

PUBLIC DISCLOSURE

September 13, 2021

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

SmartBank
2430 Teaster Lane, Suite 205
Pigeon Forge, Tennessee 37863

RSSD ID NUMBER: 3532641

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

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

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INSTITUTION’S CRA RATING

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

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

PERFORMANCE LEVELS	SmartBank		
	PERFORMANCE TESTS		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	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.

Major factors contributing to this rating include:

- A high percentage of loans were made inside the assessment areas;
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas;
- The distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes;
- The bank makes an adequate level of community development loans;
- The bank makes an adequate level of qualified community development investments and grants;
- Retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s assessment areas; and
- The bank provides an adequate level of community development services throughout its assessment areas.

INSTITUTION

DESCRIPTION OF INSTITUTION

SmartBank is a community bank headquartered in Pigeon Forge, Tennessee. The bank is wholly owned by SmartFinancial, a bank holding company located in Knoxville, Tennessee. Since its last CRA examination, dated August 5, 2019, SmartBank has expanded its footprint through acquisitions. The bank expanded into Alabama through the acquisition of Capstone Bank on November 1, 2017, and with the acquisition of Southern Community Bank on May 1, 2018, the bank expanded into three new markets: Coffee and Rutherford counties in Tennessee and Madison County in Alabama. Additionally, with the acquisition of Progressive Savings Bank on March 1, 2020, the bank extended its market in east Tennessee. According to the June 30, 2021 Report of Condition, the bank had assets totaling \$3.6 billion, an increase of approximately \$1.2 billion since the bank’s last exam. At the time of this examination, SmartBank operates 35 branch offices across 15 assessment areas in Alabama, Florida, and Tennessee.

Loan Portfolio

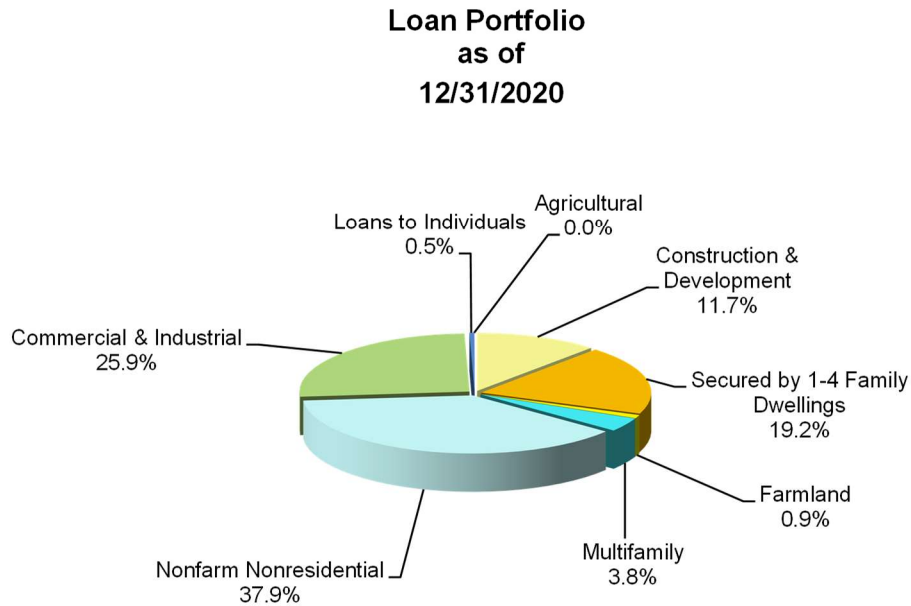
The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO				
Loan Type	12/31/2020		12/31/2019	
	\$ (000s)	Percent	\$ (000s)	Percent
Construction and Development	278,075	11.7%	253,445	11.9%
Secured by One- to Four- Family Dwellings	455,651	19.2%	488,773	23.0%
Other Real Estate: Farmland	22,185	0.9%	28,344	1.3%
Multifamily	91,380	3.8%	78,108	3.7%
Nonfarm nonresidential	899,411	37.9%	902,874	42.5%
Commercial and Industrial	616,005	25.9%	357,686	16.8%
Loans to Individuals	10,809	0.5%	14,231	0.7%
Agricultural Loans	619	0.0%	561	0.0%
<i>Total</i>	<i>\$2,374,135</i>	<i>100.00%</i>	<i>\$2,124,022</i>	<i>100.00%</i>

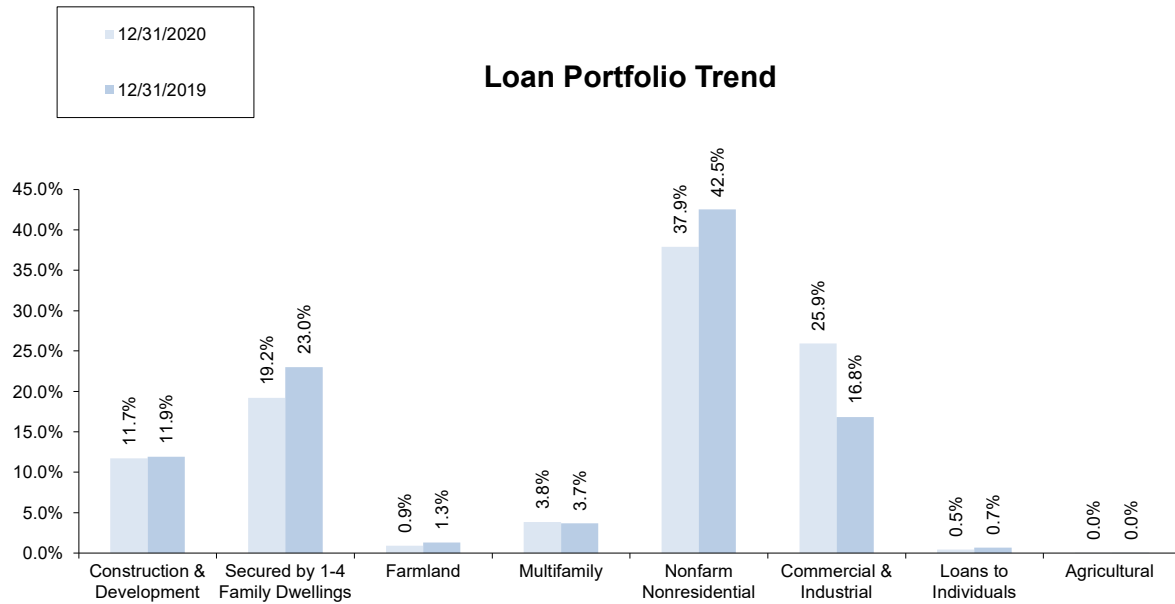
* This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included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

As shown, the bank is primarily focused on commercial lending. As of December 31, 2020, loans secured by nonfarm nonresidential property (commercial real estate) made up the largest percentage of the loan portfolio at 37.9 percent of total loans, followed by commercial and industrial loans at 25.9 percent. The largest growth in dollar volume was in commercial and industrial loans; most other loan categories decreased in their share of the overall loan portfolio.

The following chart illustrates the composition of the loan portfolio as of December 31, 2020.



The following chart shows the trend in the composition of the loan portfolio between December 31, 2019 and December 31, 2020.



Credit Products

The bank offers a variety of credit products, including commercial and industrial loans, commercial real estate loans, SBA loans, residential mortgage loans, and home equity loans.

COVID-19 Response

SmartBank offered retail lending services that were responsive to the needs of individuals and businesses in their communities affected by the COVID-19 pandemic, including low- and moderate-income individuals and communities. The bank developed a series of specifically structured, temporary modifications that were made available to commercial and consumer borrowers who were impacted by the COVID-19 pandemic. These modifications were made available to clients beginning March 2020.

Additionally, SmartBank participated in the SBA Paycheck Protection Program (PPP), which was established as part of the Coronavirus Aid, Relief, and Economic Security Act. PPP loans were designed to help businesses retain workers and staff during the economic crisis caused by the pandemic. PPP loans in amounts less than \$1.0 million were considered retail loans while loans greater than \$1 million were considered as community development loans if they also had a primary purpose of community development as defined under the CRA. Generally, loans to small businesses with gross annual revenues \$1 million or less that create or retain jobs for low- or moderate-income individuals or in low- or moderate-income geographies, or that otherwise meet the economic development “size” and “purpose” tests, qualify as community development loans. PPP loans also qualify if they help to revitalize or stabilize low- or moderate-income geographies or distressed or underserved nonmetropolitan middle-income geographies by helping to retain businesses in these geographies.

SmartBank reported 2,930 PPP loans in 2020 for a total dollar amount of \$220.6 million; 85.2 percent of the bank’s PPP loans were in the bank’s assessment area.

Assessment Areas

SmartBank’s assessment areas have changed since the previous examination due to the acquisitions previously discussed. For the purposes of the review period for this CRA examination (January 1, 2019 through December 31, 2020) SmartBank has 15 assessment areas, which are listed below.

Tennessee

- Chattanooga: Hamilton County
- Cleveland: Bradley County
- Coffee County
- East Tennessee: Cumberland, Fentress, and Putnam counties
- Knoxville: Anderson, Blount, Knox and Morgan counties
- Rutherford: Rutherford County
- Sevier: Sevier County

Alabama

- Baldwin: Baldwin County
- Clarke: Clarke County
- Huntsville: Madison County
- Mobile: Madison County
- Tuscaloosa: Tuscaloosa County

Florida

- Fort Walton: Okaloosa and Walton counties
- Panama City: Bay County
- Pensacola: Escambia County

SmartBank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its assessment areas. The bank received a “Satisfactory” rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated August 5, 2019, under the intermediate small bank examination procedures.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank’s record of meeting the credit needs of its community, including low- and moderate-income neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, as well as the economic and demographic characteristics of its defined assessment area. SmartBank’s CRA performance evaluation was based on CRA activities within its assessment area using the Large Institution Examination Procedures. “Large institutions” have total assets of at least \$1.322 billion for December 31 of both of the prior two years. Institutions meeting the threshold size are evaluated using three separately rated tests: a lending test; an investment test, and a retail service test. The bank’s performance is evaluated in light of the community needs within the bank’s assessment areas and the capacity of the bank.

SmartBank is an interstate bank; therefore, the scope of this evaluation includes a full-scope review of at least one assessment area in each state where the bank has branches. Full scope reviews were conducted on 4 of the bank’s 15 assessment areas: Chattanooga, Knoxville, Panama City, and Tuscaloosa. The remaining assessment areas were evaluated using limited-scope procedures. When determining the bank’s overall rating, the greatest weight was placed on the bank’s performance in Tennessee, and specifically on the bank’s performance in the Chattanooga and Knoxville assessment areas where the majority of the bank’s branches and lending is located.

Give the bank’s asset size, loan volume and presence in a metropolitan statistical area (MSA), the bank is required to submit annual reports about its residential real estate loan originations and applications, pursuant to the Home Mortgage Disclosure Act (HMDA). These loans are referred to as “HMDA-reportable” loans in this evaluation. HMDA-reportable loans include loan categories of home purchase, home refinance, home improvement and multi-family loans. The lending test evaluation included an analysis of HMDA-reportable and small business loans originated from January 1, 2019, through December 31, 2020. A small business loan is defined as a business loan originated with an original amount of \$1 million or less, and typically is either secured by nonfarm nonresidential real estate or classified as a commercial loan. Small farm, home improvement, and multi-family loans were not considered in the evaluation due to minimal activity levels. Retail banking services such as the branch distribution and hours of operation were analyzed using data as of December 31, 2020, and included in the service test review.

The review period for community development activities was January 1, 2018, through December 31, 2020. Community development loans originated within this timeframe were included in the lending test analysis, and community development investments funded during this period were analyzed as part of the investment test. Investments with community development as a primary purpose that were funded during a prior review period but still outstanding as of December 31, 2020 were also considered. Community development services that took place during the review period were included in the service test review. A loan, investment, or service has community development as a primary purpose when it is designed for the express purpose of revitalizing or

stabilizing low- or moderate-income areas, designated disaster areas, or underserved or distressed nonmetropolitan middle-income areas; providing affordable housing for, or community services targeted to, low- or moderate-income persons; or promoting economic development by financing small businesses and farms that meet the requirements set forth in 12 CFR 228.12(g).

As part of this evaluation, several community contacts were made with local community, governmental, or economic development representatives who are familiar with the economic and demographic characteristics as well as community development opportunities in each of the full-scope assessment areas. Information obtained from these contacts was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the applicable section of the evaluation for each assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The lending test rating is low satisfactory. The lending test included an analysis of HMDA-reportable and small business loans originated from January 1, 2019 through December 31, 2020. Lending levels reflect adequate responsiveness to assessment area credit needs. A high percentage of loans were originated inside the assessment area. The geographic distribution of loans reflects adequate penetration throughout the assessment areas. The distribution of loans reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank makes an adequate level of community development loans. Performance context information was considered in evaluating the bank's lending performance, such as factors related to competition, demographics, economic conditions, including the effects of the COVID-19 pandemic, business strategy, and opportunities.

The rating was driven by the bank's performance in Tennessee where the lending test rating was low satisfactory. The lending test rating was also low satisfactory in Alabama but needs to improve in Florida. SmartBank made an adequate level of community development loans in Tennessee and Alabama; however, the bank made few, if any community development loans in Florida.

References are made to SmartBank's lending distribution by geography and borrower income throughout this report. Detailed information about HMDA-reportable and CRA small business loans in 2019 and 2020 can be found in the lending test section for each full-scope assessment area and in Appendix F for limited-scope assessment areas. In some assessment areas and product discussions, specific numbers are quoted from these tables to support relevant points; otherwise, general references are made about performance and the reader should refer to the appendix tables for specific data.

Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of the assessment areas given the bank's market share of deposits, competition, the economic environment, and other performance context factors in the assessment areas. The following table summarizes the bank's 2019 and 2020 lending activity.

Summary of Lending Activity

Loan Type	#	%	\$(000s)	%
Total Consumer related	0	0	\$0	0
Home Improvement	26	--	\$2,841	--
Home Purchase	819	--	\$204,174	--
Multi-Family Housing	71	--	\$82,968	--
Refinancing	664	--	\$142,160	--
Other Purpose Closed-End	5	--	\$429	--
Total HMDA related	1,585	23	\$432,572	39
Total Non-HMDA related	0	0	\$0	0
Small Business	5,290	--	\$682,200	--
Total Small Business related	5,290	77	\$682,200	61
Total Small Farm related	0	0	\$0	0
TOTAL LOANS	6,875	100	\$1,114,772	100

As shown, the bank originated 1,585 HMDA-reportable loans totaling \$432.6 million during the review period. Of those, 819 (51.7 percent) were home purchase loans, 664 (41.9 percent) were refinances, 71 (4.5 percent) were multi-family housing loans, 26 (1.6 percent) were home improvement loans and 5 (0.3 percent) other purpose closed-end loans. In addition, the bank made 5,290 small business loans totaling \$682.2 million. Of the small business loans (not shown in the table), 2,930 (55.4 percent) were PPP loans totaling \$220.6 million.

Within the bank’s footprint, by both number and dollar volume of loans, more small business loans were originated than HMDA-reportable loans. Due to the higher percentage of loans by number, small business loans typically had a greater impact on lending ratings. Small business lending significantly increased in 2020 primarily from the bank’s participation in PPP lending.

Assessment Area Concentration

The bank originated a high percentage of the total loans sampled to borrowers and businesses residing in or located within the bank’s assessment area. The table below shows, by product type, the number, and percentage of loans reviewed that were located inside and outside of the bank’s assessment areas.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	25	96.2	\$2,801	98.6	1	3.8	\$40	1.4
Home Purchase - Conventional	537	80.6	\$134,223	79.1	129	19.4	\$35,457	20.9
Home Purchase - FHA	63	73.3	\$11,671	74.2	23	26.7	\$4,065	25.8
Home Purchase - VA	56	83.6	\$15,594	83.1	11	16.4	\$3,164	16.9
Multi-Family Housing	53	74.6	\$68,126	82.1	18	25.4	\$14,842	17.9
Other Purpose Closed-End	3	60.0	\$127	29.6	2	40.0	\$302	70.4
Refinancing	539	81.2	\$114,462	80.5	125	18.8	\$27,698	19.5
Total HMDA related	1,276	80.5	\$347,004	80.2	309	19.5	\$85,568	19.8
Small Business	4,298	81.2	\$543,972	79.7	992	18.8	\$138,228	20.3
Total Small Bus. related	4,298	81.2	\$543,972	79.7	992	18.8	\$138,228	20.3
TOTAL LOANS	5,574	81.1	\$890,976	79.9	1,301	18.9	\$223,796	20.1

Note: Affiliate loans not included

As shown, 80.5 percent of the HMDA-reportable loans, and 81.2 percent of small business loans are to borrowers and businesses residing within the bank’s assessment areas. This indicates the bank’s willingness to originate loans that meet the credit needs of its assessment areas.

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

The overall geographic distribution of small business and HMDA-reportable loans reflects adequate penetration throughout the assessment areas and does not reveal any unexplained gaps in lending patterns. The distribution of loans to businesses of different sizes and by borrower characteristics reflects adequate penetration among customers of different income levels. These conclusions were based primarily upon the bank’s performance in the full-scope assessment areas, considering performance context information, and in comparison to available demographic and aggregate lending data. The analyses of small business and HMDA-reportable lending within each assessment area are discussed in detail later in this report.

Community Development Lending

The bank makes an adequate level of community development loans. Since the previous examination, the bank originated or renewed 38 qualified community development loans in and around its assessment areas totaling \$83.1 million. As shown below, the majority of the bank’s activity was in Tennessee.

SUMMARY – COMMUNITY DEVELOPMENT LOANS		
State	TOTAL	
	#	\$
Tennessee	29	\$73.4 Million
Alabama	8	\$9.6 Million
Florida	1	\$75,000
OVERALL	38	\$83.1 Million

The majority of community development loans originated or renewed during the review period had a purpose of revitalization/stabilization of low- and moderate-income (LMI), distressed, or underserved geographies. Additional community development purposes included affordable housing and community services targeting or primarily benefiting LMI individuals and economic development activities that finance small businesses and result in permanent job creation and/or retention for LMI individuals.

Additional information on community development loans is found in the full-scope assessment area sections of this evaluation.

INVESTMENT TEST

The investment test rating is low satisfactory. The bank made an adequate level of qualified community development investments and donations, driven by performance in the state of Tennessee as shown in the table below. Additionally, the bank made investments that demonstrated adequate responsiveness to credit and community development needs. However, the bank made rare use of innovative and/or complex investments to support community development initiatives.

SUMMARY – INVESTMENT TEST		
State	TOTAL	
	#	\$
Tennessee	36	\$14.3 Million
Alabama	0	\$0
Florida	1	\$3.5 Million
OVERALL	37	\$17.8 Million

The preceding table included 10 investments totaling \$16.7 million obtained during the current review period, one investment made during a prior period but still outstanding totaling \$530,104, and 26 donations totaling \$56,550.

Most of the bank’s investments supported affordable housing efforts to LMI borrowers. More specifically, the bank invested \$12.5 million in municipal bonds providing financing for LMI families occupying 1-4 family units and multifamily rental housing facilities, and \$4.5 million in mortgage-backed securities. Additionally, most donations supported community service efforts targeted to or primarily benefitting LMI individuals and families, including but not limited to financial education and literacy, youth and family programs, emergency assistance including food and housing, and health services.

Additional details regarding specific investments and donations can be found in the state and full-scope assessment area sections of this evaluation.

SERVICE TEST

The service test rating is low satisfactory. SmartBank’s retail delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in the bank’s assessment areas. The bank’s record of opening and closing branches has generally not adversely affected the accessibility of its delivery systems, particularly for low- and moderate-income geographies and/or low- and moderate-income individuals. During the review period, the bank gained six branches and closed one branch through acquisition. Additionally, the bank opened one new branch in Rutherford County, Tennessee and one in Bay County, Florida. They also opened and closed one branch located in a middle-income tract, in Blount County, Tennessee. Finally, business hours and services do not vary in a way that inconveniences the needs of low- and moderate-income geographies or individuals.

SmartBank provides an adequate level of community development services throughout its assessment areas. During the review period, bank officers and staff engaged in a variety of community development service activities. As shown below, the majority of this activity was noted throughout the state of Tennessee.

SUMMARY – COMMUNITY DEVELOPMENT SERVICES		
State	TOTAL	
	#	Hours
Tennessee	62	957
Alabama	18	183
Florida	3	59
OVERALL	83	1,199

SmartBank employees were involved primarily with organizations and activities that promote or facilitate community services targeted to or primarily benefiting LMI individuals. Bank employees had supplemental activities and hours noted in economic development but provided significantly less financial expertise in the areas of affordable housing and revitalization/stabilization of LMI and distressed or underserved geographies. Board and committee leadership activities (84.2 percent) comprised most of the bank's service hours throughout its footprint.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

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

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

TENNESSEE

CRA RATING FOR TENNESSEE: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects adequate penetration throughout the Tennessee assessment areas.
- The distribution of loans by borrower income reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans in its Tennessee assessment areas.
- The bank provides an adequate level of qualified community development investments and grants that are responsive to community development needs in its Tennessee assessment areas.
- Retail banking services are adequate in the Tennessee assessment areas.
- The bank provides an adequate level of community development services throughout the Tennessee assessment areas.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Chattanooga and Knoxville assessment areas. Limited-scope reviews were conducted for the remaining five assessment areas:

- Cleveland
- Coffee
- East Tennessee
- Rutherford
- Sevier

The time period and products evaluated for the assessment areas in Tennessee are consistent with the scope discussed in the institution section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

As of December 31, 2020, SmartBank had approximately \$1.8 billion in deposits in Tennessee comprising 72.2 percent of the bank's total deposits. SmartBank operated 22 banking offices in Tennessee as of December 21, 2020, representing 64.7 percent of the bank's total offices. HMDA-reportable lending in Tennessee accounted for 62.1 percent of total institutional HMDA-reportable lending by number of loans and 61.8 percent by dollar volume. CRA small business lending in Tennessee accounted for 67.1 percent of the bank's total CRA small business lending by number of loans and 64.2 percent by dollar volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

Overview

The lending test rating for the state of Tennessee is low satisfactory.

During the review period, SmartBank reported 2,882 small business loans and 792 HMDA-reportable loans in Tennessee. Therefore, more weight was given to small business lending than HMDA-reportable lending for the lending analysis. SmartBank originated or renewed 26 community development loans totaling \$67.9 million benefiting Tennessee assessment areas during the review period.

Lending Activity

The following table displays the volume of lending activity from January 1, 2019 through December 31, 2020 by loan type.

Statewide Summary of Lending Activity
Assessment Areas Located in
Tennessee

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	337	9.2%	\$73,513	13.0%
HMDA Refinance	388	10.6%	\$78,778	14.0%
HMDA Home Improvement	20	0.5%	\$1,945	0.3%
HMDA Multi-Family	44	1.2%	\$60,199	10.7%
HMDA Other Purpose LOC	0	0.0%	\$0	0.0%
HMDA Other Purpose Closed/Exempt	3	0.1%	\$127	0.0%
HMDA Loan Purpose NA	0	0.0%	\$0	0.0%
Total HMDA	792	21.6%	\$214,562	38.1%
Total Small Business	2,882	78.4%	\$349,192	61.9%
TOTAL LOANS	3,674	100.0%	\$563,754	100.0%

Originations and Purchases

Geographic and Borrower Distribution of Loans

The geographic distribution of small business and HMDA-reportable loans is adequate, and the distribution of loans to business revenue size and by borrower income is adequate. The detailed analyses are discussed later in the full-scope assessment area sections of the report.

Community Development Lending

SmartBank made an adequate level of community development loans in the state of Tennessee. During the review period, the bank originated or renewed 26 community development loans totaling \$67.9 million benefiting Tennessee assessment areas. The bank originated four community development loans in the Knoxville full-scope assessment area, 15 loans in the Chattanooga full-scope assessment area and the remaining seven in the limited-scope assessment areas. The bank made no loans in the Cleveland and Coffee assessment areas. The bank was

considered responsive to the community credit needs in the state. Therefore, positive consideration was given to three loans totaling \$5.5 million made to community development financial institutions (CDFIs) who serve the entire state of Tennessee, including the bank's assessment areas.

Additional information on community development loans is found in the full-scope assessment area sections of this evaluation.

INVESTMENT TEST

The investment test rating for Tennessee is low satisfactory. The bank made an adequate level of qualified investments and donations totaling \$13.8 million, in its Tennessee assessment areas. By dollar amount, approximately 88.4 percent of combined investments and contribution activity occurred in the Knoxville and Chattanooga full-scope assessment areas. The bank exhibits adequate responsiveness to credit and community development needs in Tennessee. However, the bank made rare use of innovation and/or complex investments to support community development initiatives in the state.

Additional information regarding specific investments and donations is found in the full-scope assessment area sections of this evaluation.

SERVICE TEST

The service test rating for Tennessee is low satisfactory.

Retail Services

SmartBank delivery systems, including ATMs and branches, are reasonably accessible to geographies and individuals of different income levels. SmartBank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. During the review period, the bank had seven branch openings in Tennessee. Of these openings, six were due to acquisitions. Additionally, the bank had two branch closings, including one that was closed due to an acquisition. The bank closed one branch in a moderate-income census tract within the East Tennessee limited-scope assessment area. The other closing was in a middle-income tract located in the Knoxville full-scope assessment area. In addition, banking services and business hours do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or individuals. Overall, the bank's retail service performance is considered adequate in Tennessee.

Community Development Services

SmartBank provides an adequate level of community development services that benefit residents and small businesses in Tennessee. Bank employees engaged in 62 qualified service activities totaling 957 service hours during the review period. Most service activities occurred in the Knoxville full-scope assessment area (29 qualifying activities totaling 399 hours) and the Chattanooga full-scope assessment area (21 qualifying activities, totaling 298.5 hours). The remaining service activities occurred in the bank's limited-scope assessment areas (12 qualifying activities, totaling 259.5 hours). The bank reported no service activities in the Nashville and East Tennessee limited scope assessment areas.

Additional detail on the bank's retail and community development services can be found in the full-scope assessment area sections of this evaluation.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN KNOXVILLE, TENNESSEE ASSESSMENT
AREA**

Overview

The Knoxville assessment area was expanded since the previous examination as a result of the bank acquiring Progressive Savings Bank on March 1, 2020.

The Knoxville assessment area includes Anderson, Blount, Knox, and Morgan counties in eastern Tennessee. Knoxville, the principal city, is located in Knox County. The assessment area is part of the eight-county Knoxville, TN MSA. As of December 31, 2020, SmartBank operated five branch offices in the assessment area. The bank's branch presence in the assessment area represents 14.7 percent of branches and 15.3 percent of deposits for the institution. In addition, the market represents 20.5 percent of the combined HMDA-reportable and CRA small business lending by number of loans for the institution.

Knoxville is a very active banking market. According to the June 30, 2020 FDIC Summary of Deposits Report, there are 36 financial institutions operating 199 branch locations in the assessment area with \$18.0 billion in total deposits. SmartBank is ranked 10th in the market with 2.2 percent of deposits (\$389.6 million). First Horizon Bank had the largest deposit market share at 19.7 percent, followed by Truist Bank with 19.2 percent.

SmartBank is not a significant HMDA lender in this assessment area, originating less than one percent of HMDA-reportable loans in both 2019 and in 2020. The top three HMDA lenders in 2019 were Mortgage Investors Group, Wells Fargo Bank, and ORNL Federal Credit Union while the 2020 top lenders were Mortgage Investors Group, Quicken Loans, and Wells Fargo Bank. In contrast, SmartBank is a more active CRA small business lender in the assessment area. SmartBank ranked 7th out of 95 CRA reporters in 2019 with 4.6 percent of CRA-reportable loans. In 2020, SmartBank ranked 6th out of 149 CRA reporters, with 6.0 percent of CRA-reportable loans. JPMorgan Chase was the top CRA lender in the market for 2019, followed by Pinnacle Bank and Branch Banking & Trust Company. In 2020, Pinnacle Bank was the top CRA lender in the market, followed by First Horizon Bank and Truist Bank.

Population Information

According to 2019 census data, the population of the Knoxville assessment area was estimated at approximately 701,782 people, experiencing a population growth of 7.6 percent from 2010 to 2019.² Since 2010, three counties in the assessment area have posted population gains while Morgan County experienced population loss of 2.7 percent. From 2010 to 2019, Knox County experienced the most population growth (8.8 percent), followed by Blount County (8.1 percent) and Anderson County (2.5 percent). Knox County has the largest share of the assessment area population (67.0 percent).

According to 2020 FFIEC, data the assessment area is made up of 163 census tracts: 10 tracts are low-income (6.1 percent), 30 tracts are moderate-income (18.4 percent), 71 tracts are middle-income (43.6 percent), 47 tracts are upper-income (28.8 percent), and 5 tracts have unknown income (3.1 percent). Nine of the low- and twenty

² Quickfacts: United States Census Bureau. n.d. Web. 14 September 2021.
www.census.gov/quickfacts/fact/table/morgancountytennessee.knoxcountytennessee.blountcountytennessee.andersoncountytennessee/PST045219.

of the moderate- income census tracts are concentrated in central and eastern Knox County. Nearly all of the remaining LMI census tracts are concentrated throughout northern Anderson County and the adjacent Morgan County.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Knoxville, TN MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA increased from \$65,000 in 2019 to \$67,200 in 2020. The 2020 FFIEC data further shows that median family income was highest in Knox County (\$64,798) and lowest in Morgan County (\$45,613).

Borrower Income Levels
Knoxville, TN MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2019	\$65,000	0 - \$32,499	\$32,500 - \$51,999	\$52,000 - \$77,999	\$78,000 - & above
2020	\$67,200	0 - \$33,599	\$33,600 - \$53,759	\$53,760 - \$80,639	\$80,640 - & above

Furthermore, FFIEC data shows that 38.8 percent of families in the assessment area are considered LMI. It is worth noting that while Morgan County and Anderson County have the smallest populations of the four counties making up the assessment area, these two counties have the largest percentage of its populations deemed LMI (52.0 percent and 43.3 percent, respectively). Knox County is by far the most affluent of all counties within the Knoxville assessment area.

The 2020 FFIEC data also shows that, as a percentage, families living below the poverty level in the assessment area (11.4 percent) is below the state of Tennessee figure of 13.2 percent. However, both Morgan and Anderson counties have larger percentages of families living below poverty (17.5 percent and 13.9 percent, respectively). In the assessment area, 45.9 percent of families living in low-income census tracts live below the poverty level, and 20.9 percent of families living in moderate-income census tracts live below the poverty level. Furthermore, Morgan and Anderson counties have seen increases in families living below poverty between the five-year periods of 2010-2014 and 2015-2019, 5.2 percent and 4.4 percent increases, respectively³. While overall poverty rates for the assessment area compare favorably to state figures, poverty remains a significant barrier for families residing in the low-income census tracts of Knox County as well as throughout all of Morgan and Anderson counties.

Income Characteristics

The following table presents key demographic and business information used to help develop a performance context for the assessment area for the year 2020. The data reflects 2020 FFIEC census data and 2020 Dun & Bradstreet data used to analyze the bank’s CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis. As shown in the table below, the assessment area contains 163 census tracts: 10 (6.1 percent) are low-income, 30 (18.4 percent) are moderate-income, 71 (43.6 percent) are middle-income, 47 (28.8 percent) are upper-income and 5 (3.1 percent) are unknown-income levels.

³ Anderson and Morgan counties, TN (U.S. Census). *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 14 Sept. 2021.

Combined Demographics Report

Assessment Area: TN Knoxville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	6.1	7,384	4.4	3,389	45.9	36,658	21.6
Moderate-income	30	18.4	24,668	14.6	5,155	20.9	27,418	16.2
Middle-income	71	43.6	83,817	49.5	8,329	9.9	33,202	19.6
Upper-income	47	28.8	53,611	31.6	2,405	4.5	72,216	42.6
Unknown-income	5	3.1	14	0	14	100	0	0
Total Assessment Area	163	100.0	169,494	100.0	19,292	11.4	169,494	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	15,559	4,477	2.5	28.8	9,343	60	1,739	11.2
Moderate-income	54,150	22,428	12.6	41.4	24,644	45.5	7,078	13.1
Middle-income	143,608	91,534	51.2	63.7	37,314	26	14,760	10.3
Upper-income	84,026	60,204	33.7	71.6	17,698	21.1	6,124	7.3
Unknown-income	189	4	0	2.1	98	51.9	87	46
Total Assessment Area	297,532	178,647	100.0	60.0	89,097	29.9	29,788	10.0
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,146	4.1	991	3.9	151	6	4	2.2
Moderate-income	4,129	14.7	3,664	14.5	429	16.9	36	19.5
Middle-income	11,509	41	10,548	41.6	898	35.4	63	34.1
Upper-income	11,080	39.5	9,998	39.5	1,003	39.5	79	42.7
Unknown-income	194	0.7	135	0.5	56	2.2	3	1.6
Total Assessment Area	28,058	100.0	25,336	100.0	2,537	100.0	185	100.0
Percentage of Total Businesses:				90.3		9.0		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	3	0.9	3	0.9	0	0	0	0
Moderate-income	54	16.7	54	17	0	0	0	0
Middle-income	157	48.5	153	48.1	1	33.3	3	100
Upper-income	109	33.6	107	33.6	2	66.7	0	0
Unknown-income	1	0.3	1	0.3	0	0	0	0
Total Assessment Area	324	100.0	318	100.0	3	100.0	3	100.0
Percentage of Total Farms:				98.1		.9		.9

2020 FFIEC Census Data and 2020 D&B Information

Housing Characteristics

According to 2020 FFIEC data, there were 297,532 housing units located in the assessment area, of which 60.0 percent were owner-occupied, 29.9 percent were rental units, and 10.0 percent were vacant. While a majority of units were owner-occupied in each county of the assessment area, Morgan County had a much lower percentage of rental units (15.8 percent) and much larger percentage of vacant units (17.2 percent) when compared to other counties in the assessment area. In addition, a disproportionately higher percentage of housing units in low-income census tracts were rental units or vacant. In low-income census tracts, 71.2 percent of all housing units were rentals or vacant. Moreover, the median age of the housing stock was 40 years, though the median age of housing was older in low-income tracts, at 56 years. These factors suggest that limited HMDA-reportable lending opportunities may be present in Morgan County and in the low-income tracts concentrated in Knox County.

Home sales in the Knoxville region in 2020 were up 6.9 percent compared to 2019⁴. The median home sales price in the Knoxville area was \$241,000 in December 2020, down 1.6 percent from the prior month, but up more than 15.0 percent from the prior year⁵. While home sales were on the rise in 2020, the FFIEC data from 2020 indicates that home affordability was an issue throughout the assessment area, especially in Knox and Blount counties. The affordability ratio is defined as the median household income divided by the median housing value. A higher ratio means the housing is considered more affordable while a lower ratio means the housing is considered less affordable. The affordability ratio was 30.2 percent for the bank's assessment area compared to 31.8 percent for the state of Tennessee, indicating that housing in the assessment area is less affordable than it is statewide.

Additionally, for a family of four earning 50.0 percent of the median family income between 2014 and 2018, only 18.1 percent of housing in Blount County and 19.0 percent of housing in Knox County is affordable, compared to 32.2 percent of housing in Anderson County and 38.2 percent of housing in Morgan County being affordable.⁶ For a family of four earning 80.0 percent of AMI between 2014 and 2018, only 36.7 percent and 38.4 percent of housing in Blount and Knox counties, respectively, is affordable. This compares less favorably to 53.6 percent of housing in Anderson County and 50.8 percent of housing in Morgan County being affordable. This is an indication that fewer homeownership options exist for LMI borrowers in Knox and Blount counties.⁷

Employment Statistics

Throughout the review period, the Knoxville region has continued to spur investments in economic growth through various methods, including Tax Increment Financing, federal grants, federal transportation investments, and capital gains tax benefits through designation of Opportunity Zones for investments into economically distressed areas throughout Knox, Anderson, and Blount counties. These efforts were largely concentrated in Knox County but also led to several city-sponsored projects throughout the entire Knoxville region. Projects

⁴ "Knoxville Area Housing Market Finishes Strong in 2020." *Knoxville Area Association of Realtors*, www.kaarmls.com/news/knoxville-area-housing-market-finishes-strong-2020. Accessed 15 Sept. 2021.

⁵ Ibid.

⁶ *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 15 Sept. 2021.

⁷ Ibid.

included the Interstate 275 Business Park Access Improvements Project⁸, various housing projects in downtown Knoxville⁹, the Investing in Opportunity Act to spearhead the designation of Opportunity Zones¹⁰, and numerous projects spanning the entire Knoxville metro under the Transportation Improvement Program.¹¹

Top employers in the Knoxville MSA by number of employees include the U.S. Department of Energy, Covenant Health, the University of Tennessee, Knox County Schools, Walmart, University Health System, DENSO Manufacturing, Clayton Homes, Inc., and K-VA-T Food Stores.¹² It is also worth noting that the top two industries or sectors for the region (e.g., Health Care and Social Assistance and Retail Trade)¹³ along with Administrative Support, Waste Management and Remediation Services experienced significant increases in the number of job postings from September 2020 through August 2021.¹⁴ The Knoxville Chamber of Commerce infers that the increases are the result of COVID-19 and the nature of these industries (i.e., essential services).¹⁵

According to 2020 Dun & Bradstreet information, there were 28,058 businesses within the Knoxville assessment area, 90.3 percent of which had total annual revenues less than or equal to \$1.0 million and were therefore considered to be small businesses. Additionally, the vast majority of small businesses in the assessment area are located in middle- and upper-income tracts, with only 3.9 percent and 14.5 percent of small businesses being located in low- and moderate-income tracts, respectively. As described, these figures are indicative of a thriving small business sector in the assessment area. However, small businesses are disproportionately concentrated outside of LMI areas.

As shown in the following chart, the unemployment rate in the Knoxville assessment area rose sharply from 3.0 percent in 2019 to 6.1 percent in 2020. Anderson and Morgan counties maintained the highest unemployment rates throughout the review period. Unemployment rates for the Knoxville MSA area and each individual county of the assessment area were less than the Tennessee unemployment rate of 7.5 percent for 2020.

⁸ “Knoxville Aims to Spur Economic Growth with \$5.5 Million Investment into I-275 Business Park.” *WATE*, East Tennessee Economic Development Agency, 25 Jun. 2020, www.eteda.org/news/403/knoxville-aims-to-spur-economic-growth-with-55-million-investment-into-i-275-business-park. Accessed 15 Sept. 2021.

⁹ “More Than 400 New Residences Under Construction in Downtown Knoxville.” *Knoxville News Sentinel*, East Tennessee Economic Development Agency, 13 Mar. 2020, www.eteda.org/news/361/more-than-400-new-residences-under-construction-in-downtown-knoxville. Accessed 15 Sept. 2021.

¹⁰ Rodefer, Jimmy. “How to Find a Qualified Opportunity Zone.” *Knoxville News Sentinel*, East Tennessee Economic Development Agency, 27 Nov. 2019, www.eteda.org/news/317/how-to-find-a-qualified-opportunity-zone-fund. Accessed 15 Sept. 2021.

¹¹ “Upcoming Transportation Projects in Our Region.” Knoxville Regional Transportation Planning Organization, 31 Dec. 2019, knoxtpo.org/2019/12/31/tip-projects/. Accessed 15 Sept. 2021.

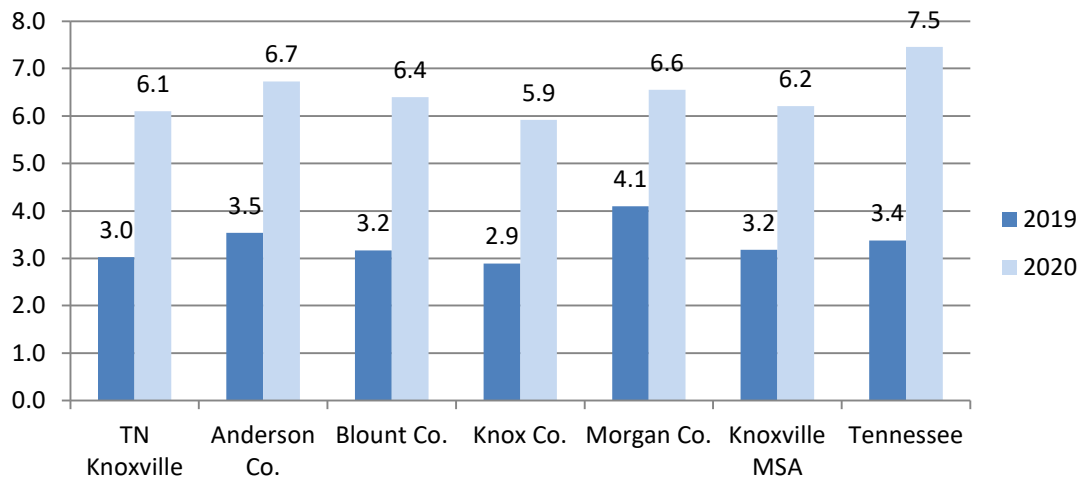
¹² “Largest Employers.” *East Tennessee Economic Development Agency*, www.eteda.org/data-library/major-employers/largest-employers/. Accessed 15 Sept 2021.

¹³ “Economic Overview” *Knoxville Chamber of Commerce*, www.knoxvillechamber.com/wp-content/uploads/2021/08/Economic-Overview-Knoxville-TN-MSA-Q1-2021.pdf

¹⁴ *Economic Conditions Outlook*. Knoxville Chamber of Commerce, September 2020, December 2020, August 2021. www.knoxvillechamber.com/eco/

¹⁵ *Ibid.*

Unemployment Rates - TN Knoxville



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

Credit and Community Development Needs

To better understand the local community development and economic landscapes, individuals familiar with the community and with community development activities were contacted. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs through lending, investment, and/or service activities.

Based on information obtained from a community contact specializing in affordable housing, the housing market in the downtown area of Knoxville is competitive. Traditionally, LMI neighborhoods are in areas east of downtown Knoxville. However, over the past several years gentrification has taken place, and older housing stock on the east side has been replaced with more expensive renovated homes or replaced with new construction. This has resulted in affordable housing stock being scarce in the east side of Knoxville, and LMI individuals have had to move further away from the urban core of the city. Moreover, the contact indicated that several banks have closed their branches in LMI neighborhoods. The branch closing was attributed partially to greater use of internet and mobile banking services as well as branch closures due to bank merger and acquisition activity.

The contact indicated that the products most needed by LMI families include mortgage loans for home purchases, down payment assistance, and home improvement/small dollar mortgage loans. The contact further stated that affordable housing is generally older housing stock in need of updates and repairs for energy efficiency. The contact noted, however, that due to low appraisal values of older housing stock, it is difficult to be approved for a mortgage or a second lien to use for updates and repairs. The contact further stated that LMI borrowers in particular tend to have poor credit histories and higher debt-to-income ratios so lenders are less likely to approve loan requests for the necessary home repairs, especially when repairs are significant. Over the last several years, the contact stated that many LMI borrowers are not able to meet debt-to-income ratios due being employed in low wage jobs. Furthermore, while down payment assistance is offered through both the Tennessee Housing Development Agency and the Federal Home Loan Bank's Welcome Home program, funds are exhausted quickly. She indicated the majority of recipients of the down payment assistance programs are moderate-income.

The contact indicated that the city has recognized the need for additional affordable housing, stating that most of the new affordable housing stock are currently rehabs of existing stock due to the rising cost of land and building materials. She indicated a local housing organization has been working closely with East Tennessee Foundation's Affordable Housing Trust Fund to provide affordable housing and necessary repairs.

The contact indicated there are a number of opportunities for banks to participate in assisting LMI housing needs, including developing obtainable mortgage products that use alternate evaluation methods for credit history such as analysis of payment of utilities, partnering with location organizations to provide financial literacy and homeownership education, and helping LMI borrowers with down payment assistance through internal or external programs. Additionally, banks can become certified to offer FHA, THDA, VA and USDA Rural Development products, which are required products for Welcome Home grant down payment assistance. Banks could also help develop or invest in a loan pool for small dollar mortgage loans serving LMI borrowers or partner with the local housing trust fund to finance homes for LMI people.

Based on information obtained from a contact specializing in local economic development, it is difficult for most start-up small businesses to receive financing through local banks mainly because some banks do not offer small dollar business loans, defined as loans in amounts \$100,000 or less. The contact indicated that banks typically send small business clients who are not existing customers to the Tennessee Small Business Development Center (TSBDC) or a small business CDFI serving the area.

The contact indicated access to capital is the number one barrier small businesses face when starting, expanding, or relocating to the Knoxville MSA. Rents for commercial space are affordable and is a major selling point for attracting employers to the area. According to the contact, many small businesses are not able to put together a sound business plan, come up with down payments, do not have sufficient collateral to back the loan or are too newly formed to demonstrate a sound history of running a business.

During the discussion, the contact indicated there is need for sound banking alternatives for businesses start-ups. The contact noted that there previously was a revolving loan fund to provide micro loans (usually under \$10,000) to assist small businesses in getting set up and off the ground. However, after making about 30 loans the fund dried up.

During the discussion, the contact indicated the following opportunities for banks to improve access to small businesses in the area including investing, lending and providing technical assistance to local CDFIs or working with local banks to re-establish a micro loan fund for small business start-ups. Additionally, banks can partner with local organizations to provide technical assistance to small businesses. Lastly, banks can work with local organizations focused on workforce development for LMI individuals or partner with area colleges and vocational schools to improve financial literacy in the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

SmartBank's lending in the Knoxville assessment area reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans by borrower income and business revenue reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank made a low level of community development loans within the assessment area.

Lending Activity

The analysis included 265 small business and 81 HMDA-reportable loans made in the assessment area in 2019 and 634 small business and 160 HMDA-reportable loans in 2020. Greater weight was placed on small business lending, as the volume of small business loans was greater than HMDA-reportable loans. The Knoxville assessment area accounted for 31.2 percent of SmartBank's total small business lending in Tennessee and 30.4 percent of its total statewide HMDA-reportable lending by dollar volume during the review period. In comparison, 21.2 percent of SmartBank's Tennessee deposits are in the Knoxville assessment area.

