	32.4%	21.0%	28.6%	34.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.3%	0.4%
TOTAL	327	100.0%	30,528	100.0%	100.0%	100.0%	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	1.3%	112	0.6%	1.2%	0.4%	0.2%
Moderate	21	13.9%	2,296	11.9%	14.6%	13.1%	11.9%
Middle	84	55.6%	9,610	49.7%	63.2%	60.2%	55.7%
Upper	44	29.1%	7,306	37.8%	21.0%	26.2%	32.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.2%
TOTAL	151	100.0%	19,324	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	1.2%	0.4%	0.5%
Moderate	21	16.9%	2,702	15.9%	14.6%	13.0%	12.1%
Middle	78	62.9%	10,422	61.3%	63.2%	54.2%	49.2%
Upper	25	20.2%	3,873	22.8%	21.0%	32.1%	38.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	124	100.0%	16,997	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.2%	0.0%	0.0%
Moderate	1	6.7%	19	2.8%	14.6%	12.7%	14.2%
Middle	7	46.7%	262	39.2%	63.2%	60.2%	61.8%
Upper	7	46.7%	388	58.0%	21.0%	25.9%	22.0%
Unknown	0	0.0%	0	0.0%	0.0%	1.2%	2.0%
TOTAL	15	100.0%	669	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	3.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	25.5%	25.8%	16.3%
Middle	1	50.0%	448	38.7%	56.5%	61.3%	68.6%
Upper	1	50.0%	709	61.3%	14.6%	12.9%	15.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	1,157	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	1.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	14.6%	11.3%	8.0%
Middle	7	87.5%	254	96.2%	63.2%	60.4%	65.1%
Upper	1	12.5%	10	3.8%	21.0%	28.3%	26.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	8	100.0%	264	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	1.2%	0.0%	0.0%
Moderate	1	16.7%	275	34.5%	14.6%	9.2%	14.9%
Middle	4	66.7%	365	45.8%	63.2%	62.1%	55.5%
Upper	1	16.7%	157	19.7%	21.0%	28.7%	29.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	6	100.0%	797	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	2	0.7%	112	0.3%	1.2%	0.4%	0.3%
Moderate	44	14.4%	5,292	13.5%	14.6%	13.0%	12.1%
Middle	181	59.2%	21,361	54.5%	63.2%	57.8%	53.3%
Upper	79	25.8%	12,443	31.7%	21.0%	28.6%	34.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	306	100.0%	39,208	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		%	\$ %
Low	9	1.4%	\$1,212	2.4%	1.3%	1.5%	1.4%
Moderate	118	18.1%	\$8,502	16.5%	21.6%	16.0%	14.8%
Middle	389	59.7%	\$26,502	51.5%	55.4%	57.5%	55.7%
Upper	136	20.9%	\$15,276	29.7%	21.7%	22.4%	27.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	2.6%	0.7%
TOTAL	652	100.0%	\$51,492	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	21	1.8%	\$965	1.1%	1.4%	1.2%	0.7%
Moderate	212	17.7%	\$14,786	16.4%	21.9%	18.3%	18.6%
Middle	707	59.0%	\$54,426	60.4%	54.9%	57.6%	58.2%
Upper	259	21.6%	\$19,935	22.1%	21.9%	22.3%	22.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.6%	0.1%
TOTAL	1,199	100.0%	\$90,112	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Farm Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Farm Loans				% of Farms	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		# %	\$ %
Low	2	0.5%	\$718	2.2%	4.2%	1.2%	1.6%
Moderate	100	25.9%	\$7,608	23.2%	10.1%	15.5%	17.0%
Middle	270	69.9%	\$22,868	69.6%	70.6%	75.1%	72.7%
Upper	14	3.6%	\$1,665	5.1%	15.1%	7.8%	8.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.1%
TOTAL	386	100.0%	\$32,859	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	9	2.4%	\$1,341	3.8%	4.6%	2.5%	2.6%
Moderate	61	16.4%	\$5,945	17.0%	9.3%	12.2%	14.1%
Middle	286	76.9%	\$26,292	75.2%	71.6%	74.7%	75.0%
Upper	16	4.3%	\$1,401	4.0%	14.5%	10.3%	8.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.2%	0.1%
TOTAL	372	100.0%	\$34,979	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	2.3%	384	2.0%	22.4%	4.3%	2.4%
Moderate	32	18.4%	2,418	12.6%	18.0%	16.4%	11.0%
Middle	33	19.0%	3,335	17.3%	18.8%	20.2%	17.3%
Upper	95	54.6%	12,431	64.6%	40.8%	44.5%	55.1%
Unknown	10	5.7%	679	3.5%	0.0%	14.5%	14.2%
TOTAL	174	100.0%	19,247	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	9	10.3%	235	2.7%	22.4%	5.8%	2.6%
Moderate	9	10.3%	468	5.4%	18.0%	12.5%	7.5%
Middle	18	20.7%	1,393	16.2%	18.8%	17.3%	13.4%
Upper	47	54.0%	5,952	69.2%	40.8%	48.0%	56.6%
Unknown	4	4.6%	557	6.5%	0.0%	16.5%	20.0%
TOTAL	87	100.0%	8,605	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	6.7%	40	4.6%	22.4%	10.2%	7.3%
Moderate	4	13.3%	104	11.9%	18.0%	14.5%	12.4%
Middle	5	16.7%	104	11.9%	18.8%	19.9%	20.0%
Upper	18	60.0%	597	68.2%	40.8%	50.0%	54.6%
Unknown	1	3.3%	30	3.4%	0.0%	5.4%	5.7%
TOTAL	30	100.0%	875	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	2	9.1%	35	3.4%	22.4%	5.7%	3.3%
Moderate	3	13.6%	111	10.8%	18.0%	11.3%	8.2%
Middle	4	18.2%	118	11.4%	18.8%	15.1%	8.5%
Upper	10	45.5%	477	46.3%	40.8%	62.3%	72.5%
Unknown	3	13.6%	290	28.1%	0.0%	5.7%	7.6%
TOTAL	22	100.0%	1,031	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	7.1%	22	2.9%	22.4%	7.9%	2.1%
Moderate	3	21.4%	123	16.0%	18.0%	23.8%	16.1%
Middle	0	0.0%	0	0.0%	18.8%	14.3%	12.0%
Upper	10	71.4%	625	81.2%	40.8%	46.8%	62.2%
Unknown	0	0.0%	0	0.0%	0.0%	7.1%	7.6%
TOTAL	14	100.0%	770	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	18	5.5%	716	2.3%	22.4%	5.0%	2.4%
Moderate	51	15.6%	3,224	10.6%	18.0%	14.9%	9.7%
Middle	60	18.3%	4,950	16.2%	18.8%	18.7%	15.5%
Upper	180	55.0%	20,082	65.8%	40.8%	45.1%	54.1%
Unknown	18	5.5%	1,556	5.1%	0.0%	16.4%	18.2%
TOTAL	327	100.0%	30,528	100.0%	100.0%	100.0%	100.0%

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	6.6%	809	4.2%	22.4%	5.5%	2.9%
Moderate	25	16.6%	2,883	14.9%	18.0%	16.1%	11.1%
Middle	29	19.2%	3,289	17.0%	18.8%	19.5%	16.8%
Upper	72	47.7%	10,835	56.1%	40.8%	44.2%	55.2%
Unknown	15	9.9%	1,508	7.8%	0.0%	14.6%	14.0%
TOTAL	151	100.0%	19,324	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	6	4.8%	186	1.1%	22.4%	3.2%	1.3%
Moderate	18	14.5%	1,387	8.2%	18.0%	8.9%	5.3%
Middle	14	11.3%	1,198	7.0%	18.8%	14.6%	10.9%
Upper	77	62.1%	11,801	69.4%	40.8%	52.5%	60.1%
Unknown	9	7.3%	2,425	14.3%	0.0%	20.8%	22.4%
TOTAL	124	100.0%	16,997	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	6.7%	23	3.4%	22.4%	9.6%	4.9%
Moderate	0	0.0%	0	0.0%	18.0%	7.2%	4.3%
Middle	6	40.0%	169	25.3%	18.8%	17.5%	12.4%
Upper	6	40.0%	292	43.6%	40.8%	57.2%	65.1%
Unknown	2	13.3%	185	27.7%	0.0%	8.4%	13.2%
TOTAL	15	100.0%	669	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	22.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.0%	0.0%	0.0%
Middle	1	50.0%	448	38.7%	18.8%	3.2%	1.6%
Upper	1	50.0%	709	61.3%	40.8%	19.4%	6.0%
Unknown	0	0.0%	0	0.0%	0.0%	77.4%	92.4%
TOTAL	2	100.0%	1,157	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	22.4%	5.7%	2.9%
Moderate	2	25.0%	37	14.0%	18.0%	11.3%	7.0%
Middle	2	25.0%	85	32.2%	18.8%	15.1%	19.6%
Upper	4	50.0%	142	53.8%	40.8%	64.2%	64.3%
Unknown	0	0.0%	0	0.0%	0.0%	3.8%	6.3%
TOTAL	8	100.0%	264	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	22.4%	3.4%	1.8%
Moderate	1	16.7%	110	13.8%	18.0%	13.8%	9.2%
Middle	2	33.3%	159	19.9%	18.8%	24.1%	19.8%
Upper	3	50.0%	528	66.2%	40.8%	58.6%	69.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	6	100.0%	797	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	17	5.6%	1,018	2.6%	22.4%	4.5%	2.1%
Moderate	46	15.0%	4,417	11.3%	18.0%	12.4%	7.9%
Middle	54	17.6%	5,348	13.6%	18.8%	16.9%	13.5%
Upper	163	53.3%	24,307	62.0%	40.8%	47.1%	55.4%
Unknown	26	8.5%	4,118	10.5%	0.0%	19.2%	21.2%
TOTAL	306	100.0%	39,208	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	457	70.1%	40.2%	\$26,008	50.5%	43.0%	89.5%
	Over \$1 Million/ Unknown	195	29.9%	59.8%	\$25,484	49.5%	57.0%	10.5%
	TOTAL	652	100.0%	100.0%	\$51,492	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	530	81.3%	91.3%	\$15,795	30.7%	36.9%	
	\$100,001– \$250,000	71	10.9%	5.5%	\$11,734	22.8%	23.6%	
	\$250,001– \$1 Million	51	7.8%	3.2%	\$23,963	46.5%	39.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	652	100.0%	100.0%	\$51,492	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	397	86.9%		\$9,972	38.3%	
		\$100,001– \$250,000	35	7.7%		\$5,902	22.7%	
		\$250,001–\$1 Million	25	5.5%		\$10,134	39.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	457	100.0%		\$26,008	100.0%	

Appendix C (continued)

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	660	55.0%	37.5%	\$32,081	35.6%	33.9%	89.6%
	Over \$1 Million/ Unknown	539	45.0%	62.5%	\$58,031	64.4%	66.1%	10.4%
	TOTAL	1199	100.0%	100.0%	\$90,112	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	963	80.3%	87.5%	\$27,968	31.0%	34.6%	
	\$100,001– \$250,000	150	12.5%	8.3%	\$23,775	26.4%	26.3%	
	\$250,001– \$1 Million	86	7.2%	4.2%	\$38,369	42.6%	39.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1199	100.0%	100.0%	\$90,112	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	586	88.8%		\$14,706	45.8%	
		\$100,001– \$250,000	50	7.6%		\$7,814	24.4%	
		\$250,001– \$1 Million	24	3.6%		\$9,561	29.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	660	100.0%		\$32,081	100.0%	

Appendix C (continued)

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	334	86.5%	69.2%	24,667	75.1%	73.8%	96.1%
	Over \$1 Million/ Unknown	52	13.5%	30.8%	8,192	24.9%	26.2%	3.9%
	TOTAL	386	100.0%	100.0%	32,859	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	294	76.2%	84.1%	8,779	26.7%	36.5%	
	\$100,001–\$250,000	54	14.0%	9.8%	9,602	29.2%	26.9%	
	\$250,001–\$500,000	38	9.8%	6.1%	14,478	44.1%	36.6%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	386	100.0%	100.0%	32,859	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	267	79.9%		7,739	31.4%	
		\$100,001–\$250,000	41	12.3%		7,271	29.5%	
		\$250,001– \$1 Million	26	7.8%		9,657	39.1%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	334	100.0%		24,667	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	293	78.8%	67.5%	23,882	68.3%	70.1%	95.9%
	Over \$1 Million/ Unknown	79	21.2%	32.5%	11,097	31.7%	29.9%	4.1%
	TOTAL	372	100.0%	100.0%	34,979	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	268	72.0%	81.0%	9,714	27.8%	35.6%	
	\$100,001–\$250,000	65	17.5%	12.8%	10,628	30.4%	31.0%	
	\$250,001–\$500,000	39	10.5%	6.2%	14,637	41.8%	33.5%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	372	100.0%	100.0%	34,979	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	229	78.2%		7,979	33.4%	
		\$100,001–\$250,000	39	13.3%		6,242	26.1%	
		\$250,001–\$1 Million	25	8.5%		9,661	40.5%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	293	100.0%		23,882	100.0%	

Appendix C (continued)

KANSAS

Wichita

Distribution of 2019 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%	5.8%	3.1%	1.4%
Moderate	4	10.0%	494	4.9%	19.6%	17.1%	9.4%
Middle	12	30.0%	2,562	25.3%	29.0%	28.9%	24.0%
Upper	24	60.0%	7,087	69.9%	45.6%	50.9%	65.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	40	100.0%	10,143	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	6.7%	39	1.0%	5.8%	2.2%	1.0%
Moderate	4	26.7%	172	4.2%	19.6%	11.6%	6.0%
Middle	3	20.0%	202	5.0%	29.0%	25.8%	19.9%
Upper	7	46.7%	3,646	89.8%	45.6%	60.3%	73.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	15	100.0%	4,059	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	5.8%	4.7%	1.4%
Moderate	0	0.0%	0	0.0%	19.6%	13.6%	10.6%
Middle	0	0.0%	0	0.0%	29.0%	25.9%	24.7%
Upper	1	100.0%	50	100.0%	45.6%	55.8%	63.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	50	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner- Occupied Units		
Low	1	1.8%	39	0.3%		5.8%	3.2%
Moderate	8	14.3%	666	4.7%	19.6%	15.6%	12.4%
Middle	15	26.8%	2,764	19.4%	29.0%	27.8%	22.5%
Upper	32	57.1%	10,783	75.7%	45.6%	53.4%	63.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	56	100.0%	14,252	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	3.0%	41	0.6%	5.8%	2.8%	1.3%
Moderate	4	12.1%	372	5.1%	19.6%	18.2%	9.9%
Middle	7	21.2%	880	12.2%	29.0%	28.5%	23.1%
Upper	21	63.6%	5,946	82.1%	45.6%	50.4%	65.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	33	100.0%	7,239	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	5.8%	1.3%	0.5%
Moderate	1	2.7%	50	0.6%	19.6%	8.2%	4.7%
Middle	6	16.2%	1,494	17.5%	29.0%	23.1%	17.9%
Upper	30	81.1%	6,983	81.9%	45.6%	67.4%	76.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	37	100.0%	8,527	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	5.8%	3.0%	1.4%
Moderate	0	0.0%	0	0.0%	19.6%	9.1%	5.8%
Middle	1	50.0%	40	48.2%	29.0%	23.3%	16.2%
Upper	1	50.0%	43	51.8%	45.6%	64.6%	76.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	83	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner- Occupied Units		
Low	1	1.4%	41	0.3%	5.8%	2.3%	1.4%
Moderate	5	6.9%	422	2.7%	19.6%	13.7%	9.7%
Middle	14	19.4%	2,414	15.2%	29.0%	25.8%	20.8%
Upper	52	72.2%	12,972	81.8%	45.6%	58.2%	68.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	72	100.0%	15,849	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	4.0%	\$979	3.9%	6.4%	5.8%	6.2%
Moderate	39	39.4%	\$9,034	35.9%	29.1%	27.1%	33.3%
Middle	27	27.3%	\$6,197	24.6%	27.4%	25.5%	24.3%
Upper	29	29.3%	\$8,949	35.6%	37.1%	39.9%	35.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.7%	0.4%
TOTAL	99	100.0%	\$25,159	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%	6.4%	6.3%	7.1%
Moderate	49	29.5%	\$14,004	41.1%	29.3%	28.0%	34.3%
Middle	29	17.5%	\$5,510	16.2%	27.3%	25.1%	25.3%
Upper	88	53.0%	\$14,542	42.7%	37.0%	40.4%	33.2%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.2%	0.0%
TOTAL	166	100.0%	\$34,056	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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%	21.4%	8.1%	4.1%
Moderate	8	20.0%	1,467	14.5%	17.6%	20.7%	15.4%
Middle	5	12.5%	643	6.3%	20.8%	22.0%	21.1%
Upper	25	62.5%	7,793	76.8%	40.2%	30.6%	42.9%
Unknown	2	5.0%	240	2.4%	0.0%	18.5%	16.4%
TOTAL	40	100.0%	10,143	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	6.7%	25	0.6%	21.4%	5.6%	2.7%
Moderate	1	6.7%	49	1.2%	17.6%	15.6%	10.0%
Middle	1	6.7%	24	0.6%	20.8%	20.6%	16.3%
Upper	7	46.7%	3,646	89.8%	40.2%	39.1%	49.6%
Unknown	5	33.3%	315	7.8%	0.0%	19.1%	21.3%
TOTAL	15	100.0%	4,059	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.4%	8.3%	5.6%
Moderate	0	0.0%	0	0.0%	17.6%	16.4%	12.7%
Middle	0	0.0%	0	0.0%	20.8%	18.8%	18.6%
Upper	1	100.0%	50	100.0%	40.2%	45.9%	51.8%
Unknown	0	0.0%	0	0.0%	0.0%	10.5%	11.3%
TOTAL	1	100.0%	50	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	1	1.8%	25	0.2%	21.4%	7.1%	3.3%
Moderate	9	16.1%	1,516	10.6%	17.6%	18.1%	12.0%
Middle	6	10.7%	667	4.7%	20.8%	21.1%	17.4%
Upper	33	58.9%	11,489	80.6%	40.2%	33.5%	40.2%
Unknown	7	12.5%	555	3.9%	0.0%	20.2%	27.1%
TOTAL	56	100.0%	14,252	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	9.1%	338	4.7%	21.4%	8.9%	4.7%
Moderate	5	15.2%	985	13.6%	17.6%	22.6%	17.5%
Middle	6	18.2%	1,111	15.3%	20.8%	21.0%	21.3%
Upper	16	48.5%	4,636	64.0%	40.2%	28.9%	41.6%
Unknown	3	9.1%	169	2.3%	0.0%	18.6%	14.8%
TOTAL	33	100.0%	7,239	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.4%	3.5%	1.6%
Moderate	7	18.9%	1,118	13.1%	17.6%	13.5%	8.8%
Middle	7	18.9%	1,269	14.9%	20.8%	19.8%	16.1%
Upper	22	59.5%	6,090	71.4%	40.2%	40.2%	50.2%
Unknown	1	2.7%	50	0.6%	0.0%	22.9%	23.3%
TOTAL	37	100.0%	8,527	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	50.0%	43	51.8%	21.4%	5.1%	3.2%
Moderate	0	0.0%	0	0.0%	17.6%	15.9%	9.8%
Middle	1	50.0%	40	48.2%	20.8%	19.2%	14.9%
Upper	0	0.0%	0	0.0%	40.2%	54.5%	65.7%
Unknown	0	0.0%	0	0.0%	0.0%	5.4%	6.4%
TOTAL	2	100.0%	83	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	4	5.6%	381	2.4%	21.4%	6.0%	2.9%
Moderate	12	16.7%	2,103	13.3%	17.6%	17.2%	11.9%
Middle	14	19.4%	2,420	15.3%	20.8%	19.7%	17.1%
Upper	38	52.8%	10,726	67.7%	40.2%	34.1%	42.6%
Unknown	4	5.6%	219	1.4%	0.0%	23.0%	25.5%
TOTAL	72	100.0%	15,849	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	44	44.4%	40.5%	\$8,099	32.2%	32.3%	88.7%
	Over \$1 Million/ Unknown	55	55.6%	59.5%	\$17,060	67.8%	67.7%	11.3%
	TOTAL	99	100.0%	100.0%	\$25,159	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	49	49.5%	88.0%	\$2,537	10.1%	24.0%	
	\$100,001– \$250,000	20	20.2%	5.3%	\$3,584	14.2%	15.3%	
	\$250,001–\$1 Million	30	30.3%	6.7%	\$19,038	75.7%	60.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	99	100.0%	100.0%	\$25,159	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	26	59.1%		\$1,228	15.2%		
	\$100,001– \$250,000	10	22.7%		\$1,852	22.9%		
	\$250,001–\$1 Million	8	18.2%		\$5,019	62.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	44	100.0%		\$8,099	100.0%		

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						Total Businesses
		Count			Dollars			
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	65	39.2%	40.1%	\$9,530	28.0%	25.6%	89.0%
	Over \$1 Million/ Unknown	101	60.8%	59.9%	\$24,526	72.0%	74.4%	11.0%
	TOTAL	166	100.0%	100.0%	\$34,056	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	86	51.8%	81.5%	\$3,766	11.1%	22.0%	
	\$100,001– \$250,000	36	21.7%	9.4%	\$5,786	17.0%	19.1%	
	\$250,001– \$1 Million	44	26.5%	9.2%	\$24,504	72.0%	58.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	166	100.0%	100.0%	\$34,056	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	39	60.0%		\$1,877	19.7%	
		\$100,001– \$250,000	14	21.5%		\$2,325	24.4%	
		\$250,001– \$1 Million	12	18.5%		\$5,328	55.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	65	100.0%		\$9,530	100.0%	

Appendix C (continued)

MISSOURI

St. Louis

Distribution of 2019 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	8.2%	723	3.4%	5.6%	2.6%	1.2%
Moderate	20	20.6%	2,237	10.7%	16.2%	13.7%	7.8%
Middle	34	35.1%	5,562	26.5%	31.5%	34.3%	28.4%
Upper	35	36.1%	12,446	59.4%	46.6%	49.2%	62.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	97	100.0%	20,968	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	2.8%	141	1.0%	5.6%	1.1%	0.5%
Moderate	20	28.2%	1,556	10.6%	16.2%	7.1%	3.8%
Middle	15	21.1%	3,087	21.0%	31.5%	29.3%	22.5%
Upper	34	47.9%	9,892	67.4%	46.6%	62.4%	73.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	71	100.0%	14,676	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	4	12.5%	96	4.9%	5.6%	1.8%	1.2%
Moderate	6	18.8%	208	10.6%	16.2%	9.0%	5.2%
Middle	6	18.8%	450	23.0%	31.5%	30.5%	25.9%
Upper	16	50.0%	1,204	61.5%	46.6%	58.4%	67.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.4%
TOTAL	32	100.0%	1,958	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	3	50.0%	3,310	27.6%	12.8%	17.4%	3.4%
Moderate	1	16.7%	1,238	10.3%	19.8%	35.3%	22.8%
Middle	0	0.0%	0	0.0%	33.0%	28.0%	41.1%
Upper	2	33.3%	7,427	62.0%	33.3%	19.0%	30.9%
Unknown	0	0.0%	0	0.0%	1.1%	0.3%	1.9%
TOTAL	6	100.0%	11,975	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	5.6%	0.8%	0.3%
Moderate	2	25.0%	48	8.7%	16.2%	5.8%	2.9%
Middle	2	25.0%	213	38.5%	31.5%	27.8%	20.8%
Upper	4	50.0%	292	52.8%	46.6%	65.5%	75.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.2%
TOTAL	8	100.0%	553	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	33.3%	30	14.0%	5.6%	1.8%	0.9%
Moderate	1	33.3%	80	37.2%	16.2%	10.6%	5.8%
Middle	1	33.3%	105	48.8%	31.5%	30.0%	18.7%
Upper	0	0.0%	0	0.0%	46.6%	57.5%	74.4%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	3	100.0%	215	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	18	8.3%	4,300	8.5%	5.6%	2.0%	1.0%
Moderate	50	23.0%	5,367	10.7%	16.2%	10.8%	6.8%
Middle	58	26.7%	9,417	18.7%	31.5%	31.8%	26.2%
Upper	91	41.9%	31,261	62.1%	46.6%	55.3%	65.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	217	100.0%	50,345	100.0%	100.0%	100.0%	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	19	20.9%	1,681	11.7%	5.6%	2.7%	1.3%
Moderate	24	26.4%	2,273	15.8%	16.2%	13.5%	7.7%
Middle	25	27.5%	4,324	30.1%	31.5%	34.8%	29.5%
Upper	23	25.3%	6,081	42.3%	46.6%	48.8%	61.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.3%	0.3%
TOTAL	91	100.0%	14,359	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	4.2%	235	1.3%	5.6%	0.8%	0.4%
Moderate	6	8.5%	907	5.1%	16.2%	6.0%	3.5%
Middle	9	12.7%	1,686	9.4%	31.5%	29.0%	23.1%
Upper	53	74.6%	15,101	84.2%	46.6%	64.1%	72.9%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.2%
TOTAL	71	100.0%	17,929	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	3	16.7%	50	4.4%	5.6%	1.6%	1.1%
Moderate	1	5.6%	11	1.0%	16.2%	6.8%	4.1%
Middle	5	27.8%	175	15.3%	31.5%	28.3%	23.6%
Upper	9	50.0%	911	79.4%	46.6%	63.2%	71.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	18	100.0%	1,147	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	12.8%	19.5%	4.3%
Moderate	0	0.0%	0	0.0%	19.8%	29.4%	15.2%
Middle	1	100.0%	5,430	100.0%	33.0%	26.4%	20.2%
Upper	0	0.0%	0	0.0%	33.3%	24.2%	56.8%
Unknown	0	0.0%	0	0.0%	1.1%	0.5%	3.4%
TOTAL	1	100.0%	5,430	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	16.7%	16	3.1%	5.6%	0.5%	0.2%
Moderate	0	0.0%	0	0.0%	16.2%	5.6%	3.3%
Middle	2	33.3%	295	57.8%	31.5%	26.2%	18.3%
Upper	3	50.0%	199	39.0%	46.6%	67.7%	78.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	6	100.0%	510	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	5.6%	2.2%	0.7%
Moderate	1	50.0%	37	13.8%	16.2%	12.3%	5.4%
Middle	1	50.0%	231	86.2%	31.5%	31.5%	20.0%
Upper	0	0.0%	0	0.0%	46.6%	53.9%	73.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	2	100.0%	268	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	26	13.8%	1,982	5.0%	5.6%	1.6%	0.8%
Moderate	32	16.9%	3,228	8.1%	16.2%	8.8%	5.2%
Middle	43	22.8%	12,141	30.6%	31.5%	30.9%	25.1%
Upper	88	46.6%	22,292	56.2%	46.6%	58.6%	68.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.3%
TOTAL	189	100.0%	39,643	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		%	\$ %
Low	18	9.3%	\$3,580	8.0%	6.4%	5.5%	5.7%
Moderate	36	18.7%	\$8,931	20.0%	16.7%	16.2%	16.8%
Middle	41	21.2%	\$8,011	18.0%	28.1%	27.6%	26.2%
Upper	96	49.7%	\$22,632	50.8%	47.7%	48.9%	47.8%
Unknown	2	1.0%	\$1,415	3.2%	1.2%	1.8%	3.4%
TOTAL	193	100.0%	\$44,569	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	45	7.4%	\$5,780	5.8%	6.6%	5.7%	5.6%
Moderate	102	16.7%	\$18,223	18.4%	16.9%	15.7%	16.8%
Middle	116	19.0%	\$18,733	18.9%	28.1%	27.3%	26.7%
Upper	342	56.2%	\$55,929	56.4%	47.2%	49.8%	48.3%
Unknown	4	0.7%	\$540	0.5%	1.2%	1.4%	2.7%
TOTAL	609	100.0%	\$99,205	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	24	24.7%	2,336	11.1%	20.9%	9.6%	4.6%
Moderate	26	26.8%	4,180	19.9%	16.1%	20.0%	13.8%
Middle	12	12.4%	1,958	9.3%	19.0%	20.4%	18.3%
Upper	31	32.0%	11,472	54.7%	44.0%	34.6%	48.9%
Unknown	4	4.1%	1,022	4.9%	0.0%	15.4%	14.4%
TOTAL	97	100.0%	20,968	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	4.2%	333	2.3%	20.9%	5.4%	2.7%
Moderate	8	11.3%	1,209	8.2%	16.1%	14.0%	8.7%
Middle	15	21.1%	2,637	18.0%	19.0%	20.5%	16.4%
Upper	27	38.0%	9,066	61.8%	44.0%	43.2%	55.9%
Unknown	18	25.4%	1,431	9.8%	0.0%	16.9%	16.4%
TOTAL	71	100.0%	14,676	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	4	12.5%	86	4.4%	20.9%	7.6%	4.3%
Moderate	7	21.9%	441	22.5%	16.1%	15.5%	11.1%
Middle	4	12.5%	103	5.3%	19.0%	22.0%	18.8%
Upper	15	46.9%	1,168	59.7%	44.0%	49.9%	59.2%
Unknown	2	6.3%	160	8.2%	0.0%	5.0%	6.6%
TOTAL	32	100.0%	1,958	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	1	16.7%	110	0.9%	20.9%	0.6%	0.0%
Moderate	0	0.0%	0	0.0%	16.1%	0.3%	0.0%
Middle	0	0.0%	0	0.0%	19.0%	0.3%	0.1%
Upper	0	0.0%	0	0.0%	44.0%	2.5%	0.6%
Unknown	5	83.3%	11,865	99.1%	0.0%	96.4%	99.3%
TOTAL	6	100.0%	11,975	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.9%	7.2%	4.4%
Moderate	1	12.5%	100	18.1%	16.1%	15.6%	10.2%
Middle	3	37.5%	223	40.3%	19.0%	21.4%	15.7%
Upper	4	50.0%	230	41.6%	44.0%	52.8%	66.7%
Unknown	0	0.0%	0	0.0%	0.0%	3.1%	3.0%
TOTAL	8	100.0%	553	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	33.3%	30	14.0%	20.9%	9.5%	4.8%
Moderate	1	33.3%	105	48.8%	16.1%	18.2%	11.3%
Middle	0	0.0%	0	0.0%	19.0%	20.7%	13.2%
Upper	0	0.0%	0	0.0%	44.0%	46.2%	63.1%
Unknown	1	33.3%	80	37.2%	0.0%	5.4%	7.6%
TOTAL	3	100.0%	215	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	33	15.2%	2,895	5.8%	20.9%	7.5%	3.5%
Moderate	43	19.8%	6,035	12.0%	16.1%	16.8%	10.6%
Middle	34	15.7%	4,921	9.8%	19.0%	20.1%	16.3%
Upper	77	35.5%	21,936	43.6%	44.0%	38.9%	49.6%
Unknown	30	13.8%	14,558	28.9%	0.0%	16.7%	20.0%
TOTAL	217	100.0%	50,345	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	31.9%	2,836	19.8%	20.9%	9.7%	4.8%
Moderate	25	27.5%	3,184	22.2%	16.1%	21.9%	15.6%
Middle	10	11.0%	1,858	12.9%	19.0%	19.6%	18.0%
Upper	19	20.9%	4,920	34.3%	44.0%	34.3%	47.4%
Unknown	8	8.8%	1,561	10.9%	0.0%	14.6%	14.2%
TOTAL	91	100.0%	14,359	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	2.8%	148	0.8%	20.9%	3.9%	1.9%
Moderate	10	14.1%	1,366	7.6%	16.1%	13.3%	8.6%
Middle	12	16.9%	2,441	13.6%	19.0%	19.6%	15.9%
Upper	40	56.3%	12,657	70.6%	44.0%	46.1%	56.9%
Unknown	7	9.9%	1,317	7.3%	0.0%	17.1%	16.7%
TOTAL	71	100.0%	17,929	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	11.1%	74	6.5%	20.9%	6.9%	3.8%
Moderate	2	11.1%	26	2.3%	16.1%	12.9%	9.4%
Middle	9	50.0%	644	56.1%	19.0%	21.1%	17.6%
Upper	5	27.8%	403	35.1%	44.0%	54.3%	61.5%
Unknown	0	0.0%	0	0.0%	0.0%	4.8%	7.7%
TOTAL	18	100.0%	1,147	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.1%	0.3%	0.0%
Middle	0	0.0%	0	0.0%	19.0%	0.3%	0.0%
Upper	0	0.0%	0	0.0%	44.0%	1.9%	0.5%
Unknown	1	100.0%	5,430	100.0%	0.0%	97.5%	99.4%
TOTAL	1	100.0%	5,430	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	2	33.3%	60	11.8%	20.9%	7.1%	3.8%
Moderate	0	0.0%	0	0.0%	16.1%	14.4%	9.6%
Middle	3	50.0%	350	68.6%	19.0%	19.1%	15.0%
Upper	1	16.7%	100	19.6%	44.0%	56.1%	68.4%
Unknown	0	0.0%	0	0.0%	0.0%	3.3%	3.3%
TOTAL	6	100.0%	510	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.9%	9.8%	4.3%
Moderate	0	0.0%	0	0.0%	16.1%	18.2%	9.1%
Middle	0	0.0%	0	0.0%	19.0%	18.5%	11.3%
Upper	2	100.0%	268	100.0%	44.0%	47.5%	66.8%
Unknown	0	0.0%	0	0.0%	0.0%	6.1%	8.4%
TOTAL	2	100.0%	268	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	35	18.5%	3,118	7.9%	20.9%	5.7%	2.7%
Moderate	37	19.6%	4,576	11.5%	16.1%	15.6%	10.4%
Middle	34	18.0%	5,293	13.4%	19.0%	19.2%	15.9%
Upper	67	35.4%	18,348	46.3%	44.0%	41.8%	52.1%
Unknown	16	8.5%	8,308	21.0%	0.0%	17.7%	18.8%
TOTAL	189	100.0%	39,643	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$(000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	80	41.5%	47.1%	\$15,156	34.0%	28.7%	89.1%
	Over \$1 Million/Unknown	113	58.5%	52.9%	\$29,413	66.0%	71.3%	10.9%
	TOTAL	193	100.0%	100.0%	\$44,569	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	88	45.6%	91.3%	\$3,715	8.3%	28.3%	
	\$100,001–\$250,000	40	20.7%	4.0%	\$6,621	14.9%	15.5%	
	\$250,001–\$1 Million	65	33.7%	4.7%	\$34,233	76.8%	56.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	193	100.0%	100.0%	\$44,569	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	39	48.8%		\$1,517	10.0%		
	\$100,001–\$250,000	21	26.3%		\$3,361	22.2%		
	\$250,001–\$1 Million	20	25.0%		\$10,278	67.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	80	100.0%		\$15,156	100.0%		