Geographic Distribution of Loans

Based on the following analysis, the overall geographic distribution of the bank's small business and HMDA-reportable loans reflects adequate penetration throughout the bank's assessment area and does not reveal any unexplained gaps in lending patterns. For this analysis, the geographic distribution of small business loans and HMDA-reportable loans was compared to demographic information. Performance context information and aggregate lending data were also considered in the evaluation. For instance, unemployment rates, poverty rates, the level of owner-occupied units, and the volume of small businesses in low- and moderate-income census tracts were considered when assessing the bank's lending performance.

Small Business Lending

The geographic distribution of small business loans reflects adequate dispersion throughout the assessment area. The following tables show the distribution of small business loans as a percentage of the total number of loans by type within its Knoxville assessment area and also includes a comparison of the bank's small business lending to the aggregate lenders within the assessment area. The CRA aggregate lenders' data are the combined total of lending activity reported by all lenders subject to CRA loan data reporting requirements in the assessment area.

Geographic Distribution of Small Business Loans

Assessment Area: TN Knoxville

Tract Income Levels	Bank Lending & Demographic Data Comparison 2019					Bank & Aggregate Lending Comparison 2019					
	Count		Bank Dollar		Total Businesses %	Count			Dollar		
	#	%	\$ (000s)	\$ %		#	%	%	\$ 000s	\$ %	Agg \$ %
Low	10	3.8%	\$3,057	6.0%	4.7%	10	3.8%	3.6%	\$3,057	6.0%	3.9%
Moderate	15	5.7%	\$6,734	13.1%	12.4%	15	5.7%	11.0%	\$6,734	13.1%	12.1%
Middle	153	57.7%	\$21,663	42.2%	41.0%	153	57.7%	41.6%	\$21,663	42.2%	40.0%
Upper	87	32.8%	\$19,878	38.7%	41.5%	87	32.8%	42.2%	\$19,878	38.7%	43.5%
Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.1%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.4%
<i>Total</i>	<i>265</i>	<i>100.0%</i>	<i>\$51,332</i>	<i>100.0%</i>	<i>100.0%</i>	<i>265</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$51,332</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2019 D&B Information

Geographic Distribution of Small Business Loans

Assessment Area: TN Knoxville

Tract Income Levels	Bank Lending & Demographic Data Comparison 2020					Bank & Aggregate Lending Comparison 2020					
	Count		Bank Dollar		Total Businesses %	Count			Dollar		
	#	%	\$ (000s)	\$ %		#	%	%	\$ 000s	\$ %	Agg \$ %
Low	20	3.2%	\$2,458	3.2%	4.1%	20	3.2%	3.0%	\$2,458	3.2%	3.4%
Moderate	68	10.7%	\$9,127	11.9%	14.7%	68	10.7%	11.8%	\$9,127	11.9%	11.7%
Middle	282	44.5%	\$32,211	42.1%	41.0%	282	44.5%	39.9%	\$32,211	42.1%	37.9%
Upper	264	41.6%	\$32,719	42.8%	39.5%	264	41.6%	44.4%	\$32,719	42.8%	45.8%
Unknown	0	0.0%	\$0	0.0%	0.7%	0	0.0%	0.5%	\$0	0.0%	1.3%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.3%	\$0	0.0%	0.1%
<i>Total</i>	<i>634</i>	<i>100.0%</i>	<i>\$76,515</i>	<i>100.0%</i>	<i>100.0%</i>	<i>634</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$76,515</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

In 2019, SmartBank originated 265 small business loans inside the Knoxville assessment area. Lending in low-income census tracts at 3.8 percent was slightly less than the percentage of businesses in these tracts. However, the bank's lending in low-income tracts was slightly above aggregate lending at 3.6 percent. The bank's lending in moderate-income tracts was below the percentage of small businesses located in moderate-income tracts and below the aggregate lending in the area.

In 2020, SmartBank originated significantly more small business loans inside the assessment area with 634 loans. Lending in low-income census tracts at 3.2 percent was slightly less than the percentage of businesses in these tracts. However, the bank's lending in low-income tracts was slightly above aggregate at 3.0 percent. Additionally, the bank's lending to moderate-income tracts at 10.7 percent was below the percentage of small businesses located in moderate-income tracts at 14.7 percent, but similar to the aggregate lending at 11.8 percent.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects adequate dispersion throughout the assessment area. The following tables show the geographic distribution of SmartBank HMDA-reportable loans for 2019 and 2020 within its Knoxville assessment area and includes a comparison of the bank's HMDA-reportable lending to the aggregate HMDA-reportable lenders within the assessment area. The HMDA-reportable aggregate lenders' data are the combined total of lending activity reported by all lenders subject to HMDA in the assessment area.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2019					2019						
		Bank		Owner Occupied Units		Count	Bank		Dollar		Count	Dollar	
		Count	Dollar	%	%		Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	1	2.6%	\$280	3.6%	2.9%	1	2.6%	2.5%	\$280	3.6%	1.5%	
	Moderate	6	15.4%	\$658	8.5%	10.0%	6	15.4%	10.0%	\$658	8.5%	6.8%	
	Middle	18	46.2%	\$3,016	39.0%	50.5%	18	46.2%	47.0%	\$3,016	39.0%	40.9%	
	Upper	14	35.9%	\$3,780	48.9%	36.6%	14	35.9%	40.5%	\$3,780	48.9%	50.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>\$7,734</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,734</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	1.6%	\$0	0.0%	1.0%	
	Moderate	1	2.8%	\$80	0.8%	10.0%	1	2.8%	7.1%	\$80	0.8%	4.8%	
	Middle	26	72.2%	\$5,956	56.5%	50.5%	26	72.2%	47.0%	\$5,956	56.5%	39.5%	
	Upper	9	25.0%	\$4,501	42.7%	36.6%	9	25.0%	44.2%	\$4,501	42.7%	54.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>36</i>	<i>100.0%</i>	<i>\$10,537</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,537</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	2.5%	\$0	0.0%	2.6%	
	Moderate	1	33.3%	\$115	25.4%	10.0%	1	33.3%	8.0%	\$115	25.4%	6.6%	
	Middle	2	66.7%	\$338	74.6%	50.5%	2	66.7%	41.7%	\$338	74.6%	36.9%	
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	47.8%	\$0	0.0%	53.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$453</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$453</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTI FAMILY				Multi-Family Units									
	Low	0	0.0%	\$0	0.0%	11.4%	0	0.0%	5.1%	\$0	0.0%	8.8%	
	Moderate	1	33.3%	\$488	16.3%	29.9%	1	33.3%	32.3%	\$488	16.3%	25.5%	
	Middle	2	66.7%	\$2,500	83.7%	38.3%	2	66.7%	45.5%	\$2,500	83.7%	36.1%	
	Upper	0	0.0%	\$0	0.0%	20.0%	0	0.0%	17.2%	\$0	0.0%	29.6%	
	Unknown	0	0.0%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$2,988</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,988</i>	<i>100.0%</i>	<i>100.0%</i>		
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	1.8%	\$0	0.0%	1.7%	
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	6.8%	\$0	0.0%	3.4%	
	Middle	0	0.0%	\$0	0.0%	50.5%	0	0.0%	40.6%	\$0	0.0%	30.5%	
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	50.8%	\$0	0.0%	64.4%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2019					2019					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	3.3%	\$0	0.0%	3.4%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	11.7%	\$0	0.0%	13.1%
	Middle	0	0.0%	\$0	0.0%	50.5%	0	0.0%	47.0%	\$0	0.0%	43.9%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	38.0%	\$0	0.0%	39.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	2.9%	0	0.0%	4.5%	\$0	0.0%	2.7%
	Moderate	0	0.0%	\$0	0.0%	10.0%	0	0.0%	10.9%	\$0	0.0%	6.6%
	Middle	0	0.0%	\$0	0.0%	50.5%	0	0.0%	52.8%	\$0	0.0%	48.7%
	Upper	0	0.0%	\$0	0.0%	36.6%	0	0.0%	31.8%	\$0	0.0%	42.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	1.2%	\$280	1.3%	2.9%	1	1.2%	2.3%	\$280	1.3%	2.0%
	Moderate	9	11.1%	\$1,341	6.2%	10.0%	9	11.1%	9.0%	\$1,341	6.2%	7.7%
	Middle	48	59.3%	\$11,810	54.4%	50.5%	48	59.3%	46.5%	\$11,810	54.4%	39.9%
	Upper	23	28.4%	\$8,281	38.1%	36.6%	23	28.4%	42.2%	\$8,281	38.1%	50.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>\$21,712</i>	<i>100.0%</i>	<i>100.0%</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,712</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2019 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2020					2020						
		Bank		Owner Occupied Units		Count	Bank		Dollar		Count	Dollar	
		Count	Dollar	%	#		%	%	%	%		%	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	2.4%	\$0	0.0%	1.4%	
	Moderate	12	16.9%	\$2,001	11.2%	12.6%	12	16.9%	11.5%	\$2,001	11.2%	8.1%	
	Middle	42	59.2%	\$10,652	59.8%	51.2%	42	59.2%	47.5%	\$10,652	59.8%	42.0%	
	Upper	17	23.9%	\$5,173	29.0%	33.7%	17	23.9%	38.5%	\$5,173	29.0%	48.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>71</i>	<i>100.0%</i>	<i>\$17,826</i>	<i>100.0%</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,826</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	0.9%	\$0	0.0%	0.5%	
	Moderate	14	16.7%	\$2,300	13.0%	12.6%	14	16.7%	7.3%	\$2,300	13.0%	5.1%	
	Middle	47	56.0%	\$8,690	49.0%	51.2%	47	56.0%	45.1%	\$8,690	49.0%	38.8%	
	Upper	23	27.4%	\$6,744	38.0%	33.7%	23	27.4%	46.7%	\$6,744	38.0%	55.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>84</i>	<i>100.0%</i>	<i>\$17,734</i>	<i>100.0%</i>	<i>100.0%</i>	<i>84</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,734</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.9%	\$0	0.0%	1.2%	
	Moderate	1	33.3%	\$60	16.7%	12.6%	1	33.3%	10.1%	\$60	16.7%	6.5%	
	Middle	0	0.0%	\$0	0.0%	51.2%	0	0.0%	40.2%	\$0	0.0%	37.4%	
	Upper	2	66.7%	\$299	83.3%	33.7%	2	66.7%	47.9%	\$299	83.3%	54.9%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$359</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$359</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTI FAMILY				Multi-Family Units									
	Low	0	0.0%	\$0	0.0%	10.5%	0	0.0%	14.6%	\$0	0.0%	6.1%	
	Moderate	1	100.0%	\$755	100.0%	32.2%	1	100.0%	32.1%	\$755	100.0%	14.9%	
	Middle	0	0.0%	\$0	0.0%	36.2%	0	0.0%	35.8%	\$0	0.0%	32.0%	
	Upper	0	0.0%	\$0	0.0%	20.7%	0	0.0%	17.5%	\$0	0.0%	47.0%	
	Unknown	0	0.0%	\$0	0.0%	0.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$755</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$755</i>	<i>100.0%</i>	<i>100.0%</i>		
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.2%	\$0	0.0%	0.6%	
	Moderate	0	0.0%	\$0	0.0%	12.6%	0	0.0%	5.9%	\$0	0.0%	3.5%	
	Middle	0	0.0%	\$0	0.0%	51.2%	0	0.0%	42.4%	\$0	0.0%	32.3%	
	Upper	0	0.0%	\$0	0.0%	33.7%	0	0.0%	50.5%	\$0	0.0%	63.6%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2020					2020					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	2.6%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	12.6%	0	0.0%	11.3%	\$0	0.0%	9.3%
	Middle	1	100.0%	\$31	100.0%	51.2%	1	100.0%	43.0%	\$31	100.0%	35.8%
	Upper	0	0.0%	\$0	0.0%	33.7%	0	0.0%	43.0%	\$0	0.0%	53.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$31</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.6%	\$0	0.0%	0.8%
	Moderate	0	0.0%	\$0	0.0%	12.6%	0	0.0%	12.9%	\$0	0.0%	10.1%
	Middle	0	0.0%	\$0	0.0%	51.2%	0	0.0%	59.0%	\$0	0.0%	55.8%
	Upper	0	0.0%	\$0	0.0%	33.7%	0	0.0%	26.5%	\$0	0.0%	33.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.7%	\$0	0.0%	1.2%
	Moderate	28	17.5%	\$5,116	13.9%	12.6%	28	17.5%	9.3%	\$5,116	13.9%	7.0%
	Middle	90	56.3%	\$19,373	52.8%	51.2%	90	56.3%	46.0%	\$19,373	52.8%	39.9%
	Upper	42	26.3%	\$12,216	33.3%	33.7%	42	26.3%	42.9%	\$12,216	33.3%	51.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>160</i>	<i>100.0%</i>	<i>\$36,705</i>	<i>100.0%</i>	<i>100.0%</i>	<i>160</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$36,705</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Home Purchase Loans

Of the 81 HMDA-reportable loans in 2019, 39 (48.1 percent) were home purchase loans. Lending in low-income census tracts at 2.6 percent was comparable to the percentage of owner-occupied units at 2.9 percent. Aggregate lending performance in low-income tracts was similar to the bank’s performance at 2.5 percent. The bank’s lending in moderate-income tracts at 15.4 percent was above the percentage of owner-occupied units in those tracts at 10.0 percent, and above aggregate performance of 10.0 percent.

Of the 160 loans HMDA-reportable loans in 2020, 71 (44.4 percent) were home purchase loans. SmartBank did not make any HMDA-reportable loans in low-income tracts. However, lending in moderate-income census tracts at 16.9 percent was above the percentage of owner-occupied units at 12.6 percent and above aggregate performance of 11.5 percent.

Home Refinance Loans

Refinance loans represented 44.4 percent of the total HMDA-reportable loans in 2019. The bank did not make any loans in low-income census tracts and only one in moderate-income tracts. The bank’s lending in moderate-income tracts at 2.8 percent was significantly below the percentage of owner-occupied units at 10.0 percent. Additionally, the bank was significantly below aggregate lenders at 7.1 percent.

Refinance loans represented 52.5 percent of the total HMDA-reportable loans in 2020. The bank did not make any loans in low-income census tracts. The bank’s lending in moderate-income tracts at 16.7 percent was above the percentage of owner-occupied units at 12.6 percent. Additionally, the bank was significantly above aggregate lenders at 7.3 percent.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income and business revenue size reflects adequate penetration among individuals of different income levels and businesses of different sizes. For this analysis, the distribution of HMDA-reportable lending to borrowers of different income levels and small business lending among businesses of different sizes was compared to available demographic information. Performance context information and aggregate lending data were considered in the evaluation.

Small Business Lending

Small business lending by business revenue size reflects adequate penetration among businesses of different sizes located throughout the assessment area. The following tables show the distribution of SmartBank small business loans, by revenue size for 2019 and 2020 within the Knoxville assessment area.

Small Business Loans by Business Revenue & Loan Size
Assessment Area: TN Knoxville

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2019					2019					
		Bank		Total			Count			Dollar		
	Revenue	Count		\$ (000s)		Businesses	#	%	%	Bank		Agg
		#	%	\$	%					\$ (000s)	%	
BUSINESS REVENUE	\$1million or Less	110	41.5%	\$18,107	35.3%	89.9%	110	41.5%	44.9%	\$18,107	35.3%	31.9%
	Over \$1 Million	145	54.7%	\$31,283	60.9%	9.5%	145	54.7%				
	Total Rev. available	255	96.2%	\$49,390	96.2%	99.4%	255	96.2%				
	Rev. Not Known	10	3.8%	\$1,942	3.8%	0.6%	10	3.8%				
	Total	265	100.0%	\$51,332	100.0%	100.0%	265	100.0%				
LOAN SIZE	\$100,000 or Less	152	57.4%	\$7,440	14.5%		152	57.4%	88.7%	\$7,440	14.5%	26.4%
	\$100,001 - \$250,000	53	20.0%	\$9,653	18.8%		53	20.0%	5.5%	\$9,653	18.8%	16.7%
	\$250,001 - \$1 Million	60	22.6%	\$34,239	66.7%		60	22.6%	5.8%	\$34,239	66.7%	56.9%
	Total	265	100.0%	\$51,332	100.0%		265	100.0%	100.0%	\$51,332	100.0%	100.0%
LOAN SIZE Rev. \$1 Mill or Less	\$100,000 or Less	68	61.8%	\$2,861	15.8%							
	\$100,001 - \$250,000	18	16.4%	\$3,218	17.8%							
	\$250,001 - \$1 Million	24	21.8%	\$12,028	66.4%							
	Total	110	100.0%	\$18,107	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2019 FFIEC Census Data and 2019 D&B Information

Small Business Loans by Business Revenue & Loan Size
Assessment Area: TN Knoxville

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2020					2020					
		Bank		Total		Businesses %	Count			Dollar		
Count #	%	\$ (000s) \$	%	Bank #	Agg %		Bank \$ (000s)	Agg \$ %				
BUSINESS REVENUE	\$1million or Less	79	12.5%	\$11,993	15.7%	90.3%	79	12.5%	39.5%	\$11,993	15.7%	23.9%
	Over \$1 Million	111	17.5%	\$19,290	25.2%	9.0%	111	17.5%				
	Total Rev. available	190	30.0%	\$31,283	40.9%	99.3%	190	30.0%				
	Rev. Not Known	444	70.0%	\$45,232	59.1%	0.7%	444	70.0%				
	Total	634	100.0%	\$76,515	100.0%	100.0%	634	100.0%				
LOAN SIZE	\$100,000 or Less	434	68.5%	\$15,137	19.8%		434	68.5%	82.6%	\$15,137	19.8%	25.2%
	\$100,001 - \$250,000	105	16.6%	\$17,459	22.8%		105	16.6%	9.8%	\$17,459	22.8%	21.9%
	\$250,001 - \$1 Million	95	15.0%	\$43,919	57.4%		95	15.0%	7.6%	\$43,919	57.4%	52.9%
	Total	634	100.0%	\$76,515	100.0%		634	100.0%	100.0%	\$76,515	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	42	53.2%	\$1,797	15.0%							
	\$100,001 - \$250,000	20	25.3%	\$3,801	31.7%							
	\$250,001 - \$1 Million	17	21.5%	\$6,395	53.3%							
	Total	79	100.0%	\$11,993	100.0%							

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2020 FFIEC Census Data and 2020 D&B Information

The table above shows 41.5 percent of bank’s loans were originated to businesses with revenue of \$1 million or less in 2019, although 89.9 percent of total businesses in the assessment area are small businesses. However, the bank’s lending was similar to aggregate lending performance at 44.9 percent. Additionally, a high volume (77.4 percent) of the bank’s loans were in the amount of \$250,000 or less, indicating a willingness to make smaller dollar loans that are typically requested by small businesses.

In 2020, the bank originated 634 small business loans, of which 79 (12.5 percent) were to businesses with revenue of \$1 million or less in the Knoxville assessment area, which was significantly less than the percentage of total businesses with a revenue of \$1 million or less (90.3 percent). The bank’s lending was also significantly below aggregate lending performance at 39.5 percent. However, revenue information was not known for 444 of the 634 loans and 437 of the loans with unknown revenue were PPP loans. Banks were not required to collect or report revenue information for PPP loans. As previously mentioned, the PPP loans were considered responsive to the needs of small businesses during the COVID-19 pandemic. If only loans with revenue available are considered, 41.6 percent of the bank’s loans were to businesses with revenue of \$1.0 million or less, which is consistent with the bank’s performance in 2019. Additionally, the percentage of loans made in amounts of \$250,000 or less (85.1 percent), shows the bank’s willingness to make small dollar loans to help meet the credit needs of businesses in the community.

Residential Real Estate (HMDA) Lending

The distribution of HMDA-reportable lending by borrower income is adequate throughout the assessment area. The following tables show the borrower distribution of SmartBank’s 2019 and 2020 HMDA-reportable loans by borrower income with the Knoxville assessment area. The tables include demographic information and a comparison of bank lending to aggregate lending.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2019					2019					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	
HOME PURCHASE	Low	1	2.6%	\$85	1.1%	20.6%	1	2.6%	5.8%	\$85	1.1%	2.9%
	Moderate	4	10.3%	\$804	10.4%	15.9%	4	10.3%	18.1%	\$804	10.4%	12.3%
	Middle	6	15.4%	\$855	11.1%	19.7%	6	15.4%	22.0%	\$855	11.1%	19.0%
	Upper	23	59.0%	\$5,267	68.1%	43.8%	23	59.0%	41.9%	\$5,267	68.1%	54.2%
	Unknown	5	12.8%	\$723	9.3%	0.0%	5	12.8%	12.2%	\$723	9.3%	11.6%
	<i>Total</i>	<i>39</i>	<i>100.0%</i>	<i>\$7,734</i>	<i>100.0%</i>	<i>100.0%</i>	<i>39</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,734</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	2.8%	\$110	1.0%	20.6%	1	2.8%	6.1%	\$110	1.0%	2.9%
	Moderate	7	19.4%	\$1,174	11.1%	15.9%	7	19.4%	14.2%	\$1,174	11.1%	8.9%
	Middle	6	16.7%	\$981	9.3%	19.7%	6	16.7%	19.4%	\$981	9.3%	15.4%
	Upper	20	55.6%	\$7,820	74.2%	43.8%	20	55.6%	42.2%	\$7,820	74.2%	53.4%
	Unknown	2	5.6%	\$452	4.3%	0.0%	2	5.6%	18.2%	\$452	4.3%	19.5%
	<i>Total</i>	<i>36</i>	<i>100.0%</i>	<i>\$10,537</i>	<i>100.0%</i>	<i>100.0%</i>	<i>36</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,537</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	6.4%	\$0	0.0%	3.8%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	13.3%	\$0	0.0%	9.6%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	18.9%	\$0	0.0%	14.1%
	Upper	2	66.7%	\$355	78.4%	43.8%	2	66.7%	57.3%	\$355	78.4%	67.4%
	Unknown	1	33.3%	\$98	21.6%	0.0%	1	33.3%	4.1%	\$98	21.6%	5.2%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$453</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$453</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	1.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	2.0%	\$0	0.0%	0.1%
	Upper	2	66.7%	\$888	29.7%	43.8%	2	66.7%	14.1%	\$888	29.7%	1.3%
	Unknown	1	33.3%	\$2,100	70.3%	0.0%	1	33.3%	82.8%	\$2,100	70.3%	98.7%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$2,988</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,988</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	6.9%	\$0	0.0%	3.3%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	10.8%	\$0	0.0%	5.9%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	19.8%	\$0	0.0%	13.1%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	58.5%	\$0	0.0%	73.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.9%	\$0	0.0%	3.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2019					Bank & Aggregate Lending Comparison 2019					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %						#	%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	9.6%	\$0	0.0%	3.8%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	13.0%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	22.0%	\$0	0.0%	16.5%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	48.8%	\$0	0.0%	57.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.6%	\$0	0.0%	14.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.4%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	15.9%	0	0.0%	1.1%	\$0	0.0%	0.9%
	Middle	0	0.0%	\$0	0.0%	19.7%	0	0.0%	0.4%	\$0	0.0%	0.7%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	1.5%	\$0	0.0%	3.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	96.6%	\$0	0.0%	95.3%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	2	2.5%	\$195	0.9%	20.6%	2	2.5%	5.9%	\$195	0.9%	2.7%
	Moderate	11	13.6%	\$1,978	9.1%	15.9%	11	13.6%	16.0%	\$1,978	9.1%	10.1%
	Middle	12	14.8%	\$1,836	8.5%	19.7%	12	14.8%	20.6%	\$1,836	8.5%	16.1%
	Upper	47	58.0%	\$14,330	66.0%	43.8%	47	58.0%	43.0%	\$14,330	66.0%	50.0%
	Unknown	9	11.1%	\$3,373	15.5%	0.0%	9	11.1%	14.4%	\$3,373	15.5%	21.2%
	<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>\$21,712</i>	<i>100.0%</i>	<i>100.0%</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$21,712</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2019 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2020					2020					
		Bank				Families by Family Income	Count			Dollar		
		Count	Dollar				Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	2	2.8%	\$198	1.1%	21.6%	2	2.8%	6.8%	\$198	1.1%	3.5%
	Moderate	10	14.1%	\$1,487	8.3%	16.2%	10	14.1%	20.1%	\$1,487	8.3%	14.0%
	Middle	14	19.7%	\$2,636	14.8%	19.6%	14	19.7%	21.7%	\$2,636	14.8%	19.2%
	Upper	37	52.1%	\$12,340	69.2%	42.6%	37	52.1%	40.9%	\$12,340	69.2%	53.5%
	Unknown	8	11.3%	\$1,165	6.5%	0.0%	8	11.3%	10.5%	\$1,165	6.5%	9.8%
	<i>Total</i>	<i>71</i>	<i>100.0%</i>	<i>\$17,826</i>	<i>100.0%</i>	<i>100.0%</i>	<i>71</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,826</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	3	3.6%	\$362	2.0%	21.6%	3	3.6%	3.9%	\$362	2.0%	1.9%
	Moderate	10	11.9%	\$1,293	7.3%	16.2%	10	11.9%	12.2%	\$1,293	7.3%	7.9%
	Middle	21	25.0%	\$3,287	18.5%	19.6%	21	25.0%	17.7%	\$3,287	18.5%	14.4%
	Upper	46	54.8%	\$11,745	66.2%	42.6%	46	54.8%	43.3%	\$11,745	66.2%	52.6%
	Unknown	4	4.8%	\$1,047	5.9%	0.0%	4	4.8%	22.9%	\$1,047	5.9%	23.2%
	<i>Total</i>	<i>84</i>	<i>100.0%</i>	<i>\$17,734</i>	<i>100.0%</i>	<i>100.0%</i>	<i>84</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$17,734</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	33.3%	\$139	38.7%	21.6%	1	33.3%	6.4%	\$139	38.7%	3.4%
	Moderate	1	33.3%	\$60	16.7%	16.2%	1	33.3%	12.9%	\$60	16.7%	8.2%
	Middle	1	33.3%	\$160	44.6%	19.6%	1	33.3%	19.7%	\$160	44.6%	15.4%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	57.1%	\$0	0.0%	69.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.0%	\$0	0.0%	3.5%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$359</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$359</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.7%	\$0	0.0%	0.1%
	Upper	1	100.0%	\$755	100.0%	42.6%	1	100.0%	16.1%	\$755	100.0%	2.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	83.2%	\$0	0.0%	97.5%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$755</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$755</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	4.2%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	13.2%	\$0	0.0%	8.2%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	16.1%	\$0	0.0%	10.6%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	63.4%	\$0	0.0%	76.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.2%	\$0	0.0%	2.6%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison					
		2020					2020					
		Bank		Dollar		Families by Family Income	Count		Dollar			
		Count	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Agg	
#	%			%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	8.1%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	16.0%	\$0	0.0%	10.2%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	22.7%	\$0	0.0%	15.1%
	Upper	1	100.0%	\$31	100.0%	42.6%	1	100.0%	45.3%	\$31	100.0%	66.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.8%	\$0	0.0%	5.5%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$31</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$31</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	21.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	99.5%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	6	3.8%	\$699	1.9%	21.6%	6	3.8%	5.2%	\$699	1.9%	2.5%
	Moderate	21	13.1%	\$2,840	7.7%	16.2%	21	13.1%	15.4%	\$2,840	7.7%	10.1%
	Middle	36	22.5%	\$6,083	16.6%	19.6%	36	22.5%	19.1%	\$6,083	16.6%	15.6%
	Upper	85	53.1%	\$24,871	67.8%	42.6%	85	53.1%	42.5%	\$24,871	67.8%	50.6%
	Unknown	12	7.5%	\$2,212	6.0%	0.0%	12	7.5%	17.8%	\$2,212	6.0%	21.2%
	<i>Total</i>	<i>160</i>	<i>100.0%</i>	<i>\$36,705</i>	<i>100.0%</i>	<i>100.0%</i>	<i>160</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$36,705</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Home Purchase Loans

As previously stated, home purchase loans represented 48.1 percent of the total HMDA-reportable loans. The bank’s lending to low-income borrower in 2019 at 2.6 percent was significantly less than the percentage of low-income families at 20.6 percent and aggregate lending at 5.8 percent. Similarly, the bank’s lending to moderate-income borrowers at 10.3 percent was less than the percentage of moderate-income families at 15.9 percent, and below aggregate lending at 18.1 percent.

In 2020, the bank’s lending to low-income borrowers at 2.8 percent was significantly less than the percentage of low-income families at 21.6 percent and below aggregate at 6.8 percent. The bank’s lending to moderate-income borrowers at 14.1 percent was slightly below to the percentage of moderate-income families at 16.2 percent, and below aggregate lenders at 20.1 percent.

Home Refinance Loans

In 2019, the bank only made one (2.8 percent) loan to a low-income borrower which was significantly less than demographic data (20.6 percent), and less than aggregate lenders at 6.1 percent. However, the bank’s lending to moderate-income borrowers at 19.4 percent was greater than the percentage of moderate-income families at 15.9 percent, and the bank outperformed aggregate lenders at 14.2 percent.

In 2020, the bank’s lending to low-income borrowers was significantly below the percentage of low-income families but was similar to aggregate lenders. The bank’s lending to moderate-income borrowers at 11.9 percent was below the percentage of moderate-income families at 16.2 percent but similar to aggregate lenders.

Community Development Lending

The bank made a low level of community development loans in the Knoxville assessment area given the bank's capacity, presence and available opportunity in the area, and performance in relation to peers. During the review period, the bank originated four community development loans totaling \$6.7 million. All of these loans were PPP loans greater than \$1.0 million made to small businesses located in LMI tracts.

INVESTMENT TEST

SmartBank made a significant level of qualified community development investments and donations in the Knoxville assessment area. The bank further exhibited good responsiveness to credit and community development needs in Knoxville, primarily in affordable housing. During the review period, the bank made seven investments inside the assessment area totaling \$8.2 million, or 57.3 percent of total investment activity for the state of Tennessee. This total was solely in new investments made during the review period, including three investments totaling \$8.0 million in municipal bonds, one investment totaling \$245,000 in a certificate of deposit in a minority-owned financial institution, and three donations totaling \$5,500.

The municipal bonds were issued to a local housing facility for the purpose of acquiring, constructing, and equipping LMI multifamily rental housing facilities in Knox County. The bonds were issued in connection with low-income housing tax credits (LIHTCs) and the Affordable Rental Development Program funding offered through the city of Knoxville. Two of the donations qualified as revitalization and stabilization and the remaining donation qualified as community services. Furthermore, one of the organizations benefiting from these donations was specifically highlighted by local community contacts as an impactful organization that creates LMI housing opportunities and improves access to funding for small businesses in the area.

SERVICE TEST

SmartBank's service test performance in the Knoxville assessment area is adequate.

Retail Services

SmartBank's delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area. The distribution of 6 branch offices as of December 31, 2020, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank had one office in a moderate-income tract in the Knoxville assessment area which represents 16.7 percent of offices in the assessment area. This is less than the households (22.8 percent) and businesses (18.7 percent) in LMI census tracts. The bank's record of opening and closing branches generally does not adversely affect the accessibility of its delivery systems, particularly to LMI geographies and/or LMI individuals. During the review period, the bank opened one branch in a moderate-income tract and one branch in a middle-income tract. The bank also closed one branch in a middle-income tract. Finally, the banking services and business hours do not vary in a way that inconveniences SmartBank's assessment areas, including low- and moderate-income geographies and individuals.

Geographic Distribution of Branches & ATMS
 Assessment Area: Assessment Area: TN Knoxville (2020)

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	Open	Closed	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	10	6.1%	5.2%	4.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	16.7%	1	0	1	1	1	Total	1	16.7%	0	0.0%	0	0	1	25.0%	1	0	30	18.4%	17.6%	14.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	3	50.0%	1	1	1	3	1	Total	3	50.0%	1	50.0%	0	0	2	50.0%	1	1	71	43.6%	48.1%	41.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	2	33.3%	0	0	2	2	1	Total	2	33.3%	1	50.0%	0	0	1	25.0%	0	0	47	28.8%	29.1%	39.4%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	5	3.1%	0.0%	0.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	6	100.0%	2	1	4	6	3	Total	6	100.0%	2	100.0%	0	0	4	100.0%	2	1	163	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

2020 FFIEC Census Data, 2020 D&B Info, and 2015 ACS Data
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

SmartBank provides an adequate level of community development services in the assessment area. During the review period, bank employees used their financial and technical expertise in 21 qualified service activities totaling 298.5 service hours throughout the assessment area. The majority of service hours (85.1 percent) involved bank staff serving on the boards or as committee members of organizations that provide housing and community services to LMI individuals. The remaining hours of service involved employees providing financial literacy to LMI children and teens. Organizations include food banks, homeless shelters, and nonprofits focused on improving the lives of primarily LMI children and families.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHATTANOOGA, TENNESSEE
ASSESSMENT AREA**

Overview

The Chattanooga assessment area includes Hamilton County, which is located in southeast Tennessee along the border of Tennessee and Georgia. The assessment area is part of the six-county Chattanooga, TN-GA MSA. As of December 31, 2020, SmartBank operated five branch offices in the assessment area. The bank's branch presence in the assessment area represents 14.7 percent of branches and 15.8 percent of deposits for the institution. In addition, the market represents 17.5 percent of the combined HMDA-reportable and CRA small business lending by number of loans for the institution.

Chattanooga is an active banking market. According to the June 30, 2020 FDIC Summary of Deposits Report, there are 19 financial institutions operating 103 branch locations in the assessment area with \$9.9 billion in total deposits. SmartBank is ranked 7th in the market with 4.1 percent of deposits (\$403.1 million). First Horizon Bank had the largest deposit market share at 28.0 percent, followed by Truist Bank with 20.0 percent.

SmartBank is not a significant HMDA lender in this assessment area, originating less than one percent of HMDA-reportable loans in both 2019 and 2020. The top three HMDA lenders in 2019 were SunTrust Bank, Movement Mortgage, and Regions Bank while the 2020 top lenders were Quicken Loans, Movement Mortgage, and Truist Bank. In contrast, SmartBank is a more pronounced CRA small business lender in the assessment area. SmartBank ranked 8th out of 82 CRA reporters in 2019 with 3.8 percent of CRA-reportable loans. In 2020, SmartBank ranked 4th out of 102 CRA reporters, with 9.5 percent of CRA-reportable loans. JPMorgan Chase was the top CRA lender in the market for 2019, followed by Pinnacle Bank and SunTrust Bank. In 2020, Pinnacle Bank was the top CRA lender in the market, followed by First Horizon Bank and Truist Bank.

Population and Income Characteristics

According to 2019 census data, the population of the Chattanooga assessment area was estimated at approximately 367,804 people, experiencing a population growth of 9.3 percent from 2010 to 2019.¹⁶

According to 2020 FFIEC data, which uses 2015 American Community Survey (ACS) data, the assessment area is made up of 82 census tracts: 10 tracts are low-income (12.2 percent), 12 tracts are moderate-income (14.6 percent), 31 tracts are middle-income (37.8 percent), 27 tracts are upper-income (32.9 percent), and 2 tracts have unknown income (2.4 percent). LMI census tracts are largely concentrated to the south and east of the Tennessee River, in and around the city of Chattanooga.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Chattanooga, TN-GA MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA increased from \$70,100 in 2019 to \$72,600 in 2020. The 2020 FFIEC data further indicates that 37.2 percent of families in the assessment area are considered low- to moderate-income.

¹⁶ "U.S. Census Bureau Quickfacts: Hamilton County, Tennessee." *Census*, 26 Mar 2020.
www.census.gov/quickfacts/fact/table/hamiltoncountytennessee/PST045219. Accessed 9 Sept. 2021.

Borrower Income Levels
Chattanooga, TN-GA MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2019	\$70,100	0 - \$35,049	\$35,050 - \$56,079	\$56,080 - \$84,119	\$84,120 - & above
2020	\$72,600	0 - \$36,299	\$36,300 - \$58,079	\$58,080 - \$87,119	\$87,120 - & above

The 2020 FFIEC data also shows that, as a percentage, families living below poverty in the assessment area (11.3 percent) is below the state of Tennessee figure of 13.2 percent. Additionally, between the five-year periods of 2010-2014 and 2015-2019, Hamilton County had a steep decline in the percentage of families living in poverty (28.2 percent), especially when compared to the state of Tennessee decline of 14.7 percent.¹⁷ While overall poverty rates for the assessment area compare favorably to state figures currently and over time, 2020 FFIEC data also shows that the largest volume of families living below the poverty level are found in middle-income geographies (32.4 percent). Furthermore, 45.1 percent of families living in low-income census tracts in the assessment area live below the poverty level, and 17.6 percent of families living in moderate-income census tracts live below the poverty level. As described, poverty levels for the overall assessment area are improving, but poverty remains a significant barrier for families residing in LMI census tracts.

Demographic Data by Census Tracts

The following table presents key demographic and business information used to help develop a performance context for the assessment area for the year 2020. The data reflects 2020 FFIEC census data and 2020 Dun & Bradstreet data used to analyze the bank’s CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

¹⁷ Hamilton, TN (U.S. Census). *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 13 Sept. 2021.

Combined Demographics Report

Assessment Area: TN Chattanooga

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	10	12.2	6,571	7.4	2,965	45.1	17,866	20.2
Moderate-income	12	14.6	11,551	13	2,034	17.6	15,075	17
Middle-income	31	37.8	32,204	36.3	3,253	10.1	16,734	18.9
Upper-income	27	32.9	38,303	43.2	1,783	4.7	38,954	44
Unknown-income	2	2.4	0	0	0	0	0	0
Total Assessment Area	82	100.0	88,629	100.0	10,035	11.3	88,629	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	14,399	3,725	4.2	25.9	7,893	54.8	2,781	19.3
Moderate-income	22,544	10,286	11.7	45.6	9,143	40.6	3,115	13.8
Middle-income	57,453	32,675	37.2	56.9	18,502	32.2	6,276	10.9
Upper-income	59,334	41,236	46.9	69.5	12,859	21.7	5,239	8.8
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	153,730	87,922	100.0	57.2	48,397	31.5	17,411	11.3
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,599	8.2	1,334	7.4	259	16.5	6	4.5
Moderate-income	2,944	15	2,620	14.6	309	19.7	15	11.2
Middle-income	7,050	35.9	6,500	36.3	510	32.5	40	29.9
Upper-income	7,987	40.7	7,440	41.5	477	30.4	70	52.2
Unknown-income	36	0.2	18	0.1	15	1	3	2.2
Total Assessment Area	19,616	100.0	17,912	100.0	1,570	100.0	134	100.0
Percentage of Total Businesses:				91.3		8.0		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	5	3.9	5	3.9	0	0	0	0
Moderate-income	16	12.4	16	12.4	0	0	0	0
Middle-income	41	31.8	41	31.8	0	0	0	0
Upper-income	67	51.9	67	51.9	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	129	100.0	129	100.0	0	.0	0	.0
Percentage of Total Farms:				100.0		.0		.0

2020 FFIEC Census Data and 2020 D&B Information

Housing Characteristics

According to 2020 FFIEC data, there were 153,730 housing units located in the assessment area, of which 57.2 percent were owner-occupied, 31.5 percent were rental units, and 11.3 percent were vacant. While a majority of units were owner-occupied, a disproportionately higher percentage of housing units in LMI tracts were rental units or vacant. In low-income census tracts, 74.1 percent of all housing units were rentals or vacant and 54.4 percent of all housing units were rentals and vacant in moderate-income tracts. The median age of the housing stock was 46 years, though the median age of housing was older in low- and moderate-income tracts, at 61 years and 57 years, respectively. These factors suggest that limited HMDA-reportable lending opportunities may be present in the low- and moderate-income tracts.

Partially driven by the lowest mortgage rates in three years, home sales in Chattanooga rose in July 2019 by 9.6 percent over the previous year, even though the median price of homes sold increased 12.7 percent in the previous twelve months to an all-time high.¹⁸ The typical Chattanooga single-family home sold in July 2019 was priced at \$210,250, up \$23,750 from a year earlier.¹⁹ Despite the increase in local home prices, the median price of a typical home in Chattanooga was still nearly 30 percent below the U.S. level.²⁰ However, housing affordability is an issue throughout the assessment area, to varying degrees. For a family of four earning 50.0 percent of AMI between 2014 and 2018, only 17.7 percent of housing in the assessment area is affordable.²¹ For a family of four earning 80.0 percent of AMI between 2014 and 2018, only 38.4 percent of housing in the assessment area is affordable. This is an indication that fewer homeownership options exist for low- and moderate-income borrowers in Hamilton County²².

Economic and Employment Conditions

Since 2008, the Greater Chattanooga Region has attracted more than \$6.0 billion in foreign direct investments, with its target sectors being automotive, advanced manufacturing, food and beverage production and back office.²³ The region attributes growth in automotive manufacturing to its economic incentives including a Foreign Trade Zone, a large pool of skilled manufacturing workers and low-cost utilities. Chattanooga has a favorable logistical location at the cross section of three major interstates and within proximity to four large metropolitan cities.²⁴ From 2016 to 2020, there were approximately 169 business investment projects in the region, totaling \$4.8 billion in new investments and approximately 13,612 new jobs.²⁵ Top employers in Chattanooga by largest number of employees include Erlanger Health System, BlueCross BlueShield of Tennessee, Hamilton County Schools, Tennessee Valley Authority, McKee Food Corp, Unum, and Volkswagen of America.²⁶

In terms of economic conditions for small businesses, Moody's notes that positive net migration, favorable tax structure, low business costs and municipally owned ultra-high-speed internet service have bolstered entrepreneurship in Chattanooga, particularly in the technology industry.²⁷ Correspondingly, Moody's asserts that

¹⁸ Flessner, Dave. "Chattanooga area's home sales rise as mortgage rates fall." *Chattanooga Times Free Press (TN)*, sec. Business, 15 Aug. 2019. P.C1. *NewsBank: America's News*, infoweb.newsbank.com/apps/news/document-view?p=NewsBank&docref=news/1755440425E4D9F8. Accessed 14 Sept. 2021.

¹⁹ Ibid.

²⁰ Ibid.

²¹ Hamilton, TN (U.S. Census). *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 13 Sept. 2021.

²² Ibid.

²³ "Target Sectors." Greater Chattanooga Economic Partnership, n.d. Web 13 Sept. 2021. www.greaterchatt.com/target-sectors/

²⁴ "Automotive Manufacturing: Why are automotive manufacturing companies choosing the Greater Chattanooga Region?" Greater Chattanooga Economic Partnership, n.d. Web 13 Sept. 2021. www.greaterchatt.com/target-sectors/automotive-manufacturing

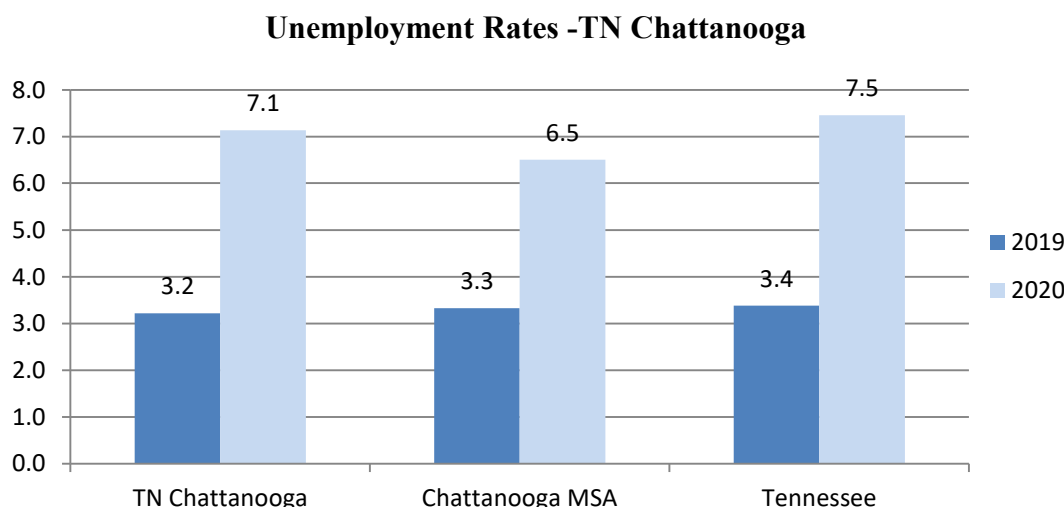
²⁵ "Insider Report." Greater Chattanooga Economic Partnership, n.d. Web. 13 Sept. 2021. www.greaterchatt.com/about-gcep/insider-report/

²⁶ Morrison, Chloe. "The 10 Largest Employers in Chattanooga, TN." *Nooga Today*, 18 Sep. 2019. noogatoday.6amcity.com/ten-largest-employers-chattanooga-tn/. Accessed 13 Sept. 2021.

²⁷ Precip U.S. Metro. Chattanooga-TN-GA. Moody's Analytics, January 2018. n.d. Web. 18 Jan. 2019. www.moodyanalytics.com/

the startup culture fuels middle to high wage job gains to boost the region’s economy. According to 2020 Dun & Bradstreet information, there were 19,616 businesses within the Chattanooga assessment area, 91.3 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Additionally, the vast majority of small businesses in the assessment area are located in middle- and upper-income tracts, with only 14.6 percent and 7.4 percent of small businesses being located in moderate- and low-income tracts, respectively. As described, these figures are indicative of a thriving small business sector in the assessment area. However, small businesses are disproportionately concentrated outside of LMI areas.

As shown in the following chart, the unemployment rate in the Chattanooga assessment area rose sharply from 3.2 percent in 2019 to 7.1 percent in 2020. As shown, this was less than the Tennessee unemployment rate of 7.5 percent for 2020. However, unemployment rates in the Chattanooga assessment area exceeded the national unemployment rate of 6.7 percent in December 2020.²⁸



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

Credit and Community Development Needs

To better understand the local community development and economic landscapes, individuals familiar with the community and with community development activities were contacted. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs through lending, investment, and/or service activities.

Based on information obtained from a community contact specializing in affordable housing, lack of funding for housing programs is the primary obstacle in providing affordable housing for LMI residents. Per the contact, mismanagement and decreases in funding have led to the shuttering of several housing non-profits. By the contact’s estimates, funding from Housing and Urban Development’s Home Program decreased from around \$20.0 million in former years, to around \$2.0 to \$2.5 million in recent years. Another concern facing affordable housing is the lack of contractors available to complete affordable home development and roof replacement projects. Many contractors have either gone out of business or chosen to work primarily on new home construction that is geared towards wealthier residents. With regards to general banking and credit needs, the

²⁸ “BLS Data Viewer.” U.S. Bureau of Labor Statistics, n.d. Web. 18 Mar. 2021.
beta.bls.gov/dataViewer/view/timeseries/LNS14000000

contact stated that many residents from low- and moderate-income neighborhoods are unbanked and utilize check-cashing facilities and payday lenders. There is a need for low interest/low fee small dollar consumer loans and affordable products that help individuals re-establish credit. Banks could offer these products directly or in partnership with local nonprofits. The mortgage products of highest need in the area include small dollar, low-cost mortgage loans for home repairs, home purchase products that also include additional financing for repairs, home purchase loans, and down payment assistance programs. The contact said affordable housing stock in the city, especially in low-income areas, is older and many homes need updating and repairs, which further underscores the need for small dollar, affordable home mortgage products. Finally, the contact noted that there are a number of opportunities to partner with nonprofit organizations doing impactful work in Chattanooga.

Based on information obtained from a contact specializing in local economic development, lack of adequate staff to assist with technical assistance is one of the primary barriers in serving the needs of start-ups and small businesses. Generally, technical assistance ranges from assisting clients in obtaining permits/licenses and providing financial education to helping entrepreneurs and businesses build strategic plans and set up various accounting tools. The contact emphasized the need for small dollar business loans (under \$50,000) to assist business start-ups and early-stage businesses seeking to grow their operations. Although the contact believes the Chattanooga area is generally small business friendly, a number of barriers were noted for business startups. First, smaller businesses have difficulty raising equity (usually collateral) to access capital for business expansion. Additionally, entrepreneurs and new start-up businesses don't always have a full understanding of how credit (especially commercial credit) works (i.e., the importance of financial statements, business strategies, debt servicing ratios, etc.).

With regards to housing, this contact noted that recent gentrification in the low-income communities is resulting in rising home prices and displacement of LMI families in these areas. Additionally, the contact discussed opportunities for participation by local financial institutions, stating that local CDFIs and other non-profits would benefit from loans and investments from banks. Banks could also help organize and administer a revolving micro loan fund. In addition, there are opportunities for banks to lend their staff resources for financial literacy programs and one-on-one small business counseling. The contact also mentioned Tax Increment Financing (TIF) and Payment in Lieu of Tax (PILOT) opportunities.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHATTANOOGA, TENNESSEE ASSESSMENT AREA

LENDING TEST

SmartBank's lending in the Chattanooga assessment area reflects good responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area, and the distribution of loans by borrower income and business revenue reflects good penetration among customers of different income levels and businesses of different sizes. The bank made a relatively high level of community development loans within the assessment area.

Lending Activity

The lending analysis for 2019 was based on 150 small business and 109 HMDA-reportable loans made in the assessment area, and the analysis for 2020 was based on 624 small business and 95 HMDA-reportable loans. Greater weight was placed on small business lending, as the volume of small business loans was greater than HMDA-reportable loans. The Chattanooga assessment area accounted for 26.9 percent of SmartBank's total small business lending and 25.8 percent of total HMDA-reportable lending by dollar volume in Tennessee during the review period. In comparison, 21.9 percent of the bank's Tennessee deposits are in the Chattanooga assessment area.

Geographic Distribution of Loans

Based on the following analysis, the overall geographic distribution of the bank’s small business and HMDA-reportable loans reflects good penetration throughout the bank’s assessment area and does not reveal any unexplained gaps in lending patterns. For this analysis, the geographic distribution of small business loans and HMDA-reportable loans was compared to demographic information. Performance context information and aggregate lending data were also considered in the evaluation. For instance, unemployment rates, poverty rates, the level of owner-occupied units, and the volume of small businesses in low- and moderate-income census tracts were considered when assessing the bank’s lending performance.

Small Business Lending

The geographic distribution of small business loans reflects good dispersion throughout the assessment area. The following table shows the distribution of small business loans as a percentage of the total number of loans within its Chattanooga assessment area and also includes a comparison of the bank’s small business lending to the aggregate lenders within the assessment area. The CRA aggregate lenders’ data are the combined total of lending activity reported by all lenders subject to CRA loan data reporting requirements in the assessment area.

Geographic Distribution of Small Business Loans

Assessment Area: TN Chattanooga

Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
					Total Businesses %	2019						2020					
	Count		Bank			Bank	Agg	Dollar		Bank	Agg	Count		Dollar			
	#	%	\$ (000s)	\$ %				#	%			\$ %	\$ %	#	%	\$ %	\$ %
Low	81	10.5%	\$12,042	12.9%	8.2%	21	14.0%	10.1%	\$4,655	14.3%	15.4%	60	9.6%	9.7%	\$7,387	12.2%	13.8%
Moderate	112	14.5%	\$15,363	16.5%	15.0%	23	15.3%	13.4%	\$5,834	17.9%	12.7%	89	14.3%	13.5%	\$9,529	15.7%	14.5%
Middle	263	34.0%	\$31,110	33.4%	35.9%	53	35.3%	34.2%	\$12,576	38.6%	35.0%	210	33.7%	35.0%	\$18,534	30.6%	35.4%
Upper	316	40.8%	\$34,079	36.6%	40.7%	53	35.3%	40.7%	\$9,538	29.3%	36.3%	263	42.1%	41.3%	\$24,541	40.5%	36.0%
Unknown	2	0.3%	\$537	0.6%	0.2%	0	0.0%	0.2%	\$0	0.0%	0.3%	2	0.3%	0.2%	\$537	0.9%	0.3%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.3%	\$0	0.0%	0.3%	0	0.0%	0.3%	\$0	0.0%	0.1%
Total	774	100.0%	\$93,131	100.0%	100.0%	150	100.0%	100.0%	\$32,603	100.0%	100.0%	624	100.0%	100.0%	\$60,528	100.0%	100.0%

Originations & Purchases
 2020 FFIEC Census Data and 2020 D&B Information

In 2019, SmartBank originated 150 small business loans inside the Chattanooga assessment area. With 21 small business loans (14.0 percent) originated in low-income census tracts, the bank exceeded the 8.2 percent of small businesses located in these tracts. The bank’s lending in low-income tracts was above aggregate at 10.1 percent. The bank’s lending in moderate-income tracts was above the percentage of small businesses located in moderate-income tracts and slightly above the aggregate lending in the area.

In 2020, SmartBank originated significantly more small business loans inside the assessment area with 624 loans. 60 loans (9.6 percent) were originated in low-income census tracts which was slightly above the 8.2 percent of small businesses located in these tracts. The bank’s lending in low-income tracts was similar to aggregate at 9.7 percent. The bank’s lending to moderate-income tracts at 14.3 percent was similar to the percentage of small businesses located in moderate-income tracts and slightly above aggregate lending at 13.5 percent.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects good penetration throughout the assessment area. The following tables show the geographic distribution of SmartBank’s HMDA-reportable loans for 2019 and 2020 within its Chattanooga assessment area and includes a comparison of the bank’s HMDA-reportable lending to the aggregate HMDA lenders within the assessment area. The HMDA aggregate lenders’ data are the combined total of lending activity reported by all lenders subject to HMDA in the MSA section of the assessment area.

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	7	7.4%	\$564	2.8%	4.2%	4	8.0%	4.1%	\$323	2.9%	2.8%	3	6.8%	3.2%	\$241	2.6%	2.5%
	Moderate	15	16.0%	\$1,888	9.3%	11.7%	8	16.0%	10.1%	\$977	8.9%	6.7%	7	15.9%	10.6%	\$911	9.7%	7.5%
	Middle	33	35.1%	\$4,989	24.6%	37.2%	19	38.0%	36.7%	\$2,963	27.1%	32.9%	14	31.8%	36.2%	\$2,026	21.7%	31.9%
	Upper	39	41.5%	\$12,856	63.3%	46.9%	19	38.0%	49.2%	\$6,688	61.1%	57.5%	20	45.5%	50.0%	\$6,168	66.0%	58.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	94	100.0%	\$20,297	100.0%	100.0%	50	100.0%	100.0%	\$10,951	100.0%	100.0%	44	100.0%	100.0%	\$9,346	100.0%	100.0%
REFINANCE	Low	2	2.6%	\$237	1.3%	4.2%	1	2.7%	2.3%	\$111	1.1%	1.7%	1	2.5%	2.1%	\$126	1.7%	1.6%
	Moderate	14	18.2%	\$1,683	9.6%	11.7%	9	24.3%	8.8%	\$1,061	10.2%	5.2%	5	12.5%	6.9%	\$622	8.6%	4.5%
	Middle	28	36.4%	\$4,720	26.8%	37.2%	9	24.3%	35.3%	\$1,882	18.2%	30.9%	19	47.5%	33.6%	\$2,838	39.2%	29.9%
	Upper	33	42.9%	\$10,944	62.2%	46.9%	18	48.6%	53.6%	\$7,299	70.5%	62.2%	15	37.5%	57.4%	\$3,645	50.4%	63.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	77	100.0%	\$17,584	100.0%	100.0%	37	100.0%	100.0%	\$10,353	100.0%	100.0%	40	100.0%	100.0%	\$7,231	100.0%	100.0%
HOME IMPROVEMENT	Low	2	33.3%	\$131	29.5%	4.2%	1	25.0%	3.7%	\$30	9.6%	1.8%	1	50.0%	3.2%	\$101	76.5%	3.3%
	Moderate	1	16.7%	\$72	16.2%	11.7%	1	25.0%	9.7%	\$72	23.1%	7.9%	0	0.0%	6.2%	\$0	0.0%	4.4%
	Middle	3	50.0%	\$241	54.3%	37.2%	2	50.0%	34.6%	\$210	67.3%	33.1%	1	50.0%	32.3%	\$31	23.5%	28.8%
	Upper	0	0.0%	\$0	0.0%	46.9%	0	0.0%	52.1%	\$0	0.0%	57.2%	0	0.0%	58.4%	\$0	0.0%	63.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	6	100.0%	\$444	100.0%	100.0%	4	100.0%	100.0%	\$312	100.0%	100.0%	2	100.0%	100.0%	\$132	100.0%	100.0%
MULTI FAMILY	Multi-Family Units						Low	8	29.6%	\$4,376	19.9%	16.1%	6	33.3%	12.2%	\$2,846	21.7%	4.1%
	Moderate	13	48.1%	\$12,076	54.8%	15.2%	8	44.4%	25.6%	\$6,876	52.5%	18.3%	5	55.6%	20.2%	\$5,200	58.2%	6.0%
	Middle	2	7.4%	\$836	3.8%	35.3%	1	5.6%	36.7%	\$600	4.6%	30.7%	1	11.1%	48.3%	\$236	2.6%	51.8%
	Upper	4	14.8%	\$4,743	21.5%	33.3%	3	16.7%	25.6%	\$2,767	21.1%	47.0%	1	11.1%	15.7%	\$1,976	22.1%	37.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	27	100.0%	\$22,031	100.0%	100.0%	18	100.0%	100.0%	\$13,089	100.0%	100.0%	9	100.0%	100.0%	\$8,942	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	3.4%	\$0	0.0%	1.7%	0	0.0%	1.9%	\$0	0.0%	2.3%
	Moderate	0	0.0%	\$0	0.0%	11.7%	0	0.0%	5.6%	\$0	0.0%	2.1%	0	0.0%	6.0%	\$0	0.0%	2.6%
	Middle	0	0.0%	\$0	0.0%	37.2%	0	0.0%	33.3%	\$0	0.0%	29.4%	0	0.0%	31.9%	\$0	0.0%	23.7%
	Upper	0	0.0%	\$0	0.0%	46.9%	0	0.0%	57.7%	\$0	0.0%	66.8%	0	0.0%	60.2%	\$0	0.0%	68.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	3.4%	\$0	0.0%	4.3%	0	0.0%	0.8%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	11.7%	0	0.0%	12.8%	\$0	0.0%	6.4%	0	0.0%	9.8%	\$0	0.0%	3.9%
	Middle	0	0.0%	\$0	0.0%	37.2%	0	0.0%	35.1%	\$0	0.0%	32.7%	0	0.0%	39.0%	\$0	0.0%	30.6%
	Upper	0	0.0%	\$0	0.0%	46.9%	0	0.0%	48.6%	\$0	0.0%	56.6%	0	0.0%	50.4%	\$0	0.0%	65.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	4.2%	0	0.0%	5.6%	\$0	0.0%	3.0%	0	0.0%	5.3%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	11.7%	0	0.0%	19.7%	\$0	0.0%	15.1%	0	0.0%	17.1%	\$0	0.0%	11.1%
	Middle	0	0.0%	\$0	0.0%	37.2%	0	0.0%	37.6%	\$0	0.0%	33.4%	0	0.0%	38.4%	\$0	0.0%	34.8%
	Upper	0	0.0%	\$0	0.0%	46.9%	0	0.0%	37.1%	\$0	0.0%	48.5%	0	0.0%	39.2%	\$0	0.0%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	19	9.3%	\$5,308	8.8%	4.2%	12	11.0%	3.5%	\$3,310	9.5%	2.6%	7	7.4%	2.7%	\$1,998	7.8%	2.2%
	Moderate	43	21.1%	\$15,719	26.0%	11.7%	26	23.9%	9.7%	\$8,986	25.9%	7.5%	17	17.9%	8.6%	\$6,733	26.2%	5.9%
	Middle	66	32.4%	\$10,786	17.9%	37.2%	31	28.4%	36.0%	\$5,655	16.3%	32.1%	35	36.8%	34.8%	\$5,131	20.0%	32.0%
	Upper	76	37.3%	\$28,543	47.3%	46.9%	40	36.7%	50.8%	\$16,754	48.3%	57.8%	36	37.9%	54.0%	\$11,789	46.0%	59.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	204	100.0%	\$60,356	100.0%	100.0%	109	100.0%	100.0%	\$34,705	100.0%	100.0%	95	100.0%	100.0%	\$25,651	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Home Purchase Loans

Of the 109 HMDA-reportable loans in 2019, 50 (45.9 percent) were home purchase loans. Lending in low-income census tracts at 8.0 percent was significantly above the percentage of owner-occupied units at 4.2 percent. The bank was significantly above aggregate lending performance in low-income tracts at 4.1 percent. The bank's lending in moderate-income tracts at 16.0 percent was also above the percentage of owner-occupied units in those tracts at 11.7 percent, and above aggregate performance of 10.1 percent.

Of the 95 loans HMDA-reportable loans in 2020, 44 (46.3 percent) were home purchase loans. Lending in low-income census tracts at 6.8 percent was above the percentage of owner-occupied units at 4.2 percent. Additionally, the bank was significantly above aggregate lending performance in low-income tracts at 3.2 percent. Lending in moderate-income census tracts at 15.9 percent was above the percentage of owner-occupied units in 11.7 percent and above aggregate performance of 10.6 percent.

Home Refinance Loans

Refinance loans represented 33.9 percent of the total HMDA-reportable loans in 2019. The bank made one loan in a low-income census tract. SmartBank was significantly below the percentage of owner-occupied units at 4.2 percent. However, the bank's lending was comparable to the aggregate. The bank's lending in moderate-income tracts at 24.3 percent was significantly above the percentage of owner-occupied units at 11.7 percent. Additionally, the bank was significantly above aggregate lenders at 8.8 percent.

Similar to 2019, the bank made one loan in 2020 in a low-income tract. The bank's home refinance lending in 2020 at 2.5 percent was below the percentage of owner-occupied units at 4.2 percent. The bank was comparable to aggregate lending performance in low-income tracts at 2.1 percent. Refinance lending for moderate-income tracts was good at 12.5 percent compared to the percentage of owner-occupied units at 11.7 percent. The bank was also above aggregate lenders at 6.9 percent.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income and business revenue size reflects good penetration among individuals of different income levels and businesses of different sizes. For this analysis, the distribution of HMDA lending to borrowers of different income levels and small business lending among businesses of different sizes was compared to available demographic information. Performance context information and aggregate lending data were considered in the evaluation.

Small Business Lending

Small business lending by business revenue size reflects good penetration among businesses of different sizes located throughout the assessment area. The following table shows the distribution of SmartBank small business loans, by revenue size for 2019 and 2020 within the Chattanooga assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TN Chattanooga

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison												
						2019						2020						
	Bank		Total Businesses			Count		Dollar				Count		Dollar				
	Count		Dollar	\$ %	%	Bank	Agg	Bank	Agg	\$ %	#	%	Agg	Bank	Agg	\$ %		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1million or Less	156	20.2%	\$28,105	30.2%	91.3%	91	60.7%	42.2%	\$15,322	47.0%	30.1%	65	10.4%	37.5%	\$12,783	21.1%	26.3%
	Over \$1 Million	101	13.0%	\$30,052	32.3%	8.0%	56	37.3%				45	7.2%					
	Total Rev. available	257	33.2%	\$58,157	62.5%	99.3%	147	98.0%				110	17.6%					
	Rev. Not Known	517	66.8%	\$34,974	37.6%	0.7%	3	2.0%				514	82.4%					
	Total	774	100.0%	\$93,131	100.0%	100.0%	150	100.0%				624	100.0%					
LOAN SIZE	\$100,000 or Less	550	71.1%	\$17,876	19.2%		77	51.3%	86.7%	\$3,611	11.1%	22.8%	473	75.8%	80.2%	\$14,265	23.6%	21.6%
	\$100,001 - \$250,000	119	15.4%	\$19,122	20.5%		30	20.0%	6.7%	\$4,985	15.3%	18.9%	89	14.3%	10.7%	\$14,137	23.4%	21.5%
	\$250,001 - \$1 Million	105	13.6%	\$56,133	60.3%		43	28.7%	6.7%	\$24,007	73.6%	58.3%	62	9.9%	9.1%	\$32,126	53.1%	56.9%
	Total	774	100.0%	\$93,131	100.0%		150	100.0%	100.0%	\$32,603	100.0%	100.0%	624	100.0%	100.0%	\$60,528	100.0%	100.0%
	Rev \$1 Mill or Less	85	54.5%	\$3,890	13.8%													
LOAN SIZE	\$100,001 - \$250,000	38	24.4%	\$6,423	22.9%													
	\$250,001 - \$1 Million	33	21.2%	\$17,792	63.3%													
	Total	156	100.0%	\$28,105	100.0%													

Originations & Purchases
 Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
 2020 FFIEC Census Data and 2020 D&B Information

The table above shows that in 2019, 60.7 percent of the small lending was to businesses with revenue of \$1 million or less, which is less than the percentage of total businesses considered small businesses in the assessment area (91.3 percent) but well above aggregate lending performance at 42.2 percent. In 2020, the bank made just 10.4 percent of loans to businesses with a revenue of \$1 million, which is again less than the percentage of small businesses and less than aggregate lenders at 37.5 percent.

Revenue information was not known for 514 of the 624 loans originated in 2020. All of these loans with unknown revenue were PPP loans and banks were not required to collect or report revenue information for these loans. As previously mentioned, the PPP loans were considered responsive to the needs of small businesses during the COVID-19 pandemic. If only loans with revenue available are considered, 59.1 percent of the bank’s loans were to businesses with revenue of \$1.0 million or less, which is consistent with the bank’s performance in 2019. Additionally, the percentage of loans made in 2020 in amounts of \$250,000 or less (90.1 percent) shows the bank’s willingness to make small dollar loans to help meet the credit needs of businesses in the community.

Residential Real Estate (HMDA) Lending

The distribution of HMDA lending by borrower income is poor throughout the assessment area. The following tables show the borrower distribution of SmartBank’s 2019 and 2020 HMDA-reportable loans by borrower income with the Chattanooga assessment area. The tables include demographic information and a comparison of bank lending to aggregate lending.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Chattanooga

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Count		Bank		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	Agg	\$ (000s)	\$ %	Agg	
HOME PURCHASE	Low	4	4.3%	\$462	2.3%	20.2%	1	2.0%	6.5%	\$52	0.5%	3.4%	3	6.8%	6.5%	\$410	4.4%	3.5%
	Moderate	9	9.6%	\$1,405	6.9%	17.0%	6	12.0%	19.3%	\$854	7.8%	13.4%	3	6.8%	20.6%	\$551	5.9%	15.2%
	Middle	13	13.8%	\$2,729	13.4%	18.9%	5	10.0%	20.0%	\$789	7.2%	18.1%	8	18.2%	22.4%	\$1,940	20.8%	20.6%
	Upper	46	48.9%	\$13,164	64.9%	44.0%	26	52.0%	41.5%	\$7,627	69.6%	53.4%	20	45.5%	40.8%	\$5,537	59.2%	51.6%
	Unknown	22	23.4%	\$2,537	12.5%	0.0%	12	24.0%	12.7%	\$1,629	14.9%	11.8%	10	22.7%	9.7%	\$908	9.7%	9.1%
	Total	94	100.0%	\$20,297	100.0%	100.0%	50	100.0%	100.0%	\$10,951	100.0%	100.0%	44	100.0%	100.0%	\$9,346	100.0%	100.0%
REFINANCE	Low	2	2.6%	\$160	0.9%	20.2%	1	2.7%	7.4%	\$60	0.6%	3.8%	1	2.5%	4.3%	\$100	1.4%	2.1%
	Moderate	8	10.4%	\$1,069	6.1%	17.0%	4	10.8%	14.8%	\$378	3.7%	10.0%	4	10.0%	13.1%	\$691	9.6%	8.6%
	Middle	7	9.1%	\$1,104	6.3%	18.9%	4	10.8%	19.4%	\$764	7.4%	16.9%	3	7.5%	18.3%	\$340	4.7%	15.2%
	Upper	37	48.1%	\$11,695	66.5%	44.0%	20	54.1%	36.3%	\$7,580	73.2%	45.6%	17	42.5%	41.4%	\$4,115	56.9%	51.6%
	Unknown	23	29.9%	\$3,556	20.2%	0.0%	8	21.6%	22.0%	\$1,571	15.2%	23.7%	15	37.5%	23.0%	\$1,985	27.5%	22.6%
	Total	77	100.0%	\$17,584	100.0%	100.0%	37	100.0%	100.0%	\$10,353	100.0%	100.0%	40	100.0%	100.0%	\$7,231	100.0%	100.0%
HOME IMPROVEMENT	Low	2	33.3%	\$102	23.0%	20.2%	2	50.0%	7.6%	\$102	32.7%	4.3%	0	0.0%	6.2%	\$0	0.0%	2.9%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	17.2%	\$0	0.0%	11.7%	0	0.0%	16.7%	\$0	0.0%	11.6%
	Middle	1	16.7%	\$125	28.2%	18.9%	1	25.0%	21.6%	\$125	40.1%	20.0%	0	0.0%	19.2%	\$0	0.0%	16.0%
	Upper	2	33.3%	\$116	26.1%	44.0%	1	25.0%	50.3%	\$85	27.2%	58.4%	1	50.0%	54.3%	\$31	23.5%	65.7%
	Unknown	1	16.7%	\$101	22.7%	0.0%	0	0.0%	3.3%	\$0	0.0%	5.6%	1	50.0%	3.5%	\$101	76.5%	3.7%
	Total	6	100.0%	\$444	100.0%	100.0%	4	100.0%	100.0%	\$312	100.0%	100.0%	2	100.0%	100.0%	\$132	100.0%	100.0%
MULTI-FAMILY	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	11.1%	\$563	2.6%	17.0%	3	16.7%	4.4%	\$563	4.3%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.4%	\$0	0.0%	0.2%
	Upper	5	18.5%	\$1,612	7.3%	44.0%	4	22.2%	10.0%	\$1,060	8.1%	1.2%	1	11.1%	14.6%	\$552	6.2%	3.5%
	Unknown	19	70.4%	\$19,856	90.1%	0.0%	11	61.1%	85.6%	\$11,466	87.6%	98.6%	8	88.9%	82.0%	\$8,390	93.8%	96.3%
	Total	27	100.0%	\$22,031	100.0%	100.0%	18	100.0%	100.0%	\$13,089	100.0%	100.0%	9	100.0%	100.0%	\$8,942	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	6.3%	\$0	0.0%	2.8%	0	0.0%	7.3%	\$0	0.0%	4.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	15.1%	\$0	0.0%	8.2%	0	0.0%	15.2%	\$0	0.0%	8.3%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	21.7%	\$0	0.0%	14.8%	0	0.0%	20.3%	\$0	0.0%	13.3%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	54.7%	\$0	0.0%	70.9%	0	0.0%	55.5%	\$0	0.0%	71.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.3%	\$0	0.0%	3.3%	0	0.0%	1.7%	\$0	0.0%	2.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Chattanooga

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Count		Bank		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	Agg	\$ (000s)	\$ %	Agg	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	14.2%	\$0	0.0%	8.4%	0	0.0%	12.2%	\$0	0.0%	5.3%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	14.2%	\$0	0.0%	8.6%	0	0.0%	13.0%	\$0	0.0%	7.3%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	19.6%	\$0	0.0%	13.0%	0	0.0%	10.6%	\$0	0.0%	7.6%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	39.2%	\$0	0.0%	52.2%	0	0.0%	53.7%	\$0	0.0%	72.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.8%	\$0	0.0%	17.8%	0	0.0%	10.6%	\$0	0.0%	7.2%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.2%	0	0.0%	1.1%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.0%	0	0.0%	1.7%	\$0	0.0%	2.6%	0	0.0%	0.3%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.9%	0	0.0%	1.1%	\$0	0.0%	1.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	44.0%	0	0.0%	1.1%	\$0	0.0%	2.7%	0	0.0%	0.3%	\$0	0.0%	0.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	94.9%	\$0	0.0%	92.1%	0	0.0%	99.4%	\$0	0.0%	99.7%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	8	3.9%	\$724	1.2%	20.2%	4	3.7%	6.8%	\$214	0.6%	3.1%	4	4.2%	5.2%	\$510	2.0%	2.6%
	Moderate	20	9.8%	\$3,037	5.0%	17.0%	13	11.9%	17.3%	\$1,795	5.2%	10.8%	7	7.4%	15.9%	\$1,242	4.8%	10.8%
	Middle	21	10.3%	\$3,958	6.6%	18.9%	10	9.2%	19.6%	\$1,678	4.8%	15.7%	11	11.6%	19.6%	\$2,280	8.9%	16.3%
	Upper	90	44.1%	\$26,587	44.1%	44.0%	51	46.8%	40.1%	\$16,352	47.1%	45.6%	39	41.1%	41.1%	\$10,235	39.9%	48.8%
	Unknown	65	31.9%	\$26,050	43.2%	0.0%	31	28.4%	16.2%	\$14,666	42.3%	24.8%	34	35.8%	18.2%	\$11,384	44.4%	21.5%
	Total	204	100.0%	\$60,356	100.0%	100.0%	109	100.0%	100.0%	\$34,705	100.0%	100.0%	95	100.0%	100.0%	\$25,651	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Home Purchase Loans

In 2019, home purchase lending to low-income borrower at 2.0 percent was below the percentage of low-income borrowers at 20.2 percent and below the aggregate lending performance (6.5 percent). For moderate-income borrowers, the bank's home purchase lending at 12.0 percent was below to the percentage of moderate-income families (17.0 percent) and the aggregate lending performance (19.3 percent).

In 2020, home purchase lending to low-income borrower at 6.8 percent was significantly below the percentage of low-income borrowers at 20.2 percent but comparable the aggregate lending performance at 6.5 percent. For moderate-income borrowers, the bank's home purchase lending at 6.8 percent was also significantly below the percentage of moderate-income families and significantly below the aggregate lending performance (20.6 percent).

Home Refinance Loans

Home refinance lending in 2019 to low-income borrowers at 2.7 percent was significantly below the percentage of low-income families at 20.2 percent and significantly below aggregate lending performance at 7.4 percent. For moderate-income borrowers, the bank's home refinance lending at 10.8 percent of total lending was below the percentage of moderate-income families in the assessment area and below aggregate lending performance (14.8 percent).

In 2020, home refinance lending to low-income borrower at 2.5 percent was below the percentage of low-income borrowers at 20.2 percent and below the aggregate lending performance at 4.3 percent. For moderate-income borrowers, the bank's home refinance lending at 10.0 percent, was below the percentage of moderate-income families at 17.0 percent and slightly below the aggregate lending performance at 13.1 percent.

Community Development Lending

The bank made a relatively high level of community development loans in the Chattanooga assessment area. During the review period, the bank originated or renewed 15 community development loans totaling \$27.2 million. Twelve of these loans, totaling \$22.2 million, qualified for the community development purpose of revitalizing and stabilizing LMI geographies. A portion of these loans (\$4.3 million) were PPP loans over \$1.0 million made to small businesses located in LMI tracts. The remaining three loans qualified for dual purposes of providing affordable housing options for LMI individuals and families and revitalizing moderate-income geographies.

Examples of noteworthy community development loans include:

- Three loans, totaling \$5.0 million were originated to a nonprofit housing organization in Chattanooga. The organization's mission is to provide affordable housing options to lower income residents and revitalize neighborhoods in historically underserved parts of Chattanooga. For the three loans noted, the organization achieved its mission through the creation of local projects submitted to, and approved by, the city of Chattanooga in its Master Plan. In addition, one of these loans was made in conjunction with the Tennessee Housing Development Agency's Community Investment Tax Credit program.
- Two loans, totaling \$8.2 million, were originated for the purpose of creating new commercial buildings in East Ridge. The new buildings are located in the Border Region Retail Development District, a city-approved new development plan helping the city remain competitive primarily through tourism and new business development. These loans align with the plan and help stabilize the area, which is primarily moderate-income tracts.
- One loan, totaling \$9.1 million, was originated for the purpose of converting a vacant commercial property in a low-income tract into useable office space for new businesses along the riverfront in downtown Chattanooga. This loan purpose aligns with the West End Revitalization Plan for the city, which was approved in order to create more office space and new offices along the riverfront.

INVESTMENT TEST

SmartBank's investment performance in the Chattanooga assessment area is adequate.

The bank exhibited adequate responsiveness to credit and community development needs in Chattanooga, primarily in affordable housing. During the review period, the bank made 11 investments inside the assessment area totaling \$4.0 million, or 28.1 percent of total investment activity for the state of Tennessee. This total was solely in new investments made during the review period, including two investments totaling \$4 million in municipal bonds and nine donations totaling \$17,400.

The municipal bonds were issued to a local housing authority for the purpose of acquiring, constructing, rehabilitating, and equipping LMI multifamily rental housing facilities in Chattanooga. The bonds were issued in connection with Low-Income Housing Tax Credits (LIHTCs) offered through the city of Chattanooga. All nine donations qualified as community services and were made to various organizations serving LMI children and families in the assessment area, including food banks, homeless shelters, children's centers, and medical clinics.

SERVICE TEST

SmartBank's service test performance in the Chattanooga assessment area is adequate. While the bank's accessibility of retail banking and delivery systems may be considered unreasonably inaccessible due to the lack of branch offices in LMI tracts, the bank engaged in an adequate level of CD service activities.

Retail Services

The distribution of 5 branch offices as of December 31, 2020, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank had no branch offices in low or moderate-income tracts in the Chattanooga assessment area while 22.8 percent of households and 23.2 percent of businesses are located in LMI tracts. As a result, SmartBank's delivery systems may be considered unreasonably inaccessible to the bank's geographies and individuals of different income levels in the assessment area. During the review period, the bank did not open or close any branches. Therefore, the bank's record of opening and closing branches generally does not adversely affect the accessibility of its delivery systems. Finally, the banking services and business hours do not vary in a way that inconveniences SmartBank's assessment areas and are generally consistent across all branch offices. SmartBank's service test performance in the Chattanooga assessment area is adequate.

Geographic Distribution of Branches & ATMS
 Assessment Area: TN Chattanooga

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	10	12.2%	8.5%	8.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	12	14.6%	14.3%	15.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	2	40.0%	0	0	2	2	2	Total	2	40.0%	2	40.0%	0	0	0	0.0%	0	0	31	37.8%	37.5%	35.9%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	3	60.0%	0	0	3	3	1	Total	3	60.0%	3	60.0%	0	0	0	0.0%	0	0	27	32.9%	39.7%	40.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	2.4%	0.0%	0.2%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	5	100.0%	0	0	5	5	3	Total	5	100.0%	5	100.0%	0	0	0	0.0%	0	0	82	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

2020 FFIEC Census Data, 2020 D&B Info, and 2015 ACS Data
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

SmartBank provides an adequate level of community development services in the assessment area. During the review period, bank employees used their financial and technical expertise in 29 qualified service activities totaling 399 service hours throughout the assessment area. All of the service hours involved bank staff serving on the boards or as committee members of organizations that provide services to small businesses and/or LMI individuals throughout the entire assessment area. Bank staff engaged with organizations including food banks, small business incubators, chambers of commerce, planning commissions, and scholarship foundations for first-time LMI college students.

**METROPOLITAN STATEWIDE AREAS
LIMITED-SCOPE REVIEW**

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

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TENNESSEE METROPOLITAN
ASSESSMENT AREAS**

- **Cleveland Assessment Area (Bradley County)**
 - As of December 31, 2020, SmartBank operated one branch in the assessment area, representing 4.5 percent of its branches in Tennessee.
 - As of June 30, 2020, the bank had \$24.9 million in deposits in this assessment area, representing a market share of 1.3 percent and 1.4 percent of SmartBank’s total deposits in Tennessee.

- **Rutherford Assessment Area (Rutherford County)**
 - As of December 31, 2020, SmartBank operated two branches in the assessment area, representing 9.1 percent of its branches in Tennessee.
 - As of June 30, 2020, the bank had \$31.6 million in deposits in this assessment area, representing a market share of 0.6 percent and 1.7 percent of SmartBank’s total deposits in Tennessee.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Performance in the Limited-Scope Review Metropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Cleveland	Not Consistent (Below)	Not Consistent (Below)	Not Consistent (Above)
Rutherford	Not Consistent (Below)	Consistent	Not Consistent (Below)

For the lending test, SmartBank received a rating of low satisfactory for the State of Tennessee. Performance in both of the metropolitan limited-scope assessment areas was below the statewide lending test performance. The bank made a low level of community development loans in Rutherford assessment area and few, if any community development loans in the Cleveland assessment area.

For the investment test, SmartBank received a rating of low satisfactory for the State of Tennessee. The bank makes an adequate level of investments in the Rutherford limited-scope assessment area and a poor level of investments in the Cleveland assessment area.

For the service test, SmartBank received a rating of low satisfactory for the State of Tennessee. Performance in the Cleveland limited-scope assessment area was consistent with the bank’s state performance. However, Rutherford had a poor performance under the service test.

The performances in the metropolitan limited-scope assessment areas did not affect the overall state rating.

**NONMETROPOLITAN STATEWIDE AREAS
LIMITED-SCOPE REVIEW**

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

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE TENNESSEE NONMETROPOLITAN
ASSESSMENT AREAS**

- **Coffee Assessment Area (Coffee County)**
 - As of December 31, 2020, SmartBank operated one branch in the assessment area, representing 4.5 percent of its branches in Tennessee.
 - As of June 30, 2020, the bank had \$92.3 million in deposits in this assessment area, representing a market share of 8.2 percent and 5.0 percent of SmartBank’s total deposits in Tennessee.
- **East Tennessee Assessment Area (Cumberland County, Fentress County, Putnam County)**
 - As of December 31, 2020, SmartBank operated four branches in the assessment area, representing 18.2 percent of its branches in Tennessee.
 - As of June 30, 2020, the bank had \$238.4 million in deposits in this assessment area, representing a market share of 5.8 percent and 12.9 percent of SmartBank’s total deposits in Tennessee.
- **Sevier Assessment Area (Sevier County)**
 - As of December 31, 2020, SmartBank operated four branches in the assessment area, representing 18.2 percent of its branches in Tennessee.
 - As of June 30, 2020, the bank had \$661.4 million in deposits in this assessment area, representing a market share of 21.3 percent and 35.9 percent of SmartBank’s total deposits in Tennessee.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Performance in the Limited-Scope Review Nonmetropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Coffee	Not Consistent (Below)	Not Consistent (Below)	Consistent
East Tennessee	Consistent	Not Consistent (Below)	Consistent
Sevier	Consistent	Not Consistent (Below)	Consistent

For the lending test, SmartBank received a rating of low satisfactory for the State of Tennessee. Performance in the East Tennessee and Sevier non-metropolitan limited-scope assessment areas was consistent with the statewide rating. Performance in the Coffee assessment area was below the statewide rating. Lending levels were adequate in the East TN and Sevier assessment areas but poor in the Coffee assessment area.

For the investment test, SmartBank received a rating of low satisfactory for the State of Tennessee. The bank's investment performance was below the statewide performance in all three assessment areas and the bank provided few, if any investments.

For the service test, SmartBank received a rating of low satisfactory for the State of Tennessee. Performance in all three non-metropolitan limited-scope assessment areas was consistent with the statewide performance.

The performances in the metropolitan limited-scope assessment areas did not affect the overall state rating.

ALABAMA

CRA RATING FOR ALABAMA: Needs to Improve

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Substantial Noncompliance

The Service Test is rated: Low Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects adequate penetration throughout the assessment area.
- The distribution of loans by borrower income reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes an adequate level of community development loans in its Alabama assessment areas.
- The bank made no qualified community development investments and grants in its Alabama assessment areas.
- Retail banking services are adequate in the Alabama assessment areas.
- The bank provides an adequate level of community development services throughout the Tennessee assessment areas.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Tuscaloosa assessment area. Limited scope reviews were conducted for the remaining four assessment areas:

- Baldwin
- Clarke
- Huntsville
- Mobile

The time period and products evaluated for the assessment areas in Alabama are consistent with the scope discussed in the institution section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

As of December 31, 2020, SmartBank had approximately \$558 million in deposits in Alabama comprising 21.9 percent of the bank's total deposits. SmartBank operated 9 banking offices in Alabama as of December 21, 2020, representing 26.5 percent of the bank's total offices. HMDA-reportable lending in Alabama accounted for 16.1 percent of total institutional HMDA-reportable lending by number of loans and 15.4 percent by dollar volume. CRA small business lending in Alabama accounted for 25.7 percent of the bank's total CRA small business lending by number of loans and 26.7 percent by dollar volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The lending test rating for the state of Alabama is low satisfactory.

During the review period, SmartBank reported 206 HMDA-reportable and 1,104 small business loans in Alabama. Therefore, more weight was given to small business lending than HMDA-reportable lending for the analyses. SmartBank originated or renewed approximately \$9.6 million in community development loans in Alabama.

Lending Activity

The following table displays the volume of lending activity from January 1, 2019 through December 31, 2020 by loan type.

Statewide Summary of Lending Activity
Assessment Areas Located in
Alabama

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	110	8.4%	\$27,527	13.8%
HMDA Refinance	86	6.6%	\$19,209	9.7%
HMDA Home Improvement	3	0.2%	\$264	0.1%
HMDA Multi-Family	7	0.5%	\$6,522	3.3%
HMDA Other Purpose LOC	0	0.0%	\$0	0.0%
HMDA Other Purpose Closed/Exempt	0	0.0%	\$0	0.0%
HMDA Loan Purpose NA	0	0.0%	\$0	0.0%
Total HMDA	206	15.7%	\$53,522	26.9%
Total Small Business	1,104	84.3%	\$145,498	73.1%
TOTAL LOANS	1,310	100.0%	\$199,020	100.0%

Originations and Purchases

Geographic and Borrower Distribution of Loans

The geographic distribution of HMDA-reportable and small business loans is adequate, and the distribution of loans by borrower income and business revenue size is adequate. The detailed analyses are discussed later in this report.

Community Development Lending

SmartBank made an adequate level of community development loans in the state of Alabama, driven by performance in the Tuscaloosa assessment area. During the review period, the bank originated or renewed eight community development loans totaling \$9.6 million benefiting Alabama assessment areas. The bank originated three community development loans in the Tuscaloosa full-scope assessment area. The bank originated two community development loans in the Mobile limited scope assessment area, and three in the Clarke County (nonMSA) limited scope assessment area. No loans were originated in the Daphne-Fairhope-Foley or Huntsville limited-scope assessment areas. Additional information on community development loans is found in the full-scope assessment area section of this evaluation.

INVESTMENT TEST

The investment test rating for Alabama is substantial noncompliance. During the review period, the bank made no investments or donations in any of its Alabama assessment areas.

SERVICE TEST

The service test rating for Alabama is low satisfactory.

Retail Services

SmartBank's delivery systems, including ATMs and branches, are reasonably accessible to geographies and individuals of different income levels. SmartBank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. During the review period, the bank had no branch openings or branch closings in the state of Alabama. In addition, banking services and business hours do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or individuals. Overall, the bank's retail service performance is considered adequate in Alabama.

Community Development Services

SmartBank provides an adequate level of community development services that benefit residents and small businesses in Alabama. Bank employees engaged in 18 qualified service activities totaling 183 service hours during the review period. In addition, the bank provided services to larger regional areas that include multiple Alabama assessment areas. Specifically, bank employees provided two qualified service activities totaling two service hours to an organization that provides community services to LMI families throughout both the Mobile MSA and Clarke County assessment areas.

Additional detail on the bank's retail and community development services can be found in the full-scope assessment area sections of this evaluation.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

**DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TUSCALOOSA, ALABAMA
ASSESSMENT AREA**

Overview

The Tuscaloosa assessment area is new since the previous evaluation period and was added as a result of the bank acquiring branches from Capstone Bank on November 1, 2017. The assessment area includes Tuscaloosa County, which is located in west central Alabama and home to the University of Alabama. The assessment area is part of the four-county Tuscaloosa, AL MSA. As of December 31, 2020, SmartBank operated three branch offices in the assessment area. The bank's branch presence in the assessment area represents 8.8 percent of branches and 13.9 percent of deposits for the institution. In addition, the market represents 12.3 percent of the combined HMDA-reportable and CRA small business lending by number of loans for the institution.

Tuscaloosa is a relatively active banking market. According to the June 30, 2020 FDIC Summary of Deposits Report, there are 19 financial institutions operating 51 branch locations in the assessment area with \$4.1 billion in total deposits. SmartBank is ranked 4th in the market with 8.6 percent of deposits (\$353.6 million). Regions Bank had the largest deposit market share at 19.6 percent, followed by Bryant Bank with 18.9 percent.

SmartBank is not a significant HMDA lender in this assessment area, originating less than one percent of HMDA-reportable loans in both 2019 and in 2020. The top three HMDA lenders in both 2019 and 2020 were First Federal Bank, Wells Fargo Bank, and Alabama One Credit Union. In contrast, SmartBank is one of the top CRA small business lenders in the assessment area. SmartBank ranked 4th out of 66 CRA reporters in 2019 with 8.3 percent of CRA-reportable loans. In 2020, SmartBank ranked 3rd out of 85 CRA reporters, with 11.0 percent of CRA-reportable loans. JPMorgan Chase was the top CRA lender in the market for 2019, followed by Bryant Bank and Synovus Bank. In 2020, Bryant Bank was the top CRA lender in the market, followed by Synovus Bank and SmartBank.

Population and Income Characteristics

According to 2019 census data, the population of the Tuscaloosa assessment area was estimated at approximately 209,355 people, experiencing a population growth of 7.5 percent from 2010 to 2019.²⁹

According to 2020 FFIEC data, the assessment area is made up of 47 census tracts: 1 tract is low-income (2.1 percent), 12 tracts are moderate-income (25.5 percent), 19 tracts are middle-income (40.4 percent), 13 tracts are upper-income (27.7 percent), and 2 tracts have unknown income (4.3 percent). The LMI tracts are largely concentrated south of Tuscaloosa and the Black Warrior River and to the immediate south and east of the University of Alabama. Both tracts with unknown incomes contain the University of Alabama, and the low-income tract abuts the University of Alabama to the west. The unknown- and low-income tracts have a limited population (9,782 and 3,645 people, respectively) and very few families (220 and 764 families, respectively).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Tuscaloosa, AL MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA increased from \$60,500 in 2019 to \$63,900 in 2020. The 2020 FFIEC data further indicates that 36.7 percent of families in the assessment area are considered LMI.

²⁹ "U.S. Census Bureau Quickfacts: Tuscaloosa County, Alabama." *Census*, 26 Mar 2020.
www.census.gov/quickfacts/fact/table/tuscaloosacountyalabama/PST045219. Accessed 20 Sept. 2021.

**Borrower Income Levels
Tuscaloosa, AL MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2019	\$60,500	0 - \$30,249	\$30,250 - \$48,399	\$48,400 - \$72,599	\$72,600 - & above
2020	\$63,900	0 - \$31,949	\$31,950 - \$51,119	\$51,120 - \$76,679	\$76,680 - & above

The 2020 FFIEC data also shows that, as a percentage, families living below poverty in the assessment area (13.4 percent) is below state of Alabama figure of 14.5 percent. Additionally, between the five-year periods of 2010-2014 and 2015-2019, Tuscaloosa County had a decline in the percentage of families living in poverty (12.6 percent). However, when considering the overall decline in families living in poverty for the entire state of Alabama (17.1 percent) and the nation as a whole (14.5 percent) during the same time period, Tuscaloosa County’s overall percentage of families living in poverty remains elevated.³⁰ The 2020 FFIEC data also shows that the largest volume of families living below the poverty level are found in middle-income geographies (41.1 percent). As described, poverty levels for the overall assessment area are improving, but poverty remains a significant barrier for families residing in middle-income census tracts.

Economic Conditions

The greater Tuscaloosa region has experienced a progressive business climate, which has attracted international attention and investment.³¹ The region’s education, healthcare, and manufacturing sectors are significant economic drivers for the area.³² Specifically, top employers in Tuscaloosa County by largest number of employees include the University of Alabama, Mercedes-Benz, DCH Regional Medical Center, County and City Board of Education for Public Education, Warrior Met Coal, Inc., Michelin/BFGoodrich Tire Manufacturing, the City of Tuscaloosa, the Veterans Administration Hospital, and Phifer Inc.³³ Tuscaloosa County has targeted certain sectors for economic development leveraging the areas support by The University of Alabama, strong educational and workforce development resources, and a long track record in the automotive and manufacturing sectors.³⁴

According to 2020 Dun & Bradstreet information, there were 7,198 businesses within the Tuscaloosa assessment area, 90.4 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Additionally, small businesses in the assessment area are relatively equally dispersed throughout moderate-, middle-, and upper-income tracts.

As shown in the following chart, the unemployment rate in the Tuscaloosa assessment area rose sharply from 2.7 percent in 2019 to 6.6 percent in 2020. As shown, this was greater than the Alabama unemployment rate of 5.9 percent for 2020. However, unemployment rates in the Tuscaloosa assessment area were in line with the national unemployment rate of 6.7 percent in December 2020.³⁵

³⁰ Tuscaloosa County, AL (U.S. Census). *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 20 Sept. 2021.