Appendix C (continued)

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	192	31.5%	39.7%	\$33,413	33.7%	22.8%	89.4%
	Over \$1 Million/ Unknown	417	68.5%	60.3%	\$65,792	66.3%	77.2%	10.6%
	TOTAL	609	100.0%	100.0%	\$99,205	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	372	61.1%	83.6%	\$13,794	13.9%	23.7%	
	\$100,001– \$250,000	113	18.6%	8.6%	\$17,807	17.9%	19.8%	
	\$250,001– \$1 Million	124	20.4%	7.9%	\$67,604	68.1%	56.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	609	100.0%	100.0%	\$99,205	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	117	60.9%		\$3,998	12.0%		
	\$100,001– \$250,000	33	17.2%		\$4,787	14.3%		
	\$250,001– \$1 Million	42	21.9%		\$24,628	73.7%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	192	100.0%		\$33,413	100.0%		

Appendix C (continued)

NonMSA Missouri

Distribution of 2019 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	0.5%	32	0.1%	0.5%	0.4%	0.3%
Moderate	4	2.1%	268	1.1%	11.0%	9.4%	7.4%
Middle	162	83.9%	20,747	82.8%	81.6%	81.6%	81.6%
Upper	26	13.5%	4,014	16.0%	6.8%	8.5%	10.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	193	100.0%	25,061	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.5%	0.1%	0.1%
Moderate	5	5.4%	648	4.8%	11.0%	7.7%	5.8%
Middle	76	82.6%	10,603	77.8%	81.6%	82.4%	83.2%
Upper	11	12.0%	2,369	17.4%	6.8%	9.7%	10.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	92	100.0%	13,620	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.5%	0.5%	0.4%
Moderate	2	6.5%	46	3.0%	11.0%	9.1%	6.0%
Middle	27	87.1%	1,441	94.6%	81.6%	83.6%	89.0%
Upper	2	6.5%	36	2.4%	6.8%	6.8%	4.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	31	100.0%	1,523	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%		1.7%	2.4%
Moderate	1	25.0%	826	39.4%	10.7%	21.4%	13.5%
Middle	3	75.0%	1,270	60.6%	80.6%	59.5%	66.1%
Upper	0	0.0%	0	0.0%	7.0%	16.7%	15.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	2,096	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.5%	0.8%	0.1%
Moderate	2	9.1%	120	14.1%	11.0%	4.7%	3.8%
Middle	16	72.7%	568	66.8%	81.6%	85.3%	88.5%
Upper	4	18.2%	162	19.1%	6.8%	9.3%	7.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	22	100.0%	850	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.5%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	11.0%	8.1%	8.7%
Middle	5	71.4%	719	50.9%	81.6%	82.9%	80.5%
Upper	2	28.6%	694	49.1%	6.8%	8.1%	10.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.8%	0.5%
TOTAL	7	100.0%	1,413	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	0.3%	32	0.1%	0.5%	0.3%	0.4%
Moderate	14	4.0%	1,908	4.3%	11.0%	8.9%	7.1%
Middle	289	82.8%	35,348	79.3%	81.6%	81.8%	81.6%
Upper	45	12.9%	7,275	16.3%	6.8%	8.9%	10.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	349	100.0%	44,563	100.0%	100.0%	100.0%	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%	0.5%	0.3%	0.2%
Moderate	18	7.5%	1,663	5.2%	11.0%	8.7%	6.5%
Middle	189	78.4%	22,756	71.3%	81.6%	81.3%	81.7%
Upper	34	14.1%	7,483	23.5%	6.8%	9.7%	11.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	241	100.0%	31,902	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.5%	0.1%	0.1%
Moderate	20	10.1%	2,064	7.9%	11.0%	6.5%	5.0%
Middle	168	84.4%	22,271	84.8%	81.6%	83.0%	83.1%
Upper	11	5.5%	1,924	7.3%	6.8%	10.4%	11.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	199	100.0%	26,259	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.5%	0.0%	0.0%
Moderate	2	8.0%	51	4.5%	11.0%	7.7%	5.3%
Middle	22	88.0%	1,054	93.9%	81.6%	78.7%	77.8%
Upper	1	4.0%	17	1.5%	6.8%	13.7%	16.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	25	100.0%	1,122	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units			
Low	0	0.0%	0	0.0%	1.7%	0.0%	0.0%	
Moderate	0	0.0%	0	0.0%	10.7%	8.8%	10.3%	
Middle	1	100.0%	500	100.0%	80.6%	73.5%	82.2%	
Upper	0	0.0%	0	0.0%	7.0%	17.6%	7.5%	
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%	
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0.5%	0.0%	0.0%	
Moderate	0	0.0%	0	0.0%	11.0%	6.2%	3.7%	
Middle	6	100.0%	255	100.0%	81.6%	86.4%	89.5%	
Upper	0	0.0%	0	0.0%	6.8%	7.4%	6.8%	
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	
TOTAL	6	100.0%	255	100.0%	100.0%	100.0%	100.0%	
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0.5%	0.0%	0.0%	
Moderate	1	14.3%	101	17.4%	11.0%	9.2%	7.9%	
Middle	6	85.7%	478	82.6%	81.6%	84.0%	86.0%	
Upper	0	0.0%	0	0.0%	6.8%	6.7%	6.0%	
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	
TOTAL	7	100.0%	579	100.0%	100.0%	100.0%	100.0%	
Total Home Mortgage Loans					% of Owner-Occupied Units			
Low	0	0.0%	0	0.0%	0.5%	0.2%	0.1%	
Moderate	41	8.6%	3,879	6.4%	11.0%	7.8%	6.0%	
Middle	392	81.8%	47,314	78.1%	81.6%	82.1%	82.4%	
Upper	46	9.6%	9,424	15.5%	6.8%	10.0%	11.5%	
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	
TOTAL	479	100.0%	60,617	100.0%	100.0%	100.0%	100.0%	

Distribution of 2019 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	0.4%	\$143	0.5%	0.5%	0.5%	0.3%
Moderate	15	5.5%	\$2,308	7.8%	13.0%	10.4%	11.2%
Middle	227	83.5%	\$21,615	72.6%	79.1%	77.9%	78.3%
Upper	29	10.7%	\$5,705	19.2%	7.4%	8.5%	9.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	2.8%	0.8%
TOTAL	272	100.0%	\$29,771	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	0.4%	\$159	0.2%	0.5%	0.4%	0.2%
Moderate	186	17.1%	\$11,880	15.3%	12.9%	11.9%	11.4%
Middle	833	76.7%	\$60,050	77.4%	79.3%	80.0%	80.1%
Upper	63	5.8%	\$5,500	7.1%	7.3%	7.2%	8.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.6%	0.2%
TOTAL	1,086	100.0%	\$77,589	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	5.2%	569	2.3%	21.4%	4.9%	2.5%
Moderate	29	15.0%	2,602	10.4%	18.7%	16.1%	11.0%
Middle	38	19.7%	4,240	16.9%	22.0%	20.6%	18.3%
Upper	104	53.9%	16,570	66.1%	37.9%	40.3%	50.9%
Unknown	12	6.2%	1,080	4.3%	0.0%	18.1%	17.3%
TOTAL	193	100.0%	25,061	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	11	12.0%	516	3.8%	21.4%	6.4%	3.0%
Moderate	16	17.4%	1,257	9.2%	18.7%	12.3%	8.0%
Middle	14	15.2%	1,640	12.0%	22.0%	17.2%	13.6%
Upper	44	47.8%	7,530	55.3%	37.9%	43.7%	52.0%
Unknown	7	7.6%	2,677	19.7%	0.0%	20.5%	23.4%
TOTAL	92	100.0%	13,620	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	3.2%	15	1.0%	21.4%	10.5%	7.1%
Moderate	7	22.6%	227	14.9%	18.7%	15.0%	11.3%
Middle	4	12.9%	225	14.8%	22.0%	22.7%	24.6%
Upper	18	58.1%	1,046	68.7%	37.9%	47.7%	52.8%
Unknown	1	3.2%	10	0.7%	0.0%	4.1%	4.2%
TOTAL	31	100.0%	1,523	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans							
Low	1	25.0%	990	47.2%	21.4%	2.4%	2.2%
Moderate	0	0.0%	0	0.0%	18.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.0%	2.4%	0.2%
Upper	0	0.0%	0	0.0%	37.9%	11.9%	8.1%
Unknown	3	75.0%	1,106	52.8%	0.0%	83.3%	89.4%
TOTAL	4	100.0%	2,096	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	4	18.2%	130	15.3%	21.4%	11.6%	5.4%
Moderate	3	13.6%	74	8.7%	18.7%	10.1%	4.3%
Middle	4	18.2%	121	14.2%	22.0%	21.7%	18.5%
Upper	8	36.4%	352	41.4%	37.9%	50.4%	66.7%
Unknown	3	13.6%	173	20.4%	0.0%	6.2%	5.2%
TOTAL	22	100.0%	850	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.4%	8.1%	3.6%
Moderate	1	14.3%	67	4.7%	18.7%	12.2%	7.2%
Middle	2	28.6%	147	10.4%	22.0%	26.0%	22.2%
Upper	4	57.1%	1,199	84.9%	37.9%	48.0%	59.1%
Unknown	0	0.0%	0	0.0%	0.0%	5.7%	7.9%
TOTAL	7	100.0%	1,413	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	27	7.7%	2,220	5.0%	21.4%	5.6%	2.7%
Moderate	56	16.0%	4,227	9.5%	18.7%	14.4%	9.4%
Middle	62	17.8%	6,373	14.3%	22.0%	19.4%	15.9%
Upper	178	51.0%	26,697	59.9%	37.9%	41.2%	49.3%
Unknown	26	7.4%	5,046	11.3%	0.0%	19.4%	22.6%
TOTAL	349	100.0%	44,563	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	14	5.8%	849	2.7%	21.4%	5.9%	3.0%
Moderate	38	15.8%	3,818	12.0%	18.7%	17.3%	11.9%
Middle	43	17.8%	4,540	14.2%	22.0%	20.6%	18.2%
Upper	138	57.3%	21,841	68.5%	37.9%	41.0%	52.0%
Unknown	8	3.3%	854	2.7%	0.0%	15.2%	14.9%
TOTAL	241	100.0%	31,902	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	23	11.6%	1,087	4.1%	21.4%	3.5%	1.5%
Moderate	23	11.6%	2,323	8.8%	18.7%	10.2%	6.6%
Middle	45	22.6%	5,908	22.5%	22.0%	16.6%	13.0%
Upper	94	47.2%	15,016	57.2%	37.9%	43.7%	49.8%
Unknown	14	7.0%	1,925	7.3%	0.0%	26.0%	29.1%
TOTAL	199	100.0%	26,259	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	8.0%	31	2.8%	21.4%	4.9%	2.3%
Moderate	5	20.0%	129	11.5%	18.7%	14.2%	9.2%
Middle	6	24.0%	210	18.7%	22.0%	18.6%	15.1%
Upper	11	44.0%	735	65.5%	37.9%	53.0%	63.2%
Unknown	1	4.0%	17	1.5%	0.0%	9.3%	10.2%
TOTAL	25	100.0%	1,122	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	22.0%	0.0%	0.0%
Upper	1	100.0%	500	100.0%	37.9%	5.9%	1.7%
Unknown	0	0.0%	0	0.0%	0.0%	94.1%	98.3%
TOTAL	1	100.0%	500	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.4%	3.7%	1.1%
Moderate	0	0.0%	0	0.0%	18.7%	7.4%	4.8%
Middle	0	0.0%	0	0.0%	22.0%	17.3%	14.8%
Upper	5	83.3%	240	94.1%	37.9%	59.3%	64.2%
Unknown	1	16.7%	15	5.9%	0.0%	12.3%	15.1%
TOTAL	6	100.0%	255	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	1	14.3%	40	6.9%	21.4%	13.4%	6.7%
Moderate	2	28.6%	146	25.2%	18.7%	16.0%	10.3%
Middle	3	42.9%	298	51.5%	22.0%	26.1%	19.1%
Upper	1	14.3%	95	16.4%	37.9%	38.7%	57.9%
Unknown	0	0.0%	0	0.0%	0.0%	5.9%	6.0%
TOTAL	7	100.0%	579	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	40	8.4%	2,007	3.3%	21.4%	4.7%	2.2%
Moderate	68	14.2%	6,416	10.6%	18.7%	13.5%	8.8%
Middle	97	20.3%	10,956	18.1%	22.0%	18.2%	14.9%
Upper	250	52.2%	38,427	63.4%	37.9%	41.4%	48.8%
Unknown	24	5.0%	2,811	4.6%	0.0%	22.1%	25.3%
TOTAL	479	100.0%	60,617	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	196	72.1%	51.8%	\$13,460	45.2%	49.9%	91.4%
	Over \$1 Million/ Unknown	76	27.9%	48.2%	\$16,311	54.8%	50.1%	8.6%
	TOTAL	272	100.0%	100.0%	\$29,771	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	204	75.0%	92.9%	\$7,036	23.6%	37.5%	
	\$100,001– \$250,000	40	14.7%	4.0%	\$6,433	21.6%	17.6%	
	\$250,001– \$1 Million	28	10.3%	3.1%	\$16,302	54.8%	44.8%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	272	100.0%	100.0%	\$29,771	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	162	82.7%		\$4,930	36.6%	
		\$100,001– \$250,000	24	12.2%		\$3,711	27.6%	
		\$250,001– \$1 Million	10	5.1%		\$4,819	35.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	196	100.0%		\$13,460	100.0%	

Appendix C (continued)

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	714	65.7%	44.6%	\$40,294	51.9%	41.1%	91.5%
	Over \$1 Million/ Unknown	372	34.3%	55.4%	\$37,295	48.1%	58.9%	8.5%
	TOTAL	1086	100.0%	100.0%	\$77,589	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	902	83.1%	88.7%	\$24,311	31.3%	32.5%	
	\$100,001– \$250,000	108	9.9%	6.4%	\$17,560	22.6%	20.0%	
	\$250,001– \$1 Million	76	7.0%	4.9%	\$35,718	46.0%	47.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1086	100.0%	100.0%	\$77,589	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	622	87.1%		\$16,067	39.9%	
		\$100,001– \$250,000	60	8.4%		\$9,790	24.3%	
		\$250,001– \$1 Million	32	4.5%		\$14,437	35.8%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	714	100.0%		\$40,294	100.0%	

Appendix C (continued)

OKLAHOMA

Oklahoma City

Distribution of 2019 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%	3.6%	2.0%	1.1%
Moderate	14	11.8%	2,637	8.3%	18.2%	13.1%	8.3%
Middle	28	23.5%	4,889	15.4%	43.2%	39.0%	34.0%
Upper	77	64.7%	24,171	76.3%	34.9%	45.7%	56.4%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.2%
TOTAL	119	100.0%	31,697	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	3.6%	1.7%	0.9%
Moderate	5	14.7%	1,240	13.7%	18.2%	12.1%	6.8%
Middle	5	14.7%	480	5.3%	43.2%	38.9%	31.8%
Upper	23	67.6%	6,880	75.9%	34.9%	47.2%	60.3%
Unknown	1	2.9%	465	5.1%	0.1%	0.1%	0.2%
TOTAL	34	100.0%	9,065	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	3.6%	2.4%	1.7%
Moderate	5	41.7%	262	25.5%	18.2%	13.8%	9.8%
Middle	3	25.0%	358	34.8%	43.2%	37.1%	32.1%
Upper	4	33.3%	409	39.7%	34.9%	46.5%	56.2%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.2%
TOTAL	12	100.0%	1,029	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	3.6%	0.9%	0.5%
Moderate	0	0.0%	0	0.0%	18.2%	8.2%	4.6%
Middle	2	28.6%	33	8.4%	43.2%	37.9%	30.1%
Upper	5	71.4%	360	91.6%	34.9%	52.8%	61.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	3.2%
TOTAL	7	100.0%	393	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.6%	1.5%	0.7%
Moderate	0	0.0%	0	0.0%	18.2%	11.6%	7.3%
Middle	0	0.0%	0	0.0%	43.2%	42.1%	32.1%
Upper	3	100.0%	738	100.0%	34.9%	44.9%	59.8%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	3	100.0%	738	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%	3.6%	2.0%	1.4%
Moderate	24	13.7%	4,139	9.6%	18.2%	13.2%	9.8%
Middle	38	21.7%	5,760	13.4%	43.2%	39.1%	34.4%
Upper	112	64.0%	32,558	75.9%	34.9%	45.5%	54.3%
Unknown	1	0.6%	465	1.1%	0.1%	0.1%	0.2%
TOTAL	175	100.0%	42,922	100.0%	100.0%	100.0%	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%	3.6%	1.9%	1.1%
Moderate	9	11.0%	2,133	9.5%	18.2%	13.1%	8.6%
Middle	22	26.8%	4,986	22.1%	43.2%	37.3%	32.3%
Upper	51	62.2%	15,429	68.4%	34.9%	47.5%	57.8%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.2%
TOTAL	82	100.0%	22,548	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.0%	60	0.2%	3.6%	1.0%	0.5%
Moderate	1	1.0%	350	1.3%	18.2%	8.2%	5.0%
Middle	18	18.4%	3,467	12.7%	43.2%	35.1%	28.8%
Upper	78	79.6%	23,320	85.7%	34.9%	55.6%	65.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.2%
TOTAL	98	100.0%	27,197	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	3.6%	2.9%	2.1%
Moderate	1	20.0%	70	8.2%	18.2%	11.0%	7.9%
Middle	1	20.0%	150	17.6%	43.2%	41.8%	35.1%
Upper	3	60.0%	632	74.2%	34.9%	44.2%	54.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.4%
TOTAL	5	100.0%	852	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	8.6%	9.7%	4.3%
Moderate	1	100.0%	400	100.0%	39.4%	39.6%	28.9%
Middle	0	0.0%	0	0.0%	33.1%	31.8%	33.8%
Upper	0	0.0%	0	0.0%	17.6%	18.4%	32.3%
Unknown	0	0.0%	0	0.0%	1.3%	0.6%	0.6%
TOTAL	1	100.0%	400	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	3.6%	1.3%	0.5%
Moderate	0	0.0%	0	0.0%	18.2%	9.1%	4.7%
Middle	1	33.3%	30	13.3%	43.2%	36.5%	30.4%
Upper	2	66.7%	195	86.7%	34.9%	53.1%	64.4%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	3	100.0%	225	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.6%	1.6%	0.7%
Moderate	2	50.0%	182	45.7%	18.2%	11.1%	6.7%
Middle	0	0.0%	0	0.0%	43.2%	39.6%	30.6%
Upper	2	50.0%	216	54.3%	34.9%	47.7%	62.0%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	4	100.0%	398	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	0.5%	60	0.1%	3.6%	1.6%	1.0%
Moderate	14	7.3%	3,135	6.1%	18.2%	11.3%	8.2%
Middle	42	21.8%	8,633	16.7%	43.2%	36.7%	31.1%
Upper	136	70.5%	39,792	77.1%	34.9%	50.3%	59.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.2%
TOTAL	193	100.0%	51,620	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	3.6%	\$851	1.7%	4.6%	4.4%	6.1%
Moderate	42	19.1%	\$8,297	16.6%	22.2%	18.4%	20.5%
Middle	78	35.5%	\$16,168	32.3%	36.9%	35.0%	34.7%
Upper	84	38.2%	\$21,420	42.8%	33.1%	37.0%	33.6%
Unknown	8	3.6%	\$3,295	6.6%	3.1%	5.2%	5.1%
TOTAL	220	100.0%	\$50,031	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	23	3.5%	\$2,010	2.3%	4.7%	4.4%	5.7%
Moderate	145	22.3%	\$17,339	19.6%	22.3%	19.7%	22.9%
Middle	213	32.7%	\$31,479	35.7%	36.8%	35.5%	33.9%
Upper	245	37.6%	\$30,441	34.5%	33.0%	37.4%	32.7%
Unknown	25	3.8%	\$6,980	7.9%	3.2%	3.0%	4.9%
TOTAL	651	100.0%	\$88,249	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	3.4%	387	1.2%	21.3%	6.7%	3.8%
Moderate	11	9.2%	1,460	4.6%	17.3%	19.9%	15.3%
Middle	11	9.2%	2,058	6.5%	20.5%	20.6%	19.7%
Upper	84	70.6%	26,808	84.6%	40.9%	32.7%	43.6%
Unknown	9	7.6%	984	3.1%	0.0%	20.2%	17.7%
TOTAL	119	100.0%	31,697	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	8.8%	285	3.1%	21.3%	6.2%	2.7%
Moderate	3	8.8%	375	4.1%	17.3%	12.9%	8.0%
Middle	1	2.9%	114	1.3%	20.5%	17.0%	13.2%
Upper	22	64.7%	6,669	73.6%	40.9%	36.8%	45.7%
Unknown	5	14.7%	1,622	17.9%	0.0%	27.1%	30.4%
TOTAL	34	100.0%	9,065	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	16.7%	55	5.3%	21.3%	6.1%	3.4%
Moderate	0	0.0%	0	0.0%	17.3%	15.7%	10.1%
Middle	1	8.3%	83	8.1%	20.5%	17.4%	13.9%
Upper	8	66.7%	816	79.3%	40.9%	51.6%	56.9%
Unknown	1	8.3%	75	7.3%	0.0%	9.2%	15.7%
TOTAL	12	100.0%	1,029	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.3%	5.1%	2.5%
Moderate	1	14.3%	13	3.3%	17.3%	11.8%	7.1%
Middle	1	14.3%	30	7.6%	20.5%	24.9%	14.8%
Upper	5	71.4%	350	89.1%	40.9%	53.5%	67.6%
Unknown	0	0.0%	0	0.0%	0.0%	4.6%	8.0%
TOTAL	7	100.0%	393	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.3%	7.0%	3.9%
Moderate	0	0.0%	0	0.0%	17.3%	20.1%	14.4%
Middle	1	33.3%	190	25.7%	20.5%	22.1%	17.6%
Upper	2	66.7%	548	74.3%	40.9%	44.6%	51.1%
Unknown	0	0.0%	0	0.0%	0.0%	6.2%	13.1%
TOTAL	3	100.0%	738	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	9	5.1%	727	1.7%	21.3%	6.3%	3.2%
Moderate	15	8.6%	1,848	4.3%	17.3%	17.2%	12.0%
Middle	15	8.6%	2,475	5.8%	20.5%	18.9%	16.3%
Upper	121	69.1%	35,191	82.0%	40.9%	33.6%	40.5%
Unknown	15	8.6%	2,681	6.2%	0.0%	24.0%	28.1%
TOTAL	175	100.0%	42,922	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	3.7%	308	1.4%	21.3%	6.3%	3.6%
Moderate	11	13.4%	1,809	8.0%	17.3%	20.0%	15.6%
Middle	11	13.4%	1,925	8.5%	20.5%	20.3%	19.5%
Upper	53	64.6%	17,895	79.4%	40.9%	32.1%	42.4%
Unknown	4	4.9%	611	2.7%	0.0%	21.3%	18.9%
TOTAL	82	100.0%	22,548	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.3%	3.2%	1.4%
Moderate	7	7.1%	1,100	4.0%	17.3%	10.6%	6.5%
Middle	9	9.2%	1,775	6.5%	20.5%	15.9%	12.6%
Upper	80	81.6%	23,505	86.4%	40.9%	40.8%	49.3%
Unknown	2	2.0%	817	3.0%	0.0%	29.5%	30.3%
TOTAL	98	100.0%	27,197	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.3%	6.2%	3.2%
Moderate	0	0.0%	0	0.0%	17.3%	13.2%	9.3%
Middle	3	60.0%	293	34.4%	20.5%	18.5%	13.9%
Upper	2	40.0%	559	65.6%	40.9%	52.4%	61.6%
Unknown	0	0.0%	0	0.0%	0.0%	9.8%	12.0%
TOTAL	5	100.0%	852	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.3%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.3%	0.3%	0.0%
Middle	0	0.0%	0	0.0%	20.5%	0.9%	0.1%
Upper	0	0.0%	0	0.0%	40.9%	4.4%	1.0%
Unknown	1	100.0%	400	100.0%	0.0%	94.4%	98.9%
TOTAL	1	100.0%	400	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	33.3%	30	13.3%	21.3%	5.5%	2.9%
Moderate	0	0.0%	0	0.0%	17.3%	13.1%	8.2%
Middle	0	0.0%	0	0.0%	20.5%	18.6%	10.4%
Upper	2	66.7%	195	86.7%	40.9%	58.6%	70.3%
Unknown	0	0.0%	0	0.0%	0.0%	4.2%	8.2%
TOTAL	3	100.0%	225	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.3%	6.5%	3.1%
Moderate	0	0.0%	0	0.0%	17.3%	16.1%	11.5%
Middle	0	0.0%	0	0.0%	20.5%	18.8%	16.2%
Upper	4	100.0%	398	100.0%	40.9%	48.0%	58.4%
Unknown	0	0.0%	0	0.0%	0.0%	10.6%	10.9%
TOTAL	4	100.0%	398	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	4	2.1%	338	0.7%	21.3%	4.7%	2.4%
Moderate	18	9.3%	2,909	5.6%	17.3%	15.0%	10.5%
Middle	23	11.9%	3,993	7.7%	20.5%	17.6%	15.0%
Upper	141	73.1%	42,552	82.4%	40.9%	35.2%	42.5%
Unknown	7	3.6%	1,828	3.5%	0.0%	27.5%	29.6%
TOTAL	193	100.0%	51,620	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	(\$ (000s))	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	107	48.6%	45.1%	\$20,355	40.7%	40.3%	91.4%
	Over \$1 Million/ Unknown	113	51.4%	54.9%	\$29,676	59.3%	59.7%	8.6%
	TOTAL	220	100.0%	100.0%	\$50,031	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	104	47.3%	92.8%	\$5,323	10.6%	35.5%	
	\$100,001– \$250,000	51	23.2%	3.6%	\$9,388	18.8%	15.4%	
	\$250,001– \$1 Million	65	29.5%	3.7%	\$35,320	70.6%	49.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	220	100.0%	100.0%	\$50,031	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	58	54.2%		\$2,651	13.0%		
	\$100,001– \$250,000	23	21.5%		\$4,028	19.8%		
	\$250,001– \$1 Million	26	24.3%		\$13,676	67.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	107	100.0%		\$20,355	100.0%		

Appendix C (continued)

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						
		Count			Dollars			Total
		Bank		Aggregate	Bank		Aggregate	Businesses
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	305	46.9%	29.2%	\$33,390	37.8%	25.5%	91.5%
	Over \$1 Million/ Unknown	346	53.1%	70.8%	\$54,859	62.2%	74.5%	8.5%
	TOTAL	651	100.0%	100.0%	\$88,249	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	427	65.6%	86.7%	\$17,422	19.7%	29.9%	
	\$100,001– \$250,000	122	18.7%	7.4%	\$20,348	23.1%	20.1%	
	\$250,001– \$1 Million	102	15.7%	5.9%	\$50,479	57.2%	50.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	651	100.0%	100.0%	\$88,249	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	220	72.1%		\$8,063	24.1%	
		\$100,001– \$250,000	45	14.8%		\$7,749	23.2%	
		\$250,001– \$1 Million	40	13.1%		\$17,578	52.6%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	305	100.0%		\$33,390	100.0%	

Appendix C (continued)

Southern NonMSA Oklahoma

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	27.6%	692	23.4%	8.2%	8.5%	6.8%
Middle	17	58.6%	1,706	57.7%	67.3%	68.5%	69.6%
Upper	4	13.8%	558	18.9%	24.5%	23.0%	23.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	29	100.0%	2,956	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	5	13.5%	512	12.3%	8.2%	6.3%	5.6%
Middle	25	67.6%	2,887	69.6%	67.3%	66.1%	67.7%
Upper	7	18.9%	751	18.1%	24.5%	27.6%	26.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	37	100.0%	4,150	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	37.5%	145	36.7%	8.2%	8.5%	6.7%
Middle	3	37.5%	210	53.2%	67.3%	69.5%	73.0%
Upper	2	25.0%	40	10.1%	24.5%	22.0%	20.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	8	100.0%	395	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.2%	8.8%	5.6%
Middle	1	100.0%	50	100.0%	67.3%	66.2%	64.7%
Upper	0	0.0%	0	0.0%	24.5%	25.0%	29.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	50	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	16	21.3%	1,349	17.9%	8.2%	7.7%	7.0%
Middle	46	61.3%	4,853	64.3%	67.3%	67.2%	67.8%
Upper	13	17.3%	1,349	17.9%	24.5%	25.1%	25.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	75	100.0%	7,551	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	94	21.2%	\$5,223	12.2%	15.5%	14.0%	14.5%
Middle	252	56.9%	\$27,533	64.2%	61.9%	66.2%	64.4%
Upper	97	21.9%	\$10,102	23.6%	22.6%	18.8%	20.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.9%	0.3%
TOTAL	443	100.0%	\$42,858	100.0%	100.0%	100.0%	100.0%

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%	20.0%	3.5%	1.8%
Moderate	3	10.3%	228	7.7%	17.6%	14.9%	10.6%
Middle	7	24.1%	694	23.5%	20.4%	22.7%	20.3%
Upper	11	37.9%	1,194	40.4%	42.0%	42.6%	53.3%
Unknown	8	27.6%	840	28.4%	0.0%	16.3%	14.1%
TOTAL	29	100.0%	2,956	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	8.1%	107	2.6%	20.0%	2.3%	1.0%
Moderate	1	2.7%	96	2.3%	17.6%	9.2%	5.6%
Middle	4	10.8%	288	6.9%	20.4%	14.6%	10.5%
Upper	24	64.9%	3,198	77.1%	42.0%	53.0%	60.8%
Unknown	5	13.5%	461	11.1%	0.0%	21.0%	22.1%
TOTAL	37	100.0%	4,150	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	25.0%	40	10.1%	20.0%	8.5%	4.7%
Moderate	0	0.0%	0	0.0%	17.6%	10.2%	7.8%
Middle	2	25.0%	120	30.4%	20.4%	21.2%	21.0%
Upper	4	50.0%	235	59.5%	42.0%	47.5%	52.3%
Unknown	0	0.0%	0	0.0%	0.0%	12.7%	14.2%
TOTAL	8	100.0%	395	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.0%	7.4%	3.6%
Moderate	1	100.0%	50	100.0%	17.6%	16.2%	10.7%
Middle	0	0.0%	0	0.0%	20.4%	26.5%	27.3%
Upper	0	0.0%	0	0.0%	42.0%	44.1%	52.5%
Unknown	0	0.0%	0	0.0%	0.0%	5.9%	5.9%
TOTAL	1	100.0%	50	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	5	6.7%	147	1.9%	20.0%	3.0%	1.3%
Moderate	5	6.7%	374	5.0%	17.6%	11.7%	7.6%
Middle	13	17.3%	1,102	14.6%	20.4%	18.3%	14.6%
Upper	39	52.0%	4,627	61.3%	42.0%	46.0%	53.6%
Unknown	13	17.3%	1,301	17.2%	0.0%	21.0%	22.9%
TOTAL	75	100.0%	7,551	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	216	48.8%	38.0%	\$20,233	47.2%	35.1%	89.6%
	Over \$1 Million/ Unknown	227	51.2%	62.0%	\$22,625	52.8%	64.9%	10.4%
	TOTAL	443	100.0%	100.0%	\$42,858	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	341	77.0%	88.0%	\$9,040	21.1%	35.7%	
	\$100,001–\$250,000	54	12.2%	7.0%	\$8,891	20.7%	20.2%	
	\$250,001–\$1 Million	48	10.8%	5.0%	\$24,927	58.2%	44.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	443	100.0%	100.0%	\$42,858	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	161	74.5%		\$4,156	20.5%		
	\$100,001–\$250,000	30	13.9%		\$4,794	23.7%		
	\$250,001–\$1 Million	25	11.6%		\$11,283	55.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	216	100.0%		\$20,233	100.0%		