³¹ “Business – Tuscaloosa Alabama.” *Tuscaloosa County*, www.tuscco.com/business/. Accessed 20 Sept. 2021.

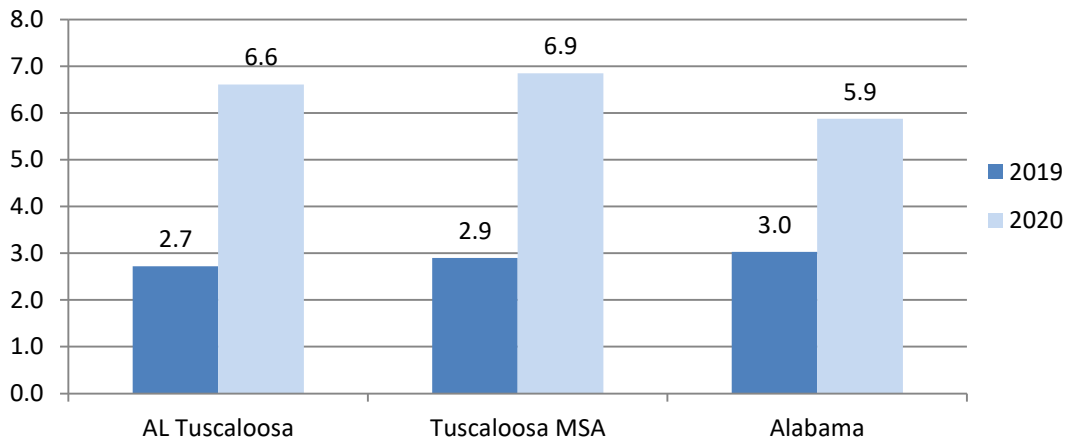
³² Ibid.

³³ “Largest Employers in Tuscaloosa County.” *Chamber of Commerce*, westalabamachamber.com/largest-employers-in-tuscaloosa-county. Accessed 20 Sept. 2021.

³⁴ “Target Industries – Tuscaloosa County EDA.” *Tuscaloosa County Economic Development Authority*, tcoeda.com/target-industries/. Accessed 20 Sept. 2021.

³⁵ “BLS Data Viewer.” U.S. Bureau of Labor Statistics, n.d. Web. 18 Mar. 2021. beta.bls.gov/dataViewer/view/timeseries/LNS14000000

Unemployment Rates - AL Tuscaloosa



Not Seasonally Adjusted. Source: Bureau of Labor Statistics

According to 2020 FFIEC data, there were 87,064 housing units located in the assessment area, of which 50.7 percent were owner-occupied, 28.7 percent were rental units, and 20.6 percent were vacant. While a majority of units were owner-occupied, a disproportionately higher percentage of housing units in LMI tracts were rental units or vacant. In low-income census tracts, 60.6 percent of all housing units were rentals or vacant versus 71.6 percent in moderate-income tracts. The median age of the housing stock was only 32 years, though the median age of housing was older in low- and moderate-income tracts, at 61 years and 45 years, respectively. These factors suggest that limited HMDA-reportable lending opportunities may be present in the low- and moderate-income tracts.

Housing values and median gross rents in the assessment area were higher and affordability was lower when compared to the state of Alabama according to 2020 FFIEC data. Additionally, home affordability was an issue for LMI families in the assessment area. For a family of four earning 50.0 percent of AMI between 2014 and 2018, only 22.0 percent of housing in the assessment area is affordable.³⁶ For a family of four earning 80.0 percent of AMI between 2014 and 2018, only 41.4 percent of housing in the assessment area is affordable. This is an indication that fewer homeownership options exist for low- and moderate-income borrowers in Tuscaloosa County³⁷.

Demographic Characteristics by Census Tract

The following table presents key demographic and business information used to help develop a performance context for the assessment area for the year 2020. The data reflects 2020 FFIEC census data and 2020 Dun & Bradstreet data used to analyze the bank's CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

³⁶ Tuscaloosa, AL (U.S. Census). *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 20 Sept. 2021.

³⁷ Ibid.

Combined Demographics Report

Assessment Area: AL Tuscaloosa

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.1	764	1.7	282	36.9	9,990	21.7
Moderate-income	12	25.5	7,561	16.4	2,019	26.7	6,866	14.9
Middle-income	19	40.4	18,852	41	2,536	13.5	8,101	17.6
Upper-income	13	27.7	18,574	40.4	1,229	6.6	21,014	45.7
Unknown-income	2	4.3	220	0.5	101	45.9	0	0
Total Assessment Area	47	100.0	45,971	100.0	6,167	13.4	45,971	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,305	514	1.2	39.4	598	45.8	193	14.8
Moderate-income	18,589	5,280	12	28.4	7,806	42	5,503	29.6
Middle-income	37,588	18,409	41.7	49	11,208	29.8	7,971	21.2
Upper-income	27,219	19,715	44.6	72.4	4,602	16.9	2,902	10.7
Unknown-income	2,363	242	0.5	10.2	754	31.9	1,367	57.9
Total Assessment Area	87,064	44,160	100.0	50.7	24,968	28.7	17,936	20.6
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	106	1.5	90	1.4	16	2.6	0	0
Moderate-income	1,765	24.5	1,566	24.1	189	30.5	10	14.7
Middle-income	2,713	37.7	2,448	37.6	233	37.6	32	47.1
Upper-income	2,436	33.8	2,253	34.6	161	26	22	32.4
Unknown-income	178	2.5	153	2.4	21	3.4	4	5.9
Total Assessment Area	7,198	100.0	6,510	100.0	620	100.0	68	100.0
Percentage of Total Businesses:				90.4		8.6		.9
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	0	0	0	0	0	0	0	0
Moderate-income	13	10.3	12	9.9	1	20	0	0
Middle-income	58	46	57	47.1	1	20	0	0
Upper-income	55	43.7	52	43	3	60	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	126	100.0	121	100.0	5	100.0	0	.0
Percentage of Total Farms:				96.0		4.0		.0

2020 FFIEC Census Data and 2020 D&B Information

Credit and Community Development Needs

To better understand the local community development and economic landscapes, individuals familiar with the community and with community development activities were contacted. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs through lending, investment, and/or service activities.

Based on information obtained from a community contact specializing in affordable housing, bad credit histories and long wait lists for vouchers to obtain Section 8 rental housing are the primary obstacles in providing affordable housing options for LMI residents. Per the contact, many LMI individuals do not have sufficient savings to cover unexpected expenses and have resorted to payday lenders. Many LMI individuals cannot afford the fee repayments, which contributes to their poor credit histories. Additionally, the contact stated that rental housing in the area is old and that many landlords are struggling to keep up repairs and maintain Section 8 housing for Housing and Urban Development (HUD) standards. This has fueled long wait lists for LMI residents to obtain HUD vouchers. The contact further described that emergency housing in the area is now full, further exacerbating the issue.

The contact stated that down payment assistance is readily available for those who meet credit standards for home mortgages. Furthermore, home purchase and home improvement loans were of greatest need for LMI residents in the area according to the contact. Specifically, the contact noted that smaller dollar home improvement loans in amounts of \$60,000 or less are needed for homeowners in the West End and to LMI senior citizens, as these homeowners struggle to come up with funds to update their homes and maintain homeowner's insurance.

The contact highlighted a number of opportunities for bank participation in meeting the housing needs of LMI people, including offering flexible lending programs that include lower credit score minimums, lower interest rates, and post-closing homeownership education in home repairs and budgeting. Additionally, banks can work with and/or partner with the numerous organizations working on improving affordable housing in the county. Finally, the contact suggested that banks should consider making larger investments and/or donations that have a greater impact on LMI communities instead of smaller dollar and largely generic community development activities that have become the norm by banks in the area.

Based on information obtained from a contact specializing in local economic development, poor credit and insufficient financial records and funding are the primary barriers in serving the needs of start-ups and small businesses. The contact further stated that more financial literacy to high schools and colleges in the area would assist students in understanding how to build capital and avoid mistakes that impact credit history. The contact stated that there are several Certified Development Financial Institutions (CDFIs) and a few micro fund lenders serving the area, which results in several capital resources for small businesses and entrepreneurs.

The contact stated that financial institutions in the area were generally active with small business lending, including offering loans through the Small Business Administration. SmartBank was specifically mentioned as a proactive bank operating in this region. The contact noted several opportunities for banks to support small businesses in the region, such as providing loans, investments, or service offerings to any of the several CDFIs operating in the area and offering small dollar business loans, specifically those under \$25,000 for start-ups and early-stage businesses. The contact also suggested that banks could provide donations or other support to affordable daycare programs catering to LMI families.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TUSCALOOSA,
ALABAMA ASSESSMENT AREA**

LENDING TEST

SmartBank's lending in the Tuscaloosa assessment area reflects adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area, and the distribution of loans by borrower income and business revenue reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank made few, if any of community development loans within the assessment area.

Lending Activity

For 2019 lending, the analysis included 175 small business and 62 HMDA-reportable loans made in the assessment area, while the 2020 analysis included 374 small business and 73 HMDA-reportable loans. Greater weight was placed on small business lending, as the volume of small business loans was greater than HMDA-reportable loans. The Tuscaloosa assessment area accounted for 49.7 percent of SmartBank's total small business lending in Alabama and 65.5 percent of its total statewide HMDA-reportable lending by dollar volume during the review period. In comparison, 63.4 percent of SmartBank's Alabama deposits are in the Tuscaloosa assessment area.

Geographic Distribution of Loans

Based on the following analysis, the overall geographic distribution of the bank's small business and HMDA-reportable loans reflects reasonable dispersion throughout the bank's assessment area and does not reveal any unexplained gaps in lending patterns. For this analysis, the geographic distribution of small business loans and HMDA-reportable loans was compared to demographic information. Performance context information and aggregate lending data were also considered in the evaluation. For instance, unemployment rates, poverty rates, the level of owner-occupied units, and the volume of small businesses in low- and moderate-income census tracts were considered when assessing the bank's lending performance. Additionally, Tuscaloosa is primarily a college town and there is just one low-income tract in the assessment area. These additional factors were also taken into account when reviewing the geographic distribution.

Small Business Lending

The geographic distribution of small business loans reflects adequate dispersion throughout the assessment area. The following table shows the distribution of small business loans as a percentage of the total number of loans within its Tuscaloosa assessment area and also includes a comparison of the bank's small business lending to the aggregate lenders within the assessment area. The CRA aggregate lenders' data are the combined total of lending activity reported by all lenders subject to CRA loan data reporting requirements in the assessment area.

Geographic Distribution of Small Business Loans
Assessment Area: AL Tuscaloosa

Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
	Bank				Total Businesses	2019					2020						
	Count		Dollar			#	%	Agg %	Dollar		#	%	Agg %	Dollar			
	#	%	\$ (000s)	\$ %	\$ 000s				\$ %	\$ %				\$ 000s	\$ %		
Low	7	1.3%	\$807	1.1%	1.5%	2	1.1%	1.5%	\$611	1.9%	2.4%	5	1.3%	1.2%	\$196	0.5%	1.7%
Moderate	138	25.1%	\$21,665	28.8%	24.5%	52	29.7%	20.8%	\$9,246	28.8%	23.9%	86	23.0%	22.5%	\$12,419	28.8%	26.5%
Middle	192	35.0%	\$31,171	41.4%	37.7%	66	37.7%	37.6%	\$15,324	47.7%	41.0%	126	33.7%	36.2%	\$15,847	36.7%	37.5%
Upper	199	36.2%	\$19,463	25.9%	33.8%	54	30.9%	36.4%	\$6,780	21.1%	31.1%	145	38.8%	38.0%	\$12,683	29.4%	31.8%
Unknown	13	2.4%	\$2,164	2.9%	2.5%	1	0.6%	1.3%	\$170	0.5%	1.0%	12	3.2%	1.5%	\$1,994	4.6%	2.1%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.4%	\$0	0.0%	0.5%	0	0.0%	0.6%	\$0	0.0%	0.3%
<i>Total</i>	<i>549</i>	<i>100.0%</i>	<i>\$75,270</i>	<i>100.0%</i>	<i>100.0%</i>	<i>175</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$32,131</i>	<i>100.0%</i>	<i>100.0%</i>	<i>374</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$43,139</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

Over the review period, the bank originated a total of 7 small business loans (1.3 percent) in low-income tracts, which was similar to the 1.5 percent of small businesses located in these tracts. Additionally, the bank originated 138 small business loans in moderate-income tracts (25.1 percent) which was slightly above the percentage of small businesses in the Tuscaloosa assessment area.

In 2019, the bank’s lending in low-income tracts at 1.1 percent was slightly below aggregate at 1.5 percent. However, the bank’s lending in moderate-income tracts at 29.7 percent was above aggregate lending in the area at 20.8 percent.

In 2020, SmartBank’s lending at 1.3 percent in low-income tracts was comparable to aggregate at 1.2 percent. Additionally, the bank’s lending to moderate-income tracts at 23.0 percent was similar to the aggregate lending performance at 22.5 percent.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects adequate dispersion throughout the assessment area. The following tables show the geographic distribution of SmartBank HMDA-reportable loans for 2019 and 2020 within its Tuscaloosa assessment area and includes a comparison of the bank’s HMDA-reportable lending to the aggregate HMDA lenders within the assessment area. The HMDA aggregate lenders’ data are the combined total of lending activity reported by all lenders subject to HMDA in the MSA section of the assessment area. Given there is just one low-income tract in this assessment area, and aggregate lending is also very limited, the geographic analysis of residential real estate lending is based only on performance in moderate-income tracts.

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	#	%	\$ (000s)	%	#	%	\$ (000s)	%				
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.2%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	9	12.9%	\$968	4.8%	12.0%	5	13.2%	8.8%	\$509	4.8%	5.9%	4	12.5%	6.9%	\$459	4.9%	4.9%
	Middle	22	31.4%	\$4,956	24.8%	41.7%	13	34.2%	38.4%	\$3,191	29.8%	32.4%	9	28.1%	36.7%	\$1,765	18.9%	30.4%
	Upper	39	55.7%	\$14,097	70.4%	44.6%	20	52.6%	52.2%	\$7,001	65.4%	60.9%	19	59.4%	55.7%	\$7,096	76.1%	63.8%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.4%	\$0	0.0%	0.8%	0	0.0%	0.6%	\$0	0.0%	0.8%
	Total	70	100.0%	\$20,021	100.0%	100.0%	38	100.0%	100.0%	\$10,701	100.0%	100.0%	32	100.0%	100.0%	\$9,320	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.4%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	4	6.7%	\$903	6.1%	12.0%	2	9.5%	7.8%	\$652	13.5%	5.5%	2	5.1%	4.7%	\$251	2.5%	3.4%
	Middle	21	35.0%	\$4,617	31.3%	41.7%	8	38.1%	35.6%	\$1,665	34.6%	31.1%	13	33.3%	33.2%	\$2,952	29.7%	28.4%
	Upper	31	51.7%	\$7,667	52.0%	44.6%	11	52.4%	55.3%	\$2,499	51.9%	60.9%	20	51.3%	61.0%	\$5,168	52.0%	66.7%
	Unknown	4	6.7%	\$1,564	10.6%	0.5%	0	0.0%	1.0%	\$0	0.0%	2.3%	4	10.3%	0.9%	\$1,564	15.7%	1.4%
	Total	60	100.0%	\$14,751	100.0%	100.0%	21	100.0%	100.0%	\$4,816	100.0%	100.0%	39	100.0%	100.0%	\$9,935	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$60	40.0%	12.0%	1	50.0%	12.0%	\$60	40.0%	7.4%	0	0.0%	9.4%	\$0	0.0%	4.8%
	Middle	0	0.0%	\$0	0.0%	41.7%	0	0.0%	33.8%	\$0	0.0%	32.5%	0	0.0%	31.8%	\$0	0.0%	24.6%
	Upper	1	50.0%	\$90	60.0%	44.6%	1	50.0%	54.1%	\$90	60.0%	60.1%	0	0.0%	58.8%	\$0	0.0%	70.6%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$150	100.0%	100.0%	2	100.0%	100.0%	\$150	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Multi-Family Units					Low	0	0.0%	6.7%	\$0	0.0%	0.2%	0	0.0%	2.6%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	34.1%	0	0.0%	40.0%	\$0	0.0%	36.5%	0	0.0%	48.7%	\$0	0.0%	25.0%
	Middle	2	66.7%	\$3,735	78.1%	47.8%	1	100.0%	33.3%	\$3,075	100.0%	52.6%	1	50.0%	38.5%	\$660	38.6%	34.8%
	Upper	0	0.0%	\$0	0.0%	10.3%	0	0.0%	8.3%	\$0	0.0%	3.4%	0	0.0%	7.7%	\$0	0.0%	38.2%
	Unknown	1	33.3%	\$1,050	21.9%	7.2%	0	0.0%	11.7%	\$0	0.0%	7.3%	1	50.0%	2.6%	\$1,050	61.4%	1.7%
	Total	3	100.0%	\$4,785	100.0%	100.0%	1	100.0%	100.0%	\$3,075	100.0%	100.0%	2	100.0%	100.0%	\$1,710	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	3.7%	\$0	0.0%	2.1%	0	0.0%	2.3%	\$0	0.0%	2.0%
	Middle	0	0.0%	\$0	0.0%	41.7%	0	0.0%	23.9%	\$0	0.0%	23.6%	0	0.0%	33.3%	\$0	0.0%	34.2%
	Upper	0	0.0%	\$0	0.0%	44.6%	0	0.0%	72.5%	\$0	0.0%	74.3%	0	0.0%	64.4%	\$0	0.0%	63.8%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: AL Tuscaloosa

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units	Count		Dollar		Count		Dollar		Count		Dollar			
		#	%		\$ (000s)	%	#	%	\$ (000s)	%	#	%	\$ (000s)	%				
OTHER PURPOSE CLOSED/EMPTY	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.9%	\$0	0.0%	0.7%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	6.0%	\$0	0.0%	3.0%	0	0.0%	8.7%	\$0	0.0%	9.2%
	Middle	0	0.0%	\$0	0.0%	41.7%	0	0.0%	44.8%	\$0	0.0%	47.0%	0	0.0%	39.8%	\$0	0.0%	43.2%
	Upper	0	0.0%	\$0	0.0%	44.6%	0	0.0%	49.3%	\$0	0.0%	50.0%	0	0.0%	48.5%	\$0	0.0%	44.8%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.0%	\$0	0.0%	2.1%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.6%	\$0	0.0%	0.2%	0	0.0%	0.6%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	12.0%	0	0.0%	21.3%	\$0	0.0%	16.5%	0	0.0%	15.5%	\$0	0.0%	10.6%
	Middle	0	0.0%	\$0	0.0%	41.7%	0	0.0%	37.6%	\$0	0.0%	36.7%	0	0.0%	42.5%	\$0	0.0%	39.2%
	Upper	0	0.0%	\$0	0.0%	44.6%	0	0.0%	39.9%	\$0	0.0%	46.0%	0	0.0%	41.1%	\$0	0.0%	49.4%
	Unknown	0	0.0%	\$0	0.0%	0.5%	0	0.0%	0.6%	\$0	0.0%	0.7%	0	0.0%	0.3%	\$0	0.0%	0.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%
	Moderate	14	10.4%	\$1,931	4.9%	12.0%	8	12.9%	9.1%	\$1,221	6.5%	12.0%	6	8.2%	6.4%	\$710	3.4%	4.9%
	Middle	45	33.3%	\$13,308	33.5%	41.7%	22	35.5%	37.3%	\$7,931	42.3%	36.2%	23	31.5%	35.3%	\$5,377	25.6%	29.8%
	Upper	71	52.6%	\$21,854	55.0%	44.6%	32	51.6%	52.7%	\$9,590	51.2%	49.3%	39	53.4%	57.5%	\$12,264	58.5%	64.1%
	Unknown	5	3.7%	\$2,614	6.6%	0.5%	0	0.0%	0.7%	\$0	0.0%	2.4%	5	6.8%	0.7%	\$2,614	12.5%	1.1%
	Total	135	100.0%	\$39,707	100.0%	100.0%	62	100.0%	100.0%	\$18,742	100.0%	100.0%	73	100.0%	100.0%	\$20,965	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Home Purchase Loans

Of the 70 HMDA-reportable home purchase loans originated by the bank during the review period, 9 (12.9 percent) were in moderate-income tracts, which was comparable to the percentage of owner-occupied units at 12.0 percent. In both 2019 and 2020, the bank’s home purchase lending in moderate-income census tracts exceeded aggregate performance.

Home Refinance Loans

The bank originated 60 home refinance HMDA-reportable loans during the review period, including 4 (6.7 percent) in moderate-income tracts. By comparison, the percentage of owner-occupied units in the assessment areas was 12.0 percent. The bank’s lending in 2019 in moderate-income census tracts at 9.5 percent was slightly above aggregate performance of 7.8 percent. In 2020, the bank’s lending in moderate-income tracts was similar to aggregate performance.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income and business revenue size reflects adequate penetration among individuals of different income levels and businesses of different sizes. For this analysis, the distribution of HMDA-reportable lending to borrowers of different income levels and small business lending among businesses of different sizes was compared to available demographic information. Performance context information and aggregate lending data were considered in the evaluation.

Small Business Lending

Small business lending by business revenue size reflects good penetration among businesses of different sizes located throughout the assessment area. The following table shows the distribution of SmartBank small business loans, by revenue size for 2019 and 2020, within the Tuscaloosa assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Tuscaloosa

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison												
	Bank		Dollar		Total Businesses %	2019		2019			2020			2020				
	Count	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %					
BUSINESS REVENUE	\$1million or Less	173	31.5%	\$23,086	30.7%	90.4%	115	65.7%	41.8%	\$15,974	49.7%	36.9%	58	15.5%	36.2%	\$7,112	16.5%	26.6%
	Over \$1 Million	75	13.7%	\$23,770	31.6%	8.6%	55	31.4%					20	5.3%				
	Total Rev. available	248	45.2%	\$46,856	62.3%	99.0%	170	97.1%					78	20.8%				
	Rev. Not Known	301	54.8%	\$28,414	37.7%	0.9%	5	2.9%					296	79.1%				
	Total	549	100.0%	\$75,270	100.0%	100.0%	175	100.0%					374	100.0%				
LOAN SIZE	\$100,000 or Less	356	64.8%	\$13,432	17.8%		102	58.3%	85.9%	\$4,912	15.3%	25.2%	254	67.9%	81.6%	\$8,520	19.8%	26.8%
	\$100,001 - \$250,000	105	19.1%	\$18,032	24.0%		34	19.4%	7.1%	\$6,870	21.4%	18.8%	71	19.0%	10.8%	\$11,162	25.9%	22.9%
	\$250,001 - \$1 Million	88	16.0%	\$43,806	58.2%		39	22.3%	6.9%	\$20,349	63.3%	55.9%	49	13.1%	7.5%	\$23,457	54.4%	50.3%
	Total	549	100.0%	\$75,270	100.0%		175	100.0%	100.0%	\$32,131	100.0%	100.0%	374	100.0%	100.0%	\$43,139	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	116	67.1%	\$4,946	21.4%													
	\$100,001 - \$250,000	27	15.6%	\$5,109	22.1%													
	\$250,001 - \$1 Million	30	17.3%	\$13,031	56.4%													
	Total	173	100.0%	\$23,086	100.0%													

Originations & Purchases
 Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
 2020 FFIEC Census Data and 2020 D&B Information

The table above shows 31.5 percent of bank’s loans were originated to businesses with revenue of \$1 million or less in 2019 and 2020, while 90.4 percent of total businesses in the assessment area are small businesses. The bank’s lending in 2019 at 65.7 percent was above aggregate lending performance which was at 41.8 percent. However, in 2020, the bank made 15.5 percent of loans to businesses with a revenue of \$1 million or less while aggregate lenders made 36.2 percent.

Revenue information was not known for 301 of the 549 loans originated in 2020. All of these loans with unknown revenue were PPP loans and banks were not required to collect or report revenue information for these loans. As previously mentioned, the PPP loans were considered responsive to the needs of small businesses during the COVID-19 pandemic. If only loans with revenue available are considered, 74.4 percent of the bank’s loans were to businesses with revenue of \$1.0 million or less. Additionally, the percentage of loans made in 2020 in amounts of \$250,000 or less (86.9 percent) shows the bank’s willingness to make small dollar loans to help meet the credit needs of businesses in the community.

Residential Real Estate (HMDA) Lending

The distribution of HMDA-reportable lending by borrower income is very poor throughout the assessment area. The following tables show the borrower distribution of SmartBank’s 2019 and 2020 HMDA-reportable loans by borrower income with the Tuscaloosa assessment area. The tables include demographic information and a comparison of bank lending to aggregate lending.

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

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Count		Dollar		Families by Family Income	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	%	Bank	Agg	Bank	Agg	\$ %	#	%	Agg	Bank	Agg	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	3.7%	\$0	0.0%	1.9%	0	0.0%	3.9%	\$0	0.0%	2.1%
	Moderate	3	4.3%	\$389	1.9%	14.9%	3	7.9%	18.5%	\$389	3.6%	13.1%	0	0.0%	21.8%	\$0	0.0%	16.0%
	Middle	9	12.9%	\$1,517	7.6%	17.6%	5	13.2%	22.9%	\$832	7.8%	19.6%	4	12.5%	21.9%	\$685	7.3%	19.7%
	Upper	43	61.4%	\$16,061	80.2%	45.7%	22	57.9%	38.2%	\$8,241	77.0%	48.8%	21	65.6%	36.9%	\$7,820	83.9%	46.9%
	Unknown	15	21.4%	\$2,054	10.3%	0.0%	8	21.1%	16.7%	\$1,239	11.6%	16.6%	7	21.9%	15.5%	\$815	8.7%	15.4%
	Total	70	100.0%	\$20,021	100.0%	100.0%	38	100.0%	100.0%	\$10,701	100.0%	100.0%	32	100.0%	100.0%	\$9,320	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	4.2%	\$0	0.0%	2.0%	0	0.0%	2.4%	\$0	0.0%	1.1%
	Moderate	2	3.3%	\$274	1.9%	14.9%	2	9.5%	8.4%	\$274	5.7%	5.4%	0	0.0%	9.1%	\$0	0.0%	5.9%
	Middle	11	18.3%	\$1,656	11.2%	17.6%	3	14.3%	16.0%	\$405	8.4%	12.8%	8	20.5%	17.3%	\$1,251	12.6%	13.7%
	Upper	37	61.7%	\$10,805	73.2%	45.7%	9	42.9%	41.4%	\$2,469	51.3%	50.6%	28	71.8%	47.1%	\$8,336	83.9%	55.6%
	Unknown	10	16.7%	\$2,016	13.7%	0.0%	7	33.3%	30.0%	\$1,668	34.6%	29.3%	3	7.7%	24.1%	\$348	3.5%	23.6%
	Total	60	100.0%	\$14,751	100.0%	100.0%	21	100.0%	100.0%	\$4,816	100.0%	100.0%	39	100.0%	100.0%	\$9,935	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	3.8%	\$0	0.0%	1.9%	0	0.0%	5.9%	\$0	0.0%	3.2%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	11.3%	\$0	0.0%	9.5%	0	0.0%	9.4%	\$0	0.0%	5.6%
	Middle	0	0.0%	\$0	0.0%	17.6%	0	0.0%	18.8%	\$0	0.0%	15.6%	0	0.0%	18.8%	\$0	0.0%	15.2%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	56.4%	\$0	0.0%	61.2%	0	0.0%	56.5%	\$0	0.0%	59.9%
	Unknown	2	100.0%	\$150	100.0%	0.0%	2	100.0%	9.8%	\$150	100.0%	11.8%	0	0.0%	9.4%	\$0	0.0%	16.1%
	Total	2	100.0%	\$150	100.0%	100.0%	2	100.0%	100.0%	\$150	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.6%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	3.3%	\$0	0.0%	0.3%	0	0.0%	7.7%	\$0	0.0%	0.7%
	Unknown	3	100.0%	\$4,785	100.0%	0.0%	1	100.0%	96.7%	\$3,075	100.0%	99.7%	2	100.0%	89.7%	\$1,710	100.0%	99.2%
	Total	3	100.0%	\$4,785	100.0%	100.0%	1	100.0%	100.0%	\$3,075	100.0%	100.0%	2	100.0%	100.0%	\$1,710	100.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	2.8%	\$0	0.0%	0.9%	0	0.0%	1.1%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	10.1%	\$0	0.0%	7.9%	0	0.0%	12.6%	\$0	0.0%	7.9%
	Middle	0	0.0%	\$0	0.0%	17.6%	0	0.0%	14.7%	\$0	0.0%	10.3%	0	0.0%	26.4%	\$0	0.0%	17.7%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	69.7%	\$0	0.0%	76.5%	0	0.0%	52.9%	\$0	0.0%	65.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	4.4%	0	0.0%	6.9%	\$0	0.0%	7.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: AL Tuscaloosa

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Count		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Agg \$ %				
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	9.7%	\$0	0.0%	4.8%	0	0.0%	9.7%	\$0	0.0%	4.3%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	11.9%	\$0	0.0%	7.8%	0	0.0%	8.7%	\$0	0.0%	4.8%
	Middle	0	0.0%	\$0	0.0%	17.6%	0	0.0%	26.9%	\$0	0.0%	23.8%	0	0.0%	18.4%	\$0	0.0%	11.1%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	46.3%	\$0	0.0%	54.1%	0	0.0%	55.3%	\$0	0.0%	69.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.2%	\$0	0.0%	9.4%	0	0.0%	7.8%	\$0	0.0%	10.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	0.6%	\$0	0.0%	0.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	99.4%	\$0	0.0%	99.5%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	21.7%	0	0.0%	3.8%	\$0	0.0%	1.6%	0	0.0%	3.1%	\$0	0.0%	1.5%
	Moderate	5	3.7%	\$663	1.7%	14.9%	5	8.1%	14.6%	\$663	3.5%	8.3%	0	0.0%	14.8%	\$0	0.0%	10.3%
	Middle	20	14.8%	\$3,173	8.0%	17.6%	8	12.9%	20.0%	\$1,237	6.6%	13.6%	12	16.4%	18.9%	\$1,936	9.2%	15.8%
	Upper	80	59.3%	\$26,866	67.7%	45.7%	31	50.0%	38.8%	\$10,710	57.1%	39.2%	49	67.1%	40.7%	\$16,156	77.1%	48.9%
	Unknown	30	22.2%	\$9,005	22.7%	0.0%	18	29.0%	22.8%	\$6,132	32.7%	37.3%	12	16.4%	22.4%	\$2,873	13.7%	23.4%
	Total	135	100.0%	\$39,707	100.0%	100.0%	62	100.0%	100.0%	\$18,742	100.0%	100.0%	73	100.0%	100.0%	\$20,965	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Home Purchase Loans

During the review period the bank did not make any home purchase loans to low-income borrowers. In the assessment area, 21.7 percent of families are considered low-income. Additionally, in both years of the review period, approximately 4.0 percent of aggregate lending was to low-income families. These factors indicate there may be limited opportunities exist for home purchase lending to low-income families in this assessment area. However, aggregate lenders were able to originate home purchase loans during the review period.

The bank made three home purchase loans to moderate-income borrowers in 2019, or 4.3 percent of total home purchase lending in the assessment area. In comparison, 14.9 percent of families are considered moderate-income in the assessment area. The bank's home purchase lending at 7.9 percent was significantly below the aggregate lending performance in 2019 at 18.5 percent. The bank made no home purchase loans to moderate-income borrowers in 2020. The level of aggregate lending in both years indicates that opportunities exist for home purchase lending to moderate-income borrowers in this assessment area.

Home Refinance Loans

Similar to home purchase loans, during the review period the bank did not make any home refinance loans to low-income borrowers. In 2019, 4.2 percent of aggregate refinance loans were to low-income borrowers and in 2020, 2.4 percent of aggregate refinance loans were to low-income borrowers. The level of aggregate lending indicates that limited opportunities exist for refinance lending to low-income borrowers.

The bank made two refinance loans to moderate-income borrowers in 2019. The bank's refinance lending in 2019 to moderate-income borrowers at 9.5 percent was slightly above aggregate lending performance at 8.4 percent. However, with no refinance loans to moderate-income borrowers in 2020, the bank was significantly outperformed by the aggregate at 9.1 percent of total refinance loans to moderate-income borrowers.

Community Development Lending

The bank made an adequate level of community development loans in the Tuscaloosa assessment area. During the review period, the bank originated or renewed three community development loans totaling \$3.6 million. While this level of community development lending was less than peers in the area, performance was deemed adequate when considering the bank's recent entrance into the market in late 2017.

Two of these loans, totaling \$3.3 million, qualified for the community development purpose of revitalizing and stabilizing LMI geographies; both were PPP loans made to small businesses located in moderate-income tracts. The remaining loan totaling \$320,000 qualified for community services as it primarily benefitted LMI students in the assessment area.

INVESTMENT TEST

The bank made no qualified community development investments or donations in the Tuscaloosa assessment area during the review period. This exhibits very poor responsiveness to credit and community development needs, especially when considering the variety of investment opportunities available and information from community contacts regarding the need for larger and more impactful investments and/or donations in the area.

SERVICE TEST

SmartBank’s service test performance in the Tuscaloosa assessment area is adequate.

Retail Services

SmartBank’s delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment area. The distribution of 3 branch offices as of December 31, 2020, was compared to the distribution of households and businesses among the tract categories within the assessment area. As noted earlier, there is just one low-income tract in this assessment area. The bank had no offices in the low-income tract and one office in a moderate-income tract while 20.5 percent of households and 26.0 percent of businesses are in LMI census tracts. The bank’s record of opening and closing branches generally does not adversely affect the accessibility of its delivery systems. During the review period, the bank did not open or close any branches. Finally, the banking services and business hours do not vary in a way that inconveniences SmartBank’s assessment area, including low- and moderate-income geographies and individuals.

Geographic Distribution of Branches & ATMS
 Assessment Area: AL Tuscaloosa

Tract Category	Branches							ATMs								Demographics						
	Total Branches		Open	Closed	Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%						#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			%
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	2.1%	1.6%	1.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	1	33.3%	0	0	1	1	0	Total	1	33.3%	0	0.0%	0	0	1	33.3%	0	0	12	25.5%	18.9%	24.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	1	33.3%	0	0	1	1	0	Total	1	33.3%	0	0.0%	0	0	1	33.3%	0	0	19	40.4%	42.8%	37.7%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	1	33.3%	0	0	1	1	0	Total	1	33.3%	0	0.0%	0	0	1	33.3%	0	0	13	27.7%	35.2%	33.8%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	4.3%	1.4%	2.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	3	100.0%	0	0	3	3	0	Total	3	100.0%	0	0.0%	0	0	3	100.0%	0	0	47	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

2020 FFIEC Census Data, 2020 D&B Info, and 2015 ACS Data
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

SmartBank provides an adequate level of community development services in the Tuscaloosa assessment area. During the review period, bank employees used their financial and technical expertise in nine qualified service activities totaling 126 service hours throughout the assessment area. A majority of the service hours (69.8 percent) involved bank staff serving on the boards or as committee members of organizations that provide community services to LMI individuals. The remaining hours of service involved employees providing financial literacy and budgeting classes to LMI youth. These hours devoted to financial literacy are especially noteworthy given that community contacts specifically stated the need for budgeting and financial literacy for youth in the area. Organizations impacted include schools, community centers, and chambers of commerce.

**METROPOLITAN STATEWIDE AREAS
LIMITED-SCOPE REVIEW**

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

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ALABAMA METROPOLITAN
ASSESSMENT AREAS**

- **Baldwin Assessment Area (Baldwin County)**
 - As of December 31, 2020, SmartBank operated one branch in the assessment area, representing 11.1 percent of its branches in Alabama.
 - As of June 30, 2020, the bank had \$49.4 million in deposits in this assessment area, representing a market share of 0.9 percent and 8.8 percent of SmartBank’s total deposits in Alabama.
- **Huntsville Assessment Area (Madison County)**
 - As of December 31, 2020, SmartBank operated one branch in the assessment area, representing 11.1 percent of its branches in Alabama.
 - As of June 30, 2020, the bank had \$17 million in deposits in this assessment area, representing a market share of 0.2 percent and 3.0 percent of SmartBank’s total deposits in Alabama.
- **Mobile Assessment Area (Washington County, Mobile County)**
 - As of December 31, 2020, SmartBank operated two branches in the assessment area, representing 22.2 percent of its branches in Alabama.
 - As of June 30, 2020, the bank had \$56.3 million in deposits in this assessment area, representing a market share of 0.6 percent and 10.1 percent of SmartBank’s total deposits in Alabama.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Performance in the Limited-Scope Review Metropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Baldwin	Not Consistent (Below)	Consistent	Not Consistent (Below)
Huntsville	Consistent	Consistent	Consistent
Mobile	Not Consistent (Below)	Consistent	Not Consistent (Below)

For the lending test, SmartBank received a rating of low satisfactory for the State of Alabama. Performance in the Huntsville metropolitan limited-scope assessment area was consistent with the statewide rating. However, performance in the Baldwin and Mobile assessment areas was below the statewide rating. The bank made a low level of community development loans in the Mobile assessment area and few if any, community development loans in Baldwin and Huntsville.

For the investment test, SmartBank received a rating of substantial noncompliance for the State of Alabama. The bank makes few if any, investments in all three of the limited-scope assessment areas.

For the service test, SmartBank received a rating of low satisfactory for the State of Alabama. Performance in the Huntsville limited-scope assessment area was consistent with the bank's state performance. However, Mobile provided a limited level of services while Baldwin provided few, if any services.

The performances in the metropolitan limited-scope assessment areas did not affect the overall state rating.

**NONMETROPOLITAN STATEWIDE AREAS
LIMITED-SCOPE REVIEW**

The following non-metropolitan assessment area was reviewed using limited-scope examination procedures.

**DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE ALABAMA NONMETROPOLITAN
ASSESSMENT AREAS**

- **Clarke Assessment Area (Clarke County)**
 - As of December 31, 2020, SmartBank operated two branches in the assessment area, representing 22.2 percent of its branches in Alabama.
 - As of June 30, 2020, the bank had \$82 million in deposits in this assessment area, representing a market share of 12.1 percent and 14.7 percent of SmartBank’s total deposits in Alabama.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Performance in the Limited-Scope Review Nonmetropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Clarke	Consistent	Consistent	Consistent

For the lending test, SmartBank received a rating of low satisfactory for the State of Alabama. Performance in Clarke was consistent with the statewide rating. Lending levels were adequate. The bank was a leader in making community development loans in the Clarke assessment area.

For the investment test, SmartBank received a rating of substantial noncompliance for the State of Alabama. Similarly, the bank made few if any, investments in the Clarke assessment area.

For the service test, SmartBank received a rating of low satisfactory for the State of Alabama. Performance in the Clarke limited-scope assessment area was consistent with the bank’s state performance.

The performances in the metropolitan limited-scope assessment areas did not affect the overall state rating.

FLORIDA

CRA RATING FOR FLORIDA: Needs to Improve

The Lending Test is rated: Needs to Improve

The Investment Test is rated: Substantial Noncompliance

The Service Test is rated: Low Satisfactory

Major factors supporting the rating include the following:

- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The distribution of loans by borrower income reflects adequate penetration among customers of different income levels and businesses of different revenue sizes.
- The bank makes few, if any community development loans in its Florida assessment areas.
- The bank provides few, if any qualified community development investments and grants that are responsive to community development needs in its Florida assessment areas.
- Retail banking services are adequate in the Florida assessment areas.
- The bank provides an adequate level of community development services throughout the Florida assessment areas.

SCOPE OF EXAMINATION

A full-scope review was conducted for the Panama City assessment area. Limited-scope reviews were conducted for the remaining two assessment areas:

- Ft. Walton
- Pensacola

The time period and products evaluated for the assessment areas in Florida are consistent with the scope discussed in the institution section of this report.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORIDA

As of December 31, 2020, SmartBank had approximately \$151 million in deposits in Florida comprising 5.9 percent of the bank's total deposits. SmartBank operated three banking offices in Florida as of December 21, 2020, representing 8.8 percent of the bank's total offices. HMDA-reportable lending in Florida accounted for 21.8 percent of total institutional HMDA-reportable lending by number of loans and 22.7 percent by dollar volume. CRA small business lending in Florida accounted for 7.3 percent of the bank's total CRA small business lending by number of loans and 9.1 percent by dollar volume.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

LENDING TEST

The lending test rating for the state of Florida is needs to improve.

During the review period, SmartBank reported 278 HMDA-reportable and 312 small business loans in Florida. Therefore, more weight was given to small business lending than HMDA-reportable lending for the analyses. SmartBank originated or renewed approximately \$3.6 million in community development loans in Florida.

Lending Activity

The following table displays the volume of lending activity from January 1, 2019 through December 31, 2020 by loan type.

Statewide Summary of Lending Activity
Assessment Areas Located in
Florida

Loan Type	#	%	\$ (000s)	%
HMDA Home Purchase	209	35.4%	\$60,448	47.2%
HMDA Refinance	65	11.0%	\$16,475	12.9%
HMDA Home Improvement	2	0.3%	\$592	0.5%
HMDA Multi-Family	2	0.3%	\$1,405	1.1%
HMDA Other Purpose LOC	0	0.0%	\$0	0.0%
HMDA Other Purpose Closed/Exempt	0	0.0%	\$0	0.0%
HMDA Loan Purpose NA	0	0.0%	\$0	0.0%
Total HMDA	278	47.1%	\$78,920	61.6%
Total Small Business	312	52.9%	\$49,282	38.4%
TOTAL LOANS	590	100.0%	\$128,202	100.0%

Originations and Purchases

Geographic and Borrower Distribution of Loans

The geographic distribution of HMDA-reportable and small business loans is marginally adequate, and the distribution of loans by borrower income and business revenue size is adequate. The detailed analyses are discussed later in this state of Florida section of the report.

Community Development Lending

The bank made few, if any community development loans in the state of Florida. During the review period, the bank originated one community development loan totaling \$75,000 benefiting a Florida assessment area. The one loan was located in the Crestview-Fort Walton Beach-Destin MSA, which was a limited-scope assessment area for this review. The bank made no community development loans in the full-scope assessment area during the review period. Additional information on community development loans is found in the full-scope assessment area section of this evaluation.

INVESTMENT TEST

The investment test rating for Florida is substantial noncompliance, which is driven by performance in the full-scope assessment area of Panama City. The bank exhibited very poor responsiveness to credit and community development needs in Florida. Moreover, the bank made no use of innovative and/or complex investments to support community development initiatives in Florida.

Despite numerous investment opportunities throughout the bank's Florida assessment areas, the bank made only one investment, totaling \$3.5 million in Florida. The one investment was in a mortgage-backed security impacting the Crestview-Fort Walton Beach-Destin limited scope assessment area.

SERVICE TEST

The service test rating for Florida is low satisfactory.

Retail Services

SmartBank delivery systems, including ATMs and branches, are reasonably accessible to geographies and individuals of different income levels. SmartBank's record of opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income geographies and individuals. During the review period, the bank had one branch opening and one branch closing in the state of Florida. In addition, banking services and business hours do not vary in a way that inconveniences the bank's assessment areas, including low- and moderate-income geographies or individuals. Overall, the bank's retail service performance is considered adequate in Florida.

Community Development Services

SmartBank provides an adequate level of community development services given its capacity and performance in the Panama City assessment area. Bank employees engaged in 3 qualified service activities totaling 59 service hours during the review period.

Additional detail on the bank's retail and community development services can be found in the full-scope assessment area sections of this evaluation.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

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

Overview

The Panama City assessment area includes Bay County, the entirety of the Panama City, FL MSA. The assessment area is located along the Gulf of Mexico in the northwestern portion of the Florida Panhandle and was ravaged by Hurricane Michael in October 2018. As of December 31, 2020, SmartBank operated one branch office in the assessment area. The bank's branch presence in the assessment area represents 2.9 percent of branches and 1.3 percent of deposits for the institution. In addition, the market represents 5.2 percent of the combined HMDA-reportable and CRA small business lending by number of loans for the institution. While the Panama City assessment area accounts for a small percentage of lending for the institution, it is the bank's largest assessment area in the state of Florida. Specifically, during the review period, the Panama City assessment area had the largest volume of combined HMDA-reportable and CRA small business lending in the state of Florida by number of loans, at 48.8 percent.

Panama City is a relatively active banking market. According to the June 30, 2020 FDIC Summary of Deposits Report, there are 17 financial institutions operating 51 branch locations in the assessment area with \$3.9 billion in total deposits. SmartBank is ranked 14th in the market with 0.9 percent of deposits (\$34.2 million). Regions Bank had the largest deposit market share at 21.7 percent, followed by Trustmark National Bank with 14.5 percent.

SmartBank is not a lead HMDA lender in this assessment area, originating approximately 1.0 percent of HMDA-reportable loans and ranking 22nd in both 2019 and 2020. The top HMDA lender in 2019 and 2020 was Trustmark National Bank, followed by Caliber Home Loans, Inc. and Wells Fargo Bank in 2019 and Tyndall Federal Credit Union and Quicken Loans in 2020. Similarly, SmartBank is not one of the top CRA small business lenders in the assessment area. SmartBank ranked 18th out of 66 CRA reporters in 2019 with less than one percent of CRA-reportable loans. In 2020, SmartBank ranked 14th out of 93 CRA reporters, with 1.3 percent of CRA-reportable loans. JPMorgan Chase was the top CRA lender in the market for 2019, followed by Ameris Bank and Lake Forest Bank & Trust Company. In 2020, Trustmark National Bank was the top CRA lender in the market, followed by Regions Bank and Ameris Bank.

Population and Income Characteristics

According to 2019 census data, the population of the Panama City assessment area was estimated at approximately 174,705 people, experiencing a population growth of 3.5 percent from 2010 to 2019.³⁸

According to 2020 FFIEC data, the assessment area is made up of 44 census tracts: 2 tracts are low-income (4.5 percent), 9 tracts are moderate-income (20.5 percent), 22 tracts are middle-income (50.0 percent), 10 tracts are upper-income (22.7 percent), and 1 tract has unknown income (2.3 percent). The LMI tracts are concentrated throughout the entire southeastern portion of Panama City between US Highway 98 and Saint Andrew Bay. The tract with unknown income has no population and is located in the Gulf of Mexico, south of Panama City Beach and the St. Andrews State Park.

³⁸ "U.S. Census Bureau Quickfacts: Bay County, Florida." *Census*, 26 Mar 2020.
www.census.gov/quickfacts/fact/table/baycountyflorida/PST045219. Accessed 21 Sept. 2021.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the Panama City, FL MSA. The table below provides a breakdown of the estimated annual family income for each income category (low, moderate, middle, and upper). As shown, the median family income for the MSA increased from \$64,300 in 2019 to \$72,000 in 2020. The 2020 FFIEC data further indicates that 39.3 percent of families in the assessment area are considered LMI.

Borrower Income Levels
Panama City, FL MSA

FFIEC Estimated Median Family Income		Low 0 - 49.99%	Moderate 50% - 79.99%	Middle 80% - 119.99%	Upper 120% - & above
2019	\$64,300	0 - \$32,149	\$32,150 - \$51,439	\$51,440 - \$77,159	\$77,160 - & above
2020	\$72,000	0 - \$35,999	\$36,000 - \$57,599	\$57,600 - \$86,399	\$86,400 - & above

The 2020 FFIEC data also shows that, as a percentage, families living below poverty in the assessment area (10.7 percent) is below state of Florida figure of 12.0 percent. However, between the five-year periods of 2010-2014 and 2015-2019, Bay County had an increase in the percentage of families living in poverty (1.7 percent). Moreover, when considering the overall decline in families living in poverty for the entire state of Florida (12.1 percent) and the nation as a whole (14.5 percent) during the same time period, Bay County’s overall percentage of families living in poverty remains elevated.³⁹ The 2020 FFIEC data also shows that the largest volume of families living below the poverty level are found in middle-income geographies (45.6 percent). As described, poverty levels for the overall assessment area are worsening, and poverty remains a significant barrier for families in the assessment area, and in particular, those residing in middle-income census tracts.

Economic Conditions

Located on the Gulf Coast in the heart of the Florida Panhandle, Bay County has a growing deep-water port, a strong military presence, freight rail and interstate connectivity, a highly skilled workforce, and an advanced technology center.⁴⁰ The county’s dedication to enhancing the economy comes from creating a competitive environment for businesses to thrive, supporting infrastructure for global competitiveness and providing key support services to assist companies in expanding or locating to Bay County.⁴¹ Bay County’s target industries include aviation, aerospace, defense and national security; renewable energy and environment; health sciences; transportation and logistics; information technology; research and engineering services; manufacturing; and corporate headquarters.⁴² Top employers include Naval Support Activity, Tyndall Air Force Base, Bay District Schools, Maximus Federal, Eastern Shipbuilding Group, Wal-Mart & Sam’s Club, Bay County Constitutional Officers, and Bay Medical Center.⁴³

The Panama City MSA remains in recovery from the after effects of Hurricane Michael in October 2018. In addition to destroying numerous homes and business, Hurricane Michael destroyed all hangars and most buildings

³⁹ Bay County, Florida (U.S. Census). *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 21 Sept. 2021.

⁴⁰ “About the Area.” *Bay Economic Development Alliance*, bayeda.com/site-selection-area.aspx. Accessed 21 Sept. 2021.

⁴¹ “Economic Development.” *Bay County Chamber of Commerce*, panamacity.org/economic-development/. Accessed 21 Sept. 2021.

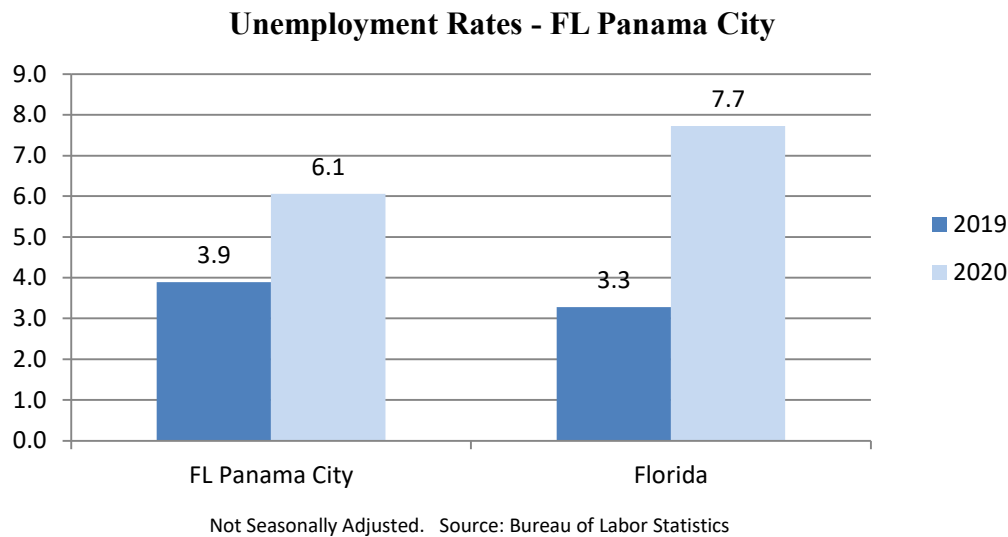
⁴² *Ibid.*

⁴³ “Business Climate.” *Bay Economic Development Alliance*, bayeda.com/business-climate.aspx. Accessed 21 Sept. 2021.

at Tyndall Air Force Base⁴⁴. Lay-offs and/or relocations of numerous employees were noted for some of the area’s top employers, including Tyndall Air Force Base and Bay Medical Center. Congress approved funding for rebuilding and disaster recovery efforts in June 2019.⁴⁵

According to 2020 Dun & Bradstreet information, there were 12,017 businesses within the Panama City assessment area, 94.4 percent of which had total annual revenues less than or equal to \$1 million and were therefore considered to be small businesses. Additionally, small businesses in the assessment area are heavily concentrated in middle-income tracts (53.1 percent) compared to only 22.4 percent of small businesses being located in LMI tracts.

As shown in the following chart, the unemployment rate in the Panama City assessment area rose from 3.9 percent in 2019 to 6.1 percent in 2020. As shown, this was much lower than the Florida unemployment rate of 7.7 percent in 2020 and lower than national unemployment rate of 6.7 percent in December 2020.⁴⁶



According to 2020 FFIEC data, there were 100,109 housing units located in the assessment area, of which 41.7 percent were owner-occupied, 26.2 percent were rental units, and 32.2 percent were vacant. The relatively large percentage of vacant units along with less than a majority of housing units being owner-occupied indicates that home ownership opportunities are limited for those living in the assessment area. This is further intensified for those living in LMI tracts because the percentage of rental and vacant units in LMI tracts is high. Specifically, in low-income census tracts, 67.6 percent of all housing units were rentals or vacant while 64.4 percent of housing units in moderate-income tracts were rental or vacant. The median age of the housing stock was only 34 years, indicating that much of the housing stock in the area is newer. These factors suggest that limited HMDA-reportable lending opportunities may be present throughout the assessment area, and especially in LMI tracts.

⁴⁴ Philipps, Dave. “Tyndall Air Force Base a ‘Complete Loss’ Amid Questions About Stealth Fighters.” *The New York Times*, 11 Oct. 2018, www.nytimes.com/2018/10/11/us/air-force-hurricane-michael-damage.html. Accessed 21 Sept. 2021.

⁴⁵ Bravender, Robin. “Congress finally passes Hurricane Michael aid.” *The Phoenix Flyer*, 3 Jun. 2019, floridaphoenix.com/blog/congress-finally-passes-hurricane-michael-aid/. Accessed 21 Sept. 2021.

⁴⁶ “BLS Data Viewer.” U.S. Bureau of Labor Statistics, n.d. Web. 18 Mar. 2021. beta.bls.gov/dataViewer/view/timeseries/LNS14000000

Housing values and median gross rents in the assessment area were lower than, and affordability was similar to, the state of Florida figures according to 2020 FFIEC data. Additionally, home affordability was an issue for LMI families in the assessment area. For a family of four earning 50.0 percent of AMI between 2014 and 2018, only 22.6 percent of housing in the assessment area is affordable.⁴⁷ For a family of four earning 80.0 percent of AMI between 2014 and 2018, only 39.4 percent of housing in the assessment area is affordable. This is an indication that fewer homeownership options exist for LMI borrowers in Bay County⁴⁸.

Demographic Characteristics by Census Tract

The following table presents key demographic and business information used to help develop a performance context for the assessment area for the year 2020. The data reflects 2020 FFIEC census data and 2020 Dun & Bradstreet data used to analyze the bank's CRA performance. Certain components of the data in the table are discussed in this evaluation as they apply to specific parts of the analysis.

⁴⁷ Bay, FL (U.S. Census). *GIS Mapping and Geographic Information System Data*. The Reinvestment Fund, n.d. www.policymap.com. Accessed 21 Sept. 2021.

⁴⁸ Ibid.

Combined Demographics Report

Assessment Area: FL Panama City

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	4.5	1,602	3.7	467	29.2	9,302	21.4
Moderate-income	9	20.5	6,552	15.1	1,437	21.9	7,779	17.9
Middle-income	22	50	22,624	52	2,131	9.4	8,699	20
Upper-income	10	22.7	12,707	29.2	634	5	17,705	40.7
Unknown-income	1	2.3	0	0	0	0	0	0
Total Assessment Area	44	100.0	43,485	100.0	4,669	10.7	43,485	100.0
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	3,217	1,042	2.5	32.4	1,383	43	792	24.6
Moderate-income	15,656	5,568	13.3	35.6	5,937	37.9	4,151	26.5
Middle-income	54,260	21,854	52.4	40.3	13,240	24.4	19,166	35.3
Upper-income	26,976	13,273	31.8	49.2	5,625	20.9	8,078	29.9
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	100,109	41,737	100.0	41.7	26,185	26.2	32,187	32.2
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	374	3.1	351	3.1	19	3.2	4	4.5
Moderate-income	2,320	19.3	2,135	18.8	165	28	20	22.5
Middle-income	6,377	53.1	6,047	53.3	287	48.7	43	48.3
Upper-income	2,946	24.5	2,806	24.7	118	20	22	24.7
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	12,017	100.0	11,339	100.0	589	100.0	89	100.0
Percentage of Total Businesses:				94.4		4.9		.7
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2	2.7	2	2.8	0	0	0	0
Moderate-income	6	8	6	8.3	0	0	0	0
Middle-income	48	64	45	62.5	3	100	0	0
Upper-income	19	25.3	19	26.4	0	0	0	0
Unknown-income	0	0	0	0	0	0	0	0
Total Assessment Area	75	100.0	72	100.0	3	100.0	0	.0
Percentage of Total Farms:				96.0		4.0		.0

2020 FFIEC Census Data and 2020 D&B Information

Credit and Community Development Needs

To better understand the local community development and economic landscapes, individuals familiar with the community and with community development activities were contacted. These individuals discussed the various opportunities and challenges in the region and how financial institutions can be responsive to local community development needs through lending, investment, and/or service activities.

A contact familiar with the economic conditions in Bay County stated that the current economy is still rebuilding from the damage brought on by Hurricane Michael in October 2018. The contact mentioned that distressed cities having difficulties recovering from the hurricane include Springfield, Callaway, and Mexico Beach. The local economy experienced a shortage in the workforce population, with approximately four to five percent of the population leaving after the hurricane. However, based on recent data, the seasonal and temporary workforces are returning to the area, which may lead to individuals staying permanently. At the time of the hurricane, approximately 8,000 people were stationed at the Tyndall Air Force Base. The hurricane caused about \$4.5 billion of damage to the base and many of the people stationed there moved to other parts of the country. About 80.0 percent of the displaced base employees have returned to Bay County.

The contact stated that Bay County's primary credit needs include affordable housing and small business development. The contact explained that there is a shortage of affordable housing within the assessment area. The majority of the apartment units damaged from the storm have yet to be rebuilt. Investors and builders have focused on rebuilding higher-income properties in the local area. The contact further stated that redevelopment of low-income housing only began recently, more than a year after Hurricane Michael.

In terms of businesses, the hurricane affected approximately 18,000 businesses in Florida, 12,000 of which were located in Bay County. About 10.0 percent of the affected Bay County businesses permanently closed, and there is a 12.0 percent reduction in business license renewals in the county.

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

LENDING TEST

SmartBank's lending in the Panama City assessment area reflects poor responsiveness to assessment area credit needs. The geographic distribution of loans reflects marginally adequate penetration throughout the assessment area, and the distribution of loans by borrower income and business revenue reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank made few, if any of community development loans within the assessment area, which had a negative impact on the bank's lending test performance.

Lending Activity

For 2019 lending, the analysis included 15 small business and 98 HMDA-reportable loans made in the assessment area, while the 2020 analysis included 57 small business and 118 HMDA loans. Greater weight was placed on HMDA-reportable loans, as the volume of HMDA-reportable loans was greater than small business lending. The Panama City assessment area accounted for 77.7 percent of SmartBank's total HMDA-reportable lending in Florida and 23.1 percent of its total statewide small business lending by dollar volume during the review period. In comparison, 22.6 percent of SmartBank's Florida deposits are in the Panama City assessment area.

Geographic Distribution of Loans

Based on the following analysis, the overall geographic distribution of the bank's HMDA-reportable loans and small business loans reflects marginally reasonable dispersion throughout the bank's assessment area and does not reveal any unexplained gaps in lending patterns. For this analysis, the geographic distribution of HMDA-reportable loans and small business loans was compared to demographic information. Performance context information and aggregate lending data were also considered in the evaluation. For instance, unemployment rates, poverty rates, the level of owner-occupied units, and the volume of small businesses in low- and moderate-income census tracts were considered when assessing the bank's lending performance. As noted previously, there are only two low-income tracts in this assessment area. Additionally, the bank does not have a strong presence in the Panama City assessment area, particularly for HMDA-reportable lending.

Residential Real Estate (HMDA) Lending

The geographic distribution of HMDA-reportable loans reflects poor dispersion throughout the assessment area. The following tables show the geographic distribution of SmartBank HMDA-reportable loans for 2019 and 2020 within its Panama City assessment area and includes a comparison of the bank's HMDA-reportable lending to the aggregate HMDA lenders within the assessment area. The HMDA aggregate lenders' data are the combined total of lending activity reported by all lenders subject to HMDA in the MSA section of the assessment area.

Home Purchase Loans

Of the 168 HMDA-reportable home purchase loans originated by the bank during the review period, 1 (0.6 percent) was inside a low-income tract in the Panama City assessment area which was significantly below the 2.5 percent of owner-occupied units. The bank originated 13 (7.7 percent) in moderate-income tracts which was also significantly below the percentage of owner-occupied units at 13.3 percent.

In 2019, 1.1 percent of all home purchase lending was in low-income tracts, which was comparable to aggregate performance of 1.2 percent. Lending in moderate-income census tracts at 10.2 percent was above aggregate performance of 7.5 percent.

In 2020, the bank did not have any home purchase lending in the low-income tracts. Aggregate lending performance was also very limited at 1.4 percent of home purchase loans to low-income borrowers. Lending in moderate-income census tracts at 5.0 percent was below aggregate performance of 7.3 percent.

Home Refinance Loans

The bank originated 46 home refinance HMDA-reportable loans during the review period, with none in a low-income tract. The bank originated one home refinance loan (2.2 percent) in a moderate-income tract, which was significantly below the percentage of owner-occupied units in these tracts at 13.3 percent.

Home refinance lending in low-income tracts was not evaluated during the review period due to the overall low volume of lending by all lenders in these tracts. In 2019, the bank had no home refinance loans in moderate-income tracts, compared to 4.9 percent of aggregate lending. In 2020, the bank's lending in moderate-income census tracts at 2.7 percent was significantly below aggregate performance of 5.6 percent.

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: FL Panama City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units	Count		Bank		Dollar			Bank		Dollar				
		Count	Dollar		#	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	1	0.6%	\$159	0.4%	2.5%	1	1.1%	1.2%	\$159	0.8%	0.9%	0	0.0%	1.4%	\$0	0.0%	1.0%
	Moderate	13	7.7%	\$2,074	5.0%	13.3%	9	10.2%	7.5%	\$1,413	7.1%	5.5%	4	5.0%	7.3%	\$661	3.1%	5.8%
	Middle	80	47.6%	\$20,371	49.2%	52.4%	41	46.6%	60.0%	\$9,213	46.1%	59.2%	39	48.8%	58.6%	\$11,158	52.2%	57.3%
	Upper	74	44.0%	\$18,763	45.4%	31.8%	37	42.0%	31.3%	\$9,192	46.0%	34.4%	37	46.3%	32.7%	\$9,571	44.7%	35.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	168	100.0%	\$41,367	100.0%	100.0%	88	100.0%	100.0%	\$19,977	100.0%	100.0%	80	100.0%	100.0%	\$21,390	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.2%	\$0	0.0%	0.9%	0	0.0%	0.7%	\$0	0.0%	0.5%
	Moderate	1	2.2%	\$75	0.7%	13.3%	0	0.0%	4.9%	\$0	0.0%	3.6%	1	2.7%	5.6%	\$75	0.8%	4.2%
	Middle	25	54.3%	\$5,671	51.9%	52.4%	4	44.4%	59.1%	\$500	39.8%	57.6%	21	56.8%	56.6%	\$5,171	53.5%	55.7%
	Upper	20	43.5%	\$5,175	47.4%	31.8%	5	55.6%	34.8%	\$757	60.2%	37.9%	15	40.5%	37.1%	\$4,418	45.7%	39.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	46	100.0%	\$10,921	100.0%	100.0%	9	100.0%	100.0%	\$1,257	100.0%	100.0%	37	100.0%	100.0%	\$9,664	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	1.5%	\$0	0.0%	0.3%	0	0.0%	1.8%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	5.2%	\$0	0.0%	3.5%	0	0.0%	10.2%	\$0	0.0%	5.9%
	Middle	0	0.0%	\$0	0.0%	52.4%	0	0.0%	50.0%	\$0	0.0%	54.2%	0	0.0%	49.7%	\$0	0.0%	47.9%
	Upper	1	100.0%	\$108	100.0%	31.8%	0	0.0%	43.3%	\$0	0.0%	41.9%	1	100.0%	38.3%	\$108	100.0%	42.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$108	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$108	100.0%	100.0%
MULTI FAMILY	Multi-Family Units					0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Low	0	0.0%	\$0	0.0%	4.3%	0	0.0%	26.7%	\$0	0.0%	18.0%	0	0.0%	35.0%	\$0	0.0%	14.3%
	Moderate	0	0.0%	\$0	0.0%	10.4%	0	0.0%	66.7%	\$298	100.0%	81.0%	0	0.0%	50.0%	\$0	0.0%	81.3%
	Middle	1	100.0%	\$298	100.0%	62.4%	1	100.0%	66.7%	\$298	100.0%	81.0%	0	0.0%	50.0%	\$0	0.0%	81.3%
	Upper	0	0.0%	\$0	0.0%	22.9%	0	0.0%	6.7%	\$0	0.0%	1.0%	0	0.0%	15.0%	\$0	0.0%	4.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Total	1	100.0%	\$298	100.0%	100.0%	1	100.0%	100.0%	\$298	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	9.2%	\$0	0.0%	10.3%	0	0.0%	7.1%	\$0	0.0%	6.9%
	Middle	0	0.0%	\$0	0.0%	52.4%	0	0.0%	53.1%	\$0	0.0%	49.3%	0	0.0%	56.6%	\$0	0.0%	60.5%
	Upper	0	0.0%	\$0	0.0%	31.8%	0	0.0%	37.8%	\$0	0.0%	40.4%	0	0.0%	33.3%	\$0	0.0%	31.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: FL Panama City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units	Count		Bank		Dollar			Bank		Dollar				
		Count	Dollar		#	%	#	%	\$ (000s)	\$ %	\$ %	#	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	12.0%	\$0	0.0%	7.4%	0	0.0%	6.1%	\$0	0.0%	4.4%
	Middle	0	0.0%	\$0	0.0%	52.4%	0	0.0%	51.8%	\$0	0.0%	43.8%	0	0.0%	52.3%	\$0	0.0%	51.2%
	Upper	0	0.0%	\$0	0.0%	31.8%	0	0.0%	36.1%	\$0	0.0%	48.8%	0	0.0%	40.2%	\$0	0.0%	42.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	2.5%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	3.0%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	13.3%	0	0.0%	14.6%	\$0	0.0%	12.9%	0	0.0%	14.2%	\$0	0.0%	9.7%
	Middle	0	0.0%	\$0	0.0%	52.4%	0	0.0%	52.8%	\$0	0.0%	52.1%	0	0.0%	53.0%	\$0	0.0%	55.2%
	Upper	0	0.0%	\$0	0.0%	31.8%	0	0.0%	32.1%	\$0	0.0%	34.8%	0	0.0%	29.9%	\$0	0.0%	33.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	0.5%	\$159	0.3%	2.5%	1	1.0%	1.1%	\$159	0.7%	0.8%	0	0.0%	1.2%	\$0	0.0%	0.8%
	Moderate	14	6.5%	\$2,149	4.1%	13.3%	9	9.2%	7.3%	\$1,413	6.6%	6.0%	5	4.2%	6.8%	\$736	2.4%	5.9%
	Middle	106	49.1%	\$26,340	50.0%	52.4%	46	46.9%	59.3%	\$10,011	46.5%	59.8%	60	50.8%	57.5%	\$16,329	52.4%	58.4%
	Upper	95	44.0%	\$24,046	45.6%	31.8%	42	42.9%	32.3%	\$9,949	46.2%	33.4%	53	44.9%	34.5%	\$14,097	45.2%	35.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	216	100.0%	\$52,694	100.0%	100.0%	98	100.0%	100.0%	\$21,532	100.0%	100.0%	118	100.0%	100.0%	\$31,162	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Small Business Lending

The geographic distribution of small business loans reflects adequate dispersion throughout the assessment area. The following table shows the distribution of small business loans as a percentage of the total number of loans in the assessment area and also includes a comparison of the bank’s small business lending to the aggregate lenders within the assessment area. The CRA aggregate lenders’ data are the combined total of lending activity reported by all lenders subject to CRA loan data reporting requirements in the assessment area.

Geographic Distribution of Small Business Loans
 Assessment Area: FL Panama City

Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
					Total Businesses %	2019					2020						
	Count		Dollar			Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank	Agg	\$ 000s	\$ %	\$ %	#	%	Agg	%	\$ 000s	\$ %	Agg
Low	2	2.8%	\$71	0.6%	3.1%	0	0.0%	2.5%	\$0	0.0%	2.9%	2	3.5%	2.5%	\$71	0.9%	3.2%
Moderate	18	25.0%	\$2,099	18.3%	19.3%	4	26.7%	17.2%	\$670	16.9%	20.6%	14	24.6%	16.7%	\$1,429	19.0%	19.9%
Middle	32	44.4%	\$5,974	52.1%	53.1%	7	46.7%	51.5%	\$1,613	40.6%	50.8%	25	43.9%	53.9%	\$4,361	58.1%	51.9%
Upper	20	27.8%	\$3,332	29.0%	24.5%	4	26.7%	27.2%	\$1,686	42.5%	25.0%	16	28.1%	26.6%	\$1,646	21.9%	24.8%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.7%	\$0	0.0%	0.7%	0	0.0%	0.3%	\$0	0.0%	0.1%
Total	72	100.0%	\$11,476	100.0%	100.0%	15	100.0%	100.0%	\$3,969	100.0%	100.0%	57	100.0%	100.0%	\$7,507	100.0%	100.0%

Originations & Purchases
 2020 FFIEC Census Data and 2020 D&B Information

Within the review period, the bank originated a total of two small business loans inside low-income tracts at 2.8 percent of total loans, which was similar to the 3.1 percent of small businesses located in these tracts. Additionally, the bank originated 18 small business loans at 25.0 percent in moderate-income tracts which was above the percentage of small businesses at 19.3 percent.

In 2019, the bank did not lend in low-income tracts in the assessment area though 2.5 percent of aggregate lending was in low-income tracts. However, the bank’s lending in moderate-income tracts at 26.7 percent was above aggregate lending at 17.2 percent.

In 2020, SmartBank’s lending at 3.5 percent of all loans in low-income tracts was above aggregate lending performance of 2.5 percent. The bank’s lending to businesses in moderate-income tracts at 24.6 percent of total loans was significantly above the aggregate lending at 16.7 percent.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans by borrower income and business revenue size reflects adequate penetration among individuals of different income levels and businesses of different sizes. For this analysis, the distribution of HMDA-reportable lending to borrowers of different income levels and small business lending among businesses of different sizes was compared to available demographic information. Performance context information and aggregate lending data were considered in the evaluation.

Residential Real Estate (HMDA) Lending

The distribution of HMDA-reportable lending by borrower income is adequate throughout the assessment area. The following tables show the borrower distribution of SmartBank’s 2019 and 2020 HMDA-reportable loans by borrower income with the Panama City assessment area. The tables include demographic information and a comparison of the bank’s lending to aggregate lending.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: FL Panama City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Count		Bank		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	Bank	Agg	\$ (000s)	\$ %	\$ %
HOME PURCHASE	Low	6	3.6%	\$880	2.1%	21.4%	2	2.3%	3.7%	\$249	1.2%	1.8%	4	5.0%	5.3%	\$631	2.9%	2.6%
	Moderate	33	19.6%	\$5,947	14.4%	17.9%	17	19.3%	14.7%	\$2,773	13.9%	9.8%	16	20.0%	18.3%	\$3,174	14.8%	12.8%
	Middle	41	24.4%	\$10,085	24.4%	20.0%	18	20.5%	23.2%	\$3,844	19.2%	21.0%	23	28.8%	22.6%	\$6,241	29.2%	20.6%
	Upper	86	51.2%	\$24,204	58.5%	40.7%	51	58.0%	41.9%	\$13,111	65.6%	50.8%	35	43.8%	40.0%	\$11,093	51.9%	49.8%
	Unknown	2	1.2%	\$251	0.6%	0.0%	0	0.0%	16.6%	\$0	0.0%	16.6%	2	2.5%	13.8%	\$251	1.2%	14.2%
	Total	168	100.0%	\$41,367	100.0%	100.0%	88	100.0%	100.0%	\$19,977	100.0%	100.0%	80	100.0%	100.0%	\$21,390	100.0%	100.0%
REFINANCE	Low	1	2.2%	\$120	1.1%	21.4%	1	11.1%	4.1%	\$120	9.5%	2.0%	0	0.0%	2.7%	\$0	0.0%	1.4%
	Moderate	8	17.4%	\$1,061	9.7%	17.9%	2	22.2%	8.3%	\$200	15.9%	4.9%	6	16.2%	10.1%	\$861	8.9%	6.9%
	Middle	6	13.0%	\$970	8.9%	20.0%	1	11.1%	14.2%	\$160	12.7%	10.9%	5	13.5%	15.0%	\$810	8.4%	12.2%
	Upper	29	63.0%	\$8,229	75.4%	40.7%	5	55.6%	41.1%	\$777	61.8%	46.4%	24	64.9%	36.1%	\$7,452	77.1%	40.2%
	Unknown	2	4.3%	\$541	5.0%	0.0%	0	0.0%	32.3%	\$0	0.0%	35.8%	2	5.4%	36.1%	\$541	5.6%	39.3%
	Total	46	100.0%	\$10,921	100.0%	100.0%	9	100.0%	100.0%	\$1,257	100.0%	100.0%	37	100.0%	100.0%	\$9,664	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	9.3%	\$0	0.0%	5.4%	0	0.0%	6.0%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	13.4%	\$0	0.0%	9.4%	0	0.0%	12.0%	\$0	0.0%	5.2%
	Middle	1	100.0%	\$108	100.0%	20.0%	0	0.0%	23.2%	\$0	0.0%	18.5%	1	100.0%	24.6%	\$108	100.0%	18.4%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	50.0%	\$0	0.0%	58.1%	0	0.0%	52.1%	\$0	0.0%	68.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	8.6%	0	0.0%	5.4%	\$0	0.0%	4.7%
	Total	1	100.0%	\$108	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$108	100.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.0%	\$0	0.0%	0.1%
	Unknown	1	100.0%	\$298	100.0%	0.0%	1	100.0%	100.0%	\$298	100.0%	100.0%	0	0.0%	95.0%	\$0	0.0%	99.9%
	Total	1	100.0%	\$298	100.0%	100.0%	1	100.0%	100.0%	\$298	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	5.1%	\$0	0.0%	3.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	8.2%	\$0	0.0%	5.4%	0	0.0%	14.1%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	21.4%	\$0	0.0%	14.0%	0	0.0%	27.3%	\$0	0.0%	21.5%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	61.2%	\$0	0.0%	71.1%	0	0.0%	52.5%	\$0	0.0%	64.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.1%	\$0	0.0%	6.2%	0	0.0%	6.1%	\$0	0.0%	6.3%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: FL Panama City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Count		Bank		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	Bank	Agg	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	10.8%	\$0	0.0%	6.0%	0	0.0%	9.1%	\$0	0.0%	5.8%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	12.0%	\$0	0.0%	4.7%	0	0.0%	24.2%	\$0	0.0%	16.5%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	20.5%	\$0	0.0%	11.2%	0	0.0%	14.4%	\$0	0.0%	11.8%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	54.2%	\$0	0.0%	77.0%	0	0.0%	49.2%	\$0	0.0%	61.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	1.1%	0	0.0%	3.0%	\$0	0.0%	4.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	21.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.7%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.9%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.0%	0	0.0%	1.4%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.7%	0	0.0%	5.7%	\$0	0.0%	7.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	92.0%	\$0	0.0%	91.0%	0	0.0%	99.3%	\$0	0.0%	99.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	7	3.2%	\$1,000	1.9%	21.4%	3	3.1%	3.9%	\$369	1.7%	1.7%	4	3.4%	4.2%	\$631	2.0%	2.0%
	Moderate	41	19.0%	\$7,008	13.3%	17.9%	19	19.4%	13.0%	\$2,973	13.8%	8.2%	22	18.6%	14.8%	\$4,035	12.9%	9.6%
	Middle	48	22.2%	\$11,163	21.2%	20.0%	19	19.4%	20.9%	\$4,004	18.6%	17.6%	29	24.6%	19.4%	\$7,159	23.0%	15.9%
	Upper	115	53.2%	\$32,433	61.5%	40.7%	56	57.1%	41.3%	\$13,888	64.5%	46.9%	59	50.0%	38.3%	\$18,545	59.5%	42.6%
	Unknown	5	2.3%	\$1,090	2.1%	0.0%	1	1.0%	20.9%	\$298	1.4%	25.6%	4	3.4%	23.2%	\$792	2.5%	30.1%
	Total	216	100.0%	\$52,694	100.0%	100.0%	98	100.0%	100.0%	\$21,532	100.0%	100.0%	118	100.0%	100.0%	\$31,162	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Home Purchase Loans

During the review period the bank made six (3.6 percent) home purchase loans to low-income borrowers, which was significantly below the number of low-income families at 21.4 percent. The bank made 33 (19.6 percent) home purchase loans to moderate-income borrowers, which was above the percentage of moderate-income families in the assessment area at 17.9 percent.

In 2019, the bank's home purchase lending to low-income borrowers was 2.3 percent, which was below aggregate performance at 3.7 percent. However, the bank's lending to moderate-income borrowers at 19.3 percent was above aggregate performance lending 14.7 percent to moderate-income borrowers.

In 2020, the bank's home purchase lending to low-income borrowers was 5.0 percent, similar to aggregate lending at 5.3 percent. The bank's lending to moderate-income borrowers at 20.0 percent was slightly better than aggregate lenders at 18.3 percent.

Home Refinance Loans

During the review period the bank made one (2.2 percent) home refinance loans to low-income borrowers, which was significantly below the number of low-income families at 21.4 percent. The bank made eight (17.4 percent) home purchase loans to moderate-income borrowers, which was similar to the percentage of moderate-income families in the assessment area at 17.9 percent.

The bank's home refinance lending in 2019 to low-income borrowers at 11.1 percent was above aggregate lending performance. Similarly, the bank's lending to moderate-income borrowers was above aggregate lenders in the assessment area.

In 2020, the did not make any home refinance loans to low-income borrowers, compared to 2.7 percent of aggregate lending to low-income borrowers. However, the bank's lending at 16.2 percent was significantly above aggregate lending performance to moderate-income borrowers at 10.1 percent.

Small Business Lending

Small business lending by business revenue size reflects good penetration among businesses of different sizes located throughout the assessment area. The following table shows the distribution of SmartBank small business loans, by revenue size for 2019 and 2020 within the Panama City assessment area.

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Panama City

Business Revenue & Loan Size	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison												
						2019						2020						
	Bank		Total Businesses			Count		Dollar				Count		Dollar				
	#	%	\$ (000s)	\$ %	%	Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	Bank \$ %	Agg \$ %			
BUSINESS REVENUE	\$1million or Less	14	19.4%	\$4,219	36.8%	94.4%	8	53.3%	38.9%	\$2,084	52.5%	36.9%	6	10.5%	30.7%	\$2,135	28.4%	23.5%
	Over \$1 Million	12	16.7%	\$3,960	34.5%	4.9%	7	46.7%					5	8.8%				
	Total Rev. available	26	36.1%	\$8,179	71.3%	99.3%	15	100.0%					11	19.3%				
	Rev. Not Known	46	63.9%	\$3,297	28.7%	0.7%	0	0.0%					46	80.7%				
	Total	72	100.0%	\$11,476	100.0%	100.0%	15	100.0%					57	100.0%				
LOAN SIZE	\$100,000 or Less	41	56.9%	\$1,321	11.5%		4	26.7%	93.9%	\$160	4.0%	41.9%	37	64.9%	87.7%	\$1,161	15.5%	33.7%
	\$100,001 - \$250,000	17	23.6%	\$3,142	27.4%		6	40.0%	3.6%	\$1,195	30.1%	19.5%	11	19.3%	7.7%	\$1,947	25.9%	23.7%
	\$250,001 - \$1 Million	14	19.4%	\$7,013	61.1%		5	33.3%	2.5%	\$2,614	65.9%	38.6%	9	15.8%	4.7%	\$4,399	58.6%	42.6%
	Total	72	100.0%	\$11,476	100.0%		15	100.0%	100.0%	\$3,969	100.0%	100.0%	57	100.0%	100.0%	\$7,507	100.0%	100.0%
	Rev \$1 Mill or Less	3	21.4%	\$110	2.6%													
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	3	21.4%	\$110	2.6%													
	\$100,001 - \$250,000	6	42.9%	\$1,072	25.4%													
	\$250,001 - \$1 Million	5	35.7%	\$3,037	72.0%													
	Total	14	100.0%	\$4,219	100.0%													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2020 FFIEC Census Data and 2020 D&B Information

The table above shows 19.4 percent of bank’s loans were originated to businesses with revenue of \$1 million or less in 2019 and 2020, while 94.4 percent of total businesses in the assessment area are small businesses. The bank’s lending in 2019 at 53.3 percent was above aggregate lending performance at 38.9 percent. However, in 2020, the bank made 10.5 percent of loans to businesses with a revenue of \$1 million or less while aggregate lenders made 30.7 percent.

Revenue information was not known for 46 of the 72 loans originated in 2020, including 45 PPP loans. Banks were not required to collect or report revenue information for these loans. As previously mentioned, the PPP loans were considered responsive to the needs of small businesses during the COVID-19 pandemic. If only loans with revenue available are considered, 53.8 percent of the bank’s loans were to businesses with revenue of \$1.0 million or less, which is consistent the bank’s lending performance in 2019. Additionally, the percentage of loans made in 2020 in amounts of \$250,000 or less (80.5 percent) shows the bank’s willingness to make small dollar loans to help meet the credit needs of businesses in the community.

Community Development Lending

For the second consecutive review period, the bank made no community development loans in the Panama City assessment area.

INVESTMENT TEST

For the second consecutive review period, The bank made no qualified community development investments or donations in the Panama City assessment area during the review period. This exhibits very poor responsiveness to credit and community development needs, especially when considering the increased variety of investment opportunities available as a result of the entire assessment area being a federally declared disaster area by the Federal Emergency Management Agency (FEMA) on October 11, 2018.

SERVICE TEST

SmartBank’s service test performance in the Panama City assessment area is adequate.

Retail Services

SmartBank’s delivery systems are reasonably accessible to the bank’s geographies and individuals of different income levels in the assessment area. The distribution of the bank’s branches as of December 31, 2020, was compared to the distribution of households and businesses among the tract categories within the assessment area. The bank had no offices in low- or moderate-income tracts in the Panama City assessment area and one office in a middle-income tract. The one branch is located near moderate income tracts, which allows the bank to serve households and businesses located in these tracts. The bank’s record of opening and closing branches generally does not adversely affect the accessibility of its delivery systems. During the review period, the bank relocated its branch in the Panama City assessment area within the same middle-income tract. Finally, the banking services and business hours do not vary in a way that inconveniences SmartBank’s assessment area, including low- and moderate-income geographies and individuals.

Geographic Distribution of Branches & ATMS

Assessment Area: FL Panama City

Tract Category	Branches							ATMs								Demographics						
	Total Branches				Drive thru	Extend-ed Hours	Week-end Hours	Total ATMs		Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	2	4.5%	3.6%	3.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Moderate	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	9	20.5%	16.9%	19.3%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Middle	1	100.0%	1	1	1	1	0	Total	1	100.0%	1	100.0%	1	0	0	0.0%	0	1	22	50.0%	51.7%	53.1%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	10	22.7%	27.8%	24.5%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	2.3%	0.0%	0.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				
Total	1	100.0%	1	1	1	1	0	Total	1	100.0%	1	100.0%	1	0	0	0.0%	0	1	44	100.0%	100.0%	100.0%
DTO	0		0	0				SA	0		0		0	0	0		0	0				

2020 FFIEC Census Data, 2020 D&B Info, and 2015 ACS Data
 Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
 DTO - Drive thru only is a subset of total branches
 SA = Stand Alone ATM is a subset of total ATMs

Community Development Services

SmartBank provides an adequate level of community development services in the assessment area. During the review period, bank employees used their financial and technical expertise in three qualified service activities totaling 59 service hours throughout the assessment area. A majority of the service hours (71.2 percent) involved bank staff providing financial literacy and mentoring to schools that have a majority of students qualifying for free or reduced lunch. The remaining hours were spent serving on the board of a community organization that provides community services to LMI individuals.

**METROPOLITAN STATEWIDE AREAS
LIMITED-SCOPE REVIEW**

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

DESCRIPTION OF INSTITUTION’S OPERATIONS IN THE FLORIDA METROPOLITAN ASSESSMENT AREAS

- **Fort Walton Assessment Area (Okaloosa County and Walton County)**
 - As of December 31, 2020, SmartBank operated one branch in the assessment area, representing 33.3 percent of its branches in Florida.
 - As of June 30, 2020, the bank had \$84 million in deposits in this assessment area, representing a market share of 1.3 percent and 55.5 percent of SmartBank’s total deposits in Florida.
- **Pensacola Assessment Area (Escambia County)**
 - As of December 31, 2020, SmartBank operated one branch in the assessment area, representing 33.3 percent of its branches in Florida.
 - As of June 30, 2020, the bank had \$33.1 million in deposits in this assessment area, representing a market share of 0.6 percent and 21.9 percent of SmartBank’s total deposits in Florida.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

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

Performance in the Limited-Scope Review Metropolitan Assessment Areas			
Assessment Area	Lending Test	Investment Test	Service Test
Fort Walton	Consistent	Not Consistent (Above)	Not Consistent (Below)
Pensacola	Consistent	Consistent	Not Consistent (Below)

For the lending test, SmartBank received a rating of needs to improve for the State of Florida. Overall, performance in both limited-scope assessment areas were consistent with the statewide lending test performance. Lending levels were poor for Fort Walton and Pensacola and the bank made few if any, community development loans.

For the investment test, SmartBank received a rating of substantial noncompliance for the State of Florida. The bank makes a low level of investments in Fort Walton and few if any, investments in Pensacola.

For the service test, SmartBank received a rating of low satisfactory for the State of Florida. Performance in the two limited-scope assessment areas was below the bank’s state performance. Both Fort Walton and Pensacola provided few, if any services.

The performances in the metropolitan limited-scope assessment areas did not affect the overall state rating.