Appendix C (continued)

TENNESSEE

Nashville

Distribution of 2019 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	9	11.3%	3,116	14.0%	4.7%	7.2%	6.7%
Moderate	10	12.5%	2,320	10.5%	16.0%	15.6%	11.3%
Middle	27	33.8%	6,286	28.3%	39.7%	37.6%	30.2%
Upper	34	42.5%	10,469	47.2%	39.5%	39.6%	51.8%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	80	100.0%	22,191	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	6	6.7%	1,234	6.3%	4.7%	5.1%	4.3%
Moderate	8	9.0%	1,599	8.1%	16.0%	13.2%	8.6%
Middle	36	40.4%	6,091	30.9%	39.7%	37.7%	30.1%
Upper	39	43.8%	10,809	54.8%	39.5%	43.8%	56.9%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	89	100.0%	19,733	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	4.7%	4.2%	3.6%
Moderate	6	17.6%	664	22.0%	16.0%	13.4%	9.7%
Middle	13	38.2%	1,013	33.5%	39.7%	33.8%	28.7%
Upper	15	44.1%	1,347	44.5%	39.5%	48.5%	58.0%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.1%
TOTAL	34	100.0%	3,024	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	14.3%	23.0%	18.4%
Moderate	0	0.0%	0	0.0%	32.0%	31.5%	19.1%
Middle	0	0.0%	0	0.0%	29.0%	31.5%	42.5%
Upper	1	100.0%	230	100.0%	24.7%	13.9%	20.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	230	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	3.3%	20	0.7%	4.7%	0.0%	0.0%
Moderate	3	10.0%	259	9.6%	16.0%	0.0%	0.0%
Middle	15	50.0%	1,072	39.6%	39.7%	0.0%	0.0%
Upper	11	36.7%	1,358	50.1%	39.5%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	30	100.0%	2,709	100.0%	100.0%	0.0%	0.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	4.7%	3.2%	1.9%
Moderate	0	0.0%	0	0.0%	16.0%	9.3%	5.3%
Middle	1	50.0%	297	42.2%	39.7%	31.8%	23.7%
Upper	1	50.0%	406	57.8%	39.5%	55.6%	69.1%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	2	100.0%	703	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	16	6.8%	4,370	9.0%	4.7%	6.1%	6.5%
Moderate	27	11.4%	4,842	10.0%	16.0%	14.4%	10.8%
Middle	92	39.0%	14,759	30.4%	39.7%	37.3%	30.8%
Upper	101	42.8%	24,619	50.7%	39.5%	42.1%	51.8%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	236	100.0%	48,590	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	4.5%	1,016	3.5%	4.7%	7.4%	6.8%
Moderate	13	14.8%	3,022	10.5%	16.0%	15.4%	11.5%
Middle	41	46.6%	12,312	42.9%	39.7%	38.3%	31.4%
Upper	30	34.1%	12,344	43.0%	39.5%	38.7%	50.2%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.1%
TOTAL	88	100.0%	28,694	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	4	2.9%	593	1.7%	4.7%	4.9%	4.5%
Moderate	13	9.4%	2,815	8.0%	16.0%	10.9%	7.8%
Middle	55	39.6%	10,594	29.9%	39.7%	34.0%	27.0%
Upper	67	48.2%	21,384	60.4%	39.5%	50.1%	60.7%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	139	100.0%	35,386	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	4.8%	150	8.5%	4.7%	3.4%	3.3%
Moderate	1	4.8%	25	1.4%	16.0%	9.5%	6.1%
Middle	11	52.4%	984	55.9%	39.7%	32.4%	26.2%
Upper	8	38.1%	602	34.2%	39.5%	54.6%	64.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	21	100.0%	1,761	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	4.7%	3.1%	1.9%
Moderate	2	13.3%	149	8.9%	16.0%	7.4%	4.1%
Middle	8	53.3%	1,026	61.3%	39.7%	28.3%	20.7%
Upper	5	33.3%	500	29.9%	39.5%	61.1%	73.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	15	100.0%	1,675	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	4.7%	5.3%	3.6%
Moderate	0	0.0%	0	0.0%	16.0%	14.2%	6.5%
Middle	0	0.0%	0	0.0%	39.7%	31.0%	16.3%
Upper	2	100.0%	370	100.0%	39.5%	49.5%	73.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	2	100.0%	370	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	9	3.4%	1,759	2.6%	4.7%	5.8%	5.5%
Moderate	29	10.9%	6,011	8.9%	16.0%	12.6%	9.2%
Middle	115	43.4%	24,916	36.7%	39.7%	35.5%	30.0%
Upper	112	42.3%	35,200	51.9%	39.5%	46.0%	55.2%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	265	100.0%	67,886	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		%	\$ %
Low	9	8.0%	\$2,600	11.9%	8.8%	9.0%	11.5%
Moderate	18	16.1%	\$2,876	13.2%	18.4%	17.3%	18.6%
Middle	39	34.8%	\$5,698	26.1%	27.0%	24.9%	20.3%
Upper	46	41.1%	\$10,662	48.8%	44.7%	46.6%	47.3%
Unknown	0	0.0%	\$0	0.0%	1.1%	2.1%	2.3%
TOTAL	112	100.0%	\$21,836	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	6.7%	\$5,157	10.2%	8.8%	8.8%	11.3%
Moderate	66	15.3%	\$6,385	12.6%	18.3%	17.0%	19.3%
Middle	164	38.0%	\$15,791	31.1%	26.9%	24.9%	19.5%
Upper	169	39.1%	\$20,893	41.1%	45.0%	48.1%	47.6%
Unknown	4	0.9%	\$2,575	5.1%	1.0%	1.2%	2.4%
TOTAL	432	100.0%	\$50,801	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family	Aggregate HMDA Data	
	#	# %	\$	\$ %	Income %	# %	\$ %
Home Purchase Loans							
Low	2	2.5%	257	1.2%	20.9%	3.8%	1.9%
Moderate	20	25.0%	3,978	17.9%	16.8%	17.0%	10.8%
Middle	11	13.8%	2,395	10.8%	19.6%	20.5%	16.6%
Upper	40	50.0%	13,111	59.1%	42.7%	46.1%	58.2%
Unknown	7	8.8%	2,450	11.0%	0.0%	12.6%	12.5%
TOTAL	80	100.0%	22,191	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	2.2%	200	1.0%	20.9%	5.7%	2.5%
Moderate	15	16.9%	1,830	9.3%	16.8%	14.1%	8.5%
Middle	16	18.0%	2,528	12.8%	19.6%	18.1%	14.1%
Upper	46	51.7%	12,216	61.9%	42.7%	43.7%	56.1%
Unknown	10	11.2%	2,959	15.0%	0.0%	18.4%	18.8%
TOTAL	89	100.0%	19,733	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	5.9%	30	1.0%	20.9%	4.9%	2.6%
Moderate	5	14.7%	595	19.7%	16.8%	13.8%	9.3%
Middle	11	32.4%	762	25.2%	19.6%	20.7%	16.1%
Upper	16	47.1%	1,637	54.1%	42.7%	58.0%	67.3%
Unknown	0	0.0%	0	0.0%	0.0%	2.7%	4.7%
TOTAL	34	100.0%	3,024	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.9%	0.6%	0.0%
Moderate	0	0.0%	0	0.0%	16.8%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.6%	2.4%	0.1%
Upper	0	0.0%	0	0.0%	42.7%	11.5%	0.9%
Unknown	1	100.0%	230	100.0%	0.0%	85.5%	99.0%
TOTAL	1	100.0%	230	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	2	6.7%	80	3.0%	20.9%	4.7%	2.1%
Moderate	5	16.7%	341	12.6%	16.8%	12.2%	6.6%
Middle	8	26.7%	712	26.3%	19.6%	19.1%	12.2%
Upper	15	50.0%	1,576	58.2%	42.7%	62.3%	77.3%
Unknown	0	0.0%	0	0.0%	0.0%	1.8%	1.8%
TOTAL	30	100.0%	2,709	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.9%	5.6%	2.4%
Moderate	0	0.0%	0	0.0%	16.8%	14.6%	5.8%
Middle	1	50.0%	297	42.2%	19.6%	20.1%	12.5%
Upper	1	50.0%	406	57.8%	42.7%	52.7%	68.3%
Unknown	0	0.0%	0	0.0%	0.0%	7.0%	11.0%
TOTAL	2	100.0%	703	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	8	3.4%	567	1.2%	20.9%	4.6%	2.0%
Moderate	45	19.1%	6,744	13.9%	16.8%	15.4%	9.1%
Middle	47	19.9%	6,694	13.8%	19.6%	19.3%	14.4%
Upper	118	50.0%	28,946	59.6%	42.7%	46.1%	53.8%
Unknown	18	7.6%	5,639	11.6%	0.0%	14.6%	20.7%
TOTAL	236	100.0%	48,590	100.0%	100.0%	100.0%	100.0%

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	5	5.7%	655	2.3%	20.9%	4.5%	2.3%
Moderate	11	12.5%	2,796	9.7%	16.8%	18.6%	12.4%
Middle	16	18.2%	4,624	16.1%	19.6%	20.9%	17.6%
Upper	46	52.3%	16,861	58.8%	42.7%	44.7%	56.6%
Unknown	10	11.4%	3,758	13.1%	0.0%	11.3%	11.1%
TOTAL	88	100.0%	28,694	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	3.6%	598	1.7%	20.9%	4.1%	1.9%
Moderate	21	15.1%	2,623	7.4%	16.8%	12.6%	7.9%
Middle	27	19.4%	5,290	14.9%	19.6%	18.2%	14.7%
Upper	84	60.4%	26,389	74.6%	42.7%	47.6%	57.9%
Unknown	2	1.4%	486	1.4%	0.0%	17.5%	17.7%
TOTAL	139	100.0%	35,386	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.9%	4.0%	2.0%
Moderate	2	9.5%	106	6.0%	16.8%	12.8%	8.0%
Middle	4	19.0%	474	26.9%	19.6%	17.5%	14.0%
Upper	15	71.4%	1,181	67.1%	42.7%	59.5%	66.8%
Unknown	0	0.0%	0	0.0%	0.0%	6.2%	9.3%
TOTAL	21	100.0%	1,761	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.9%	3.9%	1.8%
Moderate	2	13.3%	177	10.6%	16.8%	9.9%	4.9%
Middle	3	20.0%	250	14.9%	19.6%	16.7%	10.3%
Upper	10	66.7%	1,248	74.5%	42.7%	65.9%	78.5%
Unknown	0	0.0%	0	0.0%	0.0%	3.7%	4.5%
TOTAL	15	100.0%	1,675	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.9%	8.1%	2.8%
Moderate	1	50.0%	100	27.0%	16.8%	12.9%	4.5%
Middle	0	0.0%	0	0.0%	19.6%	14.2%	7.1%
Upper	1	50.0%	270	73.0%	42.7%	49.2%	70.4%
Unknown	0	0.0%	0	0.0%	0.0%	15.6%	15.2%
TOTAL	2	100.0%	370	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	10	3.8%	1,253	1.8%	20.9%	4.2%	2.0%
Moderate	37	14.0%	5,802	8.5%	16.8%	14.5%	9.3%
Middle	50	18.9%	10,638	15.7%	19.6%	18.8%	15.1%
Upper	156	58.9%	45,949	67.7%	42.7%	46.7%	55.5%
Unknown	12	4.5%	4,244	6.3%	0.0%	15.7%	18.3%
TOTAL	265	100.0%	67,886	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	62	55.4%	48.6%	\$7,826	35.8%	36.5%	90.3%
	Over \$1 Million/ Unknown	50	44.6%	51.4%	\$14,010	64.2%	63.5%	9.7%
	TOTAL	112	100.0%	100.0%	\$21,836	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	68	60.7%	91.1%	\$2,653	12.1%	28.4%	
	\$100,001– \$250,000	17	15.2%	4.1%	\$3,123	14.3%	15.4%	
	\$250,001– \$1 Million	27	24.1%	4.7%	\$16,060	73.5%	56.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	112	100.0%	100.0%	\$21,836	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	48	77.4%		\$1,750	22.4%		
	\$100,001– \$250,000	4	6.5%		\$588	7.5%		
	\$250,001– \$1 Million	10	16.1%		\$5,488	70.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	62	100.0%		\$7,826	100.0%		

Appendix C (continued)

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	229	53.0%	41.5%	\$20,984	41.3%	27.4%	90.8%
	Over \$1 Million/ Unknown	203	47.0%	58.5%	\$29,817	58.7%	72.6%	9.2%
	TOTAL	432	100.0%	100.0%	\$50,801	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	307	71.1%	84.9%	\$9,266	18.2%	26.9%	
	\$100,001– \$250,000	72	16.7%	8.3%	\$11,782	23.2%	20.5%	
	\$250,001– \$1 Million	53	12.3%	6.8%	\$29,753	58.6%	52.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	432	100.0%	100.0%	\$50,801	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	182	79.5%		\$4,557	21.7%		
	\$100,001– \$250,000	23	10.0%		\$3,852	18.4%		
	\$250,001– \$1 Million	24	10.5%		\$12,575	59.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	229	100.0%		\$20,984	100.0%		

Appendix C (continued)

Western NonMSA Tennessee

Distribution of 2019 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	5	3.6%	926	5.3%	8.3%	7.0%	6.5%
Middle	86	62.8%	9,311	53.8%	70.0%	63.8%	59.2%
Upper	46	33.6%	7,081	40.9%	21.7%	29.0%	34.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	137	100.0%	17,318	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%	8.3%	7.0%	6.6%
Middle	86	69.9%	8,422	72.4%	70.0%	65.1%	62.0%
Upper	37	30.1%	3,218	27.6%	21.7%	27.8%	31.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	123	100.0%	11,640	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	7.3%	133	7.5%	8.3%	6.5%	5.0%
Middle	28	68.3%	1,280	72.0%	70.0%	72.1%	77.3%
Upper	10	24.4%	366	20.6%	21.7%	21.4%	17.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	41	100.0%	1,779	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%	7.3%	7.1%	2.3%
Middle	1	100.0%	385	100.0%	64.3%	71.4%	64.9%
Upper	0	0.0%	0	0.0%	20.3%	21.4%	32.8%
Unknown	0	0.0%	0	0.0%	8.1%	0.0%	0.0%
TOTAL	1	100.0%	385	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.3%	7.1%	2.3%
Middle	26	65.0%	937	54.4%	70.0%	71.4%	64.9%
Upper	14	35.0%	787	45.6%	21.7%	21.4%	32.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	40	100.0%	1,724	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.3%	14.3%	10.7%
Middle	3	75.0%	254	81.9%	70.0%	57.1%	62.2%
Upper	1	25.0%	56	18.1%	21.7%	28.6%	27.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	310	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	8	2.3%	1,059	3.2%	8.3%	7.1%	6.5%
Middle	230	66.5%	20,589	62.1%	70.0%	64.3%	60.4%
Upper	108	31.2%	11,508	34.7%	21.7%	28.5%	33.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	346	100.0%	33,156	100.0%	100.0%	100.0%	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	7	5.6%	473	3.1%	8.3%	6.9%	6.7%
Middle	84	66.7%	9,805	64.4%	70.0%	66.0%	61.4%
Upper	35	27.8%	4,951	32.5%	21.7%	27.1%	31.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	126	100.0%	15,229	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	1.7%	272	1.4%	8.3%	5.9%	5.8%
Middle	118	65.9%	11,108	58.1%	70.0%	62.5%	58.1%
Upper	58	32.4%	7,741	40.5%	21.7%	31.6%	36.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	179	100.0%	19,121	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	14.3%	80	15.4%	8.3%	14.4%	11.6%
Middle	7	50.0%	217	41.7%	70.0%	66.7%	69.3%
Upper	5	35.7%	224	43.0%	21.7%	18.9%	19.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	14	100.0%	521	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%	0.0%
Moderate	0	0.0%	0	0.0%	7.3%	6.7%	3.9%	
Middle	1	100.0%	207	100.0%	64.3%	86.7%	87.7%	
Upper	0	0.0%	0	0.0%	20.3%	6.7%	8.3%	
Unknown	0	0.0%	0	0.0%	8.1%	0.0%	0.0%	
TOTAL	1	100.0%	207	100.0%	100.0%	100.0%	100.0%	
Other Purpose LOC								
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.3%	5.1%	4.9%	
Middle	18	62.1%	704	45.2%	70.0%	56.6%	48.3%	
Upper	11	37.9%	853	54.8%	21.7%	38.4%	46.8%	
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	
TOTAL	29	100.0%	1,557	100.0%	100.0%	100.0%	100.0%	
Other Purpose Closed/Exempt								
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	0.0%
Moderate	1	14.3%	34	10.5%	8.3%	6.4%	2.8%	
Middle	4	57.1%	172	52.9%	70.0%	66.0%	58.7%	
Upper	2	28.6%	119	36.6%	21.7%	27.7%	38.5%	
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	
TOTAL	7	100.0%	325	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%	0.0%
Moderate	13	3.7%	859	2.3%	8.3%	6.5%	6.2%	
Middle	232	65.2%	22,213	60.1%	70.0%	64.4%	60.1%	
Upper	111	31.2%	13,888	37.6%	21.7%	29.1%	33.7%	
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%	
TOTAL	356	100.0%	36,960	100.0%	100.0%	100.0%	100.0%	

Distribution of 2019 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%	0.0%
Moderate	10	3.0%	\$483	1.5%	6.8%	5.1%	3.1%	
Middle	231	69.0%	\$24,654	75.7%	68.7%	65.0%	67.7%	
Upper	94	28.1%	\$7,425	22.8%	23.6%	28.3%	28.6%	
Unknown	0	0.0%	\$0	0.0%	1.0%	1.7%	0.6%	
TOTAL	335	100.0%	\$32,562	100.0%	100.0%	100.0%	100.0%	

Appendix C (continued)

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	23	3.5%	\$2,339	4.6%	6.8%	4.1%	3.4%
Middle	475	71.6%	\$36,540	71.8%	68.4%	66.5%	69.0%
Upper	161	24.3%	\$11,668	22.9%	23.9%	28.9%	26.9%
Unknown	4	0.6%	\$369	0.7%	0.9%	0.5%	0.7%
TOTAL	663	100.0%	\$50,916	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	2	1.4%	\$369	2.3%	4.4%	3.1%	1.4%
Middle	109	76.8%	\$12,899	81.1%	68.4%	62.2%	65.1%
Upper	31	21.8%	\$2,629	16.5%	27.2%	34.2%	33.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.0%
TOTAL	142	100.0%	\$15,897	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	3	2.4%	\$426	3.0%	5.9%	2.7%	1.8%
Middle	92	74.2%	\$11,336	81.1%	68.1%	64.7%	64.6%
Upper	29	23.4%	\$2,212	15.8%	26.0%	32.6%	33.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.0%	0.0%
TOTAL	124	100.0%	\$13,974	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	6.6%	651	3.8%	19.7%	4.6%	2.6%
Moderate	33	24.1%	3,036	17.5%	17.2%	16.6%	11.5%
Middle	25	18.2%	2,857	16.5%	19.4%	21.1%	18.5%
Upper	64	46.7%	10,274	59.3%	43.7%	38.5%	48.7%
Unknown	6	4.4%	500	2.9%	0.0%	19.1%	18.7%
TOTAL	137	100.0%	17,318	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	9	7.3%	421	3.6%	19.7%	6.4%	2.6%
Moderate	14	11.4%	855	7.3%	17.2%	11.7%	6.9%
Middle	25	20.3%	1,560	13.4%	19.4%	19.6%	14.9%
Upper	72	58.5%	8,371	71.9%	43.7%	46.9%	53.4%
Unknown	3	2.4%	433	3.7%	0.0%	15.4%	22.3%
TOTAL	123	100.0%	11,640	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	4	9.8%	98	5.5%	19.7%	7.1%	4.9%
Moderate	4	9.8%	140	7.9%	17.2%	14.9%	11.3%
Middle	5	12.2%	193	10.8%	19.4%	17.5%	16.7%
Upper	26	63.4%	1,302	73.2%	43.7%	57.8%	64.6%
Unknown	2	4.9%	46	2.6%	0.0%	2.6%	2.5%
TOTAL	41	100.0%	1,779	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	19.7%	7.1%	0.9%
Moderate	0	0.0%	0	0.0%	17.2%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.4%	0.0%	0.0%
Upper	1	100.0%	385	100.0%	43.7%	42.9%	28.5%
Unknown	0	0.0%	0	0.0%	0.0%	50.0%	70.6%
TOTAL	1	100.0%	385	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	6	15.0%	160	9.3%	19.7%	10.7%	6.6%
Moderate	2	5.0%	30	1.7%	17.2%	4.5%	2.4%
Middle	9	22.5%	398	23.1%	19.4%	25.0%	24.0%
Upper	23	57.5%	1,136	65.9%	43.7%	57.1%	62.3%
Unknown	0	0.0%	0	0.0%	0.0%	2.7%	4.7%
TOTAL	40	100.0%	1,724	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	19.7%	9.5%	6.7%
Moderate	2	50.0%	139	44.8%	17.2%	17.5%	15.7%
Middle	0	0.0%	0	0.0%	19.4%	23.8%	23.6%
Upper	2	50.0%	171	55.2%	43.7%	46.0%	47.0%
Unknown	0	0.0%	0	0.0%	0.0%	3.2%	7.0%
TOTAL	4	100.0%	310	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	28	8.1%	1,330	4.0%	19.7%	5.5%	2.6%
Moderate	55	15.9%	4,200	12.7%	17.2%	14.4%	9.7%
Middle	64	18.5%	5,008	15.1%	19.4%	20.3%	17.0%
Upper	188	54.3%	21,639	65.3%	43.7%	42.1%	49.9%
Unknown	11	3.2%	979	3.0%	0.0%	17.7%	20.7%
TOTAL	346	100.0%	33,156	100.0%	100.0%	100.0%	100.0%

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	8	6.3%	706	4.6%	19.7%	5.5%	2.9%
Moderate	30	23.8%	2,769	18.2%	17.2%	19.3%	14.2%
Middle	38	30.2%	4,426	29.1%	19.4%	22.1%	20.2%
Upper	43	34.1%	6,168	40.5%	43.7%	32.3%	41.4%
Unknown	7	5.6%	1,160	7.6%	0.0%	20.8%	21.1%
TOTAL	126	100.0%	15,229	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	2.8%	336	1.8%	19.7%	2.9%	1.2%
Moderate	20	11.2%	1,169	6.1%	17.2%	8.4%	4.4%
Middle	35	19.6%	2,967	15.5%	19.4%	18.0%	13.6%
Upper	109	60.9%	13,609	71.2%	43.7%	49.2%	56.5%
Unknown	10	5.6%	1,040	5.4%	0.0%	21.5%	24.4%
TOTAL	179	100.0%	19,121	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.7%	6.7%	4.3%
Moderate	2	14.3%	65	12.5%	17.2%	13.3%	8.8%
Middle	5	35.7%	185	35.5%	19.4%	28.9%	29.5%
Upper	7	50.0%	271	52.0%	43.7%	50.0%	56.2%
Unknown	0	0.0%	0	0.0%	0.0%	1.1%	1.2%
TOTAL	14	100.0%	521	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans							
Low	0	0.0%	0	0.0%	19.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.2%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.4%	6.7%	3.9%
Upper	0	0.0%	0	0.0%	43.7%	40.0%	41.1%
Unknown	1	100.0%	207	100.0%	0.0%	53.3%	54.9%
TOTAL	1	100.0%	207	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	5	17.2%	216	13.9%	19.7%	10.1%	8.0%
Moderate	1	3.4%	64	4.1%	17.2%	7.1%	3.6%
Middle	4	13.8%	140	9.0%	19.4%	19.2%	14.3%
Upper	19	65.5%	1,137	73.0%	43.7%	61.6%	72.6%
Unknown	0	0.0%	0	0.0%	0.0%	2.0%	1.5%
TOTAL	29	100.0%	1,557	100.0%	100.0%	100.0%	100.05
Other Purpose Closed/Exempt							
Low	2	28.6%	64	19.7%	19.7%	12.8%	6.2%
Moderate	2	28.6%	74	22.8%	17.2%	21.3%	15.2%
Middle	1	14.3%	68	20.9%	19.4%	10.6%	8.4%
Upper	2	28.6%	119	36.6%	43.7%	48.9%	61.9%
Unknown	0	0.0%	0	0.0%	0.0%	6.4%	8.4%
TOTAL	7	100.0%	325	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	20	5.6%	1,322	3.6%	19.7%	4.4%	2.1%
Moderate	55	15.4%	4,141	11.2%	17.2%	13.6%	9.0%
Middle	83	23.3%	7,786	21.1%	19.4%	19.6%	16.5%
Upper	180	50.6%	21,304	57.6%	43.7%	40.1%	48.4%
Unknown	18	5.1%	2,407	6.5%	0.0%	22.3%	24.0%
TOTAL	356	100.0%	36,960	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	235	70.1%	51.9%	\$16,246	49.9%	55.7%	89.5%
	Over \$1 Million/ Unknown	100	29.9%	48.1%	\$16,316	50.1%	44.3%	10.5%
	TOTAL	335	100.0%	100.0%	\$32,562	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	264	78.8%	88.7%	\$9,082	27.9%	37.5%	
	\$100,001– \$250,000	46	13.7%	8.4%	\$8,172	25.1%	30.3%	
	\$250,001– \$1 Million	25	7.5%	3.0%	\$15,308	47.0%	32.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	335	100.0%	100.0%	\$32,562	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	204	86.8%		\$6,048	37.2%		
	\$100,001– \$250,000	18	7.7%		\$3,136	19.3%		
	\$250,001– \$1 Million	13	5.5%		\$7,062	43.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	235	100.0%		\$16,246	100.0%		

Appendix C (continued)

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	407	61.4%	54.3%	\$21,179	41.6%	49.3%	89.5%
	Over \$1 Million/ Unknown	256	38.6%	45.7%	\$29,737	58.4%	50.7%	10.5%
	TOTAL	663	100.0%	100.0%	\$50,916	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	547	82.5%	84.9%	\$14,965	29.4%	31.8%	
	\$100,001– \$250,000	78	11.8%	10.5%	\$12,892	25.3%	28.0%	
	\$250,001– \$1 Million	38	5.7%	4.6%	\$23,059	45.3%	40.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	663	100.0%	100.0%	\$50,916	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	369	90.7%		\$8,745	41.3%	
		\$100,001– \$250,000	25	6.1%		\$4,059	19.2%	
		\$250,001– \$1 Million	13	3.2%		\$8,375	39.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	407	100.0%		\$21,179	100.0%	

Appendix C (continued)

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	113	79.6%	68.8%	10,972	69.0%	73.7%	97.1%
	Over \$1 Million/ Unknown	29	20.4%	31.2%	4,925	31.0%	26.3%	2.9%
	TOTAL	142	100.0%	100.0%	15,897	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	89	62.7%	76.4%	3,491	22.0%	30.5%	
	\$100,001– \$250,000	38	26.8%	17.1%	6,406	40.3%	36.7%	
	\$250,001– \$500,000	15	10.6%	6.6%	6,000	37.7%	32.8%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	142	100.0%	100.0%	15,897	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	76	67.3%		2,736	24.9%		
	\$100,001– \$250,000	28	24.8%		4,719	43.0%		
	\$250,001– \$1 Million	9	8.0%		3,517	32.1%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	113	100.0%		10,972	100.0%		

Appendix C (continued)

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	98	79.0%	67.4%	8626	61.7%	73.2%	97.2%
	Over \$1 Million/ Unknown	26	21.0%	32.6%	5348	38.3%	26.8%	2.8%
	TOTAL	124	100.0%	100.0%	13974	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	79	63.7%	72.2%	3095	22.1%	24.2%	
	\$100,001–\$250,000	28	22.6%	17.9%	4463	31.9%	34.2%	
	\$250,001–\$500,000	17	13.7%	9.9%	6416	45.9%	41.6%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	124	100.0%	100.0%	13974	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	71	72.4%		2693	31.2%	
		\$100,001–\$250,000	18	18.4%		2793	32.4%	
		\$250,001–\$1 Million	9	9.2%		3140	36.4%	
		Over \$1 Million	0	0.0%		0	0.0%	
		TOTAL	98	100.0%		8626	100.0%	

Appendix C (continued)

TEXAS

Dallas

Distribution of 2019 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	10	5.9%	1,626	3.2%	5.0%	3.4%	2.2%
Moderate	27	15.9%	3,778	7.5%	19.7%	13.6%	9.5%
Middle	49	28.8%	13,206	26.1%	31.4%	33.4%	28.0%
Upper	83	48.8%	31,920	63.1%	43.8%	49.4%	60.1%
Unknown	1	0.6%	89	0.2%	0.1%	0.2%	0.2%
TOTAL	170	100.0%	50,619	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.0%	143	0.5%	5.0%	2.1%	1.5%
Moderate	4	3.8%	421	1.3%	19.7%	11.4%	7.1%
Middle	24	22.9%	4,529	14.5%	31.4%	30.0%	23.5%
Upper	76	72.4%	26,198	83.7%	43.8%	56.4%	67.8%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	105	100.0%	31,291	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	5.0%	2.7%	2.0%
Moderate	0	0.0%	0	0.0%	19.7%	11.6%	9.0%
Middle	1	33.3%	49	25.3%	31.4%	27.7%	23.6%
Upper	2	66.7%	145	74.7%	43.8%	57.9%	65.3%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.1%
TOTAL	3	100.0%	194	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	22.3%	21.7%	16.5%
Moderate	1	20.0%	2,435	41.3%	28.0%	33.2%	23.1%
Middle	1	20.0%	2,430	41.3%	26.1%	24.1%	25.9%
Upper	3	60.0%	1,025	17.4%	23.0%	20.9%	34.5%
Unknown	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
TOTAL	5	100.0%	5,890	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	5.0%	1.8%	0.9%
Moderate	0	0.0%	0	0.0%	19.7%	10.6%	6.7%
Middle	1	25.0%	50	11.3%	31.4%	25.0%	17.7%
Upper	3	75.0%	392	88.7%	43.8%	62.4%	74.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	4	100.0%	442	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	5.0%	3.1%	1.6%
Moderate	0	0.0%	0	0.0%	19.7%	13.1%	7.7%
Middle	0	0.0%	0	0.0%	31.4%	31.4%	21.5%
Upper	1	100.0%	484	100.0%	43.8%	52.3%	69.2%
Unknown	0	0.0%	0	0.0%	0.1%	0.0%	0.0%
TOTAL	1	100.0%	484	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	11	3.8%	1,769	2.0%	5.0%	3.0%	3.3%
Moderate	32	11.1%	6,634	7.5%	19.7%	13.1%	10.1%
Middle	76	26.4%	20,264	22.8%	31.4%	32.2%	26.4%
Upper	168	58.3%	60,164	67.7%	43.8%	51.6%	60.1%
Unknown	1	0.3%	89	0.1%	0.1%	0.1%	0.1%
TOTAL	288	100.0%	88,920	100.0%	100.0%	100.0%	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	2.0%	1,448	2.3%	5.0%	3.3%	2.3%
Moderate	15	7.5%	2,980	4.7%	19.7%	12.9%	9.2%
Middle	48	23.9%	13,070	20.5%	31.4%	35.2%	29.8%
Upper	134	66.7%	46,296	72.6%	43.8%	48.3%	58.5%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	0.2%
TOTAL	201	100.0%	63,794	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	6	1.4%	1,722	1.3%	5.0%	1.7%	1.4%
Moderate	11	2.6%	1,859	1.4%	19.7%	8.4%	5.7%
Middle	80	18.6%	20,100	15.6%	31.4%	27.1%	21.9%
Upper	330	76.9%	104,817	81.1%	43.8%	62.6%	70.8%
Unknown	2	0.5%	739	0.6%	0.1%	0.1%	0.1%
TOTAL	429	100.0%	129,237	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	5.0%	1.8%	1.3%
Moderate	1	33.3%	24	6.9%	19.7%	9.0%	6.7%
Middle	0	0.0%	0	0.0%	31.4%	24.3%	20.1%
Upper	2	66.7%	326	93.1%	43.8%	64.8%	71.7%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.1%
TOTAL	3	100.0%	350	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	1	25.0%	280	15.3%	22.3%	20.5%	16.8%
Moderate	0	0.0%	0	0.0%	28.0%	36.5%	26.2%
Middle	1	25.0%	940	51.4%	26.1%	27.1%	28.2%
Upper	2	50.0%	608	33.3%	23.0%	15.7%	28.8%
Unknown	0	0.0%	0	0.0%	0.6%	0.2%	0.0%
TOTAL	4	100.0%	1,828	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	5.0%	1.6%	0.8%
Moderate	0	0.0%	0	0.0%	19.7%	8.0%	4.8%
Middle	2	100.0%	137	100.0%	31.4%	20.5%	13.4%
Upper	0	0.0%	0	0.0%	43.8%	69.9%	80.9%
Unknown	0	0.0%	0	0.0%	0.1%	0.1%	0.0%
TOTAL	2	100.0%	137	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	5.0%	2.8%	1.3%
Moderate	1	9.1%	100	2.8%	19.7%	13.6%	7.4%
Middle	3	27.3%	765	21.6%	31.4%	28.7%	17.1%
Upper	7	63.6%	2,684	75.6%	43.8%	54.7%	71.2%
Unknown	0	0.0%	0	0.0%	0.1%	0.2%	3.0%
TOTAL	11	100.0%	3,549	100.0%	100.0%	0.0%	0.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	11	1.7%	3,450	1.7%	5.0%	2.5%	2.5%
Moderate	28	4.3%	4,963	2.5%	19.7%	10.9%	8.4%
Middle	134	20.6%	35,012	17.6%	31.4%	31.0%	25.7%
Upper	475	73.1%	154,731	77.8%	43.8%	55.5%	63.2%
Unknown	2	0.3%	739	0.4%	0.1%	0.1%	0.2%
TOTAL	650	100.0%	198,895	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		%	\$ %
Low	37	6.5%	\$10,317	8.8%	7.3%	6.7%	8.1%
Moderate	97	17.1%	\$21,378	18.2%	19.8%	18.9%	21.5%
Middle	139	24.6%	\$24,920	21.2%	27.5%	25.2%	23.6%
Upper	284	50.2%	\$57,991	49.4%	44.8%	47.1%	44.8%
Unknown	9	1.6%	\$2,809	2.4%	0.6%	2.0%	2.0%
TOTAL	566	100.0%	\$117,415	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	89	6.8%	\$19,106	8.0%	7.3%	7.1%	8.6%
Moderate	223	17.1%	\$50,194	21.1%	19.7%	19.0%	21.5%
Middle	300	23.0%	\$47,139	19.9%	27.4%	25.9%	24.7%
Upper	675	51.7%	\$116,343	49.0%	45.0%	46.8%	43.4%
Unknown	18	1.4%	\$4,664	2.0%	0.6%	1.1%	1.8%
TOTAL	1,305	100.0%	\$237,446	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	1.2%	95	0.2%	23.4%	3.2%	1.5%
Moderate	20	11.8%	3,465	6.8%	16.5%	15.8%	10.2%
Middle	21	12.4%	4,270	8.4%	18.1%	22.3%	18.4%
Upper	82	48.2%	34,875	68.9%	42.0%	44.8%	56.5%
Unknown	45	26.5%	7,914	15.6%	0.0%	13.8%	13.3%
TOTAL	170	100.0%	50,619	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.0%	49	0.2%	23.4%	4.4%	2.0%
Moderate	4	3.8%	827	2.6%	16.5%	11.5%	6.5%
Middle	14	13.3%	2,393	7.6%	18.1%	17.8%	13.2%
Upper	78	74.3%	26,867	85.9%	42.0%	48.3%	59.6%
Unknown	8	7.6%	1,155	3.7%	0.0%	18.0%	18.7%
TOTAL	105	100.0%	31,291	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	1	33.3%	50	25.8%	23.4%	5.0%	3.2%
Moderate	0	0.0%	0	0.0%	16.5%	11.8%	8.6%
Middle	1	33.3%	49	25.3%	18.1%	17.7%	14.2%
Upper	0	0.0%	0	0.0%	42.0%	61.0%	68.1%
Unknown	1	33.3%	95	49.0%	0.0%	4.5%	5.9%
TOTAL	3	100.0%	194	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	23.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.5%	0.2%	0.0%
Middle	0	0.0%	0	0.0%	18.1%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	42.0%	2.2%	0.1%
Unknown	5	100.0%	5,890	100.0%	0.0%	97.6%	99.9%
TOTAL	5	100.0%	5,890	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	23.4%	5.8%	3.5%
Moderate	0	0.0%	0	0.0%	16.5%	11.1%	6.9%
Middle	1	25.0%	50	11.3%	18.1%	17.5%	11.5%
Upper	3	75.0%	392	88.7%	42.0%	62.0%	74.5%
Unknown	0	0.0%	0	0.0%	0.0%	3.7%	3.6%
TOTAL	4	100.0%	442	100.0%	100.0%	100.0%	100.05
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	23.4%	6.5%	2.8%
Moderate	0	0.0%	0	0.0%	16.5%	15.4%	8.9%
Middle	0	0.0%	0	0.0%	18.1%	18.3%	11.3%
Upper	1	100.0%	484	100.0%	42.0%	52.5%	66.5%
Unknown	0	0.0%	0	0.0%	0.0%	7.2%	10.5%
TOTAL	1	100.0%	484	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	4	1.4%	194	0.2%	23.4%	3.6%	1.6%
Moderate	24	8.3%	4,292	4.8%	16.5%	13.9%	8.1%
Middle	37	12.8%	6,762	7.6%	18.1%	20.2%	15.0%
Upper	164	56.9%	62,618	70.4%	42.0%	45.7%	52.1%
Unknown	59	20.5%	15,054	16.9%	0.0%	16.5%	23.3%
TOTAL	288	100.0%	88,920	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	0.5%	22	0.0%	23.4%	3.9%	2.0%
Moderate	16	8.0%	3,928	6.2%	16.5%	18.3%	12.4%
Middle	28	13.9%	7,654	12.0%	18.1%	23.9%	20.8%
Upper	130	64.7%	47,497	74.5%	42.0%	44.0%	54.6%
Unknown	26	12.9%	4,693	7.4%	0.0%	9.9%	10.2%
TOTAL	201	100.0%	63,794	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	0.5%	219	0.2%	23.4%	2.6%	1.2%
Moderate	26	6.1%	4,280	3.3%	16.5%	9.0%	5.5%
Middle	85	19.8%	19,754	15.3%	18.1%	17.0%	13.2%
Upper	299	69.7%	100,157	77.5%	42.0%	52.0%	60.9%
Unknown	17	4.0%	4,827	3.7%	0.0%	19.3%	19.3%
TOTAL	429	100.0%	129,237	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	23.4%	3.5%	2.0%
Moderate	0	0.0%	0	0.0%	16.5%	10.4%	7.5%
Middle	0	0.0%	0	0.0%	18.1%	16.2%	12.6%
Upper	2	66.7%	144	41.1%	42.0%	66.1%	72.7%
Unknown	1	33.3%	206	58.9%	0.0%	3.9%	5.1%
TOTAL	3	100.0%	350	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	23.4%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.5%	0.2%	0.0%
Middle	0	0.0%	0	0.0%	18.1%	0.4%	0.0%
Upper	2	50.0%	608	33.3%	42.0%	4.6%	0.3%
Unknown	2	50.0%	1,220	66.7%	0.0%	94.8%	99.7%
TOTAL	4	100.0%	1,828	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	23.4%	6.1%	3.2%
Moderate	0	0.0%	0	0.0%	16.5%	11.5%	6.0%
Middle	1	50.0%	20	14.6%	18.1%	14.6%	10.0%
Upper	1	50.0%	117	85.4%	42.0%	65.5%	77.3%
Unknown	0	0.0%	0	0.0%	0.0%	2.3%	3.5%
TOTAL	2	100.0%	137	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	23.4%	5.8%	2.2%
Moderate	1	9.1%	152	4.3%	16.5%	10.7%	5.2%
Middle	0	0.0%	0	0.0%	18.1%	16.6%	9.5%
Upper	10	90.9%	3,397	95.7%	42.0%	56.6%	69.0%
Unknown	0	0.0%	0	0.0%	0.0%	10.3%	14.1%
TOTAL	11	100.0%	3,549	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	3	0.5%	241	0.1%	23.4%	3.1%	1.5%
Moderate	43	6.6%	8,360	4.2%	16.5%	12.7%	8.1%
Middle	114	17.5%	27,428	13.8%	18.1%	19.4%	15.6%
Upper	444	68.3%	151,920	76.4%	42.0%	47.1%	54.4%
Unknown	46	7.1%	10,946	5.5%	0.0%	17.7%	20.5%
TOTAL	650	100.0%	198,895	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	254	44.9%	47.0%	\$48,164	41.0%	34.2%	92.0%
	Over \$1 Million/ Unknown	312	55.1%	53.0%	\$69,251	59.0%	65.8%	8.0%
	TOTAL	566	100.0%	100.0%	\$117,415	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	319	56.4%	93.6%	\$16,580	14.1%	39.6%	
	\$100,001– \$250,000	106	18.7%	3.2%	\$19,138	16.3%	14.7%	
	\$250,001– \$1 Million	141	24.9%	3.2%	\$81,697	69.6%	45.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	566	100.0%	100.0%	\$117,415	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	152	59.8%		\$8,488	17.6%	
		\$100,001– \$250,000	47	18.5%		\$8,409	17.5%	
		\$250,001– \$1 Million	55	21.7%		\$31,267	64.9%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	254	100.0%		\$48,164	100.0%	

Appendix C (continued)

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	357	27.4%	37.7%	\$78,425	33.0%	24.6%	92.3%
	Over \$1 Million/ Unknown	948	72.6%	62.3%	\$159,021	67.0%	75.4%	7.7%
	TOTAL	1305	100.0%	100.0%	\$237,446	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	712	54.6%	87.6%	\$29,474	12.4%	32.6%	
	\$100,001– \$250,000	283	21.7%	7.1%	\$45,899	19.3%	19.9%	
	\$250,001– \$1 Million	310	23.8%	5.4%	\$162,073	68.3%	47.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	1305	100.0%	100.0%	\$237,446	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	191	53.5%		\$8,675	11.1%	
		\$100,001– \$250,000	54	15.1%		\$9,774	12.5%	
		\$250,001– \$1 Million	112	31.4%		\$59,976	76.5%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	357	100.0%		\$78,425	100.0%	

Appendix C (continued)

Sherman-Denison

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	5	9.6%	593	4.7%	17.2%	15.4%	9.9%
Middle	25	48.1%	5,894	46.8%	47.7%	44.6%	40.9%
Upper	22	42.3%	6,109	48.5%	35.1%	40.0%	49.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	52	100.0%	12,596	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	2.5%	183	1.7%	17.2%	6.4%	4.3%
Middle	18	45.0%	4,174	39.7%	47.7%	42.1%	36.7%
Upper	21	52.5%	6,145	58.5%	35.1%	51.5%	59.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	40	100.0%	10,502	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%	17.2%	13.6%	7.8%
Middle	1	25.0%	95	34.9%	47.7%	52.0%	57.6%
Upper	3	75.0%	177	65.1%	35.1%	34.4%	34.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	272	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	3.1%	2.3%
Moderate	1	100.0%	63	100.0%	17.2%	19.9%	13.1%
Middle	0	0.0%	0	0.0%	47.7%	24.2%	22.6%
Upper	0	0.0%	0	0.0%	35.1%	52.8%	62.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	63	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	7	7.2%	839	3.6%	17.2%	11.5%	8.7%
Middle	44	45.4%	10,163	43.4%	47.7%	43.8%	40.0%
Upper	46	47.4%	12,431	53.0%	35.1%	44.7%	51.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	97	100.0%	23,433	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	80	29.2%	\$10,396	37.7%	22.8%	22.9%	22.8%
Middle	91	33.2%	\$6,461	23.4%	44.3%	40.0%	37.9%
Upper	103	37.6%	\$10,700	38.8%	33.0%	36.3%	38.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.9%	0.5%
TOTAL	274	100.0%	\$27,557	100.0%	100.0%	100.0%	100.0%

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	5.8%	284	2.3%	21.1%	4.6%	2.3%
Moderate	9	17.3%	1,671	13.3%	17.0%	18.2%	12.6%
Middle	5	9.6%	1,080	8.6%	19.1%	23.4%	21.3%
Upper	32	61.5%	9,277	73.7%	42.9%	39.8%	49.7%
Unknown	3	5.8%	284	2.3%	0.0%	14.1%	14.1%
TOTAL	52	100.0%	12,596	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	2.5%	165	1.6%	21.1%	2.7%	1.2%
Moderate	5	12.5%	831	7.9%	17.0%	9.1%	5.5%
Middle	5	12.5%	1,006	9.6%	19.1%	16.1%	12.4%
Upper	25	62.5%	7,821	74.5%	42.9%	48.2%	57.1%
Unknown	4	10.0%	679	6.5%	0.0%	24.0%	23.8%
TOTAL	40	100.0%	10,502	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.1%	8.0%	4.8%
Moderate	2	50.0%	121	44.5%	17.0%	12.0%	5.5%
Middle	0	0.0%	0	0.0%	19.1%	21.6%	15.2%
Upper	2	50.0%	151	55.5%	42.9%	48.0%	61.3%
Unknown	0	0.0%	0	0.0%	0.0%	10.4%	13.2%
TOTAL	4	100.0%	272	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.1%	7.2%	2.7%
Moderate	1	100.0%	63	100.0%	17.0%	11.6%	7.6%
Middle	0	0.0%	0	0.0%	19.1%	24.9%	17.8%
Upper	0	0.0%	0	0.0%	42.9%	54.7%	69.4%
Unknown	0	0.0%	0	0.0%	0.0%	4.2%	2.5%
TOTAL	1	100.0%	63	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	4	4.1%	449	1.9%	21.1%	3.7%	1.7%
Moderate	17	17.5%	2,686	11.5%	17.0%	13.6%	8.5%
Middle	10	10.3%	2,086	8.9%	19.1%	19.4%	15.8%
Upper	59	60.8%	17,249	73.6%	42.9%	42.5%	50.0%
Unknown	7	7.2%	963	4.1%	0.0%	20.8%	23.9%
TOTAL	97	100.0%	23,433	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	92	33.6%	29.7%	\$9,002	32.7%	28.0%	91.7%
	Over \$1 Million/Unknown	182	66.4%	70.3%	\$18,555	67.3%	72.0%	8.3%
	TOTAL	274	100.0%	100.0%	\$27,557	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	202	73.7%	87.8%	\$7,245	26.3%	34.7%	
	\$100,001–\$250,000	40	14.6%	7.7%	\$6,368	23.1%	22.7%	
	\$250,001–\$1 Million	32	11.7%	4.5%	\$13,944	50.6%	42.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	274	100.0%	100.0%	\$27,557	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	70	76.1%		\$2,443	27.1%		
	\$100,001–\$250,000	11	12.0%		\$1,765	19.6%		
	\$250,001–\$1 Million	11	12.0%		\$4,794	53.3%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	92	100.0%		\$9,002	100.0%		

Appendix C (continued)

LENDING PERFORMANCE TABLES BY LIMITED-SCOPE ASSESSMENT AREA

ARKANSAS

Fort Smith

Distribution of 2019 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	7	14.6%	1,008	13.2%	15.4%	13.7%	8.4%
Middle	29	60.4%	4,324	56.7%	57.1%	54.2%	53.9%
Upper	12	25.0%	2,294	30.1%	27.5%	32.0%	37.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.2%
TOTAL	48	100.0%	7,626	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	3.8%	50	1.8%	15.4%	12.0%	7.5%
Middle	17	65.4%	1,496	53.6%	57.1%	54.6%	54.0%
Upper	8	30.8%	1,247	44.6%	27.5%	33.3%	38.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	26	100.0%	2,793	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%	11.0%	9.8%
Middle	4	57.1%	187	73.6%	57.1%	50.6%	45.3%
Upper	3	42.9%	67	26.4%	27.5%	38.4%	44.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	7	100.0%	254	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	33.3%	3,234	32.9%	37.6%	45.9%	32.2%
Middle	1	33.3%	2,990	30.4%	32.5%	41.9%	47.9%
Upper	1	33.3%	3,597	36.6%	29.9%	12.2%	19.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	9,821	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.4%	8.1%	8.2%
Middle	5	62.5%	238	72.1%	57.1%	59.7%	55.1%
Upper	3	37.5%	92	27.9%	27.5%	32.2%	36.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	8	100.0%	330	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	100.0%	10	100.0%	15.4%	20.1%	12.6%
Middle	0	0.0%	0	0.0%	57.1%	51.1%	58.1%
Upper	0	0.0%	0	0.0%	27.5%	28.1%	29.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.7%	0.0%
TOTAL	1	100.0%	10	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	10	10.8%	4,302	20.6%	15.4%	13.9%	10.1%
Middle	56	60.2%	9,235	44.3%	57.1%	54.0%	53.4%
Upper	27	29.0%	7,297	35.0%	27.5%	32.0%	36.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	93	100.0%	20,834	100.0%	100.0%	100.0%	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	7	14.9%	888	12.7%	15.4%	13.7%	8.8%
Middle	33	70.2%	4,800	68.5%	57.1%	56.1%	56.3%
Upper	7	14.9%	1,317	18.8%	27.5%	30.0%	34.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	47	100.0%	7,005	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%	15.4%	8.5%	5.1%
Middle	18	60.0%	2,888	51.8%	57.1%	55.0%	54.5%
Upper	12	40.0%	2,692	48.2%	27.5%	36.5%	40.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.1%	0.1%
TOTAL	30	100.0%	5,580	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	16.7%	12	5.0%	15.4%	9.8%	8.8%
Middle	3	50.0%	173	72.7%	57.1%	50.0%	43.2%
Upper	2	33.3%	53	22.3%	27.5%	39.2%	46.6%
Unknown	0	0.0%	0	0.0%	0.0%	1.0%	1.4%
TOTAL	6	100.0%	238	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	14.3%	75	18.5%	15.4%	8.6%	6.3%
Middle	6	85.7%	330	81.5%	57.1%	53.3%	48.9%
Upper	0	0.0%	0	0.0%	27.5%	38.1%	44.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	7	100.0%	405	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	56	18.9%	15.4%	11.3%	5.4%
Middle	1	50.0%	240	81.1%	57.1%	53.8%	50.0%
Upper	0	0.0%	0	0.0%	27.5%	35.0%	44.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	296	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	10	10.9%	1,031	7.6%	15.4%	12.1%	9.1%
Middle	61	66.3%	8,431	62.3%	57.1%	55.1%	54.7%
Upper	21	22.8%	4,062	30.0%	27.5%	32.6%	36.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.2%	0.2%
TOTAL	92	100.0%	13,524	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	14	21.2%	\$2,099	15.6%	27.9%	25.3%	27.1%
Middle	34	51.5%	\$7,406	55.0%	44.3%	45.7%	48.6%
Upper	18	27.3%	\$3,960	29.4%	27.8%	26.7%	23.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	2.3%	0.7%
TOTAL	66	100.0%	\$13,465	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	36	18.5%	\$4,330	16.7%	27.7%	25.1%	28.5%
Middle	103	52.8%	\$11,781	45.6%	44.3%	46.9%	45.4%
Upper	56	28.7%	\$9,740	37.7%	28.0%	27.3%	25.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.7%	0.4%
TOTAL	195	100.0%	\$25,851	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	4.2%	163	2.1%	21.4%	5.0%	2.5%
Moderate	9	18.8%	839	11.0%	17.7%	16.1%	10.8%
Middle	16	33.3%	1,613	21.2%	19.1%	22.4%	19.1%
Upper	20	41.7%	4,422	58.0%	41.9%	40.0%	51.1%
Unknown	1	2.1%	589	7.7%	0.0%	16.5%	16.5%
TOTAL	48	100.0%	7,626	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	3.8%	42	1.5%	21.4%	4.7%	2.0%
Moderate	3	11.5%	130	4.7%	17.7%	11.0%	6.5%
Middle	7	26.9%	802	28.7%	19.1%	19.0%	14.6%
Upper	13	50.0%	1,626	58.2%	41.9%	43.5%	52.5%
Unknown	2	7.7%	193	6.9%	0.0%	21.7%	24.5%
TOTAL	26	100.0%	2,793	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	2	28.6%	54	21.3%	21.4%	4.6%	2.4%
Moderate	0	0.0%	0	0.0%	17.7%	11.4%	8.4%
Middle	0	0.0%	0	0.0%	19.1%	19.8%	17.6%
Upper	5	71.4%	200	78.7%	41.9%	55.7%	61.9%
Unknown	0	0.0%	0	0.0%	0.0%	8.4%	9.7%
TOTAL	7	100.0%	254	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
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%	2.7%	0.5%
Upper	0	0.0%	0	0.0%	41.9%	5.4%	2.2%
Unknown	3	100.0%	9,821	100.0%	0.0%	91.9%	97.4%
TOTAL	3	100.0%	9,821	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	2	25.0%	56	17.0%	21.4%	3.4%	2.6%
Moderate	0	0.0%	0	0.0%	17.7%	13.4%	11.2%
Middle	2	25.0%	65	19.7%	19.1%	17.4%	12.3%
Upper	2	25.0%	142	43.0%	41.9%	61.7%	66.5%
Unknown	2	25.0%	67	20.3%	0.0%	4.0%	7.4%
TOTAL	8	100.0%	330	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.4%	7.9%	3.4%
Moderate	1	100.0%	10	100.0%	17.7%	19.4%	17.4%
Middle	0	0.0%	0	0.0%	19.1%	22.3%	22.5%
Upper	0	0.0%	0	0.0%	41.9%	48.9%	54.2%
Unknown	0	0.0%	0	0.0%	0.0%	1.4%	2.5%
TOTAL	1	100.0%	10	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	7	7.5%	315	1.5%	21.4%	4.7%	2.1%
Moderate	13	14.0%	979	4.7%	17.7%	13.6%	8.5%
Middle	25	26.9%	2,480	11.9%	19.1%	20.0%	15.9%
Upper	40	43.0%	6,390	30.7%	41.9%	40.2%	46.7%
Unknown	8	8.6%	10,670	51.2%	0.0%	21.5%	26.8%
TOTAL	93	100.0%	20,834	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	2.1%	62	0.9%	21.4%	5.3%	2.9%
Moderate	10	21.3%	881	12.6%	17.7%	17.6%	12.4%
Middle	9	19.1%	790	11.3%	19.1%	21.6%	19.0%
Upper	21	44.7%	3,540	50.5%	41.9%	38.0%	48.5%
Unknown	6	12.8%	1,732	24.7%	0.0%	17.5%	17.2%
TOTAL	47	100.0%	7,005	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	21.4%	2.5%	1.0%
Moderate	3	10.0%	146	2.6%	17.7%	8.3%	4.6%
Middle	5	16.7%	718	12.9%	19.1%	16.5%	12.0%
Upper	16	53.3%	3,351	60.1%	41.9%	46.6%	55.0%
Unknown	6	20.0%	1,365	24.5%	0.0%	26.1%	27.5%
TOTAL	30	100.0%	5,580	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	16.7%	12	5.0%	21.4%	2.6%	1.3%
Moderate	1	16.7%	10	4.2%	17.7%	12.9%	8.8%
Middle	2	33.3%	53	22.3%	19.1%	13.4%	7.8%
Upper	2	33.3%	163	68.5%	41.9%	59.3%	66.0%
Unknown	0	0.0%	0	0.0%	0.0%	11.9%	16.1%
TOTAL	6	100.0%	238	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
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%
Other Purpose LOC							
Low	1	14.3%	20	4.9%	21.4%	5.7%	3.7%
Moderate	1	14.3%	75	18.5%	17.7%	7.6%	6.0%
Middle	2	28.6%	145	35.8%	19.1%	18.1%	11.3%
Upper	3	42.9%	165	40.7%	41.9%	64.8%	73.8%
Unknown	0	0.0%	0	0.0%	0.0%	3.8%	5.1%
TOTAL	7	100.0%	405	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.4%	10.0%	5.3%
Moderate	0	0.0%	0	0.0%	17.7%	15.0%	11.7%
Middle	0	0.0%	0	0.0%	19.1%	21.3%	11.3%
Upper	2	100.0%	296	100.0%	41.9%	46.3%	59.6%
Unknown	0	0.0%	0	0.0%	0.0%	7.5%	12.0%
TOTAL	2	100.0%	296	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans				Families By Family Income %			
Low	3	3.3%	94	0.7%	21.4%	3.9%	1.8%
Moderate	15	16.3%	1,112	8.2%	17.7%	12.5%	7.8%
Middle	18	19.6%	1,706	12.6%	19.1%	18.2%	14.1%
Upper	44	47.8%	7,515	55.6%	41.9%	40.8%	47.4%
Unknown	12	13.0%	3,097	22.9%	0.0%	24.7%	28.9%
TOTAL	92	100.0%	13,524	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2019							
		Count			Dollars				Total Businesses
		Bank		Aggregate	Bank		Aggregate	%	
		#	%	%	\$ (000s)	\$ %	\$ %		
Business Revenue	\$1 Million or Less	38	57.6%	39.5%	\$6,941	51.5%	34.3%	88.1%	
	Over \$1 Million/ Unknown	28	42.4%	60.5%	\$6,524	48.5%	65.7%	11.9%	
	TOTAL	66	100.0%	100.0%	\$13,465	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	40	60.6%	89.7%	\$1,905	14.1%	33.0%		
	\$100,001–\$250,000	11	16.7%	5.6%	\$2,244	16.7%	19.3%		
	\$250,001–\$1 Million	15	22.7%	4.7%	\$9,316	69.2%	47.7%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	66	100.0%	100.0%	\$13,465	100.0%	100.0%		
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	25	65.8%		\$1,054	15.2%			
	\$100,001–\$250,000	7	18.4%		\$1,394	20.1%			
	\$250,001–\$1 Million	6	15.8%		\$4,493	64.7%			
	Over \$1 Million	0	0.0%		\$0	0.0%			
	TOTAL	38	100.0%		\$6,941	100.0%			

Appendix C (continued)

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	94	48.2%	31.1%	\$11,376	44.0%	29.9%	88.2%
	Over \$1 Million/ Unknown	101	51.8%	68.9%	\$14,475	56.0%	70.1%	11.8%
	TOTAL	195	100.0%	100.0%	\$25,851	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	145	74.4%	84.7%	\$3,979	15.4%	27.6%	
	\$100,001– \$250,000	17	8.7%	8.2%	\$2,788	10.8%	20.4%	
	\$250,001–\$1 Million	33	16.9%	7.1%	\$19,084	73.8%	52.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	195	100.0%	100.0%	\$25,851	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	73	77.7%		\$1,733	15.2%		
	\$100,001– \$250,000	8	8.5%		\$1,325	11.6%		
	\$250,001–\$1 Million	13	13.8%		\$8,318	73.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	94	100.0%		\$11,376	100.0%		

Appendix C (continued)

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	20	100.0%	69.6%	1064	100.0%	76.9%	96.1%
	Over \$1 Million/ Unknown	0	0.0%	30.4%	0	0.0%	23.1%	3.9%
	TOTAL	20	100.0%	100.0%	1064	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	18	90.0%	84.1%	798	75.0%	44.7%	
	\$100,001– \$250,000	2	10.0%	12.3%	266	25.0%	32.8%	
	\$250,001– \$500,000	0	0.0%	3.6%	0	0.0%	22.5%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	20	100.0%	100.0%	1064	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	18	90.0%		798	75.0%		
	\$100,001– \$250,000	2	10.0%		266	25.0%		
	\$250,001–\$1 Million	0	0.0%		0	0.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	20	100.0%		1064	100.0%		

Appendix C (continued)

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	20	95.2%	63.5%	2309	88.2%	82.6%	96.1%
	Over \$1 Million/ Unknown	1	4.8%	36.5%	310	11.8%	17.4%	3.9%
	TOTAL	21	100.0%	100.0%	2619	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	14	66.7%	79.1%	678	25.9%	33.0%	
	\$100,001– \$250,000	3	14.3%	14.9%	459	17.5%	34.0%	
	\$250,001– \$500,000	4	19.0%	6.1%	1482	56.6%	33.0%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	21	100.0%	100.0%	2619	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	14	70.0%		678	29.4%		
	\$100,001– \$250,000	3	15.0%		459	19.9%		
	\$250,001–\$1 Million	3	15.0%		1172	50.8%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	20	100.0%		2309	100.0%		

Appendix C (continued)