APPENDIX A

SCOPE OF EXAMINATION			
TIME PERIOD REVIEWED HMDA-reportable and Small Business lending: January 1, 2019 to December 31, 2020 CD Lending, Investments, and Services: January 1, 2018 to December 31, 2020			
FINANCIAL INSTITUTION SmartBank, Pigeon Forge, Tennessee		PRODUCTS REVIEWED HMDA-reportable Loans Small Business Loans	
AFFILIATE(S) N/A	AFFILIATE RELATIONSHIP N/A	PRODUCTS REVIEWED N/A	
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
ASSESSMENT AREA	TYPE OF EXAMINATION	BRANCHES VISITED	OTHER INFORMATION
Tennessee			
Chattanooga MSA # 16860	Full-scope Review		
Cleveland MSA #17420	Limited-scope Review		
Coffee County	Limited-scope Review		
East Tennessee	Limited-scope Review		
Knoxville MSA #28940	Full-scope Review		
Rutherford MSA #34980	Limited-scope Review		
Sevier County	Limited-scope Review		
Alabama			
Baldwin MSA #19300	Limited-scope Review		
Clarke County	Limited-scope Review		
Huntsville MSA #26620	Limited-scope Review		
Mobile MSA #33660	Limited-scope Review		
Tuscaloosa MSA #46220	Full-scope Review		
Florida			
Ft Walton MSA #18880	Limited-scope Review		
Panama City MSA #37460	Full-scope Review		
Pensacola MSA #37860	Limited-scope Review		

APPENDIX B – SUMMARY OF STATE RATINGS

State Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall State Rating
Alabama	Low Satisfactory	Substantial Noncompliance	Low Satisfactory	Needs to Improve
Florida	Needs to Improve	Substantial Noncompliance	Low Satisfactory	Needs to Improve
Tennessee	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

APPENDIX C – DEFINITIONS AND GENERAL INFORMATION

Definitions

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

Rounding Convention

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

APPENDIX D – GLOSSARY

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

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

Community development: All Agencies have adopted the following language. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration’s Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

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

- I. Low-or moderate-income geographies;
- II. Designated disaster areas; or
- III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, FDIC, and OCC, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

APPENDIX D – GLOSSARY (Continued)

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

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

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

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

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

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

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

APPENDIX D – GLOSSARY (Continued)

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Call Report and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Call Report. These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

APPENDIX E – GENERAL INFORMATION

General Information

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

This document is an evaluation of the CRA performance of SMARTBANK prepared by the Federal Reserve Bank of Atlanta, the institution's supervisory agency, as of September 13, 2021. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Cleveland

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	Dollar %		Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %	Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %		
HOME PURCHASE	Low	3	20.0%	\$333	12.9%	4.7%	1	12.5%	4.7%	\$85	6.0%	2.6%	2	28.6%	5.5%	\$248	21.6%	3.3%
	Moderate	2	13.3%	\$261	10.1%	3.2%	2	25.0%	3.8%	\$261	18.3%	3.3%	0	0.0%	3.8%	\$0	0.0%	3.2%
	Middle	4	26.7%	\$556	21.6%	45.6%	2	25.0%	44.7%	\$310	21.7%	40.6%	2	28.6%	43.9%	\$246	21.4%	40.6%
	Upper	6	40.0%	\$1,426	55.4%	46.4%	3	37.5%	46.8%	\$770	54.0%	53.5%	3	42.9%	46.9%	\$656	57.0%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>\$2,576</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,426</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,150</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	9.1%	\$100	8.6%	4.7%	1	16.7%	2.1%	\$100	13.9%	1.0%	0	0.0%	1.8%	\$0	0.0%	0.9%
	Moderate	2	18.2%	\$160	13.7%	3.2%	2	33.3%	3.6%	\$160	22.2%	2.9%	0	0.0%	3.6%	\$0	0.0%	3.3%
	Middle	4	36.4%	\$453	38.8%	45.6%	1	16.7%	45.9%	\$190	26.3%	40.6%	3	60.0%	42.3%	\$263	59.1%	38.6%
	Upper	4	36.4%	\$454	38.9%	46.4%	2	33.3%	48.3%	\$272	37.7%	55.5%	2	40.0%	52.4%	\$182	40.9%	57.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$1,167</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$722</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$445</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	5.5%	\$0	0.0%	3.5%	0	0.0%	4.0%	\$0	0.0%	2.0%
	Moderate	1	100.0%	\$95	100.0%	3.2%	1	100.0%	3.7%	\$95	100.0%	5.6%	0	0.0%	5.0%	\$0	0.0%	4.5%
	Middle	0	0.0%	\$0	0.0%	45.6%	0	0.0%	49.4%	\$0	0.0%	47.5%	0	0.0%	42.6%	\$0	0.0%	40.9%
	Upper	0	0.0%	\$0	0.0%	46.4%	0	0.0%	41.5%	\$0	0.0%	43.4%	0	0.0%	48.5%	\$0	0.0%	52.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	30.5%	0	0.0%	19.2%	\$0	0.0%	12.8%	0	0.0%	3.4%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	19.1%	0	0.0%	26.9%	\$0	0.0%	9.9%	0	0.0%	13.8%	\$0	0.0%	1.8%
	Middle	2	100.0%	\$816	100.0%	43.5%	1	100.0%	34.6%	\$430	100.0%	7.8%	1	100.0%	62.1%	\$386	100.0%	90.4%
	Upper	0	0.0%	\$0	0.0%	6.8%	0	0.0%	19.2%	\$0	0.0%	69.5%	0	0.0%	20.7%	\$0	0.0%	5.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$816</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$430</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$386</i>	<i>100.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	1.5%	\$0	0.0%	0.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	3.2%	0	0.0%	3.1%	\$0	0.0%	3.9%	0	0.0%	4.4%	\$0	0.0%	2.4%
	Middle	0	0.0%	\$0	0.0%	45.6%	0	0.0%	38.5%	\$0	0.0%	39.1%	0	0.0%	44.1%	\$0	0.0%	39.4%
	Upper	0	0.0%	\$0	0.0%	46.4%	0	0.0%	56.9%	\$0	0.0%	56.1%	0	0.0%	51.5%	\$0	0.0%	58.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		2019, 2020				Owner Occupied Units %	2019					2020						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	2.5%	\$0	0.0%	2.0%	0	0.0%	9.4%	\$0	0.0%	4.3%
	Moderate	0	0.0%	\$0	0.0%	3.2%	0	0.0%	10.0%	\$0	0.0%	12.1%	0	0.0%	6.3%	\$0	0.0%	4.5%
	Middle	0	0.0%	\$0	0.0%	45.6%	0	0.0%	37.5%	\$0	0.0%	43.9%	0	0.0%	31.3%	\$0	0.0%	21.9%
	Upper	0	0.0%	\$0	0.0%	46.4%	0	0.0%	50.0%	\$0	0.0%	42.0%	0	0.0%	53.1%	\$0	0.0%	69.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	4.7%	0	0.0%	3.8%	\$0	0.0%	2.4%	0	0.0%	2.5%	\$0	0.0%	1.6%
	Moderate	0	0.0%	\$0	0.0%	3.2%	0	0.0%	1.9%	\$0	0.0%	1.3%	0	0.0%	3.4%	\$0	0.0%	4.1%
	Middle	0	0.0%	\$0	0.0%	45.6%	0	0.0%	54.7%	\$0	0.0%	50.1%	0	0.0%	56.3%	\$0	0.0%	51.8%
	Upper	0	0.0%	\$0	0.0%	46.4%	0	0.0%	39.6%	\$0	0.0%	46.2%	0	0.0%	37.8%	\$0	0.0%	42.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	4	13.8%	\$433	9.3%	4.7%	2	12.5%	3.8%	\$185	6.9%	2.8%	2	15.4%	3.5%	\$248	12.5%	2.0%
	Moderate	5	17.2%	\$516	11.1%	3.2%	5	31.3%	3.9%	\$516	19.3%	3.7%	0	0.0%	3.7%	\$0	0.0%	3.2%
	Middle	10	34.5%	\$1,825	39.2%	45.6%	4	25.0%	45.2%	\$930	34.8%	38.5%	6	46.2%	43.4%	\$895	45.2%	42.7%
	Upper	10	34.5%	\$1,880	40.4%	46.4%	5	31.3%	47.0%	\$1,042	39.0%	55.0%	5	38.5%	49.4%	\$838	42.3%	52.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>29</i>	<i>100.0%</i>	<i>\$4,654</i>	<i>100.0%</i>	<i>100.0%</i>	<i>16</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,673</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,981</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Cleveland

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2019			2020			2019			2020		
		Count		Dollar			Count		Dollar		Count		Dollar		Count		Dollar	
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	6.7%	\$82	3.2%	22.2%	0	0.0%	4.4%	\$0	0.0%	2.3%	1	14.3%	4.7%	\$82	7.1%	2.7%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	18.7%	\$0	0.0%	13.5%	0	0.0%	20.7%	\$0	0.0%	15.6%
	Middle	4	26.7%	\$578	22.4%	18.4%	2	25.0%	22.4%	\$319	22.4%	20.1%	2	28.6%	23.9%	\$259	22.5%	22.4%
	Upper	8	53.3%	\$1,584	61.5%	42.6%	4	50.0%	37.9%	\$775	54.3%	47.0%	4	57.1%	31.8%	\$809	70.3%	40.5%
	Unknown	2	13.3%	\$332	12.9%	0.0%	2	25.0%	16.7%	\$332	23.3%	17.1%	0	0.0%	18.9%	\$0	0.0%	18.9%
	<i>Total</i>	<i>15</i>	<i>100.0%</i>	<i>\$2,576</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,426</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,150</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	5.2%	\$0	0.0%	2.6%	0	0.0%	3.3%	\$0	0.0%	1.6%
	Moderate	1	9.1%	\$87	7.5%	16.8%	0	0.0%	11.8%	\$0	0.0%	7.7%	1	20.0%	12.9%	\$87	19.6%	8.8%
	Middle	4	36.4%	\$557	47.7%	18.4%	3	50.0%	17.8%	\$462	64.0%	15.5%	1	20.0%	18.1%	\$95	21.3%	14.9%
	Upper	6	54.5%	\$523	44.8%	42.6%	3	50.0%	40.6%	\$260	36.0%	47.3%	3	60.0%	37.3%	\$263	59.1%	44.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	24.5%	\$0	0.0%	26.9%	0	0.0%	28.5%	\$0	0.0%	30.4%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$1,167</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$722</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$445</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	8.5%	\$0	0.0%	6.1%	0	0.0%	7.9%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	16.5%	\$0	0.0%	12.5%	0	0.0%	13.9%	\$0	0.0%	11.7%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	25.0%	\$0	0.0%	20.1%	0	0.0%	16.8%	\$0	0.0%	13.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	44.5%	\$0	0.0%	50.5%	0	0.0%	59.4%	\$0	0.0%	69.5%
	Unknown	1	100.0%	\$95	100.0%	0.0%	1	100.0%	5.5%	\$95	100.0%	10.8%	0	0.0%	2.0%	\$0	0.0%	2.8%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	26.9%	\$0	0.0%	5.5%	0	0.0%	27.6%	\$0	0.0%	5.0%
	Unknown	2	100.0%	\$816	100.0%	0.0%	1	100.0%	73.1%	\$430	100.0%	94.5%	1	100.0%	72.4%	\$386	100.0%	95.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$816</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$430</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$386</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	4.6%	\$0	0.0%	2.6%	0	0.0%	1.5%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	15.4%	\$0	0.0%	15.4%	0	0.0%	14.7%	\$0	0.0%	7.8%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	15.4%	\$0	0.0%	10.4%	0	0.0%	16.2%	\$0	0.0%	11.5%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	64.6%	\$0	0.0%	71.6%	0	0.0%	61.8%	\$0	0.0%	75.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	5.9%	\$0	0.0%	4.6%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Cleveland

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Families by Family Income	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	2.5%	\$0	0.0%	1.7%	0	0.0%	12.5%	\$0	0.0%	9.3%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	7.5%	\$0	0.0%	2.5%	0	0.0%	9.4%	\$0	0.0%	7.4%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	25.0%	\$0	0.0%	20.8%	0	0.0%	15.6%	\$0	0.0%	10.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	42.5%	\$0	0.0%	33.8%	0	0.0%	46.9%	\$0	0.0%	63.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.5%	\$0	0.0%	41.2%	0	0.0%	15.6%	\$0	0.0%	9.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	22.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	18.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	42.6%	0	0.0%	1.9%	\$0	0.0%	7.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	98.1%	\$0	0.0%	92.7%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	1	3.4%	\$82	1.8%	22.2%	0	0.0%	4.8%	\$0	0.0%	2.3%	1	7.7%	3.9%	\$82	4.1%	2.0%
	Moderate	1	3.4%	\$87	1.9%	16.8%	0	0.0%	15.7%	\$0	0.0%	10.5%	1	7.7%	16.0%	\$87	4.4%	11.1%
	Middle	8	27.6%	\$1,135	24.4%	18.4%	5	31.3%	20.4%	\$781	29.2%	16.9%	3	23.1%	20.1%	\$354	17.9%	17.0%
	Upper	14	48.3%	\$2,107	45.3%	42.6%	7	43.8%	39.1%	\$1,035	38.7%	43.9%	7	53.8%	34.8%	\$1,072	54.1%	40.2%
	Unknown	5	17.2%	\$1,243	26.7%	0.0%	4	25.0%	20.2%	\$857	32.1%	26.4%	1	7.7%	25.3%	\$386	19.5%	29.7%
	Total	29	100.0%	\$4,654	100.0%	100.0%	16	100.0%	100.0%	\$2,673	100.0%	100.0%	13	100.0%	100.0%	\$1,981	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: TN Cleveland

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison					2019					2020						
	2019, 2020		Total Businesses	Count		Dollar			Count		Dollar						
	Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Low	14	11.7%	\$1,512	7.9%	8.2%	4	10.8%	8.0%	\$645	9.0%	7.6%	10	12.0%	7.7%	\$867	7.3%	7.4%
Moderate	13	10.8%	\$2,743	14.4%	10.6%	5	13.5%	11.1%	\$550	7.7%	13.7%	8	9.6%	11.5%	\$2,193	18.4%	13.1%
Middle	44	36.7%	\$8,235	43.2%	49.4%	14	37.8%	39.6%	\$3,423	47.7%	44.4%	30	36.1%	46.3%	\$4,812	40.4%	44.2%
Upper	49	40.8%	\$6,589	34.5%	31.8%	14	37.8%	39.5%	\$2,552	35.6%	34.0%	35	42.2%	33.8%	\$4,037	33.9%	35.1%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.9%	\$0	0.0%	0.3%	0	0.0%	0.6%	\$0	0.0%	0.1%
Total	120	100.0%	\$19,079	100.0%	100.0%	37	100.0%	100.0%	\$7,170	100.0%	100.0%	83	100.0%	100.0%	\$11,909	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TN Cleveland

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			#	%	Agg %	Bank		Agg %	Count		Dollar			
		#	%	\$ (000s)	\$ %	\$ (000s)				\$ %	#		%	%	\$ (000s)	\$ %	#	%
BUSINESS REVENUE	\$1million or Less	43	35.8%	\$9,470	49.6%	91.8%	22	59.5%	45.1%	\$3,955	55.2%	41.1%	21	25.3%	40.2%	\$5,515	46.3%	35.9%
	Over \$1 Million	19	15.8%	\$4,523	23.7%	7.6%	12	32.4%					7	8.4%				
	Total Rev. available	62	51.6%	\$13,993	73.3%	99.4%	34	91.9%					28	33.7%				
	Rev. Not Known	58	48.3%	\$5,086	26.7%	0.6%	3	8.1%					55	66.3%				
	Total	120	100.0%	\$19,079	100.0%	100.0%	37	100.0%					83	100.0%				
LOAN SIZE	\$100,000 or Less	72	60.0%	\$2,478	13.0%		18	48.6%	87.5%	\$966	13.5%	25.7%	54	65.1%	82.7%	\$1,512	12.7%	26.1%
	\$100,001 - \$250,000	23	19.2%	\$3,872	20.3%		11	29.7%	6.8%	\$1,912	26.7%	21.3%	12	14.5%	10.0%	\$1,960	16.5%	24.3%
	\$250,001 - \$1 Million	25	20.8%	\$12,729	66.7%		8	21.6%	5.7%	\$4,292	59.9%	53.0%	17	20.5%	7.2%	\$8,437	70.8%	49.6%
	Total	120	100.0%	\$19,079	100.0%		37	100.0%	100.0%	\$7,170	100.0%	100.0%	83	100.0%	100.0%	\$11,909	100.0%	100.0%
	Rev \$1 Mill or Less	22	51.2%	\$981	10.4%													
LOAN SIZE	\$100,001 - \$250,000	7	16.3%	\$1,146	12.1%													
	\$250,001 - \$1 Million	14	32.6%	\$7,343	77.5%													
	Total	43	100.0%	\$9,470	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Coffee

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Owner Occupied Units	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	11.1%	\$247	6.2%	4.8%	1	9.1%	4.6%	\$92	3.5%	2.3%	1	14.3%	5.1%	\$155	11.3%	3.3%
	Middle	8	44.4%	\$1,360	34.0%	73.4%	6	54.5%	73.9%	\$986	37.5%	73.5%	2	28.6%	72.7%	\$374	27.4%	72.9%
	Upper	8	44.4%	\$2,392	59.8%	21.8%	4	36.4%	21.5%	\$1,554	59.0%	24.2%	4	57.1%	22.2%	\$838	61.3%	23.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	18	100.0%	\$3,999	100.0%	100.0%	11	100.0%	100.0%	\$2,632	100.0%	100.0%	7	100.0%	100.0%	\$1,367	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	3.3%	\$38	0.7%	4.8%	0	0.0%	2.8%	\$0	0.0%	1.2%	1	5.3%	1.8%	\$38	1.2%	0.8%
	Middle	17	56.7%	\$2,546	48.1%	73.4%	8	72.7%	77.8%	\$1,511	69.3%	78.2%	9	47.4%	76.4%	\$1,035	33.3%	75.2%
	Upper	12	40.0%	\$2,705	51.1%	21.8%	3	27.3%	19.3%	\$670	30.7%	20.5%	9	47.4%	21.8%	\$2,035	65.5%	24.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	30	100.0%	\$5,289	100.0%	100.0%	11	100.0%	100.0%	\$2,181	100.0%	100.0%	19	100.0%	100.0%	\$3,108	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.8%	0	0.0%	7.3%	\$0	0.0%	5.6%	0	0.0%	2.3%	\$0	0.0%	1.0%
	Middle	2	100.0%	\$169	100.0%	73.4%	1	100.0%	58.5%	\$23	100.0%	72.9%	1	100.0%	75.0%	\$146	100.0%	74.0%
	Upper	0	0.0%	\$0	0.0%	21.8%	0	0.0%	34.1%	\$0	0.0%	21.5%	0	0.0%	22.7%	\$0	0.0%	24.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	2	100.0%	\$169	100.0%	100.0%	1	100.0%	100.0%	\$23	100.0%	100.0%	1	100.0%	100.0%	\$146	100.0%	100.0%
MULTI FAMILY	Multi-Family Units					0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Low	0	0.0%	\$0	0.0%	31.6%	0	0.0%	33.3%	\$0	0.0%	62.3%	0	0.0%	28.6%	\$0	0.0%	44.1%
	Moderate	0	0.0%	\$0	0.0%	57.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	71.4%	\$0	0.0%	55.9%
	Middle	0	0.0%	\$0	0.0%	10.8%	1	100.0%	66.7%	\$330	100.0%	37.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	1	100.0%	\$330	100.0%	100.0%	1	100.0%	100.0%	\$330	100.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	7.1%	\$0	0.0%	10.3%
	Middle	0	0.0%	\$0	0.0%	73.4%	0	0.0%	80.0%	\$0	0.0%	73.3%	0	0.0%	85.7%	\$0	0.0%	86.7%
	Upper	0	0.0%	\$0	0.0%	21.8%	0	0.0%	20.0%	\$0	0.0%	26.7%	0	0.0%	7.1%	\$0	0.0%	3.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		2019, 2020				Owner Occupied Units %	2019					2020						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %				
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	13.3%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	73.4%	0	0.0%	91.7%	\$0	0.0%	94.4%	0	0.0%	66.7%	\$0	0.0%	68.4%
	Upper	0	0.0%	\$0	0.0%	21.8%	0	0.0%	8.3%	\$0	0.0%	5.6%	0	0.0%	20.0%	\$0	0.0%	22.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	4.8%	0	0.0%	6.5%	\$0	0.0%	2.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	73.4%	0	0.0%	87.1%	\$0	0.0%	94.1%	0	0.0%	75.0%	\$0	0.0%	76.3%
	Upper	0	0.0%	\$0	0.0%	21.8%	0	0.0%	6.5%	\$0	0.0%	3.0%	0	0.0%	25.0%	\$0	0.0%	23.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	5.9%	\$285	2.9%	4.8%	1	4.2%	3.9%	\$92	1.8%	2.2%	2	7.4%	3.3%	\$193	4.2%	2.3%
	Middle	27	52.9%	\$4,075	41.6%	73.4%	15	62.5%	75.3%	\$2,520	48.8%	74.9%	12	44.4%	74.8%	\$1,555	33.7%	74.0%
	Upper	21	41.2%	\$5,427	55.5%	21.8%	8	33.3%	20.7%	\$2,554	49.4%	22.8%	13	48.1%	21.9%	\$2,873	62.2%	23.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>\$9,787</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,166</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,621</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Coffee

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019						2020					
		Bank				Families by Family Income	Count			Dollar			Count			Dollar		
		Count	Dollar				Bank	Agg	Bank		Agg	Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	18.3%	0	0.0%	3.8%	\$0	0.0%	2.1%	0	0.0%	2.3%	\$0	0.0%	1.3%
	Moderate	1	5.6%	\$60	1.5%	16.4%	1	9.1%	12.4%	\$60	2.3%	9.0%	0	0.0%	13.2%	\$0	0.0%	9.3%
	Middle	7	38.9%	\$923	23.1%	19.6%	4	36.4%	24.6%	\$430	16.3%	21.9%	3	42.9%	25.4%	\$493	36.1%	23.6%
	Upper	10	55.6%	\$3,016	75.4%	45.7%	6	54.5%	37.4%	\$2,142	81.4%	45.8%	4	57.1%	39.6%	\$874	63.9%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.7%	\$0	0.0%	21.2%	0	0.0%	19.5%	\$0	0.0%	19.2%
	<i>Total</i>	<i>18</i>	<i>100.0%</i>	<i>\$3,999</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,632</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,367</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	3.3%	\$82	1.6%	18.3%	0	0.0%	5.2%	\$0	0.0%	2.3%	1	5.3%	1.9%	\$82	2.6%	0.8%
	Moderate	2	6.7%	\$161	3.0%	16.4%	0	0.0%	10.6%	\$0	0.0%	6.2%	2	10.5%	7.0%	\$161	5.2%	4.4%
	Middle	8	26.7%	\$951	18.0%	19.6%	4	36.4%	15.3%	\$405	18.6%	12.1%	4	21.1%	15.5%	\$546	17.6%	11.7%
	Upper	18	60.0%	\$3,935	74.4%	45.7%	6	54.5%	45.1%	\$1,616	74.1%	52.0%	12	63.2%	45.1%	\$2,319	74.6%	48.1%
	Unknown	1	3.3%	\$160	3.0%	0.0%	1	9.1%	23.9%	\$160	7.3%	27.3%	0	0.0%	30.5%	\$0	0.0%	35.0%
	<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>\$5,289</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,181</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,108</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	18.3%	0	0.0%	4.9%	\$0	0.0%	2.8%	0	0.0%	11.4%	\$0	0.0%	4.8%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	12.2%	\$0	0.0%	9.7%	0	0.0%	15.9%	\$0	0.0%	6.2%
	Middle	1	50.0%	\$23	13.6%	19.6%	1	100.0%	12.2%	\$23	100.0%	12.2%	0	0.0%	11.4%	\$0	0.0%	9.2%
	Upper	1	50.0%	\$146	86.4%	45.7%	0	0.0%	68.3%	\$0	0.0%	71.5%	1	100.0%	50.0%	\$146	100.0%	51.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.4%	\$0	0.0%	3.8%	0	0.0%	11.4%	\$0	0.0%	28.2%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$169</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$23</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$146</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	1	100.0%	\$330	100.0%	45.7%	1	100.0%	100.0%	\$330	100.0%	100.0%	0	0.0%	28.6%	\$0	0.0%	17.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	71.4%	\$0	0.0%	82.6%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$330</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$330</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	18.3%	0	0.0%	3.1%	\$0	0.0%	2.1%	0	0.0%	7.1%	\$0	0.0%	5.6%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	10.8%	\$0	0.0%	8.4%	0	0.0%	7.1%	\$0	0.0%	8.6%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	15.4%	\$0	0.0%	10.1%	0	0.0%	42.9%	\$0	0.0%	41.7%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	67.7%	\$0	0.0%	76.6%	0	0.0%	42.9%	\$0	0.0%	44.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.1%	\$0	0.0%	2.8%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Coffee

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	18.3%	0	0.0%	8.3%	\$0	0.0%	7.3%	0	0.0%	6.7%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	16.7%	\$0	0.0%	6.2%	0	0.0%	26.7%	\$0	0.0%	21.9%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	25.0%	\$0	0.0%	22.4%	0	0.0%	20.0%	\$0	0.0%	11.6%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	41.7%	\$0	0.0%	56.0%	0	0.0%	33.3%	\$0	0.0%	35.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.3%	\$0	0.0%	8.1%	0	0.0%	13.3%	\$0	0.0%	26.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	18.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.5%	\$0	0.0%	2.7%
	Upper	0	0.0%	\$0	0.0%	45.7%	0	0.0%	3.2%	\$0	0.0%	13.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	96.8%	\$0	0.0%	86.6%	0	0.0%	97.5%	\$0	0.0%	97.3%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	2.0%	\$82	0.8%	18.3%	0	0.0%	4.2%	\$0	0.0%	2.2%	1	3.7%	2.2%	\$82	1.8%	1.1%
	Moderate	3	5.9%	\$221	2.3%	16.4%	1	4.2%	11.6%	\$60	1.2%	8.0%	2	7.4%	9.8%	\$161	3.5%	6.6%
	Middle	16	31.4%	\$1,897	19.4%	19.6%	9	37.5%	20.6%	\$858	16.6%	18.1%	7	25.9%	19.6%	\$1,039	22.5%	16.9%
	Upper	30	58.8%	\$7,427	75.9%	45.7%	13	54.2%	41.1%	\$4,088	79.1%	48.4%	17	63.0%	42.1%	\$3,339	72.3%	46.8%
	Unknown	1	2.0%	\$160	1.6%	0.0%	1	4.2%	22.5%	\$160	3.1%	23.4%	0	0.0%	26.4%	\$0	0.0%	28.7%
	<i>Total</i>	<i>51</i>	<i>100.0%</i>	<i>\$9,787</i>	<i>100.0%</i>	<i>100.0%</i>	<i>24</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,166</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,621</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: TN Coffee

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison					2019					2020						
	Bank		Dollar		Total Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank	Agg	\$ 000s	\$ %	\$ %	Bank	Agg	\$ 000s	\$ %	\$ %		
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	51	30.0%	\$3,873	22.5%	10.5%	28	36.4%	12.1%	\$1,557	17.5%	14.6%	23	24.7%	12.6%	\$2,316	27.7%	15.2%
Middle	84	49.4%	\$9,313	54.1%	66.1%	34	44.2%	58.1%	\$5,283	59.5%	53.4%	50	53.8%	62.6%	\$4,030	48.3%	56.5%
Upper	35	20.6%	\$4,038	23.4%	23.3%	15	19.5%	27.5%	\$2,033	22.9%	31.6%	20	21.5%	24.4%	\$2,005	24.0%	28.3%
Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.1%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.2%	\$0	0.0%	0.4%	0	0.0%	0.4%	\$0	0.0%	0.0%
<i>Total</i>	<i>170</i>	<i>100.0%</i>	<i>\$17,224</i>	<i>100.0%</i>	<i>100.0%</i>	<i>77</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,873</i>	<i>100.0%</i>	<i>100.0%</i>	<i>93</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,351</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TN Coffee

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			#	%	Agg %	Bank		Agg %	Count		Dollar			
		#	%	\$ (000s)	\$ %	\$ (000s)				\$ %	\$ %		#	%	%	\$ (000s)	\$ %	\$ %
BUSINESS REVENUE	\$1million or Less	65	38.2%	\$7,999	46.4%	91.0%	46	59.7%	47.9%	\$4,832	54.5%	55.7%	19	20.4%	43.2%	\$3,167	37.9%	50.2%
	Over \$1 Million	41	24.1%	\$5,325	30.9%	8.1%	31	40.3%				10	10.8%					
	Total Rev. available	106	62.3%	\$13,324	77.3%	99.1%	77	100.0%				29	31.2%					
	Rev. Not Known	64	37.6%	\$3,900	22.6%	0.9%	0	0.0%				64	68.8%					
	Total	170	100.0%	\$17,224	100.0%	100.0%	77	100.0%				93	100.0%					
LOAN SIZE	\$100,000 or Less	126	74.1%	\$5,037	29.2%		53	68.8%	90.1%	\$2,436	27.5%	33.3%	73	78.5%	81.6%	\$2,601	31.1%	22.9%
	\$100,001 - \$250,000	30	17.6%	\$5,832	33.9%		17	22.1%	6.0%	\$3,287	37.0%	23.9%	13	14.0%	10.6%	\$2,545	30.5%	24.3%
	\$250,001 - \$1 Million	14	8.2%	\$6,355	36.9%		7	9.1%	3.9%	\$3,150	35.5%	42.8%	7	7.5%	7.8%	\$3,205	38.4%	52.8%
	Total	170	100.0%	\$17,224	100.0%		77	100.0%	100.0%	\$8,873	100.0%	100.0%	93	100.0%	100.0%	\$8,351	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	43	66.2%	\$2,158	27.0%													
	\$100,001 - \$250,000	15	23.1%	\$2,771	34.6%													
	\$250,001 - \$1 Million	7	10.8%	\$3,070	38.4%													
	Total	65	100.0%	\$7,999	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN East TN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2020					2020						
		Bank		Owner Occupied Units		Count	Dollar			Count	Dollar		
		Count	Dollar	Count	Dollar		Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %			
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	5	16.7%	\$459	8.7%	15.4%	5	16.7%	13.1%	\$459	8.7%	11.3%	
	Middle	17	56.7%	\$3,110	59.2%	64.3%	17	56.7%	65.8%	\$3,110	59.2%	64.7%	
	Upper	8	26.7%	\$1,687	32.1%	20.3%	8	26.7%	21.1%	\$1,687	32.1%	24.0%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>\$5,256</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,256</i>	<i>100.0%</i>	<i>100.0%</i>	
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	23	28.4%	\$2,775	23.2%	15.4%	23	28.4%	10.4%	\$2,775	23.2%	9.4%	
	Middle	53	65.4%	\$8,509	71.1%	64.3%	53	65.4%	64.6%	\$8,509	71.1%	63.9%	
	Upper	5	6.2%	\$683	5.7%	20.3%	5	6.2%	25.0%	\$683	5.7%	26.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>\$11,967</i>	<i>100.0%</i>	<i>100.0%</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,967</i>	<i>100.0%</i>	<i>100.0%</i>	
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	1	50.0%	\$22	23.2%	15.4%	1	50.0%	11.3%	\$22	23.2%	10.4%	
	Middle	0	0.0%	\$0	0.0%	64.3%	0	0.0%	60.0%	\$0	0.0%	60.9%	
	Upper	1	50.0%	\$73	76.8%	20.3%	1	50.0%	28.7%	\$73	76.8%	28.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	
MULTI FAMILY				Multi-Family Units									
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	2	100.0%	\$1,547	100.0%	57.4%	2	100.0%	75.0%	\$1,547	100.0%	19.3%	
	Middle	0	0.0%	\$0	0.0%	33.6%	0	0.0%	20.8%	\$0	0.0%	5.0%	
	Upper	0	0.0%	\$0	0.0%	9.0%	0	0.0%	4.2%	\$0	0.0%	75.7%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$1,547</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,547</i>	<i>100.0%</i>	<i>100.0%</i>		
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	Moderate	0	0.0%	\$0	0.0%	15.4%	0	0.0%	5.0%	\$0	0.0%	2.4%	
	Middle	0	0.0%	\$0	0.0%	64.3%	0	0.0%	59.4%	\$0	0.0%	57.1%	
	Upper	0	0.0%	\$0	0.0%	20.3%	0	0.0%	35.6%	\$0	0.0%	40.5%	
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	

Originations & Purchases

2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN East TN

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2020					Bank & Aggregate Lending Comparison 2020					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
		#	%	\$ (000s)	\$ %				#	%		%
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	2	100.0%	\$96	100.0%	15.4%	2	100.0%	14.9%	\$96	100.0%	12.9%
	Middle	0	0.0%	\$0	0.0%	64.3%	0	0.0%	65.7%	\$0	0.0%	65.7%
	Upper	0	0.0%	\$0	0.0%	20.3%	0	0.0%	19.4%	\$0	0.0%	21.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$96</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$96</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.4%	0	0.0%	10.1%	\$0	0.0%	8.7%
	Middle	0	0.0%	\$0	0.0%	64.3%	0	0.0%	65.2%	\$0	0.0%	57.7%
	Upper	0	0.0%	\$0	0.0%	20.3%	0	0.0%	24.6%	\$0	0.0%	33.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	33	28.2%	\$4,899	25.8%	15.4%	33	28.2%	11.9%	\$4,899	25.8%	10.7%
	Middle	70	59.8%	\$11,619	61.3%	64.3%	70	59.8%	64.8%	\$11,619	61.3%	61.5%
	Upper	14	12.0%	\$2,443	12.9%	20.3%	14	12.0%	23.3%	\$2,443	12.9%	27.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>117</i>	<i>100.0%</i>	<i>\$18,961</i>	<i>100.0%</i>	<i>100.0%</i>	<i>117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,961</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN East TN

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison					
		2020					2020					
		Bank				Families by Family Income %	Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	
HOME PURCHASE	Low	1	3.3%	\$42	0.8%	21.9%	1	3.3%	3.0%	\$42	0.8%	1.4%
	Moderate	3	10.0%	\$341	6.5%	17.9%	3	10.0%	15.3%	\$341	6.5%	10.6%
	Middle	6	20.0%	\$1,067	20.3%	20.2%	6	20.0%	22.5%	\$1,067	20.3%	19.6%
	Upper	20	66.7%	\$3,806	72.4%	39.9%	20	66.7%	43.9%	\$3,806	72.4%	53.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	15.4%	\$0	0.0%	15.4%
	<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>\$5,256</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$5,256</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	5	6.2%	\$301	2.5%	21.9%	5	6.2%	2.7%	\$301	2.5%	1.4%
	Moderate	9	11.1%	\$742	6.2%	17.9%	9	11.1%	10.7%	\$742	6.2%	7.0%
	Middle	19	23.5%	\$2,369	19.8%	20.2%	19	23.5%	18.3%	\$2,369	19.8%	14.6%
	Upper	48	59.3%	\$8,555	71.5%	39.9%	48	59.3%	41.2%	\$8,555	71.5%	48.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	27.0%	\$0	0.0%	28.9%
	<i>Total</i>	<i>81</i>	<i>100.0%</i>	<i>\$11,967</i>	<i>100.0%</i>	<i>100.0%</i>	<i>81</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,967</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	1	50.0%	\$22	23.2%	21.9%	1	50.0%	5.3%	\$22	23.2%	2.2%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	10.0%	\$0	0.0%	7.8%
	Middle	1	50.0%	\$73	76.8%	20.2%	1	50.0%	22.0%	\$73	76.8%	14.6%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	54.7%	\$0	0.0%	68.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.0%	\$0	0.0%	7.1%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$95</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	4.2%	\$0	0.0%	0.8%
	Upper	1	50.0%	\$97	6.3%	39.9%	1	50.0%	41.7%	\$97	6.3%	9.3%
	Unknown	1	50.0%	\$1,450	93.7%	0.0%	1	50.0%	54.2%	\$1,450	93.7%	89.9%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$1,547</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,547</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	3.0%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	8.9%	\$0	0.0%	7.4%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	24.8%	\$0	0.0%	18.0%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	60.4%	\$0	0.0%	70.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.0%	\$0	0.0%	1.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN East TN

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2020					Bank & Aggregate Lending Comparison 2020					
		Bank		Families by Family Income	Count		Dollar					
		Count	Dollar		Bank	Agg	Bank	Agg				
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	7.5%	\$0	0.0%	5.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	16.4%	\$0	0.0%	10.7%
	Middle	2	100.0%	\$96	100.0%	20.2%	2	100.0%	17.9%	\$96	100.0%	11.7%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	44.8%	\$0	0.0%	52.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	20.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$96</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$96</i>	<i>100.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	21.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	39.9%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	7	6.0%	\$365	1.9%	21.9%	7	6.0%	2.9%	\$365	1.9%	1.4%
	Moderate	12	10.3%	\$1,083	5.7%	17.9%	12	10.3%	12.7%	\$1,083	5.7%	8.4%
	Middle	28	23.9%	\$3,605	19.0%	20.2%	28	23.9%	20.1%	\$3,605	19.0%	16.2%
	Upper	69	59.0%	\$12,458	65.7%	39.9%	69	59.0%	42.7%	\$12,458	65.7%	48.7%
	Unknown	1	0.9%	\$1,450	7.6%	0.0%	1	0.9%	21.6%	\$1,450	7.6%	25.3%
	<i>Total</i>	<i>117</i>	<i>100.0%</i>	<i>\$18,961</i>	<i>100.0%</i>	<i>100.0%</i>	<i>117</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,961</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: TN East TN

Tract Income Levels	Bank Lending & Demographic Data Comparison 2020					Bank & Aggregate Lending Comparison 2020					
	Count		Bank Dollar		Total Businesses %	Count			Dollar		
	#	%	\$ (000s)	\$ %		#	%	Agg %	Bank		Agg \$ %
					\$ 000s				\$ %		
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	130	43.6%	\$9,331	55.1%	34.4%	130	43.6%	30.7%	\$9,331	55.1%	35.6%
Middle	127	42.6%	\$5,370	31.7%	42.7%	127	42.6%	45.9%	\$5,370	31.7%	37.4%
Upper	41	13.8%	\$2,238	13.2%	23.0%	41	13.8%	22.8%	\$2,238	13.2%	26.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.6%	\$0	0.0%	0.4%
<i>Total</i>	<i>298</i>	<i>100.0%</i>	<i>\$16,939</i>	<i>100.0%</i>	<i>100.0%</i>	<i>298</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$16,939</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TN East TN

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison						
		2020					2020						
		Bank		Total Businesses			Count			Dollar			
		Count		\$ (000s)		%	Bank		Agg		Bank		Agg
		#	%	\$	%		#	%	%	\$ (000s)	%	\$ %	
BUSINESS REVENUE	\$1million or Less	27	9.1%	\$3,315	19.6%	92.1%	27	9.1%	34.6%	\$3,315	19.6%	34.5%	
	Over \$1 Million	4	1.3%	\$682	4.0%	7.2%	4	1.3%					
	<i>Total Rev. available</i>	31	10.4%	\$3,997	23.6%	99.3%	31	10.4%					
	Rev. Not Known	267	89.6%	\$12,942	76.4%	0.7%	267	89.6%					
	<i>Total</i>	298	100.0%	\$16,939	100.0%	100.0%	298	100.0%					
LOAN SIZE	\$100,000 or Less	254	85.2%	\$6,277	37.1%		254	85.2%	87.0%	\$6,277	37.1%	32.9%	
	\$100,001 - \$250,000	34	11.4%	\$5,575	32.9%		34	11.4%	8.5%	\$5,575	32.9%	25.8%	
	\$250,001 - \$1 Million	10	3.4%	\$5,087	30.0%		10	3.4%	4.5%	\$5,087	30.0%	41.3%	
	<i>Total</i>	298	100.0%	\$16,939	100.0%		298	100.0%	100.0%	\$16,939	100.0%	100.0%	
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	17	63.0%	\$659	19.9%								
	\$100,001 - \$250,000	7	25.9%	\$1,189	35.9%								
	\$250,001 - \$1 Million	3	11.1%	\$1,467	44.3%								
	<i>Total</i>	27	100.0%	\$3,315	100.0%								

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Rutherford

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	Dollar %		Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %	Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	1.4%	\$0	0.0%	1.2%	0	0.0%	1.2%	\$0	0.0%	1.0%
	Moderate	2	25.0%	\$304	20.4%	17.2%	1	20.0%	13.5%	\$130	15.1%	11.0%	1	33.3%	12.2%	\$174	27.7%	9.8%
	Middle	5	62.5%	\$965	64.8%	57.4%	4	80.0%	61.1%	\$731	84.9%	61.2%	1	33.3%	62.7%	\$234	37.3%	62.7%
	Upper	1	12.5%	\$220	14.8%	24.2%	0	0.0%	24.0%	\$0	0.0%	26.5%	1	33.3%	23.9%	\$220	35.0%	26.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$1,489</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$861</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$628</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.7%	\$0	0.0%	0.5%	0	0.0%	0.5%	\$0	0.0%	0.4%
	Moderate	7	28.0%	\$1,352	26.7%	17.2%	1	14.3%	11.8%	\$100	11.3%	9.7%	6	33.3%	10.2%	\$1,252	29.9%	8.8%
	Middle	11	44.0%	\$2,266	44.7%	57.4%	4	57.1%	61.9%	\$554	62.7%	61.8%	7	38.9%	61.6%	\$1,712	40.9%	61.1%
	Upper	7	28.0%	\$1,449	28.6%	24.2%	2	28.6%	25.6%	\$230	26.0%	28.0%	5	27.8%	27.7%	\$1,219	29.1%	29.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$5,067</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$884</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,183</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.7%	\$0	0.0%	0.9%	0	0.0%	1.0%	\$0	0.0%	1.4%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	13.5%	\$0	0.0%	13.7%	0	0.0%	13.3%	\$0	0.0%	11.0%
	Middle	1	100.0%	\$124	100.0%	57.4%	0	0.0%	53.8%	\$0	0.0%	51.1%	1	100.0%	54.9%	\$124	100.0%	55.0%
	Upper	0	0.0%	\$0	0.0%	24.2%	0	0.0%	32.0%	\$0	0.0%	34.3%	0	0.0%	30.8%	\$0	0.0%	32.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	9.4%	0	0.0%	6.7%	\$0	0.0%	12.6%	0	0.0%	11.8%	\$0	0.0%	4.3%
	Moderate	1	25.0%	\$580	15.8%	53.1%	1	100.0%	46.7%	\$580	100.0%	29.1%	0	0.0%	52.9%	\$0	0.0%	37.8%
	Middle	2	50.0%	\$1,502	40.8%	33.9%	0	0.0%	36.7%	\$0	0.0%	57.6%	2	66.7%	27.5%	\$1,502	48.4%	50.0%
	Upper	1	25.0%	\$1,600	43.5%	3.5%	0	0.0%	10.0%	\$0	0.0%	0.6%	1	33.3%	7.8%	\$1,600	51.6%	7.8%
	Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$3,682</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$580</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,102</i>	<i>100.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	11.0%	\$0	0.0%	9.4%	0	0.0%	11.8%	\$0	0.0%	12.5%
	Middle	0	0.0%	\$0	0.0%	57.4%	0	0.0%	58.8%	\$0	0.0%	55.5%	0	0.0%	60.7%	\$0	0.0%	60.9%
	Upper	0	0.0%	\$0	0.0%	24.2%	0	0.0%	30.1%	\$0	0.0%	34.8%	0	0.0%	27.3%	\$0	0.0%	26.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2019					2020						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	Agg %	\$ (000s)	\$ %	Agg \$ %	#	%	Agg %	\$ (000s)	\$ %	Agg \$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	0.9%	\$0	0.0%	0.7%	0	0.0%	2.7%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	21.6%	\$0	0.0%	22.5%	0	0.0%	13.6%	\$0	0.0%	11.1%
	Middle	0	0.0%	\$0	0.0%	57.4%	0	0.0%	62.9%	\$0	0.0%	59.8%	0	0.0%	63.6%	\$0	0.0%	67.0%
	Upper	0	0.0%	\$0	0.0%	24.2%	0	0.0%	14.7%	\$0	0.0%	17.0%	0	0.0%	20.0%	\$0	0.0%	20.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	1.0%	\$0	0.0%	0.5%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	17.2%	0	0.0%	19.4%	\$0	0.0%	15.5%	0	0.0%	14.6%	\$0	0.0%	11.4%
	Middle	0	0.0%	\$0	0.0%	57.4%	0	0.0%	59.2%	\$0	0.0%	60.0%	0	0.0%	63.9%	\$0	0.0%	62.8%
	Upper	0	0.0%	\$0	0.0%	24.2%	0	0.0%	20.4%	\$0	0.0%	24.0%	0	0.0%	21.1%	\$0	0.0%	25.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	1.2%	0	0.0%	1.1%	\$0	0.0%	1.9%	0	0.0%	0.8%	\$0	0.0%	1.0%
	Moderate	10	26.3%	\$2,236	21.6%	17.2%	3	23.1%	12.9%	\$810	34.8%	12.2%	7	28.0%	11.3%	\$1,426	17.7%	11.5%
	Middle	19	50.0%	\$4,857	46.9%	57.4%	8	61.5%	61.0%	\$1,285	55.3%	60.9%	11	44.0%	61.9%	\$3,572	44.4%	60.9%
	Upper	9	23.7%	\$3,269	31.5%	24.2%	2	15.4%	25.0%	\$230	9.9%	24.9%	7	28.0%	26.1%	\$3,039	37.8%	26.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>38</i>	<i>100.0%</i>	<i>\$10,362</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,325</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,037</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Rutherford

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019						2020					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Dollar \$ (000s)	\$ %	\$ %	Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	4.8%	\$0	0.0%	3.1%	0	0.0%	6.4%	\$0	0.0%	4.3%
	Moderate	2	25.0%	\$454	30.5%	19.3%	0	0.0%	23.6%	\$0	0.0%	19.4%	2	66.7%	25.8%	\$454	72.3%	22.1%
	Middle	1	12.5%	\$112	7.5%	23.0%	1	20.0%	26.0%	\$112	13.0%	25.6%	0	0.0%	25.6%	\$0	0.0%	25.7%
	Upper	3	37.5%	\$619	41.6%	40.2%	3	60.0%	30.5%	\$619	71.9%	36.4%	0	0.0%	28.6%	\$0	0.0%	33.9%
	Unknown	2	25.0%	\$304	20.4%	0.0%	1	20.0%	15.1%	\$130	15.1%	15.5%	1	33.3%	13.6%	\$174	27.7%	14.0%
	<i>Total</i>	<i>8</i>	<i>100.0%</i>	<i>\$1,489</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$861</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$628</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	1	4.0%	\$34	0.7%	17.5%	1	14.3%	6.5%	\$34	3.8%	4.1%	0	0.0%	5.3%	\$0	0.0%	3.1%
	Moderate	2	8.0%	\$300	5.9%	19.3%	0	0.0%	18.9%	\$0	0.0%	14.1%	2	11.1%	16.8%	\$300	7.2%	12.8%
	Middle	3	12.0%	\$561	11.1%	23.0%	1	14.3%	20.9%	\$136	15.4%	19.2%	2	11.1%	20.4%	\$425	10.2%	18.8%
	Upper	14	56.0%	\$3,266	64.5%	40.2%	5	71.4%	28.5%	\$714	80.8%	33.7%	9	50.0%	31.5%	\$2,552	61.0%	36.4%
	Unknown	5	20.0%	\$906	17.9%	0.0%	0	0.0%	25.2%	\$0	0.0%	29.0%	5	27.8%	26.0%	\$906	21.7%	28.9%
	<i>Total</i>	<i>25</i>	<i>100.0%</i>	<i>\$5,067</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$884</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$4,183</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	5.4%	\$0	0.0%	4.6%	0	0.0%	5.8%	\$0	0.0%	3.0%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	16.6%	\$0	0.0%	15.8%	0	0.0%	15.4%	\$0	0.0%	11.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	25.9%	\$0	0.0%	24.0%	0	0.0%	23.1%	\$0	0.0%	22.2%
	Upper	1	100.0%	\$124	100.0%	40.2%	0	0.0%	48.3%	\$0	0.0%	50.9%	1	100.0%	50.7%	\$124	100.0%	56.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	4.7%	0	0.0%	5.0%	\$0	0.0%	7.5%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$124</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	1	25.0%	\$675	18.3%	23.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	33.3%	2.0%	\$675	21.8%	0.1%
	Upper	1	25.0%	\$580	15.8%	40.2%	1	100.0%	20.0%	\$580	100.0%	0.7%	0	0.0%	15.7%	\$0	0.0%	1.0%
	Unknown	2	50.0%	\$2,427	65.9%	0.0%	0	0.0%	80.0%	\$0	0.0%	99.3%	2	66.7%	82.4%	\$2,427	78.2%	98.9%
	<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$3,682</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$580</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,102</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	6.0%	\$0	0.0%	4.0%	0	0.0%	6.5%	\$0	0.0%	6.0%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	15.6%	\$0	0.0%	9.9%	0	0.0%	15.8%	\$0	0.0%	13.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	26.1%	\$0	0.0%	22.4%	0	0.0%	21.1%	\$0	0.0%	17.4%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	49.5%	\$0	0.0%	60.8%	0	0.0%	50.6%	\$0	0.0%	58.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.8%	\$0	0.0%	2.7%	0	0.0%	6.0%	\$0	0.0%	5.2%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Rutherford

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %	Bank #	Agg %	Bank \$ (000s)	\$ %	Agg \$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	10.3%	\$0	0.0%	11.0%	0	0.0%	4.5%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	20.7%	\$0	0.0%	16.9%	0	0.0%	21.8%	\$0	0.0%	17.3%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	26.7%	\$0	0.0%	26.1%	0	0.0%	24.5%	\$0	0.0%	25.2%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	37.1%	\$0	0.0%	38.3%	0	0.0%	33.6%	\$0	0.0%	34.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.2%	\$0	0.0%	7.7%	0	0.0%	15.5%	\$0	0.0%	20.9%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	17.5%	0	0.0%	0.5%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	19.3%	0	0.0%	1.0%	\$0	0.0%	1.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	23.0%	0	0.0%	2.0%	\$0	0.0%	2.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.2%	0	0.0%	1.5%	\$0	0.0%	3.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	94.9%	\$0	0.0%	92.8%	0	0.0%	99.5%	\$0	0.0%	99.9%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	2.6%	\$34	0.3%	17.5%	1	7.7%	5.5%	\$34	1.5%	3.2%	0	0.0%	5.7%	\$0	0.0%	3.4%
	Moderate	4	10.5%	\$754	7.3%	19.3%	0	0.0%	21.0%	\$0	0.0%	15.6%	4	16.0%	20.1%	\$754	9.4%	15.5%
	Middle	5	13.2%	\$1,348	13.0%	23.0%	2	15.4%	23.7%	\$248	10.7%	21.0%	3	12.0%	22.2%	\$1,100	13.7%	20.1%
	Upper	19	50.0%	\$4,589	44.3%	40.2%	9	69.2%	30.7%	\$1,913	82.3%	32.6%	10	40.0%	30.4%	\$2,676	33.3%	32.6%
	Unknown	9	23.7%	\$3,637	35.1%	0.0%	1	7.7%	19.1%	\$130	5.6%	27.6%	8	32.0%	21.6%	\$3,507	43.6%	28.5%
	<i>Total</i>	<i>38</i>	<i>100.0%</i>	<i>\$10,362</i>	<i>100.0%</i>	<i>100.0%</i>	<i>13</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,325</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,037</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: TN Rutherford

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison 2019, 2020					2019					2020						
	Count		Bank Dollar		Total Businesses %	Count		Dollar			Count		Dollar				
#	%	\$ (000s)	\$ %	Bank #		Agg %	Bank \$ 000s	\$ %	Agg \$ %	Bank #	%	Agg %	\$ 000s	\$ %	Agg \$ %		
Low	8	4.4%	\$653	4.5%	6.7%	1	6.7%	9.4%	\$322	8.4%	12.7%	7	4.2%	7.9%	\$331	3.1%	13.8%
Moderate	31	16.9%	\$2,390	16.6%	27.6%	5	33.3%	21.5%	\$1,033	27.1%	27.1%	26	15.5%	23.3%	\$1,357	12.9%	27.1%
Middle	118	64.5%	\$9,736	67.7%	49.3%	8	53.3%	49.9%	\$2,412	63.2%	45.6%	110	65.5%	52.3%	\$7,324	69.4%	45.4%
Upper	26	14.2%	\$1,596	11.1%	16.3%	1	6.7%	17.8%	\$50	1.3%	14.1%	25	14.9%	16.4%	\$1,546	14.6%	13.7%
Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.5%	0	0.0%	0.2%	\$0	0.0%	0.1%
<i>Total</i>	<i>183</i>	<i>100.0%</i>	<i>\$14,375</i>	<i>100.0%</i>	<i>100.0%</i>	<i>15</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,817</i>	<i>100.0%</i>	<i>100.0%</i>	<i>168</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,558</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TN Rutherford