Hot Springs

Distribution of 2019 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	7	6.1%	353	2.2%	3.4%	3.8%	1.7%
Moderate	13	11.3%	1,061	6.7%	11.8%	9.6%	7.1%
Middle	58	50.4%	7,798	49.3%	49.1%	47.0%	41.5%
Upper	37	32.2%	6,591	41.7%	35.6%	39.6%	49.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	115	100.0%	15,803	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	2.3%	53	0.7%	3.4%	1.7%	0.8%
Moderate	10	22.7%	3,171	39.8%	11.8%	10.5%	8.7%
Middle	20	45.5%	2,984	37.5%	49.1%	40.8%	32.8%
Upper	13	29.5%	1,755	22.0%	35.6%	47.0%	57.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	44	100.0%	7,963	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	6.3%	25	4.0%	3.4%	8.2%	3.6%
Moderate	1	6.3%	45	7.2%	11.8%	8.2%	5.4%
Middle	3	18.8%	86	13.8%	49.1%	44.5%	41.4%
Upper	11	68.8%	465	74.9%	35.6%	39.0%	49.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	16	100.0%	621	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	3.4%	1.6%	0.4%
Moderate	1	20.0%	15	4.8%	11.8%	4.8%	3.5%
Middle	2	40.0%	235	75.3%	49.1%	38.1%	30.7%
Upper	2	40.0%	62	19.9%	35.6%	55.6%	65.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	312	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.4%	3.5%	3.3%
Moderate	0	0.0%	0	0.0%	11.8%	5.3%	3.2%
Middle	3	100.0%	399	100.0%	49.1%	61.4%	46.9%
Upper	0	0.0%	0	0.0%	35.6%	29.8%	46.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	399	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	9	4.9%	431	1.7%	3.4%	3.5%	1.6%
Moderate	25	13.7%	4,292	17.1%	11.8%	9.9%	7.7%
Middle	86	47.0%	11,502	45.8%	49.1%	45.1%	39.1%
Upper	63	34.4%	8,873	35.4%	35.6%	41.5%	51.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	183	100.0%	25,098	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	2.1%	122	0.7%	3.4%	3.1%	1.6%
Moderate	9	9.3%	1,817	9.7%	11.8%	8.6%	7.3%
Middle	55	56.7%	8,704	46.5%	49.1%	48.3%	42.3%
Upper	31	32.0%	8,093	43.2%	35.6%	40.1%	48.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	97	100.0%	18,736	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	3.4%	1.6%	0.7%
Moderate	10	13.5%	1,748	11.9%	11.8%	6.7%	5.5%
Middle	25	33.8%	3,982	27.1%	49.1%	42.3%	36.1%
Upper	39	52.7%	8,957	61.0%	35.6%	49.4%	57.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	74	100.0%	14,687	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	7.7%	25	3.4%	3.4%	4.2%	2.7%
Moderate	3	23.1%	318	43.4%	11.8%	10.9%	10.2%
Middle	2	15.4%	81	11.1%	49.1%	41.2%	35.1%
Upper	7	53.8%	309	42.2%	35.6%	43.7%	52.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	13	100.0%	733	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	3.4%	4.0%	0.3%
Moderate	0	0.0%	0	0.0%	11.8%	10.0%	4.3%
Middle	3	100.0%	407	100.0%	49.1%	52.0%	38.4%
Upper	0	0.0%	0	0.0%	35.6%	34.0%	56.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	407	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	3	1.6%	147	0.4%	3.4%	2.6%	1.7%
Moderate	22	11.8%	3,883	11.2%	11.8%	8.2%	7.0%
Middle	85	45.5%	13,174	38.1%	49.1%	45.1%	37.8%
Upper	77	41.2%	17,359	50.2%	35.6%	44.1%	53.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	187	100.0%	34,563	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	1.8%	\$21	0.1%	6.8%	4.9%	3.0%
Moderate	17	14.9%	\$1,787	9.5%	19.1%	20.8%	19.8%
Middle	40	35.1%	\$8,629	45.8%	44.9%	40.5%	46.2%
Upper	55	48.2%	\$8,395	44.6%	29.2%	32.2%	30.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.5%	0.6%
TOTAL	114	100.0%	\$18,832	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	10	4.1%	\$444	1.6%	6.9%	5.0%	4.0%
Moderate	64	26.1%	\$7,122	26.0%	18.8%	22.2%	26.7%
Middle	89	36.3%	\$11,662	42.7%	44.3%	40.5%	44.1%
Upper	82	33.5%	\$8,113	29.7%	29.9%	31.9%	25.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.1%
TOTAL	245	100.0%	\$27,341	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	3.5%	390	2.5%	23.2%	6.7%	3.2%
Moderate	22	19.1%	2,531	16.0%	16.7%	17.1%	11.6%
Middle	23	20.0%	2,999	19.0%	19.6%	19.7%	17.3%
Upper	56	48.7%	8,834	55.9%	40.4%	40.8%	52.7%
Unknown	10	8.7%	1,049	6.6%	0.0%	15.7%	15.2%
TOTAL	115	100.0%	15,803	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	6.8%	269	3.4%	23.2%	6.9%	2.6%
Moderate	1	2.3%	50	0.6%	16.7%	11.8%	6.1%
Middle	5	11.4%	279	3.5%	19.6%	17.6%	12.7%
Upper	14	31.8%	3,386	42.5%	40.4%	44.2%	55.7%
Unknown	21	47.7%	3,979	50.0%	0.0%	19.5%	22.9%
TOTAL	44	100.0%	7,963	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	3	18.8%	41	6.6%	23.2%	13.0%	9.8%
Moderate	2	12.5%	60	9.7%	16.7%	17.8%	11.7%
Middle	5	31.3%	146	23.5%	19.6%	21.9%	16.0%
Upper	4	25.0%	216	34.8%	40.4%	38.4%	50.7%
Unknown	2	12.5%	158	25.4%	0.0%	8.9%	11.8%
TOTAL	16	100.0%	621	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	23.2%	6.3%	3.3%
Moderate	1	20.0%	15	4.8%	16.7%	14.3%	12.1%
Middle	0	0.0%	0	0.0%	19.6%	27.0%	24.2%
Upper	3	60.0%	162	51.9%	40.4%	46.0%	54.5%
Unknown	1	20.0%	135	43.3%	0.0%	6.3%	5.9%
TOTAL	5	100.0%	312	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	33.3%	40	10.0%	23.2%	14.0%	5.5%
Moderate	0	0.0%	0	0.0%	16.7%	17.5%	15.3%
Middle	0	0.0%	0	0.0%	19.6%	12.3%	8.8%
Upper	2	66.7%	359	90.0%	40.4%	50.9%	67.7%
Unknown	0	0.0%	0	0.0%	0.0%	5.3%	0.0%
TOTAL	3	100.0%	399	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans							
Low	11	6.0%	740	2.9%	23.2%	7.0%	3.0%
Moderate	26	14.2%	2,656	10.6%	16.7%	15.2%	9.4%
Middle	33	18.0%	3,424	13.6%	19.6%	18.8%	15.0%
Upper	79	43.2%	12,957	51.6%	40.4%	40.9%	51.4%
Unknown	34	18.6%	5,321	21.2%	0.0%	18.1%	21.2%
TOTAL	183	100.0%	25,098	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	4	4.1%	586	3.1%	23.2%	6.5%	3.4%
Moderate	14	14.4%	1,664	8.9%	16.7%	18.3%	12.4%
Middle	18	18.6%	2,586	13.8%	19.6%	18.7%	16.3%
Upper	51	52.6%	11,848	63.2%	40.4%	42.4%	54.5%
Unknown	10	10.3%	2,052	11.0%	0.0%	14.2%	13.4%
TOTAL	97	100.0%	18,736	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	7	9.5%	723	4.9%	23.2%	5.3%	2.4%
Moderate	7	9.5%	814	5.5%	16.7%	12.3%	7.9%
Middle	13	17.6%	2,296	15.6%	19.6%	15.2%	11.5%
Upper	45	60.8%	10,156	69.1%	40.4%	41.9%	52.7%
Unknown	2	2.7%	698	4.8%	0.0%	25.2%	25.5%
TOTAL	74	100.0%	14,687	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	15.4%	40	5.5%	23.2%	10.1%	3.0%
Moderate	1	7.7%	30	4.1%	16.7%	15.1%	10.3%
Middle	3	23.1%	96	13.1%	19.6%	21.0%	16.8%
Upper	6	46.2%	507	69.2%	40.4%	43.7%	55.3%
Unknown	1	7.7%	60	8.2%	0.0%	10.1%	14.5%
TOTAL	13	100.0%	733	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	33.3%	164	40.3%	23.2%	6.0%	2.5%
Moderate	1	33.3%	35	8.6%	16.7%	22.0%	11.2%
Middle	0	0.0%	0	0.0%	19.6%	24.0%	8.5%
Upper	1	33.3%	208	51.1%	40.4%	36.0%	65.9%
Unknown	0	0.0%	0	0.0%	0.0%	12.0%	11.9%
TOTAL	3	100.0%	407	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	14	7.5%	1,513	4.4%	23.2%	5.9%	2.7%
Moderate	23	12.3%	2,543	7.4%	16.7%	15.0%	9.5%
Middle	34	18.2%	4,978	14.4%	19.6%	16.5%	13.0%
Upper	103	55.1%	22,719	65.7%	40.4%	40.7%	50.4%
Unknown	13	7.0%	2,810	8.1%	0.0%	21.8%	24.4%
TOTAL	187	100.0%	34,563	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	71	62.3%	39.3%	\$12,632	67.1%	48.9%	92.4%
	Over \$1 Million/ Unknown	43	37.7%	60.7%	\$6,200	32.9%	51.1%	7.6%
	TOTAL	114	100.0%	100.0%	\$18,832	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	73	64.0%	92.7%	\$2,817	15.0%	36.5%	
	\$100,001– \$250,000	19	16.7%	4.7%	\$3,591	19.1%	23.9%	
	\$250,001–\$1 Million	22	19.3%	2.6%	\$12,424	66.0%	39.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	114	100.0%	100.0%	\$18,832	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	44	62.0%		\$1,729	13.7%		
	\$100,001– \$250,000	14	19.7%		\$2,714	21.5%		
	\$250,001–\$1 Million	13	18.3%		\$8,189	64.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	71	100.0%		\$12,632	100.0%		

Appendix C (continued)

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	123	50.2%	32.5%	\$14,709	53.8%	39.3%	92.8%
	Over \$1 Million/ Unknown	122	49.8%	67.5%	\$12,632	46.2%	60.7%	7.2%
	TOTAL	245	100.0%	100.0%	\$27,341	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	176	71.8%	86.0%	\$6,025	22.0%	30.1%	
	\$100,001– \$250,000	41	16.7%	9.0%	\$7,078	25.9%	25.5%	
	\$250,001–\$1 Million	28	11.4%	5.0%	\$14,238	52.1%	44.5%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	245	100.0%	100.0%	\$27,341	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	91	74.0%		\$2,952	20.1%	
		\$100,001– \$250,000	16	13.0%		\$2,927	19.9%	
		\$250,001–\$1 Million	16	13.0%		\$8,830	60.0%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	123	100.0%		\$14,709	100.0%	

Appendix C (continued)

Jonesboro

Distribution of 2019 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	2.2%	374	1.3%	1.7%	2.4%	1.9%
Moderate	28	15.5%	3,918	14.0%	14.3%	9.4%	7.5%
Middle	90	49.7%	12,494	44.6%	53.1%	50.6%	44.5%
Upper	59	32.6%	11,246	40.1%	30.9%	37.7%	46.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	181	100.0%	28,032	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	4	5.1%	326	2.5%	1.7%	2.7%	1.9%
Moderate	5	6.3%	400	3.0%	14.3%	9.2%	7.3%
Middle	39	49.4%	7,236	55.0%	53.1%	51.7%	48.2%
Upper	31	39.2%	5,184	39.4%	30.9%	36.4%	42.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	79	100.0%	13,146	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	5.6%	50	5.7%	1.7%	3.8%	5.2%
Moderate	2	11.1%	94	10.7%	14.3%	11.1%	8.9%
Middle	9	50.0%	436	49.5%	53.1%	50.6%	46.1%
Upper	6	33.3%	301	34.2%	30.9%	34.5%	39.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	18	100.0%	881	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	1	50.0%	958	90.7%	23.0%	14.7%	6.6%
Moderate	1	50.0%	98	9.3%	34.7%	11.8%	4.4%
Middle	0	0.0%	0	0.0%	27.2%	49.0%	50.5%
Upper	0	0.0%	0	0.0%	15.1%	24.5%	38.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	1,056	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	1.7%	0.0%	0.0%
Moderate	2	6.7%	120	7.2%	14.3%	11.6%	9.3%
Middle	18	60.0%	791	47.2%	53.1%	60.7%	53.6%
Upper	10	33.3%	765	45.6%	30.9%	27.7%	37.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	30	100.0%	1,676	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	1.7%	2.0%	1.5%
Moderate	0	0.0%	0	0.0%	14.3%	6.1%	3.6%
Middle	2	66.7%	72	85.7%	53.1%	42.4%	47.6%
Upper	1	33.3%	12	14.3%	30.9%	49.5%	47.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	84	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	10	3.2%	1,708	3.8%	1.7%	2.6%	2.4%
Moderate	38	12.1%	4,630	10.3%	14.3%	9.5%	7.2%
Middle	158	50.5%	21,029	46.9%	53.1%	51.2%	46.4%
Upper	107	34.2%	17,508	39.0%	30.9%	36.7%	44.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	313	100.0%	44,875	100.0%	100.0%	100.0%	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	9	5.4%	1,114	3.3%	1.7%	1.8%	1.4%
Moderate	16	9.5%	2,050	6.2%	14.3%	8.4%	6.7%
Middle	80	47.6%	16,232	48.8%	53.1%	52.3%	47.7%
Upper	63	37.5%	13,875	41.7%	30.9%	37.4%	44.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	168	100.0%	33,271	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	10	6.1%	1,586	4.5%	1.7%	2.0%	1.5%
Moderate	13	7.9%	2,523	7.2%	14.3%	8.2%	6.5%
Middle	67	40.6%	13,553	38.6%	53.1%	45.0%	41.1%
Upper	75	45.5%	17,427	49.7%	30.9%	44.8%	50.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	165	100.0%	35,089	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.7%	5.6%	4.4%
Moderate	1	33.3%	79	32.9%	14.3%	13.4%	6.3%
Middle	2	66.7%	161	67.1%	53.1%	49.2%	39.2%
Upper	0	0.0%	0	0.0%	30.9%	31.3%	48.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.6%	1.5%
TOTAL	3	100.0%	240	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans					% of Multifamily Units		
Low	2	50.0%	1,431	70.9%	23.0%	24.2%	19.1%
Moderate	0	0.0%	0	0.0%	34.7%	12.5%	14.9%
Middle	2	50.0%	588	29.1%	27.2%	51.7%	45.9%
Upper	0	0.0%	0	0.0%	15.1%	11.7%	20.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	2,019	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	10.0%	10	3.3%	1.7%	7.7%	10.8%
Moderate	0	0.0%	0	0.0%	14.3%	13.5%	10.7%
Middle	5	50.0%	172	56.0%	53.1%	42.3%	38.6%
Upper	4	40.0%	125	40.7%	30.9%	36.5%	39.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	10	100.0%	307	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	22	6.3%	4,141	5.8%	1.7%	2.3%	3.1%
Moderate	30	8.6%	4,652	6.6%	14.3%	8.7%	7.4%
Middle	156	44.6%	30,706	43.3%	53.1%	49.3%	44.9%
Upper	142	40.6%	31,427	44.3%	30.9%	39.8%	44.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	350	100.0%	70,926	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Income Level of Geography							
Census Tract Income Level	Bank Small Business Loans				% of Businesses	Aggregate of Peer Data	
	#	# %	\$ 000s	\$ %		%	\$ %
Low	22	4.9%	\$1,782	5.4%	8.1%	5.6%	6.1%
Moderate	47	10.5%	\$3,576	10.8%	19.7%	14.2%	16.0%
Middle	265	59.2%	\$19,969	60.4%	50.2%	52.5%	53.6%
Upper	114	25.4%	\$7,735	23.4%	22.1%	25.9%	23.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	1.7%	0.5%
TOTAL	448	100.0%	\$33,062	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	35	4.9%	\$4,668	7.2%	6.7%	6.3%	8.9%
Moderate	90	12.7%	\$8,349	12.9%	19.3%	14.5%	15.0%
Middle	396	55.8%	\$34,408	53.0%	51.3%	52.3%	51.9%
Upper	189	26.6%	\$17,494	26.9%	22.7%	26.6%	24.2%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.3%	0.1%
TOTAL	710	100.0%	\$64,919	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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%	0.6%	0.5%	0.1%
Moderate	16	9.4%	\$2,811	11.0%	18.8%	9.4%	6.5%
Middle	98	57.3%	\$14,890	58.3%	51.4%	51.3%	49.9%
Upper	57	33.3%	\$7,838	30.7%	29.2%	38.0%	43.4%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.8%	0.1%
TOTAL	171	100.0%	\$25,539	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%	0.5%	0.6%	0.3%
Moderate	23	14.3%	\$3,501	14.3%	19.2%	9.3%	10.9%
Middle	99	61.5%	\$14,598	59.7%	51.6%	50.7%	47.7%
Upper	39	24.2%	\$6,364	26.0%	28.6%	39.2%	41.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.1%	0.0%
TOTAL	161	100.0%	\$24,463	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	1.7%	210	0.7%	20.7%	2.6%	1.4%
Moderate	28	15.5%	3,255	11.6%	16.8%	14.2%	10.2%
Middle	27	14.9%	4,065	14.5%	20.0%	21.2%	18.5%
Upper	68	37.6%	13,466	48.0%	42.5%	39.7%	50.0%
Unknown	55	30.4%	7,036	25.1%	0.0%	22.3%	19.9%
TOTAL	181	100.0%	28,032	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	20.7%	2.8%	1.3%
Moderate	4	5.1%	476	3.6%	16.8%	8.4%	4.9%
Middle	12	15.2%	1,343	10.2%	20.0%	16.3%	11.3%
Upper	45	57.0%	8,676	66.0%	42.5%	50.0%	58.4%
Unknown	18	22.8%	2,651	20.2%	0.0%	22.4%	24.0%
TOTAL	79	100.0%	13,146	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.7%	4.3%	2.9%
Moderate	1	5.6%	27	3.1%	16.8%	8.5%	4.6%
Middle	4	22.2%	115	13.1%	20.0%	18.7%	13.7%
Upper	8	44.4%	535	60.7%	42.5%	57.0%	67.6%
Unknown	5	27.8%	204	23.2%	0.0%	11.5%	11.2%
TOTAL	18	100.0%	881	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.7%	1.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.8%	2.9%	0.5%
Middle	0	0.0%	0	0.0%	20.0%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	42.5%	9.8%	1.8%
Unknown	2	100.0%	1,056	100.0%	0.0%	86.3%	97.6%
TOTAL	2	100.0%	1,056	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.7%	5.4%	3.3%
Moderate	4	13.3%	125	7.5%	16.8%	8.9%	4.3%
Middle	2	6.7%	30	1.8%	20.0%	8.0%	3.5%
Upper	23	76.7%	1,441	86.0%	42.5%	74.1%	86.5%
Unknown	1	3.3%	80	4.8%	0.0%	3.6%	2.5%
TOTAL	30	100.0%	1,676	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.7%	8.1%	4.0%
Moderate	1	33.3%	12	14.3%	16.8%	19.2%	12.8%
Middle	0	0.0%	0	0.0%	20.0%	18.2%	17.3%
Upper	2	66.7%	72	85.7%	42.5%	52.5%	64.8%
Unknown	0	0.0%	0	0.0%	0.0%	2.0%	1.2%
TOTAL	3	100.0%	84	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	3	1.0%	210	0.5%	20.7%	2.8%	1.3%
Moderate	38	12.1%	3,895	8.7%	16.8%	12.0%	7.6%
Middle	45	14.4%	5,553	12.4%	20.0%	18.8%	14.4%
Upper	146	46.6%	24,190	53.9%	42.5%	42.9%	47.6%
Unknown	81	25.9%	11,027	24.6%	0.0%	23.6%	29.1%
TOTAL	313	100.0%	44,875	100.0%	100.0%	100.0%	100.0%

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	6	3.6%	514	1.5%	20.7%	4.8%	2.8%
Moderate	28	16.7%	3,423	10.3%	16.8%	18.2%	13.6%
Middle	25	14.9%	3,816	11.5%	20.0%	21.5%	19.8%
Upper	56	33.3%	16,016	48.1%	42.5%	34.3%	44.0%
Unknown	53	31.5%	9,502	28.6%	0.0%	21.2%	19.7%
TOTAL	168	100.0%	33,271	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	1.8%	266	0.8%	20.7%	2.8%	1.2%
Moderate	19	11.5%	1,980	5.6%	16.8%	9.3%	5.6%
Middle	23	13.9%	3,284	9.4%	20.0%	15.2%	10.6%
Upper	81	49.1%	21,199	60.4%	42.5%	49.8%	60.2%
Unknown	39	23.6%	8,360	23.8%	0.0%	23.0%	22.5%
TOTAL	165	100.0%	35,089	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	20.7%	3.4%	1.9%
Moderate	0	0.0%	0	0.0%	16.8%	15.1%	7.9%
Middle	0	0.0%	0	0.0%	20.0%	18.4%	11.0%
Upper	1	33.3%	15	6.3%	42.5%	48.6%	58.0%
Unknown	2	66.7%	225	93.8%	0.0%	14.5%	21.2%
TOTAL	3	100.0%	240	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans							
Low	0	0.0%	0	0.0%	20.7%	0.0%	0.0%
Moderate	1	25.0%	500	24.8%	16.8%	2.5%	0.7%
Middle	0	0.0%	0	0.0%	20.0%	0.8%	0.1%
Upper	0	0.0%	0	0.0%	42.5%	12.5%	4.4%
Unknown	3	75.0%	1,519	75.2%	0.0%	84.2%	94.8%
TOTAL	4	100.0%	2,019	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	3	30.0%	47	15.3%	20.7%	11.5%	2.3%
Moderate	2	20.0%	46	15.0%	16.8%	11.5%	5.7%
Middle	1	10.0%	25	8.1%	20.0%	21.2%	15.8%
Upper	4	40.0%	189	61.6%	42.5%	53.8%	75.1%
Unknown	0	0.0%	0	0.0%	0.0%	1.9%	1.1%
TOTAL	10	100.0%	307	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	12	3.4%	827	1.2%	20.7%	3.8%	1.8%
Moderate	50	14.3%	5,949	8.4%	16.8%	13.4%	8.7%
Middle	49	14.0%	7,125	10.0%	20.0%	17.7%	13.7%
Upper	142	40.6%	37,419	52.8%	42.5%	39.9%	46.4%
Unknown	97	27.7%	19,606	27.6%	0.0%	25.2%	29.4%
TOTAL	350	100.0%	70,926	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	319	71.2%	48.0%	\$20,045	60.6%	50.5%	90.1%
	Over \$1 Million/ Unknown	129	28.8%	52.0%	\$13,017	39.4%	49.5%	9.9%
	TOTAL	448	100.0%	100.0%	\$33,062	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	373	83.3%	88.2%	\$11,524	34.9%	32.1%	
	\$100,001– \$250,000	50	11.2%	6.9%	\$8,514	25.8%	21.5%	
	\$250,001– \$1 Million	25	5.6%	5.0%	\$13,024	39.4%	46.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	448	100.0%	100.0%	\$33,062	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	269	84.3%		\$7,483	37.3%		
	\$100,001– \$250,000	37	11.6%		\$6,243	31.1%		
	\$250,001– \$1 Million	13	4.1%		\$6,319	31.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	319	100.0%		\$20,045	100.0%		

Appendix C (continued)

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	462	65.1%	46.0%	\$37,227	57.3%	45.8%	90.4%
	Over \$1 Million/ Unknown	248	34.9%	54.0%	\$27,692	42.7%	54.2%	9.6%
	TOTAL	710	100.0%	100.0%	\$64,919	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	559	78.7%	83.4%	\$17,724	27.3%	27.6%	
	\$100,001– \$250,000	83	11.7%	9.5%	\$13,672	21.1%	21.8%	
	\$250,001–\$1 Million	68	9.6%	7.1%	\$33,523	51.6%	50.6%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	710	100.0%	100.0%	\$64,919	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	381	82.5%		\$10,912	29.3%		
	\$100,001– \$250,000	42	9.1%		\$7,023	18.9%		
	\$250,001–\$1 Million	39	8.4%		\$19,292	51.8%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	462	100.0%		\$37,227	100.0%		

Appendix C (continued)

Distribution of 2019 Small Farm Lending By Borrower Income Level								
Farm Revenue and Loan Size		2019						
		Count			Dollars			Farms
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Farm Revenue	\$1 Million or Less	139	81.3%	59.0%	20,916	81.9%	79.8%	97.0%
	Over \$1 Million/ Unknown	32	18.7%	41.0%	4,623	18.1%	20.2%	3.0%
	TOTAL	171	100.0%	100.0%	25,539	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	84	49.1%	68.4%	3,386	13.3%	17.1%	
	\$100,001– \$250,000	52	30.4%	16.9%	9,452	37.0%	29.8%	
	\$250,001– \$500,000	35	20.5%	14.7%	12,701	49.7%	53.1%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	171	100.0%	100.0%	25,539	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	71	51.1%		3,016	14.4%		
	\$100,001– \$250,000	38	27.3%		7,072	33.8%		
	\$250,001–\$1 Million	30	21.6%		10,828	51.8%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	139	100.0%		20,916	100.0%		

Appendix C (continued)

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	135	83.9%	57.6%	19,599	80.1%	75.3%	96.7%
	Over \$1 Million/ Unknown	26	16.1%	42.4%	4,864	19.9%	24.7%	3.3%
	TOTAL	161	100.0%	100.0%	24,463	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	77	47.8%	65.5%	3,099	12.7%	17.0%	
	\$100,001– \$250,000	45	28.0%	18.7%	8,076	33.0%	30.6%	
	\$250,001– \$500,000	39	24.2%	15.8%	13,288	54.3%	52.4%	
	Over \$500,000	0	0.0%	0.0%	0	0.0%	0.0%	
	TOTAL	161	100.0%	100.0%	24,463	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	69	51.1%		2,728	13.9%		
	\$100,001– \$250,000	34	25.2%		6,088	31.1%		
	\$250,001–\$1 Million	32	23.7%		10,783	55.0%		
	Over \$1 Million	0	0.0%		0	0.0%		
	TOTAL	135	100.0%		19,599	100.0%		

Appendix C (continued)

KANSAS

NonMSA Kansas

Distribution of 2019 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%	22.5%	21.1%	14.5%
Middle	2	66.7%	211	74.8%	47.7%	43.9%	39.6%
Upper	1	33.3%	71	25.2%	29.8%	35.0%	45.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	282	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%	22.5%	11.4%	6.2%
Middle	1	50.0%	183	55.0%	47.7%	51.7%	47.4%
Upper	1	50.0%	150	45.0%	29.8%	36.9%	46.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	333	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	0	0.0%	0	0.0%	22.5%	17.8%	12.0%
Middle	3	60.0%	394	64.1%	47.7%	46.9%	43.6%
Upper	2	40.0%	221	35.9%	29.8%	35.3%	44.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	615	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	1	33.3%	111	48.1%	22.5%	20.7%	12.8%
Middle	0	0.0%	0	0.0%	47.7%	44.4%	40.0%
Upper	2	66.7%	120	51.9%	29.8%	34.9%	47.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	231	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%	22.5%	10.2%	6.3%
Middle	0	0.0%	0	0.0%	47.7%	46.2%	41.7%
Upper	1	100.0%	186	100.0%	29.8%	43.6%	52.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	186	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%	22.5%	8.8%	5.5%
Middle	2	100.0%	65	100.0%	47.7%	41.2%	32.9%
Upper	0	0.0%	0	0.0%	29.8%	50.0%	61.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	65	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	1	16.7%	111	23.0%	22.5%	15.7%	9.6%
Middle	2	33.3%	65	13.5%	47.7%	45.2%	42.3%
Upper	3	50.0%	306	63.5%	29.8%	39.1%	48.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	6	100.0%	482	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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%	19.9%	16.0%	26.8%
Middle	3	75.0%	\$31	12.1%	59.1%	57.5%	51.4%
Upper	1	25.0%	\$225	87.9%	21.0%	23.3%	20.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	3.2%	1.0%
TOTAL	4	100.0%	\$256	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	4	23.5%	\$79	8.3%	19.5%	19.2%	26.8%
Middle	10	58.8%	\$625	65.4%	59.4%	57.8%	61.0%
Upper	3	17.6%	\$251	26.3%	21.1%	22.4%	12.0%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.6%	0.2%
TOTAL	17	100.0%	\$955	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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%	17.3%	11.1%	6.5%
Moderate	1	33.3%	71	25.2%	20.8%	21.2%	16.2%
Middle	1	33.3%	78	27.7%	22.9%	19.4%	18.4%
Upper	0	0.0%	0	0.0%	39.0%	31.3%	43.1%
Unknown	1	33.3%	133	47.2%	0.0%	17.0%	15.8%
TOTAL	3	100.0%	282	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	17.3%	6.0%	3.1%
Moderate	0	0.0%	0	0.0%	20.8%	15.1%	9.6%
Middle	2	100.0%	333	100.0%	22.9%	19.8%	17.3%
Upper	0	0.0%	0	0.0%	39.0%	41.2%	50.8%
Unknown	0	0.0%	0	0.0%	0.0%	17.9%	19.2%
TOTAL	2	100.0%	333	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	17.3%	8.8%	5.2%
Moderate	1	20.0%	71	11.5%	20.8%	18.7%	13.2%
Middle	3	60.0%	411	66.8%	22.9%	19.6%	17.3%
Upper	0	0.0%	0	0.0%	39.0%	33.8%	45.1%
Unknown	1	20.0%	133	21.6%	0.0%	19.1%	19.2%
TOTAL	5	100.0%	615	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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%	17.3%	9.2%	4.4%
Moderate	1	33.3%	27	11.7%	20.8%	24.4%	18.8%
Middle	1	33.3%	111	48.1%	22.9%	24.1%	23.6%
Upper	0	0.0%	0	0.0%	39.0%	27.8%	39.8%
Unknown	1	33.3%	93	40.3%	0.0%	14.5%	13.4%
TOTAL	3	100.0%	231	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	17.3%	5.2%	2.5%
Moderate	0	0.0%	0	0.0%	20.8%	14.9%	9.6%
Middle	1	100.0%	186	100.0%	22.9%	19.0%	15.7%
Upper	0	0.0%	0	0.0%	39.0%	43.6%	52.4%
Unknown	0	0.0%	0	0.0%	0.0%	17.2%	19.7%
TOTAL	1	100.0%	186	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	17.3%	11.8%	7.6%
Moderate	1	50.0%	35	53.8%	20.8%	17.6%	11.4%
Middle	1	50.0%	30	46.2%	22.9%	29.4%	18.9%
Upper	0	0.0%	0	0.0%	39.0%	29.4%	49.5%
Unknown	0	0.0%	0	0.0%	0.0%	11.8%	12.6%
TOTAL	2	100.0%	65	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	0	0.0%	0	0.0%	17.3%	6.9%	3.2%
Moderate	2	33.3%	62	12.9%	20.8%	18.9%	13.2%
Middle	3	50.0%	327	67.8%	22.9%	20.9%	18.4%
Upper	0	0.0%	0	0.0%	39.0%	35.2%	44.7%
Unknown	1	16.7%	93	19.3%	0.0%	18.0%	20.4%
TOTAL	6	100.0%	482	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	4	100.0%	43.1%	\$256	100.0%	37.0%	87.5%
	Over \$1 Million/ Unknown	0	0.0%	56.9%	\$0	0.0%	63.0%	12.5%
	TOTAL	4	100.0%	100.0%	\$256	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	3	75.0%	92.8%	\$31	12.1%	36.2%	
	\$100,001– \$250,000	1	25.0%	4.0%	\$225	87.9%	17.6%	
	\$250,001– \$1 Million	0	0.0%	3.2%	\$0	0.0%	46.2%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	4	100.0%	100.0%	\$256	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	3	75.0%		\$31	12.1%		
	\$100,001– \$250,000	1	25.0%		\$225	87.9%		
	\$250,001– \$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	4	100.0%		\$256	100.0%		

Appendix C (continued)

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	9	52.9%	46.5%	\$383	40.1%	32.2%	87.7%
	Over \$1 Million/ Unknown	8	47.1%	53.5%	\$572	59.9%	67.8%	12.3%
	TOTAL	17	100.0%	100.0%	\$955	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	15	88.2%	86.8%	\$413	43.2%	29.8%	
	\$100,001– \$250,000	1	5.9%	6.8%	\$225	23.6%	18.1%	
	\$250,001–\$1 Million	1	5.9%	6.4%	\$317	33.2%	52.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	17	100.0%	100.0%	\$955	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	8	88.9%		\$158	41.3%		
	\$100,001– \$250,000	1	11.1%		\$225	58.7%		
	\$250,001–\$1 Million	0	0.0%		\$0	0.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	9	100.0%		\$383	100.0%		

Appendix C (continued)

MISSOURI

Columbia

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%	231	0.9%	1.6%	1.6%	1.0%
Moderate	8	7.3%	993	3.7%	8.3%	10.4%	7.3%
Middle	53	48.6%	13,947	51.4%	56.2%	57.7%	54.8%
Upper	45	41.3%	11,571	42.7%	33.5%	29.7%	36.3%
Unknown	2	1.8%	369	1.4%	0.4%	0.6%	0.7%
TOTAL	109	100.0%	27,111	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	0.5%	163	0.4%	1.6%	0.8%	0.4%
Moderate	13	6.5%	1,680	4.3%	8.3%	6.4%	4.3%
Middle	89	44.7%	18,255	47.0%	56.2%	54.4%	52.4%
Upper	96	48.2%	18,741	48.3%	33.5%	38.2%	42.5%
Unknown	0	0.0%	0	0.0%	0.4%	0.3%	0.3%
TOTAL	199	100.0%	38,839	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	1.6%	3.4%	1.5%
Moderate	0	0.0%	0	0.0%	8.3%	8.9%	6.9%
Middle	1	100.0%	14	100.0%	56.2%	52.1%	48.0%
Upper	0	0.0%	0	0.0%	33.5%	35.6%	43.6%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	1	100.0%	14	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	8.2%	15.9%	13.0%
Moderate	1	50.0%	180	21.7%	18.5%	15.9%	6.6%
Middle	1	50.0%	650	78.3%	29.4%	40.2%	19.2%
Upper	0	0.0%	0	0.0%	28.0%	18.3%	46.0%
Unknown	0	0.0%	0	0.0%	15.8%	9.8%	15.1%
TOTAL	2	100.0%	830	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	1.6%	0.0%	0.0%
Moderate	1	12.5%	10	2.2%	8.3%	8.6%	2.5%
Middle	5	62.5%	350	77.4%	56.2%	55.2%	46.7%
Upper	2	25.0%	92	20.4%	33.5%	36.2%	50.8%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	8	100.0%	452	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	1.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	8.3%	3.6%	0.5%
Middle	1	50.0%	150	55.6%	56.2%	50.9%	49.8%
Upper	1	50.0%	120	44.4%	33.5%	45.5%	49.8%
Unknown	0	0.0%	0	0.0%	0.4%	0.0%	0.0%
TOTAL	2	100.0%	270	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	2	0.6%	394	0.6%	1.6%	1.3%	1.7%
Moderate	23	7.2%	2,863	4.2%	8.3%	8.3%	5.7%
Middle	150	46.7%	33,366	49.4%	56.2%	55.9%	50.8%
Upper	144	44.9%	30,524	45.2%	33.5%	34.1%	40.2%
Unknown	2	0.6%	369	0.5%	0.4%	0.5%	1.6%
TOTAL	321	100.0%	67,516	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	74	16.2%	\$14,878	18.6%	11.2%	11.1%	14.1%
Moderate	43	9.4%	\$8,266	10.3%	10.9%	8.9%	11.3%
Middle	148	32.5%	\$26,346	32.9%	43.5%	43.4%	40.9%
Upper	175	38.4%	\$28,982	36.2%	28.8%	31.8%	27.5%
Unknown	16	3.5%	\$1,644	2.1%	5.6%	4.6%	6.1%
TOTAL	456	100.0%	\$80,116	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	4	3.7%	544	2.0%	19.9%	9.2%	5.5%
Moderate	19	17.4%	3,653	13.5%	16.0%	20.9%	16.1%
Middle	25	22.9%	5,581	20.6%	21.5%	20.0%	18.8%
Upper	45	41.3%	13,985	51.6%	42.5%	32.5%	43.2%
Unknown	16	14.7%	3,348	12.3%	0.0%	17.4%	16.4%
TOTAL	109	100.0%	27,111	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	7	3.5%	590	1.5%	19.9%	4.1%	2.2%
Moderate	26	13.1%	3,395	8.7%	16.0%	13.4%	9.0%
Middle	33	16.6%	5,872	15.1%	21.5%	18.8%	15.4%
Upper	113	56.8%	25,114	64.7%	42.5%	41.6%	50.4%
Unknown	20	10.1%	3,868	10.0%	0.0%	22.1%	23.1%
TOTAL	199	100.0%	38,839	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.9%	6.8%	4.0%
Moderate	0	0.0%	0	0.0%	16.0%	17.8%	12.2%
Middle	1	100.0%	14	100.0%	21.5%	24.7%	19.6%
Upper	0	0.0%	0	0.0%	42.5%	43.2%	56.2%
Unknown	0	0.0%	0	0.0%	0.0%	7.5%	8.1%
TOTAL	1	100.0%	14	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	19.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.0%	2.4%	0.3%
Middle	0	0.0%	0	0.0%	21.5%	0.0%	0.0%
Upper	0	0.0%	0	0.0%	42.5%	3.7%	0.5%
Unknown	2	100.0%	830	100.0%	0.0%	93.9%	99.2%
TOTAL	2	100.0%	830	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	12.5%	10	2.2%	19.9%	1.7%	0.2%
Moderate	0	0.0%	0	0.0%	16.0%	10.3%	4.1%
Middle	2	25.0%	122	27.0%	21.5%	25.9%	23.3%
Upper	5	62.5%	320	70.8%	42.5%	60.3%	70.3%
Unknown	0	0.0%	0	0.0%	0.0%	1.7%	2.1%
TOTAL	8	100.0%	452	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	19.9%	5.5%	1.5%
Moderate	0	0.0%	0	0.0%	16.0%	25.5%	20.0%
Middle	0	0.0%	0	0.0%	21.5%	27.3%	18.6%
Upper	2	100.0%	270	100.0%	42.5%	27.3%	38.1%
Unknown	0	0.0%	0	0.0%	0.0%	14.5%	21.7%
TOTAL	2	100.0%	270	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans							
Low	12	3.7%	1,144	1.7%	19.9%	6.2%	3.3%
Moderate	45	14.0%	7,048	10.4%	16.0%	16.4%	11.1%
Middle	61	19.0%	11,589	17.2%	21.5%	19.0%	15.4%
Upper	165	51.4%	39,689	58.8%	42.5%	36.8%	43.0%
Unknown	38	11.8%	8,046	11.9%	0.0%	21.7%	27.3%
TOTAL	321	100.0%	67,516	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	180	39.5%	38.4%	\$37,769	47.1%	38.2%	91.9%
	Over \$1 Million/ Unknown	276	60.5%	61.6%	\$42,347	52.9%	61.8%	8.1%
	TOTAL	456	100.0%	100.0%	\$80,116	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	277	60.7%	81.4%	\$9,600	12.0%	23.5%	
	\$100,001– \$250,000	77	16.9%	9.8%	\$12,896	16.1%	19.5%	
	\$250,001– \$1 Million	102	22.4%	8.8%	\$57,620	71.9%	57.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	456	100.0%	100.0%	\$80,116	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	105	58.3%		\$3,890	10.3%		
	\$100,001– \$250,000	22	12.2%		\$4,222	11.2%		
	\$250,001– \$1 Million	53	29.4%		\$29,657	78.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	180	100.0%		\$37,769	100.0%		

Appendix C (continued)

Joplin

Distribution of 2019 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	2	13.3%	165	7.5%	10.7%	12.8%	9.0%
Middle	9	60.0%	908	41.5%	71.0%	65.9%	66.1%
Upper	4	26.7%	1,115	51.0%	18.3%	21.3%	24.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	15	100.0%	2,188	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	25.0%	59	11.6%	10.7%	8.5%	5.8%
Middle	6	75.0%	450	88.4%	71.0%	68.5%	68.4%
Upper	0	0.0%	0	0.0%	18.3%	23.1%	25.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	8	100.0%	509	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%	10.7%	14.5%	12.2%
Middle	2	66.7%	86	74.1%	71.0%	61.6%	63.0%
Upper	1	33.3%	30	25.9%	18.3%	23.8%	24.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	116	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%	31.7%	35.7%	34.9%
Middle	2	66.7%	3,273	70.0%	58.9%	51.8%	44.8%
Upper	1	33.3%	1,400	30.0%	9.4%	12.5%	20.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	4,673	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	10.7%	6.3%	4.4%
Middle	2	100.0%	54	100.0%	71.0%	66.3%	71.1%
Upper	0	0.0%	0	0.0%	18.3%	27.5%	24.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	54	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	10.7%	6.3%	3.7%
Middle	1	100.0%	40	100.0%	71.0%	66.7%	64.6%
Upper	0	0.0%	0	0.0%	18.3%	27.1%	31.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	40	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	4	12.5%	224	3.0%	10.7%	11.7%	9.4%
Middle	22	68.8%	4,811	63.5%	71.0%	66.4%	65.7%
Upper	6	18.8%	2,545	33.6%	18.3%	21.9%	24.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	32	100.0%	7,580	100.0%	100.0%	100.0%	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	24.2%	568	13.4%	10.7%	12.8%	8.7%
Middle	20	60.6%	3,006	71.0%	71.0%	65.9%	67.3%
Upper	5	15.2%	659	15.6%	18.3%	21.3%	24.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	33	100.0%	4,233	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%	10.7%	6.5%	4.5%
Middle	11	57.9%	1,540	45.1%	71.0%	70.9%	70.4%
Upper	8	42.1%	1,873	54.9%	18.3%	22.5%	25.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	19	100.0%	3,413	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	40.0%	53	26.8%	10.7%	17.7%	11.4%
Middle	3	60.0%	145	73.2%	71.0%	62.0%	69.6%
Upper	0	0.0%	0	0.0%	18.3%	20.3%	19.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	198	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	50.0%	20	40.0%	10.7%	6.4%	5.6%
Middle	1	50.0%	30	60.0%	71.0%	61.7%	61.8%
Upper	0	0.0%	0	0.0%	18.3%	31.9%	32.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	50	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	11	18.6%	641	8.1%	10.7%	10.5%	8.4%
Middle	35	59.3%	4,721	59.8%	71.0%	67.6%	67.4%
Upper	13	22.0%	2,532	32.1%	18.3%	21.9%	24.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	59	100.0%	7,894	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	22.7%	\$1,015	42.0%	18.8%	17.9%	20.2%
Middle	16	72.7%	\$1,392	57.7%	67.7%	65.9%	62.4%
Upper	1	4.5%	\$7	0.3%	13.5%	14.2%	16.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	2.0%	0.5%
TOTAL	22	100.0%	\$2,414	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	15.9%	\$2,570	27.0%	18.9%	17.0%	18.7%
Middle	49	71.0%	\$6,526	68.5%	67.8%	69.7%	67.3%
Upper	9	13.0%	\$435	4.6%	13.3%	12.8%	13.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.2%
TOTAL	69	100.0%	\$9,531	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	20.0%	468	21.4%	19.9%	7.4%	4.5%
Moderate	0	0.0%	0	0.0%	18.3%	22.5%	18.0%
Middle	4	26.7%	362	16.5%	21.2%	21.4%	20.9%
Upper	5	33.3%	1,123	51.3%	40.6%	30.5%	39.9%
Unknown	3	20.0%	235	10.7%	0.0%	18.2%	16.6%
TOTAL	15	100.0%	2,188	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	12.5%	46	9.0%	19.9%	8.2%	4.0%
Moderate	2	25.0%	66	13.0%	18.3%	13.3%	9.3%
Middle	0	0.0%	0	0.0%	21.2%	17.5%	16.1%
Upper	4	50.0%	309	60.7%	40.6%	41.4%	49.7%
Unknown	1	12.5%	88	17.3%	0.0%	19.6%	20.9%
TOTAL	8	100.0%	509	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.9%	9.3%	6.5%
Moderate	2	66.7%	86	74.1%	18.3%	17.4%	13.5%
Middle	1	33.3%	30	25.9%	21.2%	15.1%	13.9%
Upper	0	0.0%	0	0.0%	40.6%	49.4%	59.1%
Unknown	0	0.0%	0	0.0%	0.0%	8.7%	6.9%
TOTAL	3	100.0%	116	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	19.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	21.2%	1.8%	0.4%
Upper	0	0.0%	0	0.0%	40.6%	23.2%	7.4%
Unknown	3	100.0%	4,673	100.0%	0.0%	75.0%	92.2%
TOTAL	3	100.0%	4,673	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	19.9%	6.3%	3.1%
Moderate	1	50.0%	30	55.6%	18.3%	10.0%	6.4%
Middle	0	0.0%	0	0.0%	21.2%	23.8%	21.7%
Upper	1	50.0%	24	44.4%	40.6%	53.8%	66.4%
Unknown	0	0.0%	0	0.0%	0.0%	6.3%	2.6%
TOTAL	2	100.0%	54	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	1	100.0%	40	100.0%	19.9%	18.8%	15.4%
Moderate	0	0.0%	0	0.0%	18.3%	17.7%	13.8%
Middle	0	0.0%	0	0.0%	21.2%	20.8%	24.5%
Upper	0	0.0%	0	0.0%	40.6%	36.5%	38.8%
Unknown	0	0.0%	0	0.0%	0.0%	6.3%	7.5%
TOTAL	1	100.0%	40	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	5	15.6%	554	7.3%	19.9%	7.7%	4.2%
Moderate	5	15.6%	182	2.4%	18.3%	19.1%	14.5%
Middle	5	15.6%	392	5.2%	21.2%	19.7%	18.4%
Upper	10	31.3%	1,456	19.2%	40.6%	33.9%	41.0%
Unknown	7	21.9%	4,996	65.9%	0.0%	19.8%	21.9%
TOTAL	32	100.0%	7,580	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	9.1%	213	5.0%	19.9%	9.7%	5.9%
Moderate	12	36.4%	1,377	32.5%	18.3%	24.5%	19.5%
Middle	5	15.2%	690	16.3%	21.2%	21.3%	21.0%
Upper	9	27.3%	1,586	37.5%	40.6%	28.0%	38.2%
Unknown	4	12.1%	367	8.7%	0.0%	16.5%	15.4%
TOTAL	33	100.0%	4,233	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	10.5%	145	4.2%	19.9%	5.3%	2.6%
Moderate	0	0.0%	0	0.0%	18.3%	13.7%	8.9%
Middle	7	36.8%	782	22.9%	21.2%	18.1%	15.3%
Upper	10	52.6%	2,486	72.8%	40.6%	39.3%	48.1%
Unknown	0	0.0%	0	0.0%	0.0%	23.7%	25.1%
TOTAL	19	100.0%	3,413	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.9%	8.9%	6.6%
Moderate	1	20.0%	40	20.2%	18.3%	15.2%	9.9%
Middle	1	20.0%	37	18.7%	21.2%	18.4%	19.3%
Upper	1	20.0%	75	37.9%	40.6%	45.6%	56.0%
Unknown	2	40.0%	46	23.2%	0.0%	12.0%	8.2%
TOTAL	5	100.0%	198	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	19.9%	6.4%	2.2%
Moderate	0	0.0%	0	0.0%	18.3%	6.4%	2.8%
Middle	1	50.0%	20	40.0%	21.2%	23.4%	16.2%
Upper	1	50.0%	30	60.0%	40.6%	53.2%	65.3%
Unknown	0	0.0%	0	0.0%	0.0%	10.6%	13.5%
TOTAL	2	100.0%	50	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	5	8.5%	358	4.5%	19.9%	7.5%	4.1%
Moderate	13	22.0%	1,417	18.0%	18.3%	18.8%	13.5%
Middle	14	23.7%	1,529	19.4%	21.2%	19.3%	17.3%
Upper	21	35.6%	4,177	52.9%	40.6%	32.6%	40.4%
Unknown	6	10.2%	413	5.2%	0.0%	21.8%	24.8%
TOTAL	59	100.0%	7,894	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	14	63.6%	40.1%	\$1,531	63.4%	34.9%	91.0%
	Over \$1 Million/ Unknown	8	36.4%	59.9%	\$883	36.6%	65.1%	9.0%
	TOTAL	22	100.0%	100.0%	\$2,414	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	16	72.7%	92.1%	\$735	30.4%	32.3%	
	\$100,001–\$250,000	4	18.2%	4.3%	\$749	31.0%	18.4%	
	\$250,001– \$1 Million	2	9.1%	3.7%	\$930	38.5%	49.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	22	100.0%	100.0%	\$2,414	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	10	71.4%		\$303	19.8%		
	\$100,001–\$250,000	3	21.4%		\$648	42.3%		
	\$250,001– \$1 Million	1	7.1%		\$580	37.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	14	100.0%		\$1,531	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	29	42.0%	34.2%	\$2,955	31.0%	26.7%	91.2%
	Over \$1 Million/ Unknown	40	58.0%	65.8%	\$6,576	69.0%	73.3%	8.8%
	TOTAL	69	100.0%	100.0%	\$9,531	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	50	72.5%	86.4%	\$1,498	15.7%	28.5%	
	\$100,001– \$250,000	6	8.7%	7.9%	\$1,024	10.7%	22.0%	
	\$250,001–\$1 Million	13	18.8%	5.8%	\$7,009	73.5%	49.4%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	69	100.0%	100.0%	\$9,531	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	23	79.3%		\$544	18.4%		
	\$100,001– \$250,000	3	10.3%		\$501	17.0%		
	\$250,001–\$1 Million	3	10.3%		\$1,910	64.6%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	29	100.0%		\$2,955	100.0%		

Appendix C (continued)

Springfield

Distribution of 2019 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	9	4.6%	646	2.0%	2.5%	2.6%	1.2%
Moderate	30	15.5%	3,036	9.4%	13.2%	12.1%	7.1%
Middle	113	58.2%	19,579	60.9%	61.0%	64.6%	64.8%
Upper	42	21.6%	8,883	27.6%	23.3%	20.7%	27.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	194	100.0%	32,144	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.0%	92	0.6%	2.5%	1.5%	0.8%
Moderate	4	4.1%	347	2.4%	13.2%	8.6%	4.6%
Middle	63	64.3%	9,264	64.0%	61.0%	63.7%	61.2%
Upper	30	30.6%	4,776	33.0%	23.3%	26.1%	33.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	98	100.0%	14,479	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.5%	2.5%	4.4%
Moderate	2	14.3%	180	18.3%	13.2%	13.4%	8.2%
Middle	8	57.1%	555	56.5%	61.0%	61.3%	57.2%
Upper	4	28.6%	248	25.2%	23.3%	22.8%	30.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	14	100.0%	983	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	8.4%	14.0%	8.3%
Moderate	0	0.0%	0	0.0%	41.0%	27.9%	38.3%
Middle	1	50.0%	50	4.0%	40.8%	47.1%	39.3%
Upper	1	50.0%	1,200	96.0%	7.4%	8.8%	10.1%
Unknown	0	0.0%	0	0.0%	2.3%	2.2%	4.1%
TOTAL	2	100.0%	1,250	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.5%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	13.2%	5.8%	3.1%
Middle	11	73.3%	651	80.1%	61.0%	58.5%	53.5%
Upper	4	26.7%	162	19.9%	23.3%	35.7%	43.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	15	100.0%	813	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.5%	1.9%	2.1%
Moderate	0	0.0%	0	0.0%	13.2%	11.3%	7.8%
Middle	2	50.0%	219	46.2%	61.0%	61.5%	58.7%
Upper	2	50.0%	255	53.8%	23.3%	25.4%	31.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	474	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	10	3.1%	738	1.5%	2.5%	2.3%	1.5%
Moderate	36	11.0%	3,563	7.1%	13.2%	11.1%	8.3%
Middle	198	60.6%	30,318	60.5%	61.0%	63.9%	62.0%
Upper	83	25.4%	15,524	31.0%	23.3%	22.6%	27.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.3%
TOTAL	327	100.0%	50,143	100.0%	100.0%	100.0%	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%	2.5%	2.5%	1.3%
Moderate	9	23.1%	788	10.7%	13.2%	11.4%	6.9%
Middle	21	53.8%	4,617	62.5%	61.0%	64.9%	64.5%
Upper	9	23.1%	1,987	26.9%	23.3%	21.2%	27.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	39	100.0%	7,392	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.5%	0.9%	0.4%
Moderate	6	11.1%	378	4.6%	13.2%	6.5%	3.7%
Middle	34	63.0%	4,890	59.6%	61.0%	63.3%	60.0%
Upper	14	25.9%	2,941	35.8%	23.3%	29.3%	35.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	54	100.0%	8,209	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.5%	3.7%	2.0%
Moderate	1	16.7%	66	21.0%	13.2%	12.7%	11.5%
Middle	4	66.7%	148	47.1%	61.0%	54.9%	50.6%
Upper	1	16.7%	100	31.8%	23.3%	28.7%	35.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	6	100.0%	314	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.5%	0.8%	0.6%
Moderate	0	0.0%	0	0.0%	13.2%	4.5%	2.5%
Middle	4	80.0%	319	56.1%	61.0%	65.7%	58.3%
Upper	1	20.0%	250	43.9%	23.3%	28.9%	38.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	569	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.5%	0.7%	0.4%
Moderate	0	0.0%	0	0.0%	13.2%	7.0%	4.0%
Middle	0	0.0%	0	0.0%	61.0%	60.7%	55.1%
Upper	1	100.0%	92	100.0%	23.3%	31.6%	40.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	92	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	2.5%	1.8%	2.2%
Moderate	16	15.2%	1,232	7.4%	13.2%	9.1%	6.8%
Middle	63	60.0%	9,974	60.2%	61.0%	63.8%	61.3%
Upper	26	24.8%	5,370	32.4%	23.3%	25.2%	29.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.1%
TOTAL	105	100.0%	16,576	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	0.6%	\$25	0.1%	2.5%	1.7%	2.1%
Moderate	30	17.5%	\$4,724	16.4%	25.0%	23.4%	32.4%
Middle	100	58.5%	\$17,025	59.1%	54.4%	54.0%	47.0%
Upper	40	23.4%	\$7,049	24.5%	17.9%	19.6%	18.2%
Unknown	0	0.0%	\$0	0.0%	0.3%	1.3%	0.3%
TOTAL	171	100.0%	\$28,823	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	8	1.8%	\$1,677	4.1%	2.5%	1.9%	2.0%
Moderate	76	16.8%	\$7,088	17.1%	25.1%	23.4%	32.5%
Middle	249	55.1%	\$22,832	55.2%	54.1%	56.2%	48.6%
Upper	119	26.3%	\$9,781	23.6%	18.0%	18.1%	16.5%
Unknown	0	0.0%	\$0	0.0%	0.3%	0.4%	0.3%
TOTAL	452	100.0%	\$41,378	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	14	7.2%	1,448	4.5%	19.7%	6.3%	3.5%
Moderate	36	18.6%	4,754	14.8%	18.4%	19.2%	14.2%
Middle	52	26.8%	8,111	25.2%	21.2%	21.7%	20.2%
Upper	76	39.2%	15,495	48.2%	40.7%	33.2%	43.7%
Unknown	16	8.2%	2,336	7.3%	0.0%	19.6%	18.4%
TOTAL	194	100.0%	32,144	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	9	9.2%	750	5.2%	19.7%	6.2%	3.1%
Moderate	16	16.3%	1,794	12.4%	18.4%	13.9%	8.7%
Middle	20	20.4%	2,649	18.3%	21.2%	17.6%	13.8%
Upper	47	48.0%	8,581	59.3%	40.7%	39.2%	49.6%
Unknown	6	6.1%	705	4.9%	0.0%	23.1%	24.8%
TOTAL	98	100.0%	14,479	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	14.3%	35	3.6%	19.7%	6.0%	3.2%
Moderate	1	7.1%	25	2.5%	18.4%	14.3%	10.4%
Middle	4	28.6%	140	14.2%	21.2%	23.0%	19.3%
Upper	7	50.0%	783	79.7%	40.7%	48.6%	61.8%
Unknown	0	0.0%	0	0.0%	0.0%	8.1%	5.4%
TOTAL	14	100.0%	983	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Multifamily Loans							
Low	0	0.0%	0	0.0%	19.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.4%	0.7%	0.1%
Middle	0	0.0%	0	0.0%	21.2%	0.7%	0.1%
Upper	0	0.0%	0	0.0%	40.7%	7.4%	1.8%
Unknown	2	100.0%	1,250	100.0%	0.0%	91.2%	98.0%
TOTAL	2	100.0%	1,250	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	19.7%	5.0%	2.2%
Moderate	2	13.3%	40	4.9%	18.4%	12.3%	8.1%
Middle	6	40.0%	315	38.7%	21.2%	21.2%	19.6%
Upper	7	46.7%	458	56.3%	40.7%	55.4%	65.5%
Unknown	0	0.0%	0	0.0%	0.0%	6.1%	4.6%
TOTAL	15	100.0%	813	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	25.0%	85	17.9%	19.7%	4.7%	3.0%
Moderate	0	0.0%	0	0.0%	18.4%	15.5%	13.4%
Middle	2	50.0%	320	67.5%	21.2%	26.8%	19.5%
Upper	1	25.0%	69	14.6%	40.7%	41.8%	50.4%
Unknown	0	0.0%	0	0.0%	0.0%	11.3%	13.7%
TOTAL	4	100.0%	474	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans				Families by Family Income %			
Low	26	8.0%	2,318	4.6%	19.7%	6.1%	3.1%
Moderate	55	16.8%	6,613	13.2%	18.4%	16.9%	11.5%
Middle	84	25.7%	11,535	23.0%	21.2%	20.2%	16.9%
Upper	138	42.2%	25,386	50.6%	40.7%	35.4%	43.0%
Unknown	24	7.3%	4,291	8.6%	0.0%	21.5%	25.5%
TOTAL	327	100.0%	50,143	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	4	10.3%	318	4.3%	19.7%	7.5%	4.2%
Moderate	6	15.4%	752	10.2%	18.4%	21.2%	16.4%
Middle	11	28.2%	1,918	25.9%	21.2%	21.6%	20.8%
Upper	12	30.8%	3,542	47.9%	40.7%	30.3%	40.1%
Unknown	6	15.4%	862	11.7%	0.0%	19.4%	18.5%
TOTAL	39	100.0%	7,392	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	7	13.0%	645	7.9%	19.7%	4.7%	2.3%
Moderate	9	16.7%	917	11.2%	18.4%	12.7%	8.4%
Middle	10	18.5%	1,248	15.2%	21.2%	17.7%	14.6%
Upper	22	40.7%	4,573	55.7%	40.7%	39.1%	48.5%
Unknown	6	11.1%	826	10.1%	0.0%	25.8%	26.1%
TOTAL	54	100.0%	8,209	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.7%	7.2%	4.7%
Moderate	1	16.7%	50	15.9%	18.4%	14.6%	10.0%
Middle	3	50.0%	98	31.2%	21.2%	21.5%	22.5%
Upper	2	33.3%	166	52.9%	40.7%	50.1%	58.1%
Unknown	0	0.0%	0	0.0%	0.0%	6.5%	4.7%
TOTAL	6	100.0%	314	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	19.7%	5.0%	1.7%
Moderate	0	0.0%	0	0.0%	18.4%	14.5%	8.6%
Middle	1	20.0%	15	2.6%	21.2%	17.8%	11.7%
Upper	4	80.0%	554	97.4%	40.7%	49.6%	62.2%
Unknown	0	0.0%	0	0.0%	0.0%	13.2%	15.8%
TOTAL	5	100.0%	569	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	100.0%	92	100.0%	19.7%	5.8%	3.1%
Moderate	0	0.0%	0	0.0%	18.4%	18.7%	13.2%
Middle	0	0.0%	0	0.0%	21.2%	23.1%	19.2%
Upper	0	0.0%	0	0.0%	40.7%	48.1%	60.5%
Unknown	0	0.0%	0	0.0%	0.0%	4.4%	4.0%
TOTAL	1	100.0%	92	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families By Family Income %			
Low	12	11.4%	1,055	6.4%	19.7%	5.9%	2.8%	
Moderate	16	15.2%	1,719	10.4%	18.4%	16.3%	10.7%	
Middle	25	23.8%	3,279	19.8%	21.2%	19.2%	15.4%	
Upper	40	38.1%	8,835	53.3%	40.7%	34.6%	39.5%	
Unknown	12	11.4%	1,688	10.2%	0.0%	24.0%	31.5%	
TOTAL	105	100.0%	16,576	100.0%	100.0%	100.0%	100.0%	

Distribution of 2019 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2019							Total Businesses %
		Count			Dollars				
		Bank		Aggregate	Bank		Aggregate		
		#	%	%	\$(000s)	\$ %	\$ %		
Business Revenue	\$1 Million or Less	91	53.2%	46.8%	\$11,771	40.8%	38.7%	90.7%	
	Over \$1 Million/ Unknown	80	46.8%	53.2%	\$17,052	59.2%	61.3%	9.3%	
	TOTAL	171	100.0%	100.0%	\$28,823	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	96	56.1%	87.9%	\$3,065	10.6%	26.2%		
	\$100,001– \$250,000	34	19.9%	6.5%	\$5,719	19.8%	20.0%		
	\$250,001–\$1 Million	41	24.0%	5.6%	\$20,039	69.5%	53.8%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	171	100.0%	100.0%	\$28,823	100.0%	100.0%		
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	61	67.0%		\$1,675	14.2%			
	\$100,001– \$250,000	14	15.4%		\$2,637	22.4%			
	\$250,001–\$1 Million	16	17.6%		\$7,459	63.4%			
	Over \$1 Million	0	0.0%		\$0	0.0%			
	TOTAL	91	100.0%		\$11,771	100.0%			

Appendix C (continued)

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	185	40.9%	35.6%	\$15,086	36.5%	28.4%	91.1%	
	Over \$1 Million/ Unknown	267	59.1%	64.4%	\$26,292	63.5%	71.6%	8.9%	
	TOTAL	452	100.0%	100.0%	\$41,378	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	349	77.2%	85.2%	\$10,840	26.2%	27.5%		
	\$100,001– \$250,000	58	12.8%	8.3%	\$9,139	22.1%	21.2%		
	\$250,001–\$1 Million	45	10.0%	6.5%	\$21,399	51.7%	51.3%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	452	100.0%	100.0%	\$41,378	100.0%	100.0%		
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	150	81.1%		\$4,005	26.5%			
	\$100,001– \$250,000	14	7.6%		\$2,251	14.9%			
	\$250,001–\$1 Million	21	11.4%		\$8,830	58.5%			
	Over \$1 Million	0	0.0%		\$0	0.0%			
	TOTAL	185	100.0%		\$15,086	100.0%			

Appendix C (continued)

OKLAHOMA

Tulsa

Distribution of 2019 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%	4.5%	1.1%	0.5%
Moderate	2	22.2%	624	27.4%	20.5%	14.9%	9.0%
Middle	3	33.3%	517	22.7%	32.9%	35.6%	32.9%
Upper	4	44.4%	1,134	49.8%	42.1%	48.5%	57.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	9	100.0%	2,275	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	4.5%	1.0%	0.4%
Moderate	0	0.0%	0	0.0%	20.5%	12.0%	6.7%
Middle	2	50.0%	372	51.8%	32.9%	30.5%	24.1%
Upper	2	50.0%	346	48.2%	42.1%	56.6%	68.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	718	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	4.5%	2.2%	1.2%
Moderate	1	33.3%	20	19.0%	20.5%	13.0%	9.8%
Middle	1	33.3%	10	9.5%	32.9%	31.0%	25.9%
Upper	1	33.3%	75	71.4%	42.1%	53.7%	63.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	3	100.0%	105	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	4.5%	0.9%	0.2%
Moderate	0	0.0%	0	0.0%	20.5%	10.8%	5.9%
Middle	0	0.0%	0	0.0%	32.9%	26.5%	19.6%
Upper	1	100.0%	100	100.0%	42.1%	61.8%	74.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	100	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	4.5%	1.8%	1.3%
Moderate	1	50.0%	110	54.5%	20.5%	12.9%	8.4%
Middle	1	50.0%	92	45.5%	32.9%	35.4%	30.2%
Upper	0	0.0%	0	0.0%	42.1%	49.8%	60.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	202	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	4.5%	1.2%	0.9%
Moderate	4	21.1%	754	22.2%	20.5%	14.4%	9.5%
Middle	7	36.8%	991	29.1%	32.9%	34.0%	34.1%
Upper	8	42.1%	1,655	48.7%	42.1%	50.4%	55.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	19	100.0%	3,400	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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%	4.5%	1.4%	0.5%
Moderate	1	12.5%	78	3.5%	20.5%	13.1%	8.0%
Middle	3	37.5%	952	42.3%	32.9%	33.9%	29.3%
Upper	4	50.0%	1,221	54.2%	42.1%	51.6%	62.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	8	100.0%	2,251	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	4.5%	0.5%	0.3%
Moderate	3	20.0%	370	12.8%	20.5%	8.0%	4.7%
Middle	3	20.0%	331	11.4%	32.9%	29.2%	24.2%
Upper	9	60.0%	2,190	75.8%	42.1%	62.3%	70.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	15	100.0%	2,891	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	4.5%	1.5%	0.6%
Moderate	0	0.0%	0	0.0%	20.5%	14.2%	7.6%
Middle	1	100.0%	66	100.0%	32.9%	33.8%	23.0%
Upper	0	0.0%	0	0.0%	42.1%	50.5%	68.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	66	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner- Occupied Units		
Low	0	0.0%	0	0.0%	4.5%	1.1%	0.6%
Moderate	4	16.7%	448	8.6%	20.5%	11.4%	8.4%
Middle	7	29.2%	1,349	25.9%	32.9%	31.9%	27.3%
Upper	13	54.2%	3,411	65.5%	42.1%	55.7%	63.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	24	100.0%	5,208	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	2.7%	\$150	1.4%	4.0%	3.3%	4.5%
Moderate	8	21.6%	\$1,788	17.2%	22.0%	20.3%	24.0%
Middle	14	37.8%	\$5,070	48.9%	34.7%	34.1%	36.1%
Upper	14	37.8%	\$3,362	32.4%	39.3%	40.0%	34.7%
Unknown	0	0.0%	\$0	0.0%	0.0%	2.4%	0.6%
TOTAL	37	100.0%	\$10,370	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	2.3%	\$505	2.1%	4.0%	3.2%	4.0%
Moderate	30	22.7%	\$5,342	22.0%	22.0%	20.8%	23.8%
Middle	54	40.9%	\$11,623	47.9%	34.8%	35.3%	37.8%
Upper	45	34.1%	\$6,786	28.0%	39.3%	40.3%	34.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.4%	0.1%
TOTAL	132	100.0%	\$24,256	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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%	22.0%	7.0%	3.8%
Moderate	0	0.0%	0	0.0%	16.9%	19.8%	14.1%
Middle	1	11.1%	15	0.7%	19.6%	20.6%	18.6%
Upper	8	88.9%	2,260	99.3%	41.4%	35.4%	48.6%
Unknown	0	0.0%	0	0.0%	0.0%	17.2%	14.8%
TOTAL	9	100.0%	2,275	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	25.0%	92	12.8%	22.0%	6.5%	3.0%
Moderate	0	0.0%	0	0.0%	16.9%	12.5%	7.3%
Middle	0	0.0%	0	0.0%	19.6%	18.2%	13.2%
Upper	2	50.0%	346	48.2%	41.4%	44.6%	56.0%
Unknown	1	25.0%	280	39.0%	0.0%	18.2%	20.5%
TOTAL	4	100.0%	718	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	22.0%	5.6%	3.9%
Moderate	1	33.3%	20	19.0%	16.9%	13.0%	8.8%
Middle	1	33.3%	10	9.5%	19.6%	17.8%	13.4%
Upper	1	33.3%	75	71.4%	41.4%	51.9%	58.0%
Unknown	0	0.0%	0	0.0%	0.0%	11.7%	15.9%
TOTAL	3	100.0%	105	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	22.0%	5.5%	3.2%
Moderate	0	0.0%	0	0.0%	16.9%	13.5%	9.4%
Middle	0	0.0%	0	0.0%	19.6%	17.8%	13.7%
Upper	1	100.0%	100	100.0%	41.4%	56.6%	68.0%
Unknown	0	0.0%	0	0.0%	0.0%	6.5%	5.7%
TOTAL	1	100.0%	100	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	22.0%	8.5%	6.0%
Moderate	0	0.0%	0	0.0%	16.9%	17.7%	13.2%
Middle	0	0.0%	0	0.0%	19.6%	15.1%	8.0%
Upper	2	100.0%	202	100.0%	41.4%	51.3%	63.2%
Unknown	0	0.0%	0	0.0%	0.0%	7.4%	9.6%
TOTAL	2	100.0%	202	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	1	5.3%	92	2.7%	22.0%	6.6%	3.1%
Moderate	1	5.3%	20	0.6%	16.9%	17.0%	10.5%
Middle	2	10.5%	25	0.7%	19.6%	19.2%	14.7%
Upper	14	73.7%	2,983	87.7%	41.4%	37.7%	44.0%
Unknown	1	5.3%	280	8.2%	0.0%	19.5%	27.6%
TOTAL	19	100.0%	3,400	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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%	22.0%	5.3%	2.9%
Moderate	1	12.5%	78	3.5%	16.9%	19.4%	14.0%
Middle	2	25.0%	452	20.1%	19.6%	20.3%	18.4%
Upper	5	62.5%	1,721	76.5%	41.4%	38.6%	50.2%
Unknown	0	0.0%	0	0.0%	0.0%	16.4%	14.6%
TOTAL	8	100.0%	2,251	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	22.0%	3.0%	1.4%
Moderate	2	13.3%	161	5.6%	16.9%	10.7%	6.4%
Middle	3	20.0%	234	8.1%	19.6%	16.1%	11.8%
Upper	10	66.7%	2,496	86.3%	41.4%	49.6%	59.7%
Unknown	0	0.0%	0	0.0%	0.0%	20.7%	20.7%
TOTAL	15	100.0%	2,891	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	100.0%	66	100.0%	22.0%	6.9%	2.5%
Moderate	0	0.0%	0	0.0%	16.9%	18.6%	14.4%
Middle	0	0.0%	0	0.0%	19.6%	12.7%	6.2%
Upper	0	0.0%	0	0.0%	41.4%	48.5%	63.4%
Unknown	0	0.0%	0	0.0%	0.0%	13.2%	13.5%
TOTAL	1	100.0%	66	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	1	4.2%	66	1.3%	22.0%	4.1%	2.1%
Moderate	3	12.5%	239	4.6%	16.9%	14.7%	9.8%
Middle	5	20.8%	686	13.2%	19.6%	17.7%	14.3%
Upper	15	62.5%	4,217	81.0%	41.4%	42.6%	51.5%
Unknown	0	0.0%	0	0.0%	0.0%	21.0%	22.3%
TOTAL	24	100.0%	5,208	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						Total Businesses
		Count			Dollars			
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	19	51.4%	44.5%	\$3,999	38.6%	32.5%	90.6%
	Over \$1 Million/ Unknown	18	48.6%	55.5%	\$6,371	61.4%	67.5%	9.4%
	TOTAL	37	100.0%	100.0%	\$10,370	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	13	35.1%	92.3%	\$429	4.1%	31.9%	
	\$100,001–\$250,000	10	27.0%	3.7%	\$1,732	16.7%	15.1%	
	\$250,001–\$1 Million	14	37.8%	4.1%	\$8,209	79.2%	53.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	37	100.0%	100.0%	\$10,370	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	8	42.1%		\$178	4.5%		
	\$100,001–\$250,000	6	31.6%		\$986	24.7%		
	\$250,001–\$1 Million	5	26.3%		\$2,835	70.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	19	100.0%		\$3,999	100.0%		