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	17	9.3%	\$3,502	24.4%	93.6%	5	33.3%	48.2%	\$1,815	47.6%	40.5%	12	7.1%	38.7%	\$1,687	16.0%	32.4%
	Over \$1 Million	15	8.2%	\$3,255	22.6%	5.8%	8	53.3%				7	4.2%					
	Total Rev. available	32	17.5%	\$6,757	47.0%	99.4%	13	86.6%				19	11.3%					
	Rev. Not Known	151	82.5%	\$7,618	53.0%	0.5%	2	13.3%				149	88.7%					
	Total	183	100.0%	\$14,375	100.0%	100.0%	15	100.0%				168	100.0%					
LOAN SIZE	\$100,000 or Less	153	83.6%	\$4,322	30.1%		9	60.0%	91.4%	\$430	11.3%	28.9%	144	85.7%	87.8%	\$3,892	36.9%	33.1%
	\$100,001 - \$250,000	19	10.4%	\$3,006	20.9%		1	6.7%	4.3%	\$190	5.0%	17.0%	18	10.7%	7.6%	\$2,816	26.7%	22.9%
	\$250,001 - \$1 Million	11	6.0%	\$7,047	49.0%		5	33.3%	4.3%	\$3,197	83.8%	54.1%	6	3.6%	4.6%	\$3,850	36.5%	43.9%
	Total	183	100.0%	\$14,375	100.0%		15	100.0%	100.0%	\$3,817	100.0%	100.0%	168	100.0%	100.0%	\$10,558	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	8	47.1%	\$493	14.1%													
	\$100,001 - \$250,000	5	29.4%	\$846	24.2%													
	\$250,001 - \$1 Million	4	23.5%	\$2,163	61.8%													
	Total	17	100.0%	\$3,502	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Sevier

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	Dollar %		Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %	Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	1.0%	\$0	0.0%	1.0%	0	0.0%	0.6%	\$0	0.0%	0.6%
	Middle	47	75.8%	\$10,760	75.1%	66.0%	28	82.4%	70.2%	\$6,110	79.6%	73.3%	19	67.9%	70.8%	\$4,650	69.9%	75.1%
	Upper	15	24.2%	\$3,576	24.9%	33.0%	6	17.6%	28.7%	\$1,570	20.4%	25.5%	9	32.1%	28.5%	\$2,006	30.1%	24.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.2%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>62</i>	<i>100.0%</i>	<i>\$14,336</i>	<i>100.0%</i>	<i>100.0%</i>	<i>34</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,680</i>	<i>100.0%</i>	<i>100.0%</i>	<i>28</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,656</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	2.3%	\$275	2.9%	1.1%	0	0.0%	0.8%	\$0	0.0%	0.5%	1	3.3%	0.7%	\$275	3.9%	0.7%
	Middle	29	65.9%	\$5,646	59.9%	66.0%	11	78.6%	67.9%	\$1,918	78.2%	69.9%	18	60.0%	65.9%	\$3,728	53.4%	67.5%
	Upper	14	31.8%	\$3,512	37.2%	33.0%	3	21.4%	31.2%	\$534	21.8%	29.6%	11	36.7%	33.4%	\$2,978	42.7%	31.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.1%
	<i>Total</i>	<i>44</i>	<i>100.0%</i>	<i>\$9,433</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,452</i>	<i>100.0%</i>	<i>100.0%</i>	<i>30</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,981</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	50.0%	\$100	48.5%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	1	50.0%	0.8%	\$100	48.5%	0.7%
	Middle	1	50.0%	\$106	51.5%	66.0%	0	0.0%	47.5%	\$0	0.0%	47.2%	1	50.0%	64.0%	\$106	51.5%	71.6%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	52.5%	\$0	0.0%	52.8%	0	0.0%	35.2%	\$0	0.0%	27.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100.0%</i>	<i>\$206</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$206</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	25.0%	\$12,200	43.5%	10.8%	1	25.0%	6.9%	\$12,200	43.5%	14.8%	0	0.0%	3.2%	\$0	0.0%	1.5%
	Middle	2	50.0%	\$14,850	52.9%	77.6%	2	50.0%	79.3%	\$14,850	52.9%	80.9%	0	0.0%	90.3%	\$0	0.0%	97.6%
	Upper	1	25.0%	\$1,000	3.6%	11.6%	1	25.0%	13.8%	\$1,000	3.6%	4.3%	0	0.0%	6.5%	\$0	0.0%	1.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>4</i>	<i>100.0%</i>	<i>\$28,050</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$28,050</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.8%	\$0	0.0%	0.5%
	Middle	0	0.0%	\$0	0.0%	66.0%	0	0.0%	63.5%	\$0	0.0%	68.4%	0	0.0%	61.8%	\$0	0.0%	66.9%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	36.5%	\$0	0.0%	31.6%	0	0.0%	36.4%	\$0	0.0%	32.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	1.6%	\$0	0.0%	1.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	66.0%	0	0.0%	65.1%	\$0	0.0%	70.4%	0	0.0%	75.0%	\$0	0.0%	82.4%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	33.3%	\$0	0.0%	28.0%	0	0.0%	25.0%	\$0	0.0%	17.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.6%
	Middle	0	0.0%	\$0	0.0%	66.0%	0	0.0%	62.5%	\$0	0.0%	66.2%	0	0.0%	58.0%	\$0	0.0%	62.4%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	37.5%	\$0	0.0%	33.8%	0	0.0%	40.7%	\$0	0.0%	37.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	2.7%	\$12,575	24.2%	1.1%	1	1.9%	0.9%	\$12,200	32.0%	2.0%	2	3.3%	0.7%	\$375	2.7%	0.7%
	Middle	79	70.5%	\$31,362	60.3%	66.0%	41	78.8%	68.9%	\$22,878	59.9%	72.8%	38	63.3%	68.4%	\$8,484	61.3%	73.3%
	Upper	30	26.8%	\$8,088	15.5%	33.0%	10	19.2%	30.0%	\$3,104	8.1%	25.1%	20	33.3%	30.9%	\$4,984	36.0%	26.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	112	100.0%	\$52,025	100.0%	100.0%	52	100.0%	100.0%	\$38,182	100.0%	100.0%	60	100.0%	100.0%	\$13,843	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units	Count		Dollar			Count		Dollar						
		Count	Dollar		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg						
#	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%	#	%	%	\$ (000s)	%	%		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	1.6%	\$0	0.0%	1.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	66.0%	0	0.0%	65.1%	\$0	0.0%	70.4%	0	0.0%	75.0%	\$0	0.0%	82.4%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	33.3%	\$0	0.0%	28.0%	0	0.0%	25.0%	\$0	0.0%	17.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	1.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	1.2%	\$0	0.0%	0.6%
	Middle	0	0.0%	\$0	0.0%	66.0%	0	0.0%	62.5%	\$0	0.0%	66.2%	0	0.0%	58.0%	\$0	0.0%	62.4%
	Upper	0	0.0%	\$0	0.0%	33.0%	0	0.0%	37.5%	\$0	0.0%	33.8%	0	0.0%	40.7%	\$0	0.0%	37.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	3	2.7%	\$12,575	24.2%	1.1%	1	1.9%	0.9%	\$12,200	32.0%	2.0%	2	3.3%	0.7%	\$375	2.7%	0.7%
	Middle	79	70.5%	\$31,362	60.3%	66.0%	41	78.8%	68.9%	\$22,878	59.9%	72.8%	38	63.3%	68.4%	\$8,484	61.3%	73.3%
	Upper	30	26.8%	\$8,088	15.5%	33.0%	10	19.2%	30.0%	\$3,104	8.1%	25.1%	20	33.3%	30.9%	\$4,984	36.0%	26.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.1%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	112	100.0%	\$52,025	100.0%	100.0%	52	100.0%	100.0%	\$38,182	100.0%	100.0%	60	100.0%	100.0%	\$13,843	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Sevier

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	16.6%	0	0.0%	11.1%	\$0	0.0%	6.5%	0	0.0%	2.3%	\$0	0.0%	1.1%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	9.5%	\$0	0.0%	5.9%	0	0.0%	9.1%	\$0	0.0%	6.1%
	Middle	0	0.0%	\$0	0.0%	20.6%	0	0.0%	20.6%	\$0	0.0%	8.6%	0	0.0%	15.9%	\$0	0.0%	15.6%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	50.8%	\$0	0.0%	69.9%	0	0.0%	65.9%	\$0	0.0%	70.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.9%	\$0	0.0%	9.1%	0	0.0%	6.8%	\$0	0.0%	6.3%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	16.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	45.0%	0	0.0%	9.4%	\$0	0.0%	14.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	90.6%	\$0	0.0%	85.3%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	2	1.8%	\$221	0.4%	16.6%	1	1.9%	2.5%	\$94	0.2%	1.1%	1	1.7%	1.8%	\$127	0.9%	0.7%
	Moderate	10	8.9%	\$1,529	2.9%	17.8%	2	3.8%	8.3%	\$218	0.6%	4.8%	8	13.3%	7.0%	\$1,311	9.5%	3.9%
	Middle	15	13.4%	\$2,570	4.9%	20.6%	7	13.5%	15.1%	\$1,137	3.0%	10.6%	8	13.3%	14.5%	\$1,433	10.4%	10.3%
	Upper	74	66.1%	\$18,527	35.6%	45.0%	33	63.5%	57.4%	\$7,755	20.3%	59.4%	41	68.3%	56.8%	\$10,772	77.8%	61.5%
	Unknown	11	9.8%	\$29,178	56.1%	0.0%	9	17.3%	16.7%	\$28,978	75.9%	24.1%	2	3.3%	19.9%	\$200	1.4%	23.6%
	<i>Total</i>	<i>112</i>	<i>100.0%</i>	<i>\$52,025</i>	<i>100.0%</i>	<i>100.0%</i>	<i>52</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$38,182</i>	<i>100.0%</i>	<i>100.0%</i>	<i>60</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,843</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: TN Sevier

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison 2019, 2020					2019					2020						
	Count		Bank		Total Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank	Agg	\$ 000s	\$ %	\$ %	Bank	Agg	\$ 000s	\$ %	\$ %		
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	27	6.2%	\$3,096	5.1%	7.5%	3	3.0%	6.2%	\$406	2.2%	6.1%	24	7.1%	6.5%	\$2,690	6.4%	7.4%
Middle	342	78.1%	\$50,324	83.0%	72.8%	72	72.0%	70.8%	\$14,901	80.1%	78.7%	270	79.9%	71.5%	\$35,423	84.4%	78.7%
Upper	69	15.8%	\$7,177	11.8%	19.6%	25	25.0%	21.2%	\$3,296	17.7%	14.5%	44	13.0%	21.3%	\$3,881	9.2%	13.6%
Unknown	0	0.0%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.8%	\$0	0.0%	0.7%	0	0.0%	0.6%	\$0	0.0%	0.3%
<i>Total</i>	<i>438</i>	<i>100.0%</i>	<i>\$60,597</i>	<i>100.0%</i>	<i>100.0%</i>	<i>100</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$18,603</i>	<i>100.0%</i>	<i>100.0%</i>	<i>338</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$41,994</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TN Sevier

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			#	%	Agg %	Bank		Agg %	Count		Dollar			
		#	%	\$ (000s)	\$ %	\$ (000s)				\$ %	#		%	%	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	86	19.6%	\$14,245	23.5%	92.7%	41	41.0%	44.8%	\$5,188	27.9%	37.2%	45	13.3%	38.5%	\$9,057	21.6%	28.8%
	Over \$1 Million	76	17.4%	\$23,606	39.0%	6.6%	47	47.0%					29	8.6%				
	Total Rev. available	162	37.0%	\$37,851	62.5%	99.3%	88	88.0%					74	21.9%				
	Rev. Not Known	276	63.0%	\$22,746	37.5%	0.7%	12	12.0%					264	78.1%				
	Total	438	100.0%	\$60,597	100.0%	100.0%	100	100.0%					338	100.0%				
LOAN SIZE	\$100,000 or Less	294	67.1%	\$9,788	16.2%		56	56.0%	92.6%	\$2,813	15.1%	35.6%	238	70.4%	88.4%	\$6,975	16.6%	32.5%
	\$100,001 - \$250,000	67	15.3%	\$11,164	18.4%		19	19.0%	4.0%	\$3,239	17.4%	16.8%	48	14.2%	6.3%	\$7,925	18.9%	18.5%
	\$250,001 - \$1 Million	77	17.6%	\$39,645	65.4%		25	25.0%	3.4%	\$12,551	67.5%	47.6%	52	15.4%	5.4%	\$27,094	64.5%	49.0%
	Total	438	100.0%	\$60,597	100.0%		100	100.0%	100.0%	\$18,603	100.0%	100.0%	338	100.0%	100.0%	\$41,994	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	53	61.6%	\$2,132	15.0%													
	\$100,001 - \$250,000	15	17.4%	\$2,492	17.5%													
	\$250,001 - \$1 Million	18	20.9%	\$9,621	67.5%													
	Total	86	100.0%	\$14,245	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Baldwin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	Dollar %		Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %	Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	11.1%	\$172	5.9%	14.9%	0	0.0%	16.7%	\$0	0.0%	16.1%	1	33.3%	17.0%	\$172	21.5%	16.4%
	Middle	4	44.4%	\$1,400	48.1%	65.0%	4	66.7%	57.8%	\$1,400	66.4%	51.8%	0	0.0%	56.8%	\$0	0.0%	52.1%
	Upper	4	44.4%	\$1,336	45.9%	20.1%	2	33.3%	25.5%	\$708	33.6%	32.1%	2	66.7%	26.2%	\$628	78.5%	31.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$2,908</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,108</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$800</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	13.9%	\$0	0.0%	13.1%	0	0.0%	13.1%	\$0	0.0%	12.1%
	Middle	2	66.7%	\$568	54.0%	65.0%	2	66.7%	58.0%	\$568	54.0%	51.9%	0	0.0%	56.1%	\$0	0.0%	51.8%
	Upper	1	33.3%	\$484	46.0%	20.1%	1	33.3%	28.1%	\$484	46.0%	35.0%	0	0.0%	30.8%	\$0	0.0%	36.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$1,052</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,052</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	13.8%	\$0	0.0%	11.3%	0	0.0%	11.3%	\$0	0.0%	9.8%
	Middle	0	0.0%	\$0	0.0%	65.0%	0	0.0%	58.8%	\$0	0.0%	51.9%	0	0.0%	53.2%	\$0	0.0%	47.9%
	Upper	0	0.0%	\$0	0.0%	20.1%	0	0.0%	27.4%	\$0	0.0%	36.7%	0	0.0%	35.6%	\$0	0.0%	42.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	28.4%	0	0.0%	35.0%	\$0	0.0%	23.3%	0	0.0%	44.0%	\$0	0.0%	22.5%
	Middle	1	100.0%	\$597	100.0%	42.8%	0	0.0%	60.0%	\$0	0.0%	60.4%	1	100.0%	52.0%	\$597	100.0%	76.3%
	Upper	0	0.0%	\$0	0.0%	28.8%	0	0.0%	5.0%	\$0	0.0%	16.3%	0	0.0%	4.0%	\$0	0.0%	1.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$597</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$597</i>	<i>100.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	10.5%	\$0	0.0%	8.0%	0	0.0%	9.1%	\$0	0.0%	6.6%
	Middle	0	0.0%	\$0	0.0%	65.0%	0	0.0%	60.3%	\$0	0.0%	53.1%	0	0.0%	55.8%	\$0	0.0%	52.9%
	Upper	0	0.0%	\$0	0.0%	20.1%	0	0.0%	29.2%	\$0	0.0%	38.9%	0	0.0%	35.2%	\$0	0.0%	40.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: AL Baldwin

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		2019, 2020				Owner Occupied Units %	2019					2020						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count	%	\$ (000s)	\$ %		Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	#	%	#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	12.4%	\$0	0.0%	13.2%	0	0.0%	16.0%	\$0	0.0%	11.9%
	Middle	0	0.0%	\$0	0.0%	65.0%	0	0.0%	61.8%	\$0	0.0%	47.2%	0	0.0%	63.0%	\$0	0.0%	52.9%
	Upper	0	0.0%	\$0	0.0%	20.1%	0	0.0%	25.8%	\$0	0.0%	39.6%	0	0.0%	21.0%	\$0	0.0%	35.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	14.9%	0	0.0%	17.7%	\$0	0.0%	14.1%	0	0.0%	14.3%	\$0	0.0%	11.5%
	Middle	0	0.0%	\$0	0.0%	65.0%	0	0.0%	61.1%	\$0	0.0%	52.8%	0	0.0%	61.8%	\$0	0.0%	51.6%
	Upper	0	0.0%	\$0	0.0%	20.1%	0	0.0%	21.2%	\$0	0.0%	33.1%	0	0.0%	24.0%	\$0	0.0%	36.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	7.7%	\$172	3.8%	14.9%	0	0.0%	15.5%	\$0	0.0%	15.2%	1	25.0%	15.0%	\$172	12.3%	14.4%
	Middle	7	53.8%	\$2,565	56.3%	65.0%	6	66.7%	58.1%	\$1,968	62.3%	52.2%	1	25.0%	56.5%	\$597	42.7%	52.4%
	Upper	5	38.5%	\$1,820	39.9%	20.1%	3	33.3%	26.4%	\$1,192	37.7%	32.6%	2	50.0%	28.6%	\$628	45.0%	33.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$4,557</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,160</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,397</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Baldwin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019						2020					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Dollar \$ (000s)	\$ %	\$ %	Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	8.8%	\$0	0.0%	4.8%	0	0.0%	8.3%	\$0	0.0%	4.8%
	Moderate	2	22.2%	\$291	10.0%	17.7%	2	33.3%	21.0%	\$291	13.8%	15.1%	0	0.0%	20.9%	\$0	0.0%	15.5%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	20.4%	\$0	0.0%	18.2%	0	0.0%	21.6%	\$0	0.0%	19.4%
	Upper	6	66.7%	\$2,381	81.9%	40.9%	4	66.7%	35.4%	\$1,817	86.2%	47.4%	2	66.7%	37.8%	\$564	70.5%	49.1%
	Unknown	1	11.1%	\$236	8.1%	0.0%	0	0.0%	14.4%	\$0	0.0%	14.6%	1	33.3%	11.5%	\$236	29.5%	11.3%
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$2,908</i>	<i>100.0%</i>	<i>100.0%</i>	<i>6</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,108</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$800</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	8.6%	\$0	0.0%	4.7%	0	0.0%	5.3%	\$0	0.0%	2.8%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	15.7%	\$0	0.0%	10.5%	0	0.0%	13.5%	\$0	0.0%	9.4%
	Middle	1	33.3%	\$92	8.7%	20.9%	1	33.3%	17.3%	\$92	8.7%	14.4%	0	0.0%	17.1%	\$0	0.0%	14.1%
	Upper	2	66.7%	\$960	91.3%	40.9%	2	66.7%	35.8%	\$960	91.3%	46.2%	0	0.0%	39.8%	\$0	0.0%	49.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	22.5%	\$0	0.0%	24.2%	0	0.0%	24.4%	\$0	0.0%	24.3%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$1,052</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,052</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	12.0%	\$0	0.0%	6.8%	0	0.0%	8.3%	\$0	0.0%	4.7%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	16.9%	\$0	0.0%	13.6%	0	0.0%	16.4%	\$0	0.0%	12.7%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	23.5%	\$0	0.0%	21.1%	0	0.0%	21.4%	\$0	0.0%	18.8%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	44.5%	\$0	0.0%	54.7%	0	0.0%	50.9%	\$0	0.0%	60.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.1%	\$0	0.0%	3.8%	0	0.0%	2.9%	\$0	0.0%	3.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	8.0%	\$0	0.0%	1.5%
	Unknown	1	100.0%	\$597	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	92.0%	\$597	100.0%	98.5%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$597</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$597</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	8.3%	\$0	0.0%	3.7%	0	0.0%	7.3%	\$0	0.0%	4.1%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	19.2%	\$0	0.0%	11.6%	0	0.0%	16.7%	\$0	0.0%	8.9%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	21.1%	\$0	0.0%	17.6%	0	0.0%	21.2%	\$0	0.0%	15.1%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	48.5%	\$0	0.0%	65.0%	0	0.0%	52.7%	\$0	0.0%	70.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	2.9%	\$0	0.0%	2.2%	0	0.0%	2.1%	\$0	0.0%	1.9%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: AL Baldwin

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	Agg	\$ (000s)	\$ %	Agg	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	12.9%	\$0	0.0%	5.6%	0	0.0%	10.9%	\$0	0.0%	5.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	20.4%	\$0	0.0%	9.7%	0	0.0%	9.2%	\$0	0.0%	4.9%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	21.5%	\$0	0.0%	17.3%	0	0.0%	23.5%	\$0	0.0%	17.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	39.8%	\$0	0.0%	57.4%	0	0.0%	51.3%	\$0	0.0%	68.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	5.4%	\$0	0.0%	10.0%	0	0.0%	5.0%	\$0	0.0%	4.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	0.9%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	20.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.9%	0	0.0%	1.8%	\$0	0.0%	2.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	97.3%	\$0	0.0%	97.4%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.6%	0	0.0%	8.8%	\$0	0.0%	4.6%	0	0.0%	6.8%	\$0	0.0%	3.8%
	Moderate	2	15.4%	\$291	6.4%	17.7%	2	22.2%	19.0%	\$291	9.2%	13.0%	0	0.0%	17.0%	\$0	0.0%	12.2%
	Middle	1	7.7%	\$92	2.0%	20.9%	1	11.1%	19.5%	\$92	2.9%	16.3%	0	0.0%	19.2%	\$0	0.0%	16.5%
	Upper	8	61.5%	\$3,341	73.3%	40.9%	6	66.7%	36.0%	\$2,777	87.9%	45.5%	2	50.0%	38.9%	\$564	40.4%	48.3%
	Unknown	2	15.4%	\$833	18.3%	0.0%	0	0.0%	16.6%	\$0	0.0%	20.6%	2	50.0%	18.0%	\$833	59.6%	19.3%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$4,557</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$3,160</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,397</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: AL Baldwin

Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
	Count		Bank Dollar		Total Businesses %	2019			2020								
	#	%	\$ (000s)	\$ %		#	%	%	Dollar		Count		Dollar				
					Bank				Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %	#	%	%	\$ 000s	\$ %	\$ %	
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	10	6.3%	\$2,280	12.2%	18.9%	8	17.8%	16.6%	\$1,869	23.2%	16.8%	2	1.8%	16.7%	\$411	3.9%	18.3%
Middle	90	56.6%	\$10,149	54.5%	60.5%	18	40.0%	55.8%	\$3,073	38.2%	54.3%	72	63.2%	56.5%	\$7,076	66.9%	53.8%
Upper	59	37.1%	\$6,204	33.3%	20.6%	19	42.2%	24.3%	\$3,108	38.6%	27.6%	40	35.1%	26.0%	\$3,096	29.3%	27.3%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	3.3%	\$0	0.0%	1.2%	0	0.0%	0.9%	\$0	0.0%	0.6%
<i>Total</i>	<i>159</i>	<i>100.0%</i>	<i>\$18,633</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,050</i>	<i>100.0%</i>	<i>100.0%</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,583</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Baldwin

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Count		Bank Dollar		Total Businesses %	2019			2020								
		#	%	\$ (000s)	\$ %		#	%	%	Dollar		Count		Dollar				
						Bank				Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
BUSINESS REVENUE	\$1million or Less	53	33.3%	\$8,029	43.1%	92.7%	34	75.6%	41.7%	\$5,519	68.6%	42.2%	19	16.7%	34.7%	\$2,510	23.7%	30.6%
	Over \$1 Million	19	11.9%	\$5,207	27.9%	6.4%	11	24.4%				8	7.0%					
	Total Rev. available	72	45.2%	\$13,236	71.0%	99.1%	45	100.0%				27	23.7%					
	Rev. Not Known	87	54.7%	\$5,397	29.0%	0.9%	0	0.0%				87	76.3%					
	<i>Total</i>	<i>159</i>	<i>100.0%</i>	<i>\$18,633</i>	<i>100.0%</i>	<i>100.0%</i>	<i>45</i>	<i>100.0%</i>				<i>114</i>	<i>100.0%</i>					
LOAN SIZE	\$100,000 or Less	114	71.7%	\$4,481	24.0%		28	62.2%	90.1%	\$1,422	17.7%	32.0%	86	75.4%	85.6%	\$3,059	28.9%	30.3%
	\$100,001 - \$250,000	24	15.1%	\$3,833	20.6%		6	13.3%	5.2%	\$900	11.2%	19.0%	18	15.8%	8.4%	\$2,933	27.7%	21.7%
	\$250,001 - \$1 Million	21	13.2%	\$10,319	55.4%		11	24.4%	4.7%	\$5,728	71.2%	49.0%	10	8.8%	6.1%	\$4,591	43.4%	48.0%
	<i>Total</i>	<i>159</i>	<i>100.0%</i>	<i>\$18,633</i>	<i>100.0%</i>		<i>45</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,050</i>	<i>100.0%</i>	<i>100.0%</i>	<i>114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,583</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	37	69.8%	\$1,703	21.2%													
	\$100,001 - \$250,000	7	13.2%	\$1,111	13.8%													
	\$250,001 - \$1 Million	9	17.0%	\$5,215	65.0%													
	<i>Total</i>	<i>53</i>	<i>100.0%</i>	<i>\$8,029</i>	<i>100.0%</i>													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Clarke

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank				Owner Occupied Units %	Count		Dollar			Count		Dollar				
		Count #	%	Dollar \$ (000s)	Dollar %		Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %	Bank #	Agg %	Bank \$ (000s)	Dollar %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	11.1%	\$73	8.2%	5.0%	0	0.0%	2.6%	\$0	0.0%	2.8%	1	20.0%	4.0%	\$73	21.3%	4.1%
	Middle	8	88.9%	\$814	91.8%	95.0%	4	100.0%	96.9%	\$545	100.0%	97.1%	4	80.0%	95.5%	\$269	78.7%	95.8%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.5%	\$0	0.0%	0.1%	0	0.0%	0.4%	\$0	0.0%	0.1%
	<i>Total</i>	9	100.0%	\$887	100.0%	100.0%	4	100.0%	100.0%	\$545	100.0%	100.0%	5	100.0%	100.0%	\$342	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.0%	0	0.0%	5.2%	\$0	0.0%	4.8%	0	0.0%	3.2%	\$0	0.0%	3.5%
	Middle	3	100.0%	\$369	100.0%	95.0%	1	100.0%	94.8%	\$34	100.0%	95.2%	2	100.0%	96.8%	\$335	100.0%	96.5%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	3	100.0%	\$369	100.0%	100.0%	1	100.0%	100.0%	\$34	100.0%	100.0%	2	100.0%	100.0%	\$335	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.0%	0	0.0%	12.5%	\$0	0.0%	5.0%	0	0.0%	50.0%	\$0	0.0%	44.5%
	Middle	0	0.0%	\$0	0.0%	95.0%	0	0.0%	87.5%	\$0	0.0%	95.0%	0	0.0%	50.0%	\$0	0.0%	55.5%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	0.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	99.2%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	16.7%	\$0	0.0%	10.8%
	Middle	0	0.0%	\$0	0.0%	95.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	83.3%	\$0	0.0%	89.2%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: AL Clarke

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
						Owner Occupied Units %	2019					2020						
		Bank		Dollar			Count		Dollar			Count		Dollar				
		Count		Dollar	\$ %		Bank	Agg	Bank	Agg	Agg	Bank	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %			
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	95.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	5.0%	0	0.0%	10.0%	\$0	0.0%	9.2%	0	0.0%	5.0%	\$0	0.0%	3.3%
	Middle	0	0.0%	\$0	0.0%	95.0%	0	0.0%	90.0%	\$0	0.0%	90.8%	0	0.0%	95.0%	\$0	0.0%	96.7%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	1	8.3%	\$73	5.8%	5.0%	0	0.0%	3.9%	\$0	0.0%	3.7%	1	14.3%	4.2%	\$73	10.8%	3.9%
	Middle	11	91.7%	\$1,183	94.2%	95.0%	5	100.0%	95.8%	\$579	100.0%	96.3%	6	85.7%	95.6%	\$604	89.2%	96.0%
	Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.2%	\$0	0.0%	0.1%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$1,256</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$579</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$677</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Clarke

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019						2020					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg %	Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	1	11.1%	\$41	4.6%	23.8%	0	0.0%	1.0%	\$0	0.0%	0.9%	1	20.0%	3.1%	\$41	12.0%	1.4%
	Moderate	1	11.1%	\$73	8.2%	15.6%	0	0.0%	13.8%	\$0	0.0%	9.0%	1	20.0%	15.2%	\$73	21.3%	8.1%
	Middle	0	0.0%	\$0	0.0%	17.7%	0	0.0%	24.6%	\$0	0.0%	19.5%	0	0.0%	27.8%	\$0	0.0%	23.7%
	Upper	4	44.4%	\$524	59.1%	43.0%	2	50.0%	49.2%	\$320	58.7%	58.5%	2	40.0%	45.3%	\$204	59.6%	57.7%
	Unknown	3	33.3%	\$249	28.1%	0.0%	2	50.0%	11.3%	\$225	41.3%	12.1%	1	20.0%	8.5%	\$24	7.0%	9.1%
	Total	9	100.0%	\$887	100.0%	100.0%	4	100.0%	100.0%	\$545	100.0%	100.0%	5	100.0%	100.0%	\$342	100.0%	100.0%
REFINANCE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	7.5%	\$0	0.0%	4.0%	0	0.0%	4.6%	\$0	0.0%	1.7%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	9.0%	\$0	0.0%	7.1%	0	0.0%	7.3%	\$0	0.0%	4.2%
	Middle	2	66.7%	\$169	45.8%	17.7%	1	100.0%	14.9%	\$34	100.0%	10.6%	1	50.0%	11.4%	\$135	40.3%	8.0%
	Upper	1	33.3%	\$200	54.2%	43.0%	0	0.0%	55.2%	\$0	0.0%	59.3%	1	50.0%	52.1%	\$200	59.7%	57.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	13.4%	\$0	0.0%	19.0%	0	0.0%	24.7%	\$0	0.0%	28.4%
	Total	3	100.0%	\$369	100.0%	100.0%	1	100.0%	100.0%	\$34	100.0%	100.0%	2	100.0%	100.0%	\$335	100.0%	100.0%
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.7%	0	0.0%	37.5%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.0%	0	0.0%	62.5%	\$0	0.0%	79.7%	0	0.0%	75.0%	\$0	0.0%	79.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	25.0%	\$0	0.0%	20.5%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	33.3%	\$0	0.0%	25.3%
	Middle	0	0.0%	\$0	0.0%	17.7%	0	0.0%	33.3%	\$0	0.0%	14.7%	0	0.0%	16.7%	\$0	0.0%	23.2%
	Upper	0	0.0%	\$0	0.0%	43.0%	0	0.0%	66.7%	\$0	0.0%	85.3%	0	0.0%	50.0%	\$0	0.0%	51.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: AL Clarke

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	Agg	Bank	\$ (000s)	\$ %	Agg
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	12.5%	\$0	0.0%	6.0%
	Middle	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	12.5%	\$0	0.0%	8.2%
	Upper	0	0.0%	\$0	0.0%	43.0%	0	0.0%	66.7%	\$0	0.0%	79.4%	0	0.0%	75.0%	\$0	0.0%	85.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	33.3%	\$0	0.0%	20.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	23.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.6%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	1	8.3%	\$41	3.3%	23.8%	0	0.0%	3.4%	\$0	0.0%	2.0%	1	14.3%	3.5%	\$41	6.1%	1.5%
	Moderate	1	8.3%	\$73	5.8%	15.6%	0	0.0%	10.9%	\$0	0.0%	7.7%	1	14.3%	11.0%	\$73	10.8%	6.1%
	Middle	2	16.7%	\$169	13.5%	17.7%	1	20.0%	20.4%	\$34	5.9%	15.3%	1	14.3%	18.5%	\$135	19.9%	15.3%
	Upper	5	41.7%	\$724	57.6%	43.0%	2	40.0%	50.7%	\$320	55.3%	57.5%	3	42.9%	47.2%	\$404	59.7%	56.2%
	Unknown	3	25.0%	\$249	19.8%	0.0%	2	40.0%	14.6%	\$225	38.9%	17.6%	1	14.3%	19.8%	\$24	3.5%	21.0%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$1,256</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$579</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$677</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: AL Clarke

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison 2019, 2020					2019					2020						
	Count		Bank Dollar		Total Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank	Agg	\$ 000s	\$ %	\$ %	#	%	Agg	Bank	\$ 000s	\$ %	Agg
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	4	2.0%	\$113	0.5%	3.2%	2	2.9%	2.7%	\$50	0.6%	1.3%	2	1.5%	2.0%	\$63	0.4%	1.2%
Middle	200	98.0%	\$22,814	99.5%	96.8%	66	97.1%	84.0%	\$8,200	99.4%	96.8%	134	98.5%	96.9%	\$14,614	99.6%	98.5%
Upper	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	13.2%	\$0	0.0%	1.9%	0	0.0%	1.0%	\$0	0.0%	0.3%
<i>Total</i>	<i>204</i>	<i>100.0%</i>	<i>\$22,927</i>	<i>100.0%</i>	<i>100.0%</i>	<i>68</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,250</i>	<i>100.0%</i>	<i>100.0%</i>	<i>136</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$14,677</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Clarke

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	79	38.7%	\$7,962	34.7%	88.3%	48	70.6%	42.4%	\$3,244	39.3%	42.5%	31	22.8%	32.8%	\$4,718	32.1%	32.1%
	Over \$1 Million	26	12.7%	\$7,367	32.1%	9.5%	16	23.5%				10	7.4%					
	Total Rev. available	105	51.4%	\$15,329	66.8%	97.8%	64	94.1%				41	30.2%					
	Rev. Not Known	99	48.5%	\$7,598	33.1%	2.2%	4	5.9%				95	69.9%					
	Total	204	100.0%	\$22,927	100.0%	100.0%	68	100.0%				136	100.0%					
LOAN SIZE	\$100,000 or Less	146	71.6%	\$5,258	22.9%		47	69.1%	84.0%	\$1,902	23.1%	24.1%	99	72.8%	77.8%	\$3,356	22.9%	25.0%
	\$100,001 - \$250,000	35	17.2%	\$5,507	24.0%		12	17.6%	9.6%	\$1,874	22.7%	24.7%	23	16.9%	14.2%	\$3,633	24.8%	26.2%
	\$250,001 - \$1 Million	23	11.3%	\$12,162	53.0%		9	13.2%	6.3%	\$4,474	54.2%	51.1%	14	10.3%	8.0%	\$7,688	52.4%	48.7%
	Total	204	100.0%	\$22,927	100.0%		68	100.0%	100.0%	\$8,250	100.0%	100.0%	136	100.0%	100.0%	\$14,677	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	63	79.7%	\$2,277	28.6%													
	\$100,001 - \$250,000	10	12.7%	\$1,449	18.2%													
	\$250,001 - \$1 Million	6	7.6%	\$4,236	53.2%													
	Total	79	100.0%	\$7,962	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Huntsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	1	6.3%	\$52	1.9%	5.1%	1	14.3%	2.4%	\$52	4.8%	1.0%	0	0.0%	2.9%	\$0	0.0%	1.5%
	Moderate	6	37.5%	\$1,290	48.3%	18.3%	2	28.6%	13.7%	\$418	38.6%	10.1%	4	44.4%	13.8%	\$872	54.9%	10.7%
	Middle	4	25.0%	\$680	25.4%	33.0%	2	28.6%	37.0%	\$363	33.5%	34.3%	2	22.2%	37.9%	\$317	20.0%	36.2%
	Upper	5	31.3%	\$650	24.3%	43.6%	2	28.6%	46.9%	\$251	23.2%	54.6%	3	33.3%	45.4%	\$399	25.1%	51.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$2,672</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,084</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,588</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	4	36.4%	\$455	28.6%	5.1%	3	33.3%	2.2%	\$405	30.1%	0.8%	1	50.0%	1.2%	\$50	20.4%	0.5%
	Moderate	1	9.1%	\$50	3.1%	18.3%	1	11.1%	11.5%	\$50	3.7%	8.3%	0	0.0%	9.5%	\$0	0.0%	7.7%
	Middle	4	36.4%	\$690	43.4%	33.0%	3	33.3%	32.7%	\$495	36.8%	29.6%	1	50.0%	32.4%	\$195	79.6%	29.6%
	Upper	2	18.2%	\$394	24.8%	43.6%	2	22.2%	53.6%	\$394	29.3%	61.4%	0	0.0%	56.9%	\$0	0.0%	62.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$1,589</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,344</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$245</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	2.4%	\$0	0.0%	3.3%	0	0.0%	2.9%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	12.6%	\$0	0.0%	9.9%	0	0.0%	11.8%	\$0	0.0%	8.5%
	Middle	0	0.0%	\$0	0.0%	33.0%	0	0.0%	36.2%	\$0	0.0%	32.1%	0	0.0%	32.9%	\$0	0.0%	29.5%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	48.8%	\$0	0.0%	54.7%	0	0.0%	52.4%	\$0	0.0%	60.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	1	33.3%	\$222	19.5%	26.0%	1	50.0%	30.4%	\$222	43.6%	5.6%	0	0.0%	35.3%	\$0	0.0%	7.2%
	Moderate	2	66.7%	\$918	80.5%	28.8%	1	50.0%	37.0%	\$287	56.4%	18.7%	1	100.0%	19.6%	\$631	100.0%	22.3%
	Middle	0	0.0%	\$0	0.0%	32.6%	0	0.0%	10.9%	\$0	0.0%	21.1%	0	0.0%	27.5%	\$0	0.0%	34.6%
	Upper	0	0.0%	\$0	0.0%	12.6%	0	0.0%	21.7%	\$0	0.0%	54.6%	0	0.0%	17.6%	\$0	0.0%	35.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$1,140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$509</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$631</i>	<i>100.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	2.8%	\$0	0.0%	1.3%	0	0.0%	1.5%	\$0	0.0%	0.6%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	10.4%	\$0	0.0%	7.6%	0	0.0%	10.0%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	33.0%	0	0.0%	32.5%	\$0	0.0%	28.7%	0	0.0%	32.9%	\$0	0.0%	30.3%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	54.3%	\$0	0.0%	62.4%	0	0.0%	55.6%	\$0	0.0%	60.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: AL Huntsville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2019					2020						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %	#	%	Agg %	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	3.1%	\$0	0.0%	2.2%	0	0.0%	5.0%	\$0	0.0%	2.1%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	13.0%	\$0	0.0%	8.3%	0	0.0%	13.9%	\$0	0.0%	9.5%
	Middle	0	0.0%	\$0	0.0%	33.0%	0	0.0%	35.9%	\$0	0.0%	32.7%	0	0.0%	34.7%	\$0	0.0%	28.8%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	48.1%	\$0	0.0%	56.9%	0	0.0%	46.5%	\$0	0.0%	59.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	5.1%	0	0.0%	7.7%	\$0	0.0%	3.8%	0	0.0%	5.2%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	18.3%	0	0.0%	25.5%	\$0	0.0%	17.0%	0	0.0%	24.6%	\$0	0.0%	17.1%
	Middle	0	0.0%	\$0	0.0%	33.0%	0	0.0%	34.4%	\$0	0.0%	35.7%	0	0.0%	34.5%	\$0	0.0%	35.3%
	Upper	0	0.0%	\$0	0.0%	43.6%	0	0.0%	32.4%	\$0	0.0%	43.4%	0	0.0%	35.7%	\$0	0.0%	45.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	6	20.0%	\$729	13.5%	5.1%	5	27.8%	2.5%	\$679	23.1%	1.4%	1	8.3%	2.1%	\$50	2.0%	1.2%
	Moderate	9	30.0%	\$2,258	41.8%	18.3%	4	22.2%	13.2%	\$755	25.7%	10.3%	5	41.7%	11.8%	\$1,503	61.0%	9.7%
	Middle	8	26.7%	\$1,370	25.4%	33.0%	5	27.8%	35.5%	\$858	29.2%	31.9%	3	25.0%	34.8%	\$512	20.8%	32.7%
	Upper	7	23.3%	\$1,044	19.3%	43.6%	4	22.2%	48.8%	\$645	22.0%	56.5%	3	25.0%	51.3%	\$399	16.2%	56.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>30</i>	<i>100.0%</i>	<i>\$5,401</i>	<i>100.0%</i>	<i>100.0%</i>	<i>18</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,937</i>	<i>100.0%</i>	<i>100.0%</i>	<i>12</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,464</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Huntsville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019						2020					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count #	%	Dollar \$ (000s)	\$ %		Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg %	Bank #	Agg %	Dollar \$ (000s)	\$ %	Agg %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	10.2%	\$0	0.0%	5.9%	0	0.0%	8.1%	\$0	0.0%	4.7%
	Moderate	4	25.0%	\$624	23.4%	16.0%	2	28.6%	19.1%	\$298	27.5%	15.0%	2	22.2%	18.4%	\$326	20.5%	14.4%
	Middle	1	6.3%	\$119	4.5%	17.4%	0	0.0%	22.2%	\$0	0.0%	21.9%	1	11.1%	22.9%	\$119	7.5%	21.9%
	Upper	1	6.3%	\$432	16.2%	43.8%	0	0.0%	33.3%	\$0	0.0%	43.2%	1	11.1%	36.2%	\$432	27.2%	45.4%
	Unknown	10	62.5%	\$1,497	56.0%	0.0%	5	71.4%	15.2%	\$786	72.5%	14.0%	5	55.6%	14.3%	\$711	44.8%	13.6%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$2,672</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,084</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,588</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	9.3%	\$0	0.0%	4.5%	0	0.0%	4.5%	\$0	0.0%	2.3%
	Moderate	2	18.2%	\$277	17.4%	16.0%	2	22.2%	12.9%	\$277	20.6%	8.9%	0	0.0%	10.9%	\$0	0.0%	7.4%
	Middle	1	9.1%	\$72	4.5%	17.4%	1	11.1%	16.0%	\$72	5.4%	13.7%	0	0.0%	15.5%	\$0	0.0%	13.0%
	Upper	3	27.3%	\$577	36.3%	43.8%	2	22.2%	32.9%	\$382	28.4%	40.9%	1	50.0%	35.8%	\$195	79.6%	41.2%
	Unknown	5	45.5%	\$663	41.7%	0.0%	4	44.4%	28.9%	\$613	45.6%	32.1%	1	50.0%	33.3%	\$50	20.4%	36.1%
	<i>Total</i>	<i>11</i>	<i>100.0%</i>	<i>\$1,589</i>	<i>100.0%</i>	<i>100.0%</i>	<i>9</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,344</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$245</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	9.8%	\$0	0.0%	5.6%	0	0.0%	9.6%	\$0	0.0%	5.1%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	17.5%	\$0	0.0%	14.9%	0	0.0%	14.8%	\$0	0.0%	11.9%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	21.9%	\$0	0.0%	19.3%	0	0.0%	21.0%	\$0	0.0%	17.1%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	47.1%	\$0	0.0%	55.0%	0	0.0%	50.6%	\$0	0.0%	58.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.7%	\$0	0.0%	5.3%	0	0.0%	4.0%	\$0	0.0%	7.2%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.0%	\$0	0.0%	0.1%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	10.9%	\$0	0.0%	0.9%	0	0.0%	5.9%	\$0	0.0%	0.4%
	Unknown	3	100.0%	\$1,140	100.0%	0.0%	2	100.0%	89.1%	\$509	100.0%	99.1%	1	100.0%	92.2%	\$631	100.0%	99.5%
	<i>Total</i>	<i>3</i>	<i>100.0%</i>	<i>\$1,140</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$509</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$631</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	6.8%	\$0	0.0%	4.1%	0	0.0%	8.7%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	17.8%	\$0	0.0%	12.0%	0	0.0%	14.3%	\$0	0.0%	9.4%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	21.6%	\$0	0.0%	17.3%	0	0.0%	20.1%	\$0	0.0%	18.6%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	52.1%	\$0	0.0%	65.7%	0	0.0%	52.2%	\$0	0.0%	66.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.7%	\$0	0.0%	0.8%	0	0.0%	4.8%	\$0	0.0%	2.3%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: AL Huntsville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	#	%	Agg	\$ (000s)	\$ %	Agg	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	20.6%	\$0	0.0%	13.1%	0	0.0%	13.9%	\$0	0.0%	5.5%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	16.0%	\$0	0.0%	13.6%	0	0.0%	16.8%	\$0	0.0%	13.0%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	13.0%	\$0	0.0%	10.4%	0	0.0%	20.8%	\$0	0.0%	20.6%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	41.2%	\$0	0.0%	50.9%	0	0.0%	38.6%	\$0	0.0%	51.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	9.2%	\$0	0.0%	12.1%	0	0.0%	9.9%	\$0	0.0%	9.6%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	1.5%	\$0	0.0%	1.0%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Moderate	0	0.0%	\$0	0.0%	16.0%	0	0.0%	0.8%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	17.4%	0	0.0%	0.8%	\$0	0.0%	0.6%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	43.8%	0	0.0%	0.4%	\$0	0.0%	0.2%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	96.5%	\$0	0.0%	97.5%	0	0.0%	99.6%	\$0	0.0%	99.9%
	Total	0	0.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	100.0%	\$0	0.0%	100.0%
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	22.9%	0	0.0%	9.8%	\$0	0.0%	5.1%	0	0.0%	6.2%	\$0	0.0%	3.3%
	Moderate	6	20.0%	\$901	16.7%	16.0%	4	22.2%	16.9%	\$575	19.6%	12.0%	2	16.7%	14.1%	\$326	13.2%	10.1%
	Middle	2	6.7%	\$191	3.5%	17.4%	1	5.6%	20.0%	\$72	2.5%	17.6%	1	8.3%	18.6%	\$119	4.8%	16.2%
	Upper	4	13.3%	\$1,009	18.7%	43.8%	2	11.1%	34.0%	\$382	13.0%	39.4%	2	16.7%	36.0%	\$627	25.4%	41.2%
	Unknown	18	60.0%	\$3,300	61.1%	0.0%	11	61.1%	19.4%	\$1,908	65.0%	26.0%	7	58.3%	25.1%	\$1,392	56.5%	29.2%
	Total	30	100.0%	\$5,401	100.0%	100.0%	18	100.0%	100.0%	\$2,937	100.0%	100.0%	12	100.0%	100.0%	\$2,464	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: AL Huntsville