Distribution of 2020 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2020						Total Businesses
		Count			Dollars			
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	
Business Revenue	\$1 Million or Less	40	30.3%	31.8%	\$7,374	30.4%	22.1%	90.9%
	Over \$1 Million/ Unknown	92	69.7%	68.2%	\$16,882	69.6%	77.9%	9.1%
	TOTAL	132	100.0%	100.0%	\$24,256	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	78	59.1%	87.0%	\$3,009	12.4%	27.8%	
	\$100,001–\$250,000	20	15.2%	6.6%	\$3,467	14.3%	17.3%	
	\$250,001–\$1 Million	34	25.8%	6.4%	\$17,780	73.3%	54.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	132	100.0%	100.0%	\$24,256	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	22	55.0%		\$719	9.8%		
	\$100,001–\$250,000	7	17.5%		\$1,192	16.2%		
	\$250,001– \$1 Million	11	27.5%		\$5,463	74.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	40	100.0%		\$7,374	100.0%		

Appendix C (continued)

Payne County

Distribution of 2019 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	3.1%	931	4.8%	0.6%	1.1%	0.9%
Moderate	22	22.7%	2,892	15.0%	22.0%	26.1%	17.8%
Middle	25	25.8%	4,639	24.1%	43.1%	31.8%	29.8%
Upper	47	48.5%	10,809	56.1%	34.3%	41.0%	51.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	97	100.0%	19,271	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	3.7%	175	3.0%	0.6%	1.7%	1.2%
Moderate	2	7.4%	218	3.7%	22.0%	19.1%	11.9%
Middle	4	14.8%	304	5.2%	43.1%	31.6%	27.1%
Upper	20	74.1%	5,204	88.2%	34.3%	47.6%	59.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	27	100.0%	5,901	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	2	16.7%	169	21.4%	22.0%	18.0%	13.1%
Middle	1	8.3%	20	2.5%	43.1%	24.0%	12.4%
Upper	9	75.0%	601	76.1%	34.3%	58.0%	74.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	12	100.0%	790	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	1	20.0%	13	3.8%	22.0%	25.0%	12.7%
Middle	0	0.0%	0	0.0%	43.1%	14.3%	10.9%
Upper	4	80.0%	331	96.2%	34.3%	60.7%	76.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	5	100.0%	344	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	22.0%	22.9%	14.8%
Middle	1	50.0%	120	54.5%	43.1%	17.1%	15.3%
Upper	1	50.0%	100	45.5%	34.3%	60.0%	69.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	220	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	4	2.8%	1,106	4.2%	0.6%	1.5%	14.8%
Moderate	27	18.9%	3,292	12.4%	22.0%	24.2%	17.4%
Middle	31	21.7%	5,083	19.2%	43.1%	30.6%	20.8%
Upper	81	56.6%	17,045	64.3%	34.3%	43.7%	47.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	143	100.0%	26,526	100.0%	100.0%	100.0%	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	2.4%	295	1.1%	0.6%	0.9%	0.6%
Moderate	34	27.6%	4,937	18.5%	22.0%	28.2%	20.2%
Middle	15	12.2%	2,661	10.0%	43.1%	28.2%	24.0%
Upper	71	57.7%	18,746	70.4%	34.3%	42.7%	55.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	123	100.0%	26,639	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	1.0%	261	1.2%	0.6%	0.8%	0.7%
Moderate	7	6.9%	1,031	4.6%	22.0%	12.9%	8.8%
Middle	19	18.6%	3,388	15.0%	43.1%	28.5%	25.4%
Upper	75	73.5%	17,911	79.3%	34.3%	57.8%	65.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	102	100.0%	22,591	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	16.7%	316	46.3%	0.6%	5.4%	13.9%
Moderate	0	0.0%	0	0.0%	22.0%	13.5%	14.1%
Middle	2	33.3%	196	28.7%	43.1%	40.5%	32.9%
Upper	3	50.0%	170	24.9%	34.3%	40.5%	39.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	6	100.0%	682	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	22.0%	14.3%	6.5%
Middle	1	50.0%	125	91.2%	43.1%	17.9%	21.6%
Upper	1	50.0%	12	8.8%	34.3%	67.9%	71.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	137	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	22.0%	6.5%	4.5%
Middle	1	50.0%	158	66.9%	43.1%	16.1%	10.7%
Upper	1	50.0%	78	33.1%	34.3%	77.4%	84.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	236	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	5	2.1%	872	1.7%	0.6%	1.0%	1.2%
Moderate	41	17.4%	5,968	11.9%	22.0%	21.2%	14.0%
Middle	38	16.2%	6,528	13.0%	43.1%	28.4%	25.6%
Upper	151	64.3%	36,917	73.4%	34.3%	49.4%	59.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	235	100.0%	50,285	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	5.1%	\$281	1.4%	10.3%	8.0%	7.8%
Moderate	28	35.9%	\$6,545	32.8%	29.2%	23.7%	25.4%
Middle	6	7.7%	\$2,426	12.2%	33.3%	30.2%	28.8%
Upper	40	51.3%	\$10,680	53.6%	27.2%	35.4%	37.5%
Unknown	0	0.0%	\$0	0.0%	0.0%	2.6%	0.4%
TOTAL	78	100.0%	\$19,932	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	31	13.1%	\$5,185	17.3%	10.4%	8.9%	13.5%
Moderate	85	36.0%	\$10,490	34.9%	29.1%	30.5%	29.6%
Middle	33	14.0%	\$4,645	15.5%	33.2%	28.5%	23.6%
Upper	87	36.9%	\$9,731	32.4%	27.3%	32.0%	33.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.1%	0.0%
TOTAL	236	100.0%	\$30,051	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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%	130	0.7%	19.8%	3.1%	1.3%
Moderate	3	3.1%	367	1.9%	17.5%	10.4%	6.2%
Middle	15	15.5%	2,399	12.4%	18.7%	14.4%	12.1%
Upper	74	76.3%	15,881	82.4%	44.0%	53.1%	61.0%
Unknown	3	3.1%	494	2.6%	0.0%	19.1%	19.4%
TOTAL	97	100.0%	19,271	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	19.8%	2.8%	1.4%
Moderate	2	7.4%	244	4.1%	17.5%	8.0%	4.3%
Middle	4	14.8%	388	6.6%	18.7%	12.5%	9.1%
Upper	21	77.8%	5,269	89.3%	44.0%	54.6%	60.6%
Unknown	0	0.0%	0	0.0%	0.0%	22.2%	24.5%
TOTAL	27	100.0%	5,901	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.8%	6.0%	3.4%
Moderate	0	0.0%	0	0.0%	17.5%	2.0%	1.0%
Middle	2	16.7%	80	10.1%	18.7%	10.0%	7.2%
Upper	10	83.3%	710	89.9%	44.0%	80.0%	86.9%
Unknown	0	0.0%	0	0.0%	0.0%	2.0%	1.5%
TOTAL	12	100.0%	790	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	19.8%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.5%	10.7%	7.5%
Middle	3	60.0%	174	50.6%	18.7%	17.9%	13.9%
Upper	2	40.0%	170	49.4%	44.0%	57.1%	54.5%
Unknown	0	0.0%	0	0.0%	0.0%	14.3%	24.1%
TOTAL	5	100.0%	344	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	19.8%	5.7%	1.5%
Moderate	0	0.0%	0	0.0%	17.5%	8.6%	7.6%
Middle	0	0.0%	0	0.0%	18.7%	11.4%	7.9%
Upper	2	100.0%	220	100.0%	44.0%	65.7%	66.4%
Unknown	0	0.0%	0	0.0%	0.0%	8.6%	16.6%
TOTAL	2	100.0%	220	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	2	1.4%	130	0.5%	19.8%	2.9%	0.9%
Moderate	5	3.5%	611	2.3%	17.5%	9.0%	3.9%
Middle	24	16.8%	3,041	11.5%	18.7%	13.1%	7.6%
Upper	109	76.2%	22,250	83.9%	44.0%	51.6%	41.3%
Unknown	3	2.1%	494	1.9%	0.0%	23.4%	46.2%
TOTAL	143	100.0%	26,526	100.0%	100.0%	100.0%	100.0%

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	0.8%	43	0.2%	19.8%	2.1%	0.9%
Moderate	12	9.8%	1,632	6.1%	17.5%	11.2%	7.5%
Middle	13	10.6%	2,512	9.4%	18.7%	15.0%	12.5%
Upper	95	77.2%	22,093	82.9%	44.0%	52.2%	60.7%
Unknown	2	1.6%	359	1.3%	0.0%	19.6%	18.4%
TOTAL	123	100.0%	26,639	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	4.9%	445	2.0%	19.8%	2.3%	1.0%
Moderate	0	0.0%	0	0.0%	17.5%	4.4%	2.4%
Middle	14	13.7%	2,067	9.1%	18.7%	14.7%	11.1%
Upper	77	75.5%	18,872	83.5%	44.0%	57.6%	64.1%
Unknown	6	5.9%	1,207	5.3%	0.0%	21.1%	21.4%
TOTAL	102	100.0%	22,591	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	19.8%	2.7%	1.8%
Moderate	2	33.3%	80	11.7%	17.5%	16.2%	10.9%
Middle	1	16.7%	60	8.8%	18.7%	8.1%	4.4%
Upper	2	33.3%	226	33.1%	44.0%	64.9%	63.9%
Unknown	1	16.7%	316	46.3%	0.0%	8.1%	18.9%
TOTAL	6	100.0%	682	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	1	50.0%	12	8.8%	19.8%	7.1%	2.6%
Moderate	0	0.0%	0	0.0%	17.5%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	18.7%	3.6%	3.2%
Upper	1	50.0%	125	91.2%	44.0%	78.6%	72.7%
Unknown	0	0.0%	0	0.0%	0.0%	10.7%	21.4%
TOTAL	2	100.0%	137	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	19.8%	3.2%	1.5%
Moderate	0	0.0%	0	0.0%	17.5%	3.2%	3.2%
Middle	0	0.0%	0	0.0%	18.7%	16.1%	18.5%
Upper	2	100.0%	236	100.0%	44.0%	61.3%	63.3%
Unknown	0	0.0%	0	0.0%	0.0%	16.1%	13.5%
TOTAL	2	100.0%	236	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	7	3.0%	500	1.0%	19.8%	2.2%	0.9%
Moderate	14	6.0%	1,712	3.4%	17.5%	8.0%	4.7%
Middle	28	11.9%	4,639	9.2%	18.7%	14.3%	10.6%
Upper	177	75.3%	41,552	82.6%	44.0%	54.0%	57.1%
Unknown	9	3.8%	1,882	3.7%	0.0%	21.6%	26.8%
TOTAL	235	100.0%	50,285	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	48	61.5%	48.6%	\$13,552	68.0%	52.9%	91.5%
	Over \$1 Million/ Unknown	30	38.5%	51.4%	\$6,380	32.0%	47.1%	8.5%
	TOTAL	78	100.0%	100.0%	\$19,932	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	31	39.7%	88.9%	\$1,563	7.8%	28.7%	
	\$100,001– \$250,000	21	26.9%	6.0%	\$4,179	21.0%	21.4%	
	\$250,001–\$1 Million	26	33.3%	5.1%	\$14,190	71.2%	49.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	78	100.0%	100.0%	\$19,932	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	16	33.3%		\$738	5.4%		
	\$100,001– \$250,000	13	27.1%		\$2,629	19.4%		
	\$250,001–\$1 Million	19	39.6%		\$10,185	75.2%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	48	100.0%		\$13,552	100.0%		

Appendix C (continued)

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	114	48.3%	35.0%	\$14,747	49.1%	40.6%	91.9%
	Over \$1 Million/ Unknown	122	51.7%	65.0%	\$15,304	50.9%	59.4%	8.1%
	TOTAL	236	100.0%	100.0%	\$30,051	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	164	69.5%	85.5%	\$5,337	17.8%	30.4%	
	\$100,001– \$250,000	36	15.3%	9.1%	\$6,627	22.1%	25.9%	
	\$250,001–\$1 Million	36	15.3%	5.4%	\$18,087	60.2%	43.7%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	236	100.0%	100.0%	\$30,051	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	84	73.7%		\$2,630	17.8%		
	\$100,001– \$250,000	11	9.6%		\$2,237	15.2%		
	\$250,001–\$1 Million	19	16.7%		\$9,880	67.0%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	114	100.0%		\$14,747	100.0%		

Appendix C (continued)

TENNESSEE

Jackson

Distribution of 2019 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%	2.5%	0.3%	0.1%
Moderate	29	24.0%	4,289	20.7%	21.5%	19.8%	15.9%
Middle	39	32.2%	5,410	26.1%	41.2%	33.1%	27.4%
Upper	53	43.8%	11,017	53.2%	34.6%	46.6%	56.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	121	100.0%	20,716	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.5%	0.6%	0.4%
Moderate	9	14.8%	633	7.0%	21.5%	16.7%	13.2%
Middle	23	37.7%	1,895	20.9%	41.2%	32.9%	26.3%
Upper	29	47.5%	6,530	72.1%	34.6%	49.5%	60.0%
Unknown	0	0.0%	0	0.0%	0.2%	0.3%	0.1%
TOTAL	61	100.0%	9,058	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.5%	0.7%	0.2%
Moderate	6	22.2%	390	20.4%	21.5%	22.7%	18.9%
Middle	11	40.7%	822	42.9%	41.2%	46.8%	39.5%
Upper	10	37.0%	704	36.7%	34.6%	29.8%	41.4%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	27	100.0%	1,916	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	15.3%	5.3%	22.7%
Moderate	2	66.7%	330	28.0%	44.1%	34.2%	12.3%
Middle	1	33.3%	850	72.0%	9.2%	28.9%	48.6%
Upper	0	0.0%	0	0.0%	24.9%	28.9%	15.5%
Unknown	0	0.0%	0	0.0%	6.5%	2.6%	0.9%
TOTAL	3	100.0%	1,180	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.5%	1.4%	0.8%
Moderate	2	15.4%	116	9.1%	21.5%	13.6%	7.4%
Middle	6	46.2%	420	32.8%	41.2%	44.3%	47.3%
Upper	5	38.5%	744	58.1%	34.6%	40.7%	44.5%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	13	100.0%	1,280	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.5%	0.0%	0.0%
Moderate	1	33.3%	20	5.2%	21.5%	25.4%	25.5%
Middle	1	33.3%	70	18.4%	41.2%	39.0%	31.8%
Upper	1	33.3%	291	76.4%	34.6%	32.2%	41.1%
Unknown	0	0.0%	0	0.0%	0.2%	3.4%	1.6%
TOTAL	3	100.0%	381	100.0%	100.0%	0.0%	0.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	2.5%	0.5%	1.4%
Moderate	49	21.5%	5,778	16.7%	21.5%	19.0%	15.0%
Middle	81	35.5%	9,467	27.4%	41.2%	34.2%	28.9%
Upper	98	43.0%	19,286	55.9%	34.6%	46.1%	54.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.2%	0.1%
TOTAL	228	100.0%	34,531	100.0%	100.0%	100.0%	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	0.6%	63	0.2%	2.5%	0.7%	0.3%
Moderate	30	18.1%	3,910	13.6%	21.5%	17.4%	13.9%
Middle	49	29.5%	6,671	23.2%	41.2%	31.1%	25.5%
Upper	86	51.8%	18,133	63.0%	34.6%	50.7%	60.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	166	100.0%	28,777	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.5%	0.2%	0.2%
Moderate	8	7.5%	733	4.2%	21.5%	14.8%	12.1%
Middle	39	36.4%	6,028	34.6%	41.2%	29.8%	25.3%
Upper	60	56.1%	10,653	61.2%	34.6%	55.1%	62.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	107	100.0%	17,414	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	2.5%	1.0%	0.6%
Moderate	3	25.0%	100	15.9%	21.5%	21.9%	15.7%
Middle	5	41.7%	225	35.8%	41.2%	33.3%	36.5%
Upper	4	33.3%	303	48.2%	34.6%	43.8%	47.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	12	100.0%	628	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	15.3%	4.2%	1.1%
Moderate	1	100.0%	600	100.0%	44.1%	62.5%	86.4%
Middle	0	0.0%	0	0.0%	9.2%	25.0%	10.6%
Upper	0	0.0%	0	0.0%	24.9%	4.2%	1.2%
Unknown	0	0.0%	0	0.0%	6.5%	4.2%	0.8%
TOTAL	1	100.0%	600	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.5%	2.2%	0.9%
Moderate	0	0.0%	0	0.0%	21.5%	14.3%	6.9%
Middle	2	66.7%	174	82.5%	41.2%	27.5%	30.5%
Upper	1	33.3%	37	17.5%	34.6%	56.0%	61.7%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	3	100.0%	211	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.5%	2.0%	0.5%
Moderate	1	25.0%	56	18.3%	21.5%	20.4%	14.2%
Middle	1	25.0%	58	19.0%	41.2%	40.8%	33.5%
Upper	2	50.0%	192	62.7%	34.6%	36.7%	51.8%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	4	100.0%	306	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	0.3%	63	0.1%	2.5%	0.5%	0.3%
Moderate	43	14.7%	5,399	11.3%	21.5%	16.5%	14.1%
Middle	96	32.8%	13,156	27.4%	41.2%	30.7%	25.4%
Upper	153	52.2%	29,318	61.2%	34.6%	52.2%	60.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.1%
TOTAL	293	100.0%	47,936	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 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	0.5%	\$100	0.4%	2.1%	1.9%	1.4%
Moderate	38	18.6%	\$3,358	12.9%	30.1%	26.6%	23.1%
Middle	94	46.1%	\$11,211	43.1%	34.6%	31.7%	33.8%
Upper	54	26.5%	\$9,568	36.8%	27.1%	31.1%	30.0%
Unknown	17	8.3%	\$1,792	6.9%	6.2%	8.7%	11.7%
TOTAL	204	100.0%	\$26,029	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	1.7%	\$238	0.6%	2.0%	1.3%	1.2%
Moderate	102	24.5%	\$8,039	20.8%	30.2%	28.2%	28.9%
Middle	169	40.6%	\$14,021	36.2%	34.4%	31.3%	29.2%
Upper	125	30.0%	\$13,961	36.1%	27.4%	32.1%	29.4%
Unknown	13	3.1%	\$2,446	6.3%	6.0%	7.0%	11.3%
TOTAL	416	100.0%	\$38,705	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	2.5%	278	1.3%	21.2%	3.9%	2.0%
Moderate	35	28.9%	3,438	16.6%	17.7%	17.4%	11.8%
Middle	25	20.7%	2,880	13.9%	18.8%	23.0%	20.2%
Upper	52	43.0%	10,494	50.7%	42.3%	38.4%	49.7%
Unknown	6	5.0%	3,626	17.5%	0.0%	17.3%	16.3%
TOTAL	121	100.0%	20,716	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	3.3%	133	1.5%	21.2%	4.2%	1.7%
Moderate	8	13.1%	618	6.8%	17.7%	12.6%	7.4%
Middle	10	16.4%	676	7.5%	18.8%	17.7%	12.9%
Upper	35	57.4%	4,869	53.8%	42.3%	44.7%	52.3%
Unknown	6	9.8%	2,762	30.5%	0.0%	20.8%	25.7%
TOTAL	61	100.0%	9,058	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	0	0.0%	0	0.0%	21.2%	7.8%	4.0%
Moderate	2	7.4%	173	9.0%	17.7%	15.6%	10.4%
Middle	6	22.2%	308	16.1%	18.8%	17.0%	11.2%
Upper	14	51.9%	940	49.1%	42.3%	54.6%	67.0%
Unknown	5	18.5%	495	25.8%	0.0%	5.0%	7.3%
TOTAL	27	100.0%	1,916	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	18.8%	2.6%	0.3%
Upper	1	33.3%	850	72.0%	42.3%	23.7%	8.6%
Unknown	2	66.7%	330	28.0%	0.0%	73.7%	91.1%
TOTAL	3	100.0%	1,180	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	7.7%	67	5.2%	21.2%	7.9%	3.3%
Moderate	4	30.8%	398	31.1%	17.7%	15.7%	10.8%
Middle	0	0.0%	0	0.0%	18.8%	14.3%	7.6%
Upper	8	61.5%	815	63.7%	42.3%	56.4%	73.8%
Unknown	0	0.0%	0	0.0%	0.0%	5.7%	4.6%
TOTAL	13	100.0%	1,280	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.2%	6.8%	3.2%
Moderate	0	0.0%	0	0.0%	17.7%	23.7%	12.8%
Middle	1	33.3%	20	5.2%	18.8%	15.3%	9.9%
Upper	2	66.7%	361	94.8%	42.3%	45.8%	63.1%
Unknown	0	0.0%	0	0.0%	0.0%	8.5%	11.0%
TOTAL	3	100.0%	381	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	6	2.6%	478	1.4%	21.2%	4.2%	1.8%
Moderate	49	21.5%	4,627	13.4%	17.7%	15.6%	9.9%
Middle	42	18.4%	3,884	11.2%	18.8%	20.3%	16.7%
Upper	112	49.1%	18,329	53.1%	42.3%	40.5%	48.3%
Unknown	19	8.3%	7,213	20.9%	0.0%	19.4%	23.3%
TOTAL	228	100.0%	34,531	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	6.6%	977	3.4%	21.2%	3.9%	2.1%
Moderate	33	19.9%	3,955	13.7%	17.7%	19.1%	13.6%
Middle	46	27.7%	7,425	25.8%	18.8%	23.3%	21.0%
Upper	69	41.6%	15,048	52.3%	42.3%	37.9%	47.8%
Unknown	7	4.2%	1,372	4.8%	0.0%	15.7%	15.5%
TOTAL	166	100.0%	28,777	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	2.8%	161	0.9%	21.2%	3.1%	1.2%
Moderate	10	9.3%	1,142	6.6%	17.7%	8.8%	5.1%
Middle	27	25.2%	2,786	16.0%	18.8%	16.2%	11.7%
Upper	65	60.7%	11,761	67.5%	42.3%	51.5%	59.6%
Unknown	2	1.9%	1,564	9.0%	0.0%	20.4%	22.4%
TOTAL	107	100.0%	17,414	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	21.2%	7.3%	2.7%
Moderate	3	25.0%	130	20.7%	17.7%	13.5%	6.6%
Middle	2	16.7%	45	7.2%	18.8%	16.7%	12.1%
Upper	6	50.0%	377	60.0%	42.3%	57.3%	70.3%
Unknown	1	8.3%	76	12.1%	0.0%	5.2%	8.3%
TOTAL	12	100.0%	628	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.2%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	17.7%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	18.8%	4.2%	0.7%
Upper	0	0.0%	0	0.0%	42.3%	54.2%	24.2%
Unknown	1	100.0%	600	100.0%	0.0%	41.7%	75.1%
TOTAL	1	100.0%	600	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.2%	3.3%	1.7%
Moderate	0	0.0%	0	0.0%	17.7%	12.1%	8.4%
Middle	2	66.7%	66	31.3%	18.8%	14.3%	9.6%
Upper	1	33.3%	145	68.7%	42.3%	63.7%	76.1%
Unknown	0	0.0%	0	0.0%	0.0%	6.6%	4.1%
TOTAL	3	100.0%	211	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.2%	10.2%	5.2%
Moderate	1	25.0%	64	20.9%	17.7%	22.4%	16.2%
Middle	1	25.0%	58	19.0%	18.8%	24.5%	22.0%
Upper	2	50.0%	184	60.1%	42.3%	32.7%	47.1%
Unknown	0	0.0%	0	0.0%	0.0%	10.2%	9.6%
TOTAL	4	100.0%	306	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	14	4.8%	1,138	2.4%	21.2%	3.5%	1.7%
Moderate	47	16.0%	5,291	11.0%	17.7%	13.8%	9.3%
Middle	78	26.6%	10,380	21.7%	18.8%	19.3%	16.1%
Upper	143	48.8%	27,515	57.4%	42.3%	43.6%	52.3%
Unknown	11	3.8%	3,612	7.5%	0.0%	19.7%	20.6%
TOTAL	293	100.0%	47,936	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	126	61.8%	43.9%	\$11,141	42.8%	46.5%	89.6%
	Over \$1 Million/ Unknown	78	38.2%	56.1%	\$14,888	57.2%	53.5%	10.4%
	TOTAL	204	100.0%	100.0%	\$26,029	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	140	68.6%	87.4%	\$5,047	19.4%	30.5%	
	\$100,001– \$250,000	31	15.2%	7.1%	\$4,957	19.0%	20.5%	
	\$250,001– \$1 Million	33	16.2%	5.5%	\$16,025	61.6%	49.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	204	100.0%	100.0%	\$26,029	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	99	78.6%		\$3,148	28.3%		
	\$100,001– \$250,000	15	11.9%		\$2,371	21.3%		
	\$250,001– \$1 Million	12	9.5%		\$5,622	50.5%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	126	100.0%		\$11,141	100.0%		

Appendix C (continued)

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	223	53.6%	43.4%	\$15,115	39.1%	41.6%	89.7%
	Over \$1 Million/ Unknown	193	46.4%	56.6%	\$23,590	60.9%	58.4%	10.3%
	TOTAL	416	100.0%	100.0%	\$38,705	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	316	76.0%	83.5%	\$9,413	24.3%	28.4%	
	\$100,001– \$250,000	62	14.9%	9.8%	\$10,193	26.3%	23.6%	
	\$250,001–\$1 Million	38	9.1%	6.7%	\$19,099	49.3%	48.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	416	100.0%	100.0%	\$38,705	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	189	84.8%		\$4,839	32.0%	
		\$100,001– \$250,000	18	8.1%		\$2,859	18.9%	
		\$250,001–\$1 Million	16	7.2%		\$7,417	49.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	223	100.0%		\$15,115	100.0%	

Appendix C (continued)

Knoxville

Distribution of 2019 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%	2.1%	1.3%
Moderate	5	19.2%	551	9.3%	11.8%	11.4%	7.9%
Middle	13	50.0%	2,932	49.6%	53.6%	50.5%	45.3%
Upper	8	30.8%	2,423	41.0%	32.0%	36.0%	45.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	26	100.0%	5,906	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.6%	1.5%	0.9%
Moderate	3	10.3%	844	15.8%	11.8%	8.5%	5.9%
Middle	18	62.1%	2,999	56.0%	53.6%	50.9%	45.0%
Upper	8	27.6%	1,513	28.2%	32.0%	39.1%	48.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	29	100.0%	5,356	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	8.3%	140	15.4%	2.6%	2.1%	2.1%
Moderate	0	0.0%	0	0.0%	11.8%	9.8%	8.5%
Middle	8	66.7%	636	69.8%	53.6%	44.7%	40.6%
Upper	3	25.0%	135	14.8%	32.0%	43.4%	48.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	12	100.0%	911	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.6%	1.7%	1.5%
Moderate	2	50.0%	21	10.2%	11.8%	8.2%	4.4%
Middle	1	25.0%	34	16.6%	53.6%	45.7%	36.8%
Upper	1	25.0%	150	73.2%	32.0%	44.4%	57.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	205	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	2.6%	2.5%	2.7%
Moderate	0	0.0%	0	0.0%	11.8%	13.8%	13.8%
Middle	2	100.0%	201	100.0%	53.6%	50.3%	46.6%
Upper	0	0.0%	0	0.0%	32.0%	33.3%	36.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	2	100.0%	201	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	1.4%	140	1.1%	2.6%	2.0%	1.7%
Moderate	10	13.7%	1,416	11.3%	11.8%	10.4%	8.5%
Middle	42	57.5%	6,802	54.1%	53.6%	50.1%	44.5%
Upper	20	27.4%	4,221	33.6%	32.0%	37.5%	45.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	73	100.0%	12,579	100.0%	100.0%	100.0%	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%	2.6%	2.3%	1.4%
Moderate	4	19.0%	524	9.4%	11.8%	11.7%	8.2%
Middle	11	52.4%	3,113	55.9%	53.6%	49.8%	45.2%
Upper	6	28.6%	1,935	34.7%	32.0%	36.2%	45.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	21	100.0%	5,572	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	2.6%	1.0%	0.5%
Moderate	5	9.4%	699	6.2%	11.8%	7.3%	5.3%
Middle	31	58.5%	6,403	57.1%	53.6%	47.8%	42.5%
Upper	17	32.1%	4,121	36.7%	32.0%	44.0%	51.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	53	100.0%	11,223	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	2.6%	1.8%	1.1%
Moderate	2	50.0%	136	44.0%	11.8%	10.1%	6.8%
Middle	1	25.0%	37	12.0%	53.6%	43.7%	41.5%
Upper	1	25.0%	136	44.0%	32.0%	44.4%	50.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	309	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	11.0%	13.2%	6.1%
Moderate	1	100.0%	596	100.0%	32.1%	34.0%	16.0%
Middle	0	0.0%	0	0.0%	36.2%	37.7%	32.4%
Upper	0	0.0%	0	0.0%	20.4%	15.1%	45.5%
Unknown	0	0.0%	0	0.0%	0.3%	0.0%	0.0%
TOTAL	1	100.0%	596	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	0	0.0%	0	0.0%	2.6%	1.2%	0.5%
Moderate	1	25.0%	23	10.3%	11.8%	6.4%	3.9%
Middle	3	75.0%	200	89.7%	53.6%	44.8%	36.8%
Upper	0	0.0%	0	0.0%	32.0%	47.6%	58.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	4	100.0%	223	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	1	100.0%	146	100.0%	2.6%	2.8%	1.4%
Moderate	0	0.0%	0	0.0%	11.8%	10.3%	8.1%
Middle	0	0.0%	0	0.0%	53.6%	47.3%	41.9%
Upper	0	0.0%	0	0.0%	32.0%	39.8%	48.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	146	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	1	1.2%	146	0.8%	2.6%	1.6%	1.2%
Moderate	13	15.5%	1,978	10.9%	11.8%	9.4%	7.1%
Middle	46	54.8%	9,753	54.0%	53.6%	48.6%	43.3%
Upper	24	28.6%	6,192	34.3%	32.0%	40.4%	48.4%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	84	100.0%	18,069	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	0.9%	\$68	0.5%	4.3%	3.3%	3.9%
Moderate	8	7.3%	\$469	3.5%	14.2%	12.3%	12.7%
Middle	79	71.8%	\$8,451	62.4%	43.9%	44.7%	42.8%
Upper	22	20.0%	\$4,564	33.7%	36.9%	37.7%	39.1%
Unknown	0	0.0%	\$0	0.0%	0.7%	2.0%	1.4%
TOTAL	110	100.0%	\$13,552	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

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	1	0.6%	\$40	0.3%	4.2%	3.2%	3.6%
Moderate	18	11.3%	\$867	5.9%	14.3%	11.7%	11.8%
Middle	108	67.5%	\$9,127	61.8%	43.8%	42.9%	40.6%
Upper	32	20.0%	\$4,670	31.6%	37.0%	41.5%	42.7%
Unknown	1	0.6%	\$74	0.5%	0.7%	0.8%	1.3%
TOTAL	160	100.0%	\$14,778	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	3.8%	66	1.1%	21.5%	6.2%	3.1%
Moderate	3	11.5%	507	8.6%	16.3%	18.4%	12.5%
Middle	4	15.4%	720	12.2%	20.0%	22.1%	19.2%
Upper	18	69.2%	4,613	78.1%	42.2%	40.9%	53.6%
Unknown	0	0.0%	0	0.0%	0.0%	12.3%	11.6%
TOTAL	26	100.0%	5,906	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	2	6.9%	163	3.0%	21.5%	6.3%	3.0%
Moderate	0	0.0%	0	0.0%	16.3%	14.3%	8.9%
Middle	7	24.1%	984	18.4%	20.0%	19.3%	15.3%
Upper	18	62.1%	4,073	76.0%	42.2%	41.8%	52.8%
Unknown	2	6.9%	136	2.5%	0.0%	18.3%	19.9%
TOTAL	29	100.0%	5,356	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	16.7%	43	4.7%	21.5%	6.5%	3.9%
Moderate	0	0.0%	0	0.0%	16.3%	14.1%	10.3%
Middle	2	16.7%	40	4.4%	20.0%	19.1%	14.3%
Upper	7	58.3%	705	77.4%	42.2%	56.5%	66.9%
Unknown	1	8.3%	123	13.5%	0.0%	3.8%	4.7%
TOTAL	12	100.0%	911	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose LOC							
Low	1	25.0%	10	4.9%	21.5%	8.1%	3.9%
Moderate	0	0.0%	0	0.0%	16.3%	12.5%	7.2%
Middle	2	50.0%	45	22.0%	20.0%	19.7%	14.0%
Upper	1	25.0%	150	73.2%	42.2%	56.1%	71.2%
Unknown	0	0.0%	0	0.0%	0.0%	3.6%	3.7%
TOTAL	4	100.0%	205	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.5%	10.0%	4.8%
Moderate	0	0.0%	0	0.0%	16.3%	14.3%	9.7%
Middle	0	0.0%	0	0.0%	20.0%	21.8%	17.2%
Upper	2	100.0%	201	100.0%	42.2%	48.8%	57.3%
Unknown	0	0.0%	0	0.0%	0.0%	5.2%	11.1%
TOTAL	2	100.0%	201	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	6	8.2%	282	2.2%	21.5%	6.3%	2.9%
Moderate	3	4.1%	507	4.0%	16.3%	16.3%	10.3%
Middle	15	20.5%	1,789	14.2%	20.0%	20.7%	16.3%
Upper	46	63.0%	9,742	77.4%	42.2%	42.2%	49.9%
Unknown	3	4.1%	259	2.1%	0.0%	14.5%	20.6%
TOTAL	73	100.0%	12,579	100.0%	100.0%	100.0%	100.0%

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%	21.5%	6.7%	3.4%
Moderate	5	23.8%	817	14.7%	16.3%	20.0%	13.7%
Middle	3	14.3%	469	8.4%	20.0%	21.6%	19.0%
Upper	10	47.6%	3,597	64.6%	42.2%	41.4%	54.2%
Unknown	3	14.3%	689	12.4%	0.0%	10.4%	9.7%
TOTAL	21	100.0%	5,572	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	5	9.4%	738	6.6%	21.5%	4.0%	1.9%
Moderate	9	17.0%	1,490	13.3%	16.3%	12.0%	7.8%
Middle	9	17.0%	1,538	13.7%	20.0%	17.6%	14.4%
Upper	28	52.8%	7,290	65.0%	42.2%	43.4%	52.5%
Unknown	2	3.8%	167	1.5%	0.0%	23.0%	23.5%
TOTAL	53	100.0%	11,223	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Home Improvement							
Low	1	25.0%	84	27.2%	21.5%	6.5%	3.5%
Moderate	2	50.0%	173	56.0%	16.3%	12.9%	7.9%
Middle	1	25.0%	52	16.8%	20.0%	20.3%	15.8%
Upper	0	0.0%	0	0.0%	42.2%	56.6%	69.2%
Unknown	0	0.0%	0	0.0%	0.0%	3.8%	3.6%
TOTAL	4	100.0%	309	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	21.5%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	16.3%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	20.0%	1.9%	0.1%
Upper	0	0.0%	0	0.0%	42.2%	18.9%	2.8%
Unknown	1	100.0%	596	100.0%	0.0%	79.2%	97.1%
TOTAL	1	100.0%	596	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	21.5%	4.2%	1.9%
Moderate	0	0.0%	0	0.0%	16.3%	12.4%	7.7%
Middle	1	25.0%	28	12.6%	20.0%	16.9%	11.1%
Upper	3	75.0%	195	87.4%	42.2%	63.5%	76.8%
Unknown	0	0.0%	0	0.0%	0.0%	3.0%	2.3%
TOTAL	4	100.0%	223	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	21.5%	7.3%	2.2%
Moderate	0	0.0%	0	0.0%	16.3%	15.3%	9.5%
Middle	0	0.0%	0	0.0%	20.0%	23.8%	15.2%
Upper	1	100.0%	146	100.0%	42.2%	45.5%	67.2%
Unknown	0	0.0%	0	0.0%	0.0%	8.3%	5.8%
TOTAL	1	100.0%	146	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	6	7.1%	822	4.5%	21.5%	5.2%	2.5%
Moderate	16	19.0%	2,480	13.7%	16.3%	15.2%	10.0%
Middle	14	16.7%	2,087	11.6%	20.0%	19.1%	15.6%
Upper	42	50.0%	11,228	62.1%	42.2%	42.8%	51.1%
Unknown	6	7.1%	1,452	8.0%	0.0%	17.8%	20.8%
TOTAL	84	100.0%	18,069	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	73	66.4%	45.9%	\$8,332	61.5%	32.1%	90.2%
	Over \$1 Million/ Unknown	37	33.6%	54.1%	\$5,220	38.5%	67.9%	9.8%
	TOTAL	110	100.0%	100.0%	\$13,552	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	78	70.9%	89.1%	\$2,887	21.3%	26.9%	
	\$100,001– \$250,000	18	16.4%	5.4%	\$3,012	22.2%	17.1%	
	\$250,001– \$1 Million	14	12.7%	5.5%	\$7,653	56.5%	56.0%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	110	100.0%	100.0%	\$13,552	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	54	74.0%		\$2,013	24.2%		
	\$100,001– \$250,000	11	15.1%		\$1,893	22.7%		
	\$250,001– \$1 Million	8	11.0%		\$4,426	53.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	73	100.0%		\$8,332	100.0%		

Appendix C (continued)

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	95	59.4%	39.8%	\$7,247	49.0%	24.2%	90.5%
	Over \$1 Million/ Unknown	65	40.6%	60.2%	\$7,531	51.0%	75.8%	9.5%
	TOTAL	160	100.0%	100.0%	\$14,778	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	124	77.5%	82.9%	\$3,695	25.0%	25.5%	
	\$100,001– \$250,000	19	11.9%	9.5%	\$3,263	22.1%	21.6%	
	\$250,001–\$1 Million	17	10.6%	7.6%	\$7,820	52.9%	52.9%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	160	100.0%	100.0%	\$14,778	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	76	80.0%		\$2,017	27.8%		
	\$100,001– \$250,000	12	12.6%		\$2,103	29.0%		
	\$250,001–\$1 Million	7	7.4%		\$3,127	43.1%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	95	100.0%		\$7,247	100.0%		

Appendix C (continued)

Memphis

Distribution of 2019 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	7	15.9%	439	6.1%	13.3%	5.6%	2.1%
Moderate	12	27.3%	1,103	15.4%	17.6%	12.1%	5.8%
Middle	10	22.7%	1,806	25.2%	18.7%	17.3%	12.5%
Upper	15	34.1%	3,824	53.3%	50.3%	65.1%	79.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	44	100.0%	7,172	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	16.7%	1,921	37.6%	13.3%	3.2%	1.2%
Moderate	1	5.6%	60	1.2%	17.6%	7.9%	3.8%
Middle	5	27.8%	368	7.2%	18.7%	16.2%	10.7%
Upper	9	50.0%	2,761	54.0%	50.3%	72.7%	84.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	18	100.0%	5,110	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	13.3%	7.5%	3.8%
Moderate	1	33.3%	5	13.5%	17.6%	9.7%	5.5%
Middle	1	33.3%	17	45.9%	18.7%	14.1%	8.8%
Upper	1	33.3%	15	40.5%	50.3%	68.7%	81.9%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	3	100.0%	37	100.0%	100.0%	100.0%	100.0%
Multifamily Loans					% of Multifamily Units		
Low	0	0.0%	0	0.0%	32.6%	35.0%	16.0%
Moderate	0	0.0%	0	0.0%	21.0%	20.0%	16.9%
Middle	0	0.0%	0	0.0%	13.1%	10.8%	3.3%
Upper	1	100.0%	16,660	100.0%	32.7%	34.2%	63.8%
Unknown	0	0.0%	0	0.0%	0.6%	0.0%	0.0%
TOTAL	1	100.0%	16,660	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	13.3%	4.1%	1.8%
Moderate	1	25.0%	50	10.3%	17.6%	6.6%	3.1%
Middle	0	0.0%	0	0.0%	18.7%	11.1%	7.0%
Upper	3	75.0%	437	89.7%	50.3%	78.2%	88.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	4	100.0%	487	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	10	14.3%	2,360	8.0%	13.3%	5.3%	3.5%
Moderate	15	21.4%	1,218	4.1%	17.6%	10.9%	6.5%
Middle	16	22.9%	2,191	7.4%	18.7%	16.7%	10.9%
Upper	29	41.4%	23,697	80.4%	50.3%	67.2%	79.1%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	70	100.0%	29,466	100.0%	100.0%	100.0%	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	7	14.0%	606	5.7%	13.3%	6.1%	2.4%
Moderate	15	30.0%	1,440	13.6%	17.6%	11.6%	5.5%
Middle	12	24.0%	2,768	26.2%	18.7%	17.3%	12.6%
Upper	16	32.0%	5,767	54.5%	50.3%	65.0%	79.6%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	50	100.0%	10,581	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	3	8.8%	202	4.7%	13.3%	1.6%	0.9%
Moderate	6	17.6%	899	21.0%	17.6%	5.0%	2.7%
Middle	8	23.5%	823	19.2%	18.7%	12.2%	8.1%
Upper	17	50.0%	2,358	55.1%	50.3%	81.2%	88.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	34	100.0%	4,282	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	13.3%	5.6%	2.5%
Moderate	2	40.0%	62	36.7%	17.6%	8.9%	5.3%
Middle	2	40.0%	37	21.9%	18.7%	13.1%	8.9%
Upper	1	20.0%	70	41.4%	50.3%	72.3%	83.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.1%	0.0%
TOTAL	5	100.0%	169	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	1	50.0%	35	60.3%	13.3%	2.6%	1.4%
Moderate	0	0.0%	0	0.0%	17.6%	5.7%	2.9%
Middle	0	0.0%	0	0.0%	18.7%	9.8%	4.8%
Upper	1	50.0%	23	39.7%	50.3%	82.0%	90.9%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	2	100.0%	58	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	13.3%	8.2%	3.0%
Moderate	0	0.0%	0	0.0%	17.6%	10.9%	6.2%
Middle	1	50.0%	61	44.9%	18.7%	12.8%	6.7%
Upper	1	50.0%	75	55.1%	50.3%	68.1%	84.2%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.0%
TOTAL	2	100.0%	136	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	11	11.8%	843	5.5%	13.3%	3.9%	2.3%
Moderate	23	24.7%	2,401	15.8%	17.6%	8.3%	4.4%
Middle	23	24.7%	3,689	24.2%	18.7%	14.7%	10.7%
Upper	36	38.7%	8,293	54.5%	50.3%	73.0%	82.3%
Unknown	0	0.0%	0	0.0%	0.2%	0.0%	0.3%
TOTAL	93	100.0%	15,226	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	3.8%	\$707	2.2%	15.1%	11.8%	12.3%
Moderate	14	8.8%	\$3,512	10.8%	16.8%	15.6%	17.5%
Middle	44	27.7%	\$11,361	34.9%	17.2%	16.2%	17.0%
Upper	93	58.5%	\$16,826	51.7%	49.9%	52.8%	49.7%
Unknown	2	1.3%	\$120	0.4%	1.0%	3.6%	3.4%
TOTAL	159	100.0%	\$32,526	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	16	5.3%	\$2,196	4.7%	15.1%	12.6%	12.4%
Moderate	23	7.7%	\$5,729	12.3%	16.7%	15.6%	17.6%
Middle	67	22.3%	\$10,702	22.9%	17.1%	15.5%	15.8%
Upper	191	63.7%	\$27,671	59.3%	50.0%	54.7%	51.4%
Unknown	3	1.0%	\$395	0.8%	1.0%	1.5%	2.7%
TOTAL	300	100.0%	\$46,693	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Distribution of 2019 Home Mortgage Lending By Borrower Income Level							
Census Tract Income Level	Bank Loans				Families by Family Income %	Aggregate HMDA Data	
	#	# %	\$	\$ %		# %	\$ %
Home Purchase Loans							
Low	7	15.9%	614	8.6%	25.9%	3.0%	1.4%
Moderate	15	34.1%	1,871	26.1%	15.4%	12.6%	8.2%
Middle	6	13.6%	915	12.8%	16.4%	20.2%	17.5%
Upper	12	27.3%	3,518	49.1%	42.3%	48.3%	58.7%
Unknown	4	9.1%	254	3.5%	0.0%	15.8%	14.2%
TOTAL	44	100.0%	7,172	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	1	5.6%	80	1.6%	25.9%	4.1%	1.9%
Moderate	2	11.1%	144	2.8%	15.4%	9.0%	5.3%
Middle	1	5.6%	187	3.7%	16.4%	17.5%	13.0%
Upper	8	44.4%	998	19.5%	42.3%	47.7%	56.9%
Unknown	6	33.3%	3,701	72.4%	0.0%	21.7%	23.0%
TOTAL	18	100.0%	5,110	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	25.9%	5.6%	2.5%
Moderate	2	66.7%	22	59.5%	15.4%	11.9%	6.9%
Middle	1	33.3%	15	40.5%	16.4%	18.1%	12.9%
Upper	0	0.0%	0	0.0%	42.3%	59.5%	72.5%
Unknown	0	0.0%	0	0.0%	0.0%	4.9%	5.2%
TOTAL	3	100.0%	37	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	25.9%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	15.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	16.4%	0.8%	0.0%
Upper	0	0.0%	0	0.0%	42.3%	5.8%	0.3%
Unknown	1	100.0%	16,660	100.0%	0.0%	93.3%	99.6%
TOTAL	1	100.0%	16,660	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	25.9%	4.0%	1.5%
Moderate	0	0.0%	0	0.0%	15.4%	9.6%	5.0%
Middle	1	25.0%	50	10.3%	16.4%	14.8%	8.6%
Upper	2	50.0%	370	76.0%	42.3%	68.9%	82.3%
Unknown	1	25.0%	67	13.8%	0.0%	2.7%	2.6%
TOTAL	4	100.0%	487	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Total Home Mortgage Loans					Families by Family Income %		
Low	8	11.4%	694	2.4%	25.9%	3.4%	1.4%
Moderate	19	27.1%	2,037	6.9%	15.4%	11.0%	6.3%
Middle	9	12.9%	1,167	4.0%	16.4%	18.6%	13.9%
Upper	22	31.4%	4,886	16.6%	42.3%	47.6%	51.4%
Unknown	12	17.1%	20,682	70.2%	0.0%	19.4%	27.0%
TOTAL	70	100.0%	29,466	100.0%	100.0%	100.0%	100.0%

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	8	16.0%	679	6.4%	25.9%	3.2%	1.4%
Moderate	19	38.0%	2,710	25.6%	15.4%	14.3%	9.4%
Middle	4	8.0%	796	7.5%	16.4%	20.1%	17.8%
Upper	15	30.0%	5,116	48.4%	42.3%	46.3%	56.7%
Unknown	4	8.0%	1,280	12.1%	0.0%	16.2%	14.6%
TOTAL	50	100.0%	10,581	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	25.9%	1.7%	0.7%
Moderate	4	11.8%	485	11.3%	15.4%	7.0%	4.1%
Middle	7	20.6%	777	18.1%	16.4%	15.5%	11.4%
Upper	19	55.9%	2,671	62.4%	42.3%	52.9%	60.6%
Unknown	4	11.8%	349	8.2%	0.0%	22.9%	23.2%
TOTAL	34	100.0%	4,282	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	0	0.0%	0	0.0%	25.9%	3.8%	1.3%
Moderate	1	20.0%	12	7.1%	15.4%	9.8%	5.4%
Middle	2	40.0%	76	45.0%	16.4%	17.4%	13.8%
Upper	2	40.0%	81	47.9%	42.3%	63.7%	73.8%
Unknown	0	0.0%	0	0.0%	0.0%	5.3%	5.7%
TOTAL	5	100.0%	169	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	25.9%	2.2%	0.9%
Moderate	0	0.0%	0	0.0%	15.4%	7.7%	4.8%
Middle	1	50.0%	35	60.3%	16.4%	12.6%	7.9%
Upper	1	50.0%	23	39.7%	42.3%	74.5%	80.8%
Unknown	0	0.0%	0	0.0%	0.0%	3.0%	5.7%
TOTAL	2	100.0%	58	100.0%	100.0%	100.0%	100.0%

Appendix C (continued)

Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	25.9%	6.2%	2.6%
Moderate	0	0.0%	0	0.0%	15.4%	10.5%	7.1%
Middle	0	0.0%	0	0.0%	16.4%	12.5%	8.5%
Upper	2	100.0%	136	100.0%	42.3%	57.6%	70.8%
Unknown	0	0.0%	0	0.0%	0.0%	13.2%	11.0%
TOTAL	2	100.0%	136	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families By Family Income %		
Low	8	8.6%	679	4.5%	25.9%	2.3%	1.0%
Moderate	24	25.8%	3,207	21.1%	15.4%	9.8%	6.0%
Middle	14	15.1%	1,684	11.1%	16.4%	16.6%	13.2%
Upper	39	41.9%	8,027	52.7%	42.3%	48.6%	55.2%
Unknown	8	8.6%	1,629	10.7%	0.0%	22.7%	24.7%
TOTAL	93	100.0%	15,226	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 Small Business Lending By Borrower Income Level									
Business Revenue and Loan Size		2019							
		Count			Dollars				Total Businesses
		Bank		Aggregate	Bank		Aggregate	%	
		#	%	%	\$ (000s)	\$ %	\$ %		
Business Revenue	\$1 Million or Less	90	56.6%	40.9%	\$16,414	50.5%	30.6%	89.4%	
	Over \$1 Million/Unknown	69	43.4%	59.1%	\$16,112	49.5%	69.4%	10.6%	
	TOTAL	159	100.0%	100.0%	\$32,526	100.0%	100.0%	100.0%	
Loan Size	\$100,000 or Less	87	54.7%	91.3%	\$3,659	11.2%	30.1%		
	\$100,001–\$250,000	33	20.8%	4.4%	\$6,191	19.0%	16.5%		
	\$250,001–\$1 Million	39	24.5%	4.3%	\$22,676	69.7%	53.4%		
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%		
	TOTAL	159	100.0%	100.0%	\$32,526	100.0%	100.0%		
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	58	64.4%		\$2,048	12.5%			
	\$100,001–\$250,000	15	16.7%		\$2,953	18.0%			
	\$250,001–\$1 Million	17	18.9%		\$11,413	69.5%			
	Over \$1 Million	0	0.0%		\$0	0.0%			
	TOTAL	90	100.0%		\$16,414	100.0%			

Appendix C (continued)

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	147	49.0%	33.6%	\$13,191	28.3%	22.5%	90.0%
	Over \$1 Million/ Unknown	153	51.0%	66.4%	\$33,502	71.7%	77.5%	10.0%
	TOTAL	300	100.0%	100.0%	\$46,693	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	187	62.3%	86.5%	\$6,734	14.4%	28.8%	
	\$100,001– \$250,000	51	17.0%	7.5%	\$8,595	18.4%	20.1%	
	\$250,001– \$1 Million	62	20.7%	6.0%	\$31,364	67.2%	51.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	300	100.0%	100.0%	\$46,693	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	117	79.6%		\$3,678	27.9%	
		\$100,001– \$250,000	13	8.8%		\$1,822	13.8%	
		\$250,001– \$1 Million	17	11.6%		\$7,691	58.3%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	147	100.0%		\$13,191	100.0%	

Eastern NonMSA Tennessee

Distribution of 2019 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%	3.6%	6.0%	4.3%
Middle	16	84.2%	2,344	81.7%	90.2%	85.6%	87.5%
Upper	3	15.8%	526	18.3%	6.2%	8.3%	8.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	19	100.0%	2,870	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	2	7.7%	182	6.5%	3.6%	2.9%	2.2%
Middle	22	84.6%	2,426	87.1%	90.2%	90.4%	91.6%
Upper	2	7.7%	177	6.4%	6.2%	6.7%	6.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	26	100.0%	2,785	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	9.1%	50	10.3%	3.6%	5.0%	3.3%
Middle	8	72.7%	295	60.7%	90.2%	87.0%	89.8%
Upper	2	18.2%	141	29.0%	6.2%	8.0%	6.9%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	11	100.0%	486	100.0%	100.0%	100.0%	100.0%
Other Purpose LOC							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	3.6%	1.3%	0.7%
Middle	9	90.0%	632	95.9%	90.2%	96.2%	96.7%
Upper	1	10.0%	27	4.1%	6.2%	2.5%	2.6%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	10	100.0%	659	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	3.6%	0.0%	0.0%
Middle	1	100.0%	32	100.0%	90.2%	97.4%	98.2%
Upper	0	0.0%	0	0.0%	6.2%	2.6%	1.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	32	100.0%	100.0%	100.0%	100.0%

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Total Home Mortgage Loans					% of Owner-Occupied Units		
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	3	4.5%	232	3.4%	3.6%	4.8%	3.5%
Middle	56	83.6%	5,729	83.9%	90.2%	87.7%	89.1%
Upper	8	11.9%	871	12.7%	6.2%	7.5%	7.3%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	67	100.0%	6,832	100.0%	100.0%	100.0%	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	2	7.4%	93	2.3%	3.6%	5.0%	3.8%
Middle	20	74.1%	3,271	80.1%	90.2%	87.7%	89.0%
Upper	5	18.5%	719	17.6%	6.2%	7.4%	7.2%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	27	100.0%	4,083	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	1	2.5%	70	1.2%	3.6%	2.7%	1.8%
Middle	35	87.5%	5,135	86.5%	90.2%	89.6%	90.4%
Upper	4	10.0%	728	12.3%	6.2%	7.7%	7.8%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	40	100.0%	5,933	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%	3.6%	1.6%	1.6%
Middle	4	66.7%	235	62.7%	90.2%	83.6%	74.7%
Upper	2	33.3%	140	37.3%	6.2%	14.8%	23.7%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	6	100.0%	375	100.0%	100.0%	100.0%	100.0%

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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%	34.6%	10.0%	1.5%
Middle	1	100.0%	225	100.0%	59.7%	90.0%	98.5%
Upper	0	0.0%	0	0.0%	5.7%	0.0%	0.0%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	225	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	3.6%	13.3%	12.7%
Middle	1	100.0%	80	100.0%	90.2%	80.0%	79.2%
Upper	0	0.0%	0	0.0%	6.2%	6.7%	8.1%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	1	100.0%	80	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	3	4.0%	163	1.5%	3.6%	4.0%	2.9%
Middle	61	81.3%	8,946	83.6%	90.2%	88.5%	89.6%
Upper	11	14.7%	1,587	14.8%	6.2%	7.5%	7.5%
Unknown	0	0.0%	0	0.0%	0.0%	0.0%	0.0%
TOTAL	75	100.0%	10,696	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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	19	11.2%	\$4,605	25.1%	12.9%	11.8%	21.8%
Middle	134	78.8%	\$12,460	68.0%	80.6%	78.2%	73.5%
Upper	17	10.0%	\$1,255	6.9%	6.5%	7.9%	4.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	2.1%	0.3%
TOTAL	170	100.0%	\$18,320	100.0%	100.0%	100.0%	100.0%

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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	28	11.5%	\$1,923	7.9%	13.1%	14.7%	15.6%
Middle	181	74.5%	\$20,170	83.0%	80.3%	76.6%	79.4%
Upper	34	14.0%	\$2,198	9.0%	6.7%	8.2%	4.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0.5%	0.1%
TOTAL	243	100.0%	\$24,291	100.0%	100.0%	100.0%	100.0%

Distribution of 2019 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%	20.7%	4.0%	2.1%
Moderate	5	26.3%	709	24.7%	18.4%	16.7%	11.3%
Middle	3	15.8%	673	23.4%	19.6%	23.7%	19.6%
Upper	6	31.6%	980	34.1%	41.3%	39.4%	51.6%
Unknown	5	26.3%	508	17.7%	0.0%	16.2%	15.4%
TOTAL	19	100.0%	2,870	100.0%	100.0%	100.0%	100.0%
Refinance							
Low	4	15.4%	203	7.3%	20.7%	6.2%	2.9%
Moderate	2	7.7%	210	7.5%	18.4%	11.3%	7.8%
Middle	4	15.4%	569	20.4%	19.6%	16.4%	14.0%
Upper	11	42.3%	1,214	43.6%	41.3%	41.3%	46.0%
Unknown	5	19.2%	589	21.1%	0.0%	24.8%	29.3%
TOTAL	26	100.0%	2,785	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	2	18.2%	100	20.6%	20.7%	8.0%	6.6%
Moderate	3	27.3%	85	17.5%	18.4%	15.0%	10.5%
Middle	5	45.5%	276	56.8%	19.6%	25.0%	19.1%
Upper	1	9.1%	25	5.1%	41.3%	44.0%	52.8%
Unknown	0	0.0%	0	0.0%	0.0%	8.0%	11.0%
TOTAL	11	100.0%	486	100.0%	100.0%	100.0%	100.0%

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Other Purpose LOC							
Low	0	0.0%	0	0.0%	20.7%	3.8%	0.9%
Moderate	0	0.0%	0	0.0%	18.4%	12.7%	8.4%
Middle	1	10.0%	72	10.9%	19.6%	19.0%	18.7%
Upper	6	60.0%	456	69.2%	41.3%	59.5%	69.3%
Unknown	3	30.0%	131	19.9%	0.0%	5.1%	2.8%
TOTAL	10	100.0%	659	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.7%	10.5%	3.5%
Moderate	1	100.0%	32	100.0%	18.4%	13.2%	7.8%
Middle	0	0.0%	0	0.0%	19.6%	18.4%	12.2%
Upper	0	0.0%	0	0.0%	41.3%	50.0%	58.2%
Unknown	0	0.0%	0	0.0%	0.0%	7.9%	18.3%
TOTAL	1	100.0%	32	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans					Families by Family Income %		
Low	6	9.0%	303	4.4%	20.7%	4.8%	2.4%
Moderate	11	16.4%	1,036	15.2%	18.4%	14.5%	9.9%
Middle	13	19.4%	1,590	23.3%	19.6%	20.9%	17.4%
Upper	24	35.8%	2,675	39.2%	41.3%	40.2%	50.0%
Unknown	13	19.4%	1,228	18.0%	0.0%	19.6%	20.4%
TOTAL	67	100.0%	6,832	100.0%	100.0%	100.0%	100.0%

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%	20.7%	4.2%	2.2%
Moderate	5	18.5%	607	14.9%	18.4%	18.5%	13.2%
Middle	7	25.9%	1,164	28.5%	19.6%	24.8%	21.8%
Upper	10	37.0%	1,730	42.4%	41.3%	38.9%	50.4%
Unknown	5	18.5%	582	14.3%	0.0%	13.6%	12.4%
TOTAL	27	100.0%	4,083	100.0%	100.0%	100.0%	100.0%

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Refinance							
Low	7	17.5%	483	8.1%	20.7%	4.1%	1.8%
Moderate	6	15.0%	634	10.7%	18.4%	8.6%	5.2%
Middle	8	20.0%	1,171	19.7%	19.6%	17.7%	13.9%
Upper	14	35.0%	3,042	51.3%	41.3%	41.6%	49.4%
Unknown	5	12.5%	603	10.2%	0.0%	28.1%	29.7%
TOTAL	40	100.0%	5,933	100.0%	100.0%	100.0%	100.0%
Home Improvement							
Low	1	16.7%	55	14.7%	20.7%	6.6%	2.3%
Moderate	0	0.0%	0	0.0%	18.4%	11.5%	8.1%
Middle	1	16.7%	35	9.3%	19.6%	19.7%	20.0%
Upper	3	50.0%	235	62.7%	41.3%	54.1%	63.8%
Unknown	1	16.7%	50	13.3%	0.0%	8.2%	5.8%
TOTAL	6	100.0%	375	100.0%	100.0%	100.0%	100.0%
Multifamily Loans							
Low	0	0.0%	0	0.0%	20.7%	0.0%	0.0%
Moderate	0	0.0%	0	0.0%	18.4%	0.0%	0.0%
Middle	0	0.0%	0	0.0%	19.6%	10.0%	1.5%
Upper	1	100.0%	225	100.0%	41.3%	70.0%	79.5%
Unknown	0	0.0%	0	0.0%	0.0%	20.0%	19.0%
TOTAL	1	100.0%	225	100.0%	100.0%	100.0%	100.0%
Other Purpose Closed/Exempt							
Low	0	0.0%	0	0.0%	20.7%	6.7%	4.4%
Moderate	0	0.0%	0	0.0%	18.4%	10.0%	7.1%
Middle	0	0.0%	0	0.0%	19.6%	26.7%	18.8%
Upper	0	0.0%	0	0.0%	41.3%	50.0%	63.9%
Unknown	1	100.0%	80	100.0%	0.0%	6.7%	5.9%
TOTAL	1	100.0%	80	100.0%	100.0%	100.0%	100.0%
Total Home Mortgage Loans				Families By Family Income %			
Low	8	10.7%	538	5.0%	20.7%	4.1%	2.0%
Moderate	11	14.7%	1,241	11.6%	18.4%	13.3%	9.1%
Middle	16	21.3%	2,370	22.2%	19.6%	20.9%	17.6%
Upper	28	37.3%	5,232	48.9%	41.3%	39.8%	49.8%
Unknown	12	16.0%	1,315	12.3%	0.0%	21.8%	21.5%
TOTAL	75	100.0%	10,696	100.0%	100.0%	100.0%	100.0%

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Distribution of 2019 Small Business Lending By Borrower Income Level								
Business Revenue and Loan Size		2019						
		Count			Dollars			Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	\$ (000s)	\$ %	\$ %	%
Business Revenue	\$1 Million or Less	119	70.0%	50.9%	\$8,103	44.2%	39.1%	91.5%
	Over \$1 Million/ Unknown	51	30.0%	49.1%	\$10,217	55.8%	60.9%	8.5%
	TOTAL	170	100.0%	100.0%	\$18,320	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	122	71.8%	86.6%	\$4,252	23.2%	25.7%	
	\$100,001– \$250,000	31	18.2%	7.8%	\$5,687	31.0%	23.2%	
	\$250,001–\$1 Million	17	10.0%	5.7%	\$8,381	45.7%	51.1%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	170	100.0%	100.0%	\$18,320	100.0%	100.0%	
Loan Size Revenue \$1 Million or Less	\$100,000 or Less	93	78.2%		\$3,069	37.9%		
	\$100,001– \$250,000	23	19.3%		\$4,153	51.3%		
	\$250,001–\$1 Million	3	2.5%		\$881	10.9%		
	Over \$1 Million	0	0.0%		\$0	0.0%		
	TOTAL	119	100.0%		\$8,103	100.0%		

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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	141	58.0%	36.8%	\$9,992	41.1%	29.1%	91.8%
	Over \$1 Million/ Unknown	102	42.0%	63.2%	\$14,299	58.9%	70.9%	8.2%
	TOTAL	243	100.0%	100.0%	\$24,291	100.0%	100.0%	100.0%
Loan Size	\$100,000 or Less	178	73.3%	81.3%	\$5,244	21.6%	24.3%	
	\$100,001–\$250,000	39	16.0%	11.3%	\$6,773	27.9%	24.4%	
	\$250,001–\$1 Million	26	10.7%	7.4%	\$12,274	50.5%	51.3%	
	Over \$1 Million	0	0.0%	0.0%	\$0	0.0%	0.0%	
	TOTAL	243	100.0%	100.0%	\$24,291	100.0%	100.0%	
Loan Size	Revenue \$1 Million or Less	\$100,000 or Less	111	78.7%		\$2,876	28.8%	
		\$100,001–\$250,000	22	15.6%		\$3,711	37.1%	
		\$250,001–\$1 Million	8	5.7%		\$3,405	34.1%	
		Over \$1 Million	0	0.0%		\$0	0.0%	
		TOTAL	141	100.0%		\$9,992	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.

Appendix D (continued)

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).

Appendix D (continued)

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.

Appendix D (continued)

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.