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison					2019					2020						
	Count		Bank		Total Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank	Agg	\$ 000s	\$ %	\$ %	#	%	Agg	\$ 000s	\$ %	Agg	
Low	10	14.5%	\$2,749	19.1%	12.5%	6	24.0%	14.4%	\$2,453	34.0%	18.4%	4	9.1%	14.5%	\$296	4.1%	18.6%
Moderate	23	33.3%	\$2,764	19.2%	20.4%	6	24.0%	17.2%	\$869	12.0%	18.2%	17	38.6%	18.4%	\$1,895	26.4%	21.3%
Middle	14	20.3%	\$2,807	19.5%	28.5%	7	28.0%	29.1%	\$1,699	23.5%	25.1%	7	15.9%	28.9%	\$1,108	15.4%	25.1%
Upper	22	31.9%	\$6,086	42.2%	38.5%	6	24.0%	38.4%	\$2,202	30.5%	38.0%	16	36.4%	37.8%	\$3,884	54.1%	34.9%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.9%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.1%
Total	69	100.0%	\$14,406	100.0%	100.0%	25	100.0%	100.0%	\$7,223	100.0%	100.0%	44	100.0%	100.0%	\$7,183	100.0%	100.0%

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Huntsville

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	27	39.1%	\$7,972	55.3%	91.9%	12	48.0%	44.4%	\$3,098	42.9%	41.6%	15	34.1%	41.4%	\$4,874	67.9%	32.0%
	Over \$1 Million	22	31.9%	\$5,660	39.3%	7.4%	13	52.0%				9	20.5%					
	Total Rev. available	49	71.0%	\$13,632	94.6%	99.3%	25	100.0%				24	54.6%					
	Rev. Not Known	20	29.0%	\$774	5.4%	0.7%	0	0.0%				20	45.5%					
	Total	69	100.0%	\$14,406	100.0%	100.0%	25	100.0%				44	100.0%					
LOAN SIZE	\$100,000 or Less	37	53.6%	\$1,535	10.7%		10	40.0%	86.8%	\$516	7.1%	24.5%	27	61.4%	81.5%	\$1,019	14.2%	23.9%
	\$100,001 - \$250,000	13	18.8%	\$2,222	15.4%		5	20.0%	6.2%	\$931	12.9%	17.1%	8	18.2%	10.1%	\$1,291	18.0%	21.0%
	\$250,001 - \$1 Million	19	27.5%	\$10,649	73.9%		10	40.0%	7.0%	\$5,776	80.0%	58.4%	9	20.5%	8.4%	\$4,873	67.8%	55.1%
	Total	69	100.0%	\$14,406	100.0%		25	100.0%	100.0%	\$7,223	100.0%	100.0%	44	100.0%	100.0%	\$7,183	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	10	37.0%	\$370	4.6%													
	\$100,001 - \$250,000	5	18.5%	\$871	10.9%													
	\$250,001 - \$1 Million	12	44.4%	\$6,731	84.4%													
	Total	27	100.0%	\$7,972	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Mobile

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	0.7%	\$0	0.0%	0.4%	0	0.0%	1.0%	\$0	0.0%	0.5%
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	7.8%	\$0	0.0%	5.3%	0	0.0%	7.7%	\$0	0.0%	5.0%
	Middle	3	50.0%	\$503	48.4%	41.5%	2	66.7%	37.0%	\$479	80.0%	33.0%	1	33.3%	37.5%	\$24	5.5%	34.2%
	Upper	3	50.0%	\$536	51.6%	38.9%	1	33.3%	54.4%	\$120	20.0%	61.3%	2	66.7%	53.9%	\$416	94.5%	60.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$1,039</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$599</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$440</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	1.1%	\$0	0.0%	1.2%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	7.0%	\$0	0.0%	3.9%	0	0.0%	5.3%	\$0	0.0%	3.3%
	Middle	7	77.8%	\$1,004	69.3%	41.5%	4	80.0%	36.0%	\$405	81.7%	31.5%	3	75.0%	32.0%	\$599	62.9%	28.3%
	Upper	2	22.2%	\$444	30.7%	38.9%	1	20.0%	55.9%	\$91	18.3%	63.4%	1	25.0%	62.0%	\$353	37.1%	68.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$1,448</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$496</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$952</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	1.3%	\$0	0.0%	0.6%	0	0.0%	1.1%	\$0	0.0%	0.3%
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	9.6%	\$0	0.0%	5.2%	0	0.0%	9.1%	\$0	0.0%	5.7%
	Middle	1	100.0%	\$114	100.0%	41.5%	0	0.0%	35.7%	\$0	0.0%	31.0%	1	100.0%	38.3%	\$114	100.0%	34.8%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	53.4%	\$0	0.0%	63.1%	0	0.0%	51.5%	\$0	0.0%	59.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$114</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	5.3%	0	0.0%	12.5%	\$0	0.0%	7.1%	0	0.0%	25.5%	\$0	0.0%	11.4%
	Moderate	0	0.0%	\$0	0.0%	25.6%	0	0.0%	29.2%	\$0	0.0%	32.2%	0	0.0%	25.5%	\$0	0.0%	32.1%
	Middle	0	0.0%	\$0	0.0%	32.1%	0	0.0%	35.4%	\$0	0.0%	40.4%	0	0.0%	14.9%	\$0	0.0%	4.0%
	Upper	0	0.0%	\$0	0.0%	37.0%	0	0.0%	22.9%	\$0	0.0%	20.3%	0	0.0%	34.0%	\$0	0.0%	52.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	0.6%	\$0	0.0%	0.3%	0	0.0%	0.4%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	7.4%	\$0	0.0%	4.2%	0	0.0%	7.4%	\$0	0.0%	5.3%
	Middle	0	0.0%	\$0	0.0%	41.5%	0	0.0%	25.9%	\$0	0.0%	19.3%	0	0.0%	33.8%	\$0	0.0%	30.9%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	66.1%	\$0	0.0%	76.2%	0	0.0%	58.5%	\$0	0.0%	63.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: AL Mobile

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units			Count		Dollar			Count		Dollar				
		Count	Dollar	Count	Agg	Bank	Agg	Count	Agg	Bank	Agg	Count	Agg	Bank	Agg			
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	0.7%	\$0	0.0%	0.1%	0	0.0%	0.8%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	8.7%	\$0	0.0%	4.2%	0	0.0%	3.1%	\$0	0.0%	1.8%
	Middle	0	0.0%	\$0	0.0%	41.5%	0	0.0%	44.3%	\$0	0.0%	32.1%	0	0.0%	39.4%	\$0	0.0%	35.3%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	46.3%	\$0	0.0%	63.6%	0	0.0%	56.7%	\$0	0.0%	62.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	3.5%	\$0	0.0%	2.1%	0	0.0%	2.1%	\$0	0.0%	1.0%
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	18.7%	\$0	0.0%	12.5%	0	0.0%	13.1%	\$0	0.0%	8.8%
	Middle	0	0.0%	\$0	0.0%	41.5%	0	0.0%	40.2%	\$0	0.0%	37.4%	0	0.0%	37.8%	\$0	0.0%	33.9%
	Upper	0	0.0%	\$0	0.0%	38.9%	0	0.0%	37.7%	\$0	0.0%	47.9%	0	0.0%	47.0%	\$0	0.0%	56.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	5.4%	0	0.0%	1.0%	\$0	0.0%	1.1%	0	0.0%	1.0%	\$0	0.0%	0.9%
	Moderate	0	0.0%	\$0	0.0%	14.3%	0	0.0%	8.1%	\$0	0.0%	6.8%	0	0.0%	6.9%	\$0	0.0%	5.6%
	Middle	11	68.8%	\$1,621	62.3%	41.5%	6	75.0%	36.5%	\$884	80.7%	32.9%	5	62.5%	35.0%	\$737	48.9%	30.1%
	Upper	5	31.3%	\$980	37.7%	38.9%	2	25.0%	54.4%	\$211	19.3%	59.1%	3	37.5%	57.1%	\$769	51.1%	63.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$2,601</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,095</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,506</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: AL Mobile

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2019			2020								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	5.5%	\$0	0.0%	3.0%	0	0.0%	5.3%	\$0	0.0%	2.9%
	Moderate	1	16.7%	\$120	11.5%	15.7%	1	33.3%	18.2%	\$120	20.0%	13.0%	0	0.0%	20.8%	\$0	0.0%	14.8%
	Middle	2	33.3%	\$168	16.2%	19.1%	0	0.0%	26.0%	\$0	0.0%	23.4%	2	66.7%	26.2%	\$168	38.2%	24.0%
	Upper	3	50.0%	\$751	72.3%	41.2%	2	66.7%	38.1%	\$479	80.0%	49.4%	1	33.3%	36.0%	\$272	61.8%	47.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	12.2%	\$0	0.0%	11.2%	0	0.0%	11.6%	\$0	0.0%	10.9%
	<i>Total</i>	<i>6</i>	<i>100.0%</i>	<i>\$1,039</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$599</i>	<i>100.0%</i>	<i>100.0%</i>	<i>3</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$440</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	2	22.2%	\$84	5.8%	24.0%	2	40.0%	6.0%	\$84	16.9%	2.9%	0	0.0%	3.0%	\$0	0.0%	1.5%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	11.8%	\$0	0.0%	7.2%	0	0.0%	8.2%	\$0	0.0%	5.0%
	Middle	1	11.1%	\$75	5.2%	19.1%	1	20.0%	17.7%	\$75	15.1%	13.5%	0	0.0%	15.8%	\$0	0.0%	12.1%
	Upper	6	66.7%	\$1,289	89.0%	41.2%	2	40.0%	42.6%	\$337	67.9%	51.6%	4	100.0%	45.1%	\$952	100.0%	53.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	21.9%	\$0	0.0%	24.8%	0	0.0%	28.0%	\$0	0.0%	27.7%
	<i>Total</i>	<i>9</i>	<i>100.0%</i>	<i>\$1,448</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$496</i>	<i>100.0%</i>	<i>100.0%</i>	<i>4</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$952</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	8.1%	\$0	0.0%	5.4%	0	0.0%	6.4%	\$0	0.0%	3.1%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	13.6%	\$0	0.0%	10.2%	0	0.0%	13.4%	\$0	0.0%	9.1%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	19.3%	\$0	0.0%	14.8%	0	0.0%	19.6%	\$0	0.0%	15.4%
	Upper	1	100.0%	\$114	100.0%	41.2%	0	0.0%	55.4%	\$0	0.0%	66.8%	1	100.0%	57.4%	\$114	100.0%	68.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.5%	\$0	0.0%	2.9%	0	0.0%	3.2%	\$0	0.0%	3.4%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$114</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$114</i>	<i>100.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	2.1%	\$0	0.0%	0.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	0	0.0%	97.9%	\$0	0.0%	99.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	6.5%	\$0	0.0%	2.9%	0	0.0%	4.0%	\$0	0.0%	2.4%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	11.9%	\$0	0.0%	8.3%	0	0.0%	12.9%	\$0	0.0%	7.1%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	19.3%	\$0	0.0%	12.7%	0	0.0%	17.6%	\$0	0.0%	11.8%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	58.6%	\$0	0.0%	72.1%	0	0.0%	61.4%	\$0	0.0%	74.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	3.6%	\$0	0.0%	4.0%	0	0.0%	4.0%	\$0	0.0%	4.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2
Assessment Area: AL Mobile

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2019					2020						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	14.1%	\$0	0.0%	7.4%	0	0.0%	7.1%	\$0	0.0%	6.5%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	15.4%	\$0	0.0%	10.2%	0	0.0%	12.6%	\$0	0.0%	8.3%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	22.8%	\$0	0.0%	17.7%	0	0.0%	25.2%	\$0	0.0%	22.8%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	40.3%	\$0	0.0%	56.6%	0	0.0%	48.0%	\$0	0.0%	55.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.4%	\$0	0.0%	8.1%	0	0.0%	7.1%	\$0	0.0%	7.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	24.0%	0	0.0%	0.3%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	15.7%	0	0.0%	0.3%	\$0	0.0%	0.3%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	19.1%	0	0.0%	0.6%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	41.2%	0	0.0%	0.3%	\$0	0.0%	0.6%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	98.4%	\$0	0.0%	98.6%	0	0.0%	99.7%	\$0	0.0%	99.9%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	2	12.5%	\$84	3.2%	24.0%	2	25.0%	5.7%	\$84	7.7%	2.8%	0	0.0%	4.1%	\$0	0.0%	2.1%
	Moderate	1	6.3%	\$120	4.6%	15.7%	1	12.5%	15.2%	\$120	11.0%	10.1%	0	0.0%	13.9%	\$0	0.0%	9.3%
	Middle	3	18.8%	\$243	9.3%	19.1%	1	12.5%	22.1%	\$75	6.8%	18.1%	2	25.0%	20.1%	\$168	11.2%	16.8%
	Upper	10	62.5%	\$2,154	82.8%	41.2%	4	50.0%	39.7%	\$816	74.5%	46.5%	6	75.0%	39.5%	\$1,338	88.8%	47.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	17.3%	\$0	0.0%	22.6%	0	0.0%	22.4%	\$0	0.0%	24.5%
	<i>Total</i>	<i>16</i>	<i>100.0%</i>	<i>\$2,601</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,095</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,506</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases

2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of Small Business Loans

Assessment Area: AL Mobile

Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
	Count		Bank Dollar		Total Businesses %	2019			2020								
	#	%	\$ (000s)	\$ %		Count		Dollar			Count		Dollar				
					Bank	Agg	Bank	Agg	\$ %	Bank	Agg	Bank	Agg	\$ 000s	\$ %	\$ %	
Low	0	0.0%	\$0	0.0%	6.5%	0	0.0%	5.9%	\$0	0.0%	8.5%	0	0.0%	6.4%	\$0	0.0%	9.2%
Moderate	7	5.7%	\$1,129	7.9%	18.4%	5	10.0%	17.3%	\$926	12.5%	17.8%	2	2.7%	17.2%	\$203	3.0%	17.0%
Middle	81	65.9%	\$5,812	40.8%	32.4%	33	66.0%	33.3%	\$2,841	38.5%	31.5%	48	65.8%	31.8%	\$2,971	43.2%	31.6%
Upper	35	28.5%	\$7,321	51.3%	42.6%	12	24.0%	41.6%	\$3,619	49.0%	41.4%	23	31.5%	43.9%	\$3,702	53.8%	42.0%
Unknown	0	0.0%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	2.0%	\$0	0.0%	0.7%	0	0.0%	0.7%	\$0	0.0%	0.3%
<i>Total</i>	<i>123</i>	<i>100.0%</i>	<i>\$14,262</i>	<i>100.0%</i>	<i>100.0%</i>	<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,386</i>	<i>100.0%</i>	<i>100.0%</i>	<i>73</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,876</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

Small Business Loans by Business Revenue & Loan Size

Assessment Area: AL Mobile

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Count		Bank Dollar		Total Businesses %	2019			2020								
		#	%	\$ (000s)	\$ %		Count		Dollar			Count		Dollar				
						Bank	Agg	Bank	Agg	\$ %	Bank	Agg	Bank	Agg	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	50	40.7%	\$5,475	38.4%	90.0%	32	64.0%	37.8%	\$3,625	49.1%	36.7%	18	24.7%	32.8%	\$1,850	26.9%	28.5%
	Over \$1 Million	20	16.3%	\$4,936	34.6%	9.3%	13	26.0%				7	9.6%					
	<i>Total Rev. available</i>	70	57.0%	\$10,411	73.0%	99.3%	45	90.0%				25	34.3%					
	Rev. Not Known	53	43.1%	\$3,851	27.0%	0.8%	5	10.0%				48	65.8%					
	<i>Total</i>	<i>123</i>	<i>100.0%</i>	<i>\$14,262</i>	<i>100.0%</i>	<i>100.0%</i>	<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,386</i>	<i>100.0%</i>	<i>100.0%</i>	<i>73</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,876</i>	<i>100.0%</i>	<i>100.0%</i>
LOAN SIZE	\$100,000 or Less	79	64.2%	\$2,300	16.1%		26	52.0%	88.3%	\$683	9.2%	28.0%	53	72.6%	84.1%	\$1,617	23.5%	28.2%
	\$100,001 - \$250,000	25	20.3%	\$4,083	28.6%		14	28.0%	6.0%	\$2,293	31.0%	18.9%	11	15.1%	9.1%	\$1,790	26.0%	21.9%
	\$250,001 - \$1 Million	19	15.4%	\$7,879	55.2%		10	20.0%	5.7%	\$4,410	59.7%	53.0%	9	12.3%	6.8%	\$3,469	50.5%	49.8%
	<i>Total</i>	<i>123</i>	<i>100.0%</i>	<i>\$14,262</i>	<i>100.0%</i>		<i>50</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,386</i>	<i>100.0%</i>	<i>100.0%</i>	<i>73</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,876</i>	<i>100.0%</i>	<i>100.0%</i>
	Rev \$1 Mill or Less	33	66.0%	\$949	17.3%													
LOAN SIZE Rev \$1 Mill or Less	\$100,001 - \$250,000	10	20.0%	\$1,769	32.3%													
	\$250,001 - \$1 Million	7	14.0%	\$2,757	50.4%													
	<i>Total</i>	<i>50</i>	<i>100.0%</i>	<i>\$5,475</i>	<i>100.0%</i>													

Originations & Purchases
Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: FL Ft Walton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		#	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	5.8%	\$0	0.0%	3.4%	0	0.0%	6.0%	\$0	0.0%	3.2%
	Middle	13	46.4%	\$7,607	45.9%	62.3%	8	57.1%	61.3%	\$4,940	63.3%	55.0%	5	35.7%	58.2%	\$2,667	30.4%	53.2%
	Upper	15	53.6%	\$8,967	54.1%	25.5%	6	42.9%	32.9%	\$2,863	36.7%	41.6%	9	64.3%	35.9%	\$6,104	69.6%	43.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>28</i>	<i>100.0%</i>	<i>\$16,574</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,803</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,771</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	5.4%	\$0	0.0%	3.1%	0	0.0%	4.2%	\$0	0.0%	2.8%
	Middle	9	75.0%	\$2,743	77.6%	62.3%	5	100.0%	58.2%	\$1,412	100.0%	50.1%	4	57.1%	56.9%	\$1,331	62.8%	49.8%
	Upper	3	25.0%	\$790	22.4%	25.5%	0	0.0%	36.4%	\$0	0.0%	46.7%	3	42.9%	38.9%	\$790	37.2%	47.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$3,533</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,412</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,121</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	4.7%	\$0	0.0%	2.5%	0	0.0%	3.2%	\$0	0.0%	1.6%
	Middle	0	0.0%	\$0	0.0%	62.3%	0	0.0%	52.9%	\$0	0.0%	43.5%	0	0.0%	51.8%	\$0	0.0%	45.2%
	Upper	0	0.0%	\$0	0.0%	25.5%	0	0.0%	42.4%	\$0	0.0%	54.0%	0	0.0%	45.0%	\$0	0.0%	53.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	7.5%	0	0.0%	6.3%	\$0	0.0%	0.4%	0	0.0%	19.0%	\$0	0.0%	6.6%
	Middle	0	0.0%	\$0	0.0%	27.6%	0	0.0%	56.3%	\$0	0.0%	63.8%	0	0.0%	61.9%	\$0	0.0%	74.0%
	Upper	1	100.0%	\$1,107	100.0%	64.8%	0	0.0%	37.5%	\$0	0.0%	35.7%	1	100.0%	19.0%	\$1,107	100.0%	19.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$1,107</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,107</i>	<i>100.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	6.2%	\$0	0.0%	3.2%	0	0.0%	4.3%	\$0	0.0%	2.1%
	Middle	0	0.0%	\$0	0.0%	62.3%	0	0.0%	42.2%	\$0	0.0%	35.0%	0	0.0%	50.4%	\$0	0.0%	43.0%
	Upper	0	0.0%	\$0	0.0%	25.5%	0	0.0%	51.6%	\$0	0.0%	61.8%	0	0.0%	45.3%	\$0	0.0%	54.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
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APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: FL Ft Walton

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Owner Occupied Units			Count		Dollar			Count		Dollar				
		Count	Dollar				Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg				
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	5.2%	\$0	0.0%	1.9%	0	0.0%	4.2%	\$0	0.0%	1.0%
	Middle	0	0.0%	\$0	0.0%	62.3%	0	0.0%	45.5%	\$0	0.0%	46.7%	0	0.0%	50.6%	\$0	0.0%	52.5%
	Upper	0	0.0%	\$0	0.0%	25.5%	0	0.0%	49.3%	\$0	0.0%	51.4%	0	0.0%	45.2%	\$0	0.0%	46.6%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	4.4%	\$0	0.0%	3.0%	0	0.0%	8.8%	\$0	0.0%	5.1%
	Middle	0	0.0%	\$0	0.0%	62.3%	0	0.0%	64.4%	\$0	0.0%	59.8%	0	0.0%	69.5%	\$0	0.0%	66.0%
	Upper	0	0.0%	\$0	0.0%	25.5%	0	0.0%	31.1%	\$0	0.0%	37.1%	0	0.0%	21.7%	\$0	0.0%	28.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	12.2%	0	0.0%	5.7%	\$0	0.0%	3.1%	0	0.0%	5.1%	\$0	0.0%	3.1%
	Middle	22	53.7%	\$10,350	48.8%	62.3%	13	68.4%	59.9%	\$6,352	68.9%	54.0%	9	40.9%	57.6%	\$3,998	33.3%	52.2%
	Upper	19	46.3%	\$10,864	51.2%	25.5%	6	31.6%	34.5%	\$2,863	31.1%	42.9%	13	59.1%	37.3%	\$8,001	66.7%	44.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>\$21,214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,215</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,999</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: FL Ft Walton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019						2020					
		Bank				Families by Family Income %	Count			Dollar			Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	4.0%	\$0	0.0%	1.8%	0	0.0%	4.0%	\$0	0.0%	1.6%
	Moderate	1	3.6%	\$189	1.1%	17.9%	0	0.0%	16.5%	\$0	0.0%	10.2%	1	7.1%	17.2%	\$189	2.2%	9.9%
	Middle	7	25.0%	\$2,225	13.4%	21.5%	5	35.7%	19.4%	\$1,555	19.9%	14.9%	2	14.3%	17.9%	\$670	7.6%	12.7%
	Upper	17	60.7%	\$10,800	65.2%	40.3%	8	57.1%	42.3%	\$3,746	48.0%	56.1%	9	64.3%	45.9%	\$7,054	80.4%	61.5%
	Unknown	3	10.7%	\$3,360	20.3%	0.0%	1	7.1%	17.7%	\$2,502	32.1%	17.0%	2	14.3%	15.0%	\$858	9.8%	14.4%
	<i>Total</i>	<i>28</i>	<i>100.0%</i>	<i>\$16,574</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,803</i>	<i>100.0%</i>	<i>100.0%</i>	<i>14</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$8,771</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	4.1%	\$0	0.0%	1.8%	0	0.0%	2.9%	\$0	0.0%	1.3%
	Moderate	2	16.7%	\$267	7.6%	17.9%	1	20.0%	10.1%	\$163	11.5%	5.4%	1	14.3%	7.6%	\$104	4.9%	4.6%
	Middle	1	8.3%	\$258	7.3%	21.5%	0	0.0%	13.9%	\$0	0.0%	9.4%	1	14.3%	10.5%	\$258	12.2%	8.0%
	Upper	8	66.7%	\$2,719	77.0%	40.3%	3	60.0%	37.7%	\$960	68.0%	48.1%	5	71.4%	33.9%	\$1,759	82.9%	42.3%
	Unknown	1	8.3%	\$289	8.2%	0.0%	1	20.0%	34.2%	\$289	20.5%	35.3%	0	0.0%	45.1%	\$0	0.0%	43.9%
	<i>Total</i>	<i>12</i>	<i>100.0%</i>	<i>\$3,533</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,412</i>	<i>100.0%</i>	<i>100.0%</i>	<i>7</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,121</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	5.2%	\$0	0.0%	3.3%	0	0.0%	4.7%	\$0	0.0%	3.5%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	15.7%	\$0	0.0%	6.9%	0	0.0%	12.4%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	21.5%	0	0.0%	16.5%	\$0	0.0%	9.6%	0	0.0%	20.3%	\$0	0.0%	13.1%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	58.4%	\$0	0.0%	66.6%	0	0.0%	56.8%	\$0	0.0%	67.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	4.2%	\$0	0.0%	13.6%	0	0.0%	5.9%	\$0	0.0%	8.7%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	1	100.0%	\$1,107	100.0%	0.0%	0	0.0%	100.0%	\$0	0.0%	100.0%	1	100.0%	100.0%	\$1,107	100.0%	100.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$1,107</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,107</i>	<i>100.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	5.0%	\$0	0.0%	1.6%	0	0.0%	5.1%	\$0	0.0%	2.5%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	10.3%	\$0	0.0%	6.9%	0	0.0%	10.2%	\$0	0.0%	5.0%
	Middle	0	0.0%	\$0	0.0%	21.5%	0	0.0%	17.6%	\$0	0.0%	9.8%	0	0.0%	15.7%	\$0	0.0%	7.9%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	65.7%	\$0	0.0%	79.4%	0	0.0%	66.9%	\$0	0.0%	81.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	1.5%	\$0	0.0%	2.3%	0	0.0%	2.0%	\$0	0.0%	2.6%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

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APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: FL Ft Walton

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	6.0%	\$0	0.0%	1.6%	0	0.0%	3.6%	\$0	0.0%	1.2%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	11.2%	\$0	0.0%	2.7%	0	0.0%	14.3%	\$0	0.0%	3.7%
	Middle	0	0.0%	\$0	0.0%	21.5%	0	0.0%	14.9%	\$0	0.0%	3.7%	0	0.0%	10.1%	\$0	0.0%	4.4%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	60.4%	\$0	0.0%	78.2%	0	0.0%	60.1%	\$0	0.0%	74.4%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.5%	\$0	0.0%	13.9%	0	0.0%	11.9%	\$0	0.0%	16.2%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	17.9%	0	0.0%	1.7%	\$0	0.0%	1.3%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	21.5%	0	0.0%	0.6%	\$0	0.0%	0.7%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	40.3%	0	0.0%	1.7%	\$0	0.0%	2.5%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	96.1%	\$0	0.0%	95.5%	0	0.0%	100.0%	\$0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	4.1%	\$0	0.0%	1.7%	0	0.0%	3.5%	\$0	0.0%	1.4%
	Moderate	3	7.3%	\$456	2.1%	17.9%	1	5.3%	14.5%	\$163	1.8%	8.3%	2	9.1%	12.3%	\$293	2.4%	7.4%
	Middle	8	19.5%	\$2,483	11.7%	21.5%	5	26.3%	17.6%	\$1,555	16.9%	12.5%	3	13.6%	14.2%	\$928	7.7%	10.3%
	Upper	25	61.0%	\$13,519	63.7%	40.3%	11	57.9%	41.6%	\$4,706	51.1%	51.3%	14	63.6%	40.1%	\$8,813	73.4%	52.4%
	Unknown	5	12.2%	\$4,756	22.4%	0.0%	2	10.5%	22.2%	\$2,791	30.3%	26.2%	3	13.6%	29.9%	\$1,965	16.4%	28.5%
	<i>Total</i>	<i>41</i>	<i>100.0%</i>	<i>\$21,214</i>	<i>100.0%</i>	<i>100.0%</i>	<i>19</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$9,215</i>	<i>100.0%</i>	<i>100.0%</i>	<i>22</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$11,999</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: FL Ft Walton

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison 2019, 2020					2019					2020						
	Count		Bank Dollar		Total Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank	Agg	\$ 000s	\$ %	\$ %	Bank	Agg	\$ 000s	\$ %	\$ %		
Low	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Moderate	13	12.4%	\$3,374	19.3%	10.8%	4	16.0%	9.5%	\$1,707	24.1%	7.4%	9	11.3%	9.4%	\$1,667	16.0%	9.9%
Middle	30	28.6%	\$2,137	12.2%	55.2%	4	16.0%	48.7%	\$485	6.9%	46.6%	26	32.5%	46.8%	\$1,652	15.9%	43.7%
Upper	62	59.0%	\$11,966	68.5%	34.0%	17	68.0%	40.3%	\$4,877	69.0%	45.3%	45	56.3%	43.5%	\$7,089	68.1%	46.2%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	1.5%	\$0	0.0%	0.8%	0	0.0%	0.3%	\$0	0.0%	0.2%
<i>Total</i>	<i>105</i>	<i>100.0%</i>	<i>\$17,477</i>	<i>100.0%</i>	<i>100.0%</i>	<i>25</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$7,069</i>	<i>100.0%</i>	<i>100.0%</i>	<i>80</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$10,408</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Ft Walton

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	25	23.8%	\$5,669	32.4%	95.1%	14	56.0%	39.8%	\$4,124	58.3%	37.7%	11	13.8%	35.7%	\$1,545	14.8%	28.6%
	Over \$1 Million	25	23.8%	\$6,859	39.2%	4.1%	11	44.0%				14	17.5%					
	Total Rev. available	50	47.6%	\$12,528	71.6%	99.2%	25	100.0%				25	31.3%					
	Rev. Not Known	55	52.4%	\$4,949	28.3%	0.8%	0	0.0%				55	68.8%					
	Total	105	100.0%	\$17,477	100.0%	100.0%	25	100.0%				80	100.0%					
LOAN SIZE	\$100,000 or Less	62	59.0%	\$2,270	13.0%		8	32.0%	93.8%	\$470	6.6%	39.9%	54	67.5%	89.5%	\$1,800	17.3%	36.4%
	\$100,001 - \$250,000	18	17.1%	\$2,997	17.1%		6	24.0%	3.3%	\$1,087	15.4%	16.7%	12	15.0%	6.4%	\$1,910	18.4%	21.2%
	\$250,001 - \$1 Million	25	23.8%	\$12,210	69.9%		11	44.0%	2.9%	\$5,512	78.0%	43.4%	14	17.5%	4.2%	\$6,698	64.4%	42.4%
	Total	105	100.0%	\$17,477	100.0%		25	100.0%	100.0%	\$7,069	100.0%	100.0%	80	100.0%	100.0%	\$10,408	100.0%	100.0%
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	12	48.0%	\$671	11.8%													
	\$100,001 - \$250,000	3	12.0%	\$527	9.3%													
	\$250,001 - \$1 Million	10	40.0%	\$4,471	78.9%													
	Total	25	100.0%	\$5,669	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue.
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: FL Pensacola

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Owner Occupied Units %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank #	Agg %	\$ (000s)	\$ %	\$ %	Bank #	Agg %	\$ (000s)	\$ %	Agg \$ %		
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.7%	\$0	0.0%	0.3%	0	0.0%	0.7%	\$0	0.0%	0.3%
	Moderate	3	23.1%	\$411	16.4%	20.4%	1	12.5%	14.1%	\$239	15.1%	10.2%	2	40.0%	13.6%	\$172	18.6%	10.3%
	Middle	5	38.5%	\$856	34.1%	53.8%	3	37.5%	49.0%	\$393	24.9%	42.7%	2	40.0%	49.3%	\$463	49.9%	43.6%
	Upper	5	38.5%	\$1,240	49.5%	23.1%	4	50.0%	36.3%	\$948	60.0%	46.8%	1	20.0%	36.4%	\$292	31.5%	45.8%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$2,507</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,580</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$927</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.5%	\$0	0.0%	0.2%	0	0.0%	0.3%	\$0	0.0%	0.2%
	Moderate	1	14.3%	\$79	3.9%	20.4%	1	50.0%	13.3%	\$79	17.1%	9.1%	0	0.0%	10.7%	\$0	0.0%	8.6%
	Middle	2	28.6%	\$910	45.0%	53.8%	0	0.0%	52.2%	\$0	0.0%	46.0%	2	40.0%	48.1%	\$910	58.4%	41.1%
	Upper	4	57.1%	\$1,032	51.1%	23.1%	1	50.0%	34.1%	\$384	82.9%	44.7%	3	60.0%	40.9%	\$648	41.6%	50.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$2,021</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$463</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,558</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.5%	\$0	0.0%	0.5%	0	0.0%	0.6%	\$0	0.0%	0.4%
	Moderate	0	0.0%	\$0	0.0%	20.4%	0	0.0%	14.6%	\$0	0.0%	10.8%	0	0.0%	14.2%	\$0	0.0%	9.2%
	Middle	0	0.0%	\$0	0.0%	53.8%	0	0.0%	50.9%	\$0	0.0%	47.5%	0	0.0%	49.1%	\$0	0.0%	43.3%
	Upper	1	100.0%	\$484	100.0%	23.1%	1	100.0%	34.0%	\$484	100.0%	41.1%	0	0.0%	36.1%	\$0	0.0%	47.1%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$484</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$484</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Multi-Family Units																	
	Low	0	0.0%	\$0	0.0%	2.3%	0	0.0%	2.7%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	31.3%	0	0.0%	45.9%	\$0	0.0%	60.1%	0	0.0%	27.8%	\$0	0.0%	19.3%
	Middle	0	0.0%	\$0	0.0%	34.7%	0	0.0%	48.6%	\$0	0.0%	39.7%	0	0.0%	66.7%	\$0	0.0%	67.0%
	Upper	0	0.0%	\$0	0.0%	31.7%	0	0.0%	2.7%	\$0	0.0%	0.1%	0	0.0%	5.6%	\$0	0.0%	13.7%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	1.5%	\$0	0.0%	1.8%	0	0.0%	0.5%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	20.4%	0	0.0%	8.4%	\$0	0.0%	6.5%	0	0.0%	12.8%	\$0	0.0%	10.1%
	Middle	0	0.0%	\$0	0.0%	53.8%	0	0.0%	50.9%	\$0	0.0%	43.1%	0	0.0%	49.8%	\$0	0.0%	41.5%
	Upper	0	0.0%	\$0	0.0%	23.1%	0	0.0%	39.3%	\$0	0.0%	48.7%	0	0.0%	37.0%	\$0	0.0%	48.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: FL Pensacola

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Owner Occupied Units %	2019					2020						
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	Agg %	\$ (000s)	\$ %	Agg %	#	%	Agg %	\$ (000s)	\$ %	Agg %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.7%	\$0	0.0%	0.4%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.4%	0	0.0%	16.9%	\$0	0.0%	9.9%	0	0.0%	12.2%	\$0	0.0%	9.6%
	Middle	0	0.0%	\$0	0.0%	53.8%	0	0.0%	45.6%	\$0	0.0%	36.3%	0	0.0%	46.3%	\$0	0.0%	33.4%
	Upper	0	0.0%	\$0	0.0%	23.1%	0	0.0%	36.8%	\$0	0.0%	53.5%	0	0.0%	41.5%	\$0	0.0%	57.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	2.7%	\$0	0.0%	1.4%	0	0.0%	0.8%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	20.4%	0	0.0%	21.5%	\$0	0.0%	14.8%	0	0.0%	21.7%	\$0	0.0%	16.9%
	Middle	0	0.0%	\$0	0.0%	53.8%	0	0.0%	55.9%	\$0	0.0%	56.8%	0	0.0%	59.9%	\$0	0.0%	58.4%
	Upper	0	0.0%	\$0	0.0%	23.1%	0	0.0%	19.9%	\$0	0.0%	27.1%	0	0.0%	17.5%	\$0	0.0%	24.5%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	2.6%	0	0.0%	0.7%	\$0	0.0%	0.3%	0	0.0%	0.5%	\$0	0.0%	0.3%
	Moderate	4	19.0%	\$490	9.8%	20.4%	2	18.2%	14.0%	\$318	12.6%	14.0%	2	20.0%	12.7%	\$172	6.9%	10.1%
	Middle	7	33.3%	\$1,766	35.2%	53.8%	3	27.3%	50.0%	\$393	15.6%	43.4%	4	40.0%	49.2%	\$1,373	55.3%	43.7%
	Upper	10	47.6%	\$2,756	55.0%	23.1%	6	54.5%	35.4%	\$1,816	71.9%	42.3%	4	40.0%	37.6%	\$940	37.8%	46.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$5,012</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,527</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,485</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: FL Pensacola

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Families by Family Income %	2019			2020								
		Count		Dollar			Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	6.3%	\$0	0.0%	3.2%	0	0.0%	4.2%	\$0	0.0%	2.0%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	19.4%	\$0	0.0%	14.1%	0	0.0%	17.3%	\$0	0.0%	11.9%
	Middle	2	15.4%	\$444	17.7%	22.8%	2	25.0%	21.8%	\$444	28.1%	19.8%	0	0.0%	21.5%	\$0	0.0%	19.0%
	Upper	7	53.8%	\$1,555	62.0%	36.5%	3	37.5%	33.7%	\$672	42.5%	44.6%	4	80.0%	38.0%	\$883	95.3%	48.7%
	Unknown	4	30.8%	\$508	20.3%	0.0%	3	37.5%	18.6%	\$464	29.4%	18.4%	1	20.0%	19.1%	\$44	4.7%	18.4%
	<i>Total</i>	<i>13</i>	<i>100.0%</i>	<i>\$2,507</i>	<i>100.0%</i>	<i>100.0%</i>	<i>8</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,580</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$927</i>	<i>100.0%</i>	<i>100.0%</i>
REFINANCE	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	7.2%	\$0	0.0%	3.6%	0	0.0%	3.4%	\$0	0.0%	1.6%
	Moderate	1	14.3%	\$146	7.2%	20.5%	0	0.0%	14.6%	\$0	0.0%	9.9%	1	20.0%	9.2%	\$146	9.4%	5.8%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	17.8%	\$0	0.0%	14.8%	0	0.0%	14.7%	\$0	0.0%	11.3%
	Upper	5	71.4%	\$1,796	88.9%	36.5%	1	50.0%	31.0%	\$384	82.9%	38.4%	4	80.0%	33.2%	\$1,412	90.6%	39.4%
	Unknown	1	14.3%	\$79	3.9%	0.0%	1	50.0%	29.4%	\$79	17.1%	33.3%	0	0.0%	39.4%	\$0	0.0%	42.0%
	<i>Total</i>	<i>7</i>	<i>100.0%</i>	<i>\$2,021</i>	<i>100.0%</i>	<i>100.0%</i>	<i>2</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$463</i>	<i>100.0%</i>	<i>100.0%</i>	<i>5</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$1,558</i>	<i>100.0%</i>	<i>100.0%</i>
HOME IMPROVEMENT	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	7.2%	\$0	0.0%	4.3%	0	0.0%	5.2%	\$0	0.0%	2.6%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	19.4%	\$0	0.0%	14.9%	0	0.0%	14.8%	\$0	0.0%	10.4%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	18.6%	\$0	0.0%	14.4%	0	0.0%	23.8%	\$0	0.0%	19.3%
	Upper	1	100.0%	\$484	100.0%	36.5%	1	100.0%	47.6%	\$484	100.0%	58.6%	0	0.0%	50.0%	\$0	0.0%	61.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	7.2%	\$0	0.0%	7.8%	0	0.0%	6.2%	\$0	0.0%	6.7%
	<i>Total</i>	<i>1</i>	<i>100.0%</i>	<i>\$484</i>	<i>100.0%</i>	<i>100.0%</i>	<i>1</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$484</i>	<i>100.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
MULTI FAMILY	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	2.7%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	2.7%	\$0	0.0%	0.1%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	32.4%	\$0	0.0%	1.9%	0	0.0%	5.6%	\$0	0.0%	0.2%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	62.2%	\$0	0.0%	97.9%	0	0.0%	94.4%	\$0	0.0%	99.8%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
OTHER PURPOSE LOC	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	5.8%	\$0	0.0%	3.5%	0	0.0%	2.8%	\$0	0.0%	1.3%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	16.7%	\$0	0.0%	14.6%	0	0.0%	12.3%	\$0	0.0%	7.5%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	22.9%	\$0	0.0%	20.8%	0	0.0%	18.5%	\$0	0.0%	11.5%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	47.6%	\$0	0.0%	56.2%	0	0.0%	61.1%	\$0	0.0%	75.3%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	6.9%	\$0	0.0%	4.8%	0	0.0%	5.2%	\$0	0.0%	4.4%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT
AREAS (CONTINUED)

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: FL Pensacola

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
		2019, 2020					2019					2020						
		Bank		Dollar		Families by Family Income %	Count		Dollar			Count		Dollar				
		#	%	\$ (000s)	\$ %		Bank	Agg	\$ (000s)	\$ %	\$ %	Bank	Agg	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	5.1%	\$0	0.0%	2.7%	0	0.0%	7.3%	\$0	0.0%	3.8%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	17.6%	\$0	0.0%	11.8%	0	0.0%	17.1%	\$0	0.0%	11.4%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	19.9%	\$0	0.0%	19.3%	0	0.0%	22.0%	\$0	0.0%	9.4%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	49.3%	\$0	0.0%	60.5%	0	0.0%	43.9%	\$0	0.0%	65.9%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	8.1%	\$0	0.0%	5.7%	0	0.0%	9.8%	\$0	0.0%	9.5%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	0.5%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.2%
	Moderate	0	0.0%	\$0	0.0%	20.5%	0	0.0%	1.1%	\$0	0.0%	0.4%	0	0.0%	0.2%	\$0	0.0%	0.1%
	Middle	0	0.0%	\$0	0.0%	22.8%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Upper	0	0.0%	\$0	0.0%	36.5%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
	Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	98.4%	\$0	0.0%	99.2%	0	0.0%	99.6%	\$0	0.0%	99.7%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>\$0</i>	<i>0.0%</i>	<i>100.0%</i>
HMDA TOTALS	Low	0	0.0%	\$0	0.0%	20.3%	0	0.0%	6.5%	\$0	0.0%	3.0%	0	0.0%	3.8%	\$0	0.0%	1.8%
	Moderate	1	4.8%	\$146	2.9%	20.5%	0	0.0%	17.7%	\$0	0.0%	11.8%	1	10.0%	13.3%	\$146	5.9%	8.8%
	Middle	2	9.5%	\$444	8.9%	22.8%	2	18.2%	20.3%	\$444	17.6%	16.8%	0	0.0%	18.0%	\$0	0.0%	14.8%
	Upper	13	61.9%	\$3,835	76.5%	36.5%	5	45.5%	33.5%	\$1,540	60.9%	39.6%	8	80.0%	35.4%	\$2,295	92.4%	42.7%
	Unknown	5	23.8%	\$587	11.7%	0.0%	4	36.4%	22.1%	\$543	21.5%	28.8%	1	10.0%	29.6%	\$44	1.8%	31.9%
	<i>Total</i>	<i>21</i>	<i>100.0%</i>	<i>\$5,012</i>	<i>100.0%</i>	<i>100.0%</i>	<i>11</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,527</i>	<i>100.0%</i>	<i>100.0%</i>	<i>10</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$2,485</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2015 ACS Data

Geographic Distribution of Small Business Loans

Assessment Area: FL Pensacola

Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending Comparison											
	Comparison					2019					2020						
	Bank		Dollar		Total Businesses %	Count		Dollar			Count		Dollar				
	#	%	\$ (000s)	\$ %		Bank	Agg	\$ 000s	\$ %	\$ %	Bank	Agg	\$ 000s	\$ %	\$ %		
Low	5	3.7%	\$651	3.2%	3.3%	0	0.0%	3.3%	\$0	0.0%	2.4%	5	4.6%	3.5%	\$651	4.7%	3.3%
Moderate	39	28.9%	\$3,680	18.1%	26.9%	7	25.9%	25.1%	\$549	8.5%	29.3%	32	29.6%	27.3%	\$3,131	22.6%	28.5%
Middle	58	43.0%	\$9,093	44.7%	50.5%	13	48.1%	51.9%	\$3,576	55.1%	52.2%	45	41.7%	50.4%	\$5,517	39.9%	53.4%
Upper	33	24.4%	\$6,905	34.0%	19.3%	7	25.9%	19.0%	\$2,369	36.5%	15.9%	26	24.1%	18.5%	\$4,536	32.8%	14.6%
Unknown	0	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%	0	0.0%	0.0%	\$0	0.0%	0.0%
Tr Unknown	0	0.0%	\$0	0.0%		0	0.0%	0.7%	\$0	0.0%	0.3%	0	0.0%	0.2%	\$0	0.0%	0.1%
<i>Total</i>	<i>135</i>	<i>100.0%</i>	<i>\$20,329</i>	<i>100.0%</i>	<i>100.0%</i>	<i>27</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$6,494</i>	<i>100.0%</i>	<i>100.0%</i>	<i>108</i>	<i>100.0%</i>	<i>100.0%</i>	<i>\$13,835</i>	<i>100.0%</i>	<i>100.0%</i>

Originations & Purchases
2020 FFIEC Census Data and 2020 D&B Information

APPENDIX F – LENDING PERFORMANCE TABLES FOR LIMITED-SCOPE ASSESSMENT AREAS (CONTINUED)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: FL Pensacola

Business Revenue & Loan Size		Bank Lending & Demographic Data Comparison 2019, 2020					Bank & Aggregate Lending Comparison											
		Bank				Total Businesses %	2019			2020								
		Count		Dollar			Count	Dollar		Count		Dollar						
		#	%	\$ (000s)	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	#	%	%	\$ (000s)	\$ %	\$ %	
BUSINESS REVENUE	\$1million or Less	31	23.0%	\$4,020	19.8%	94.0%	15	55.6%	36.6%	\$1,938	29.8%	36.1%	16	14.8%	36.1%	\$2,082	15.0%	28.2%
	Over \$1 Million	20	14.8%	\$9,639	47.4%	5.4%	11	40.7%				9	8.3%					
	Total Rev. available	51	37.8%	\$13,659	67.2%	99.4%	26	96.3%				25	23.1%					
	Rev. Not Known	84	62.2%	\$6,670	32.8%	0.6%	1	3.7%				83	76.9%					
	Total	135	100.0%	\$20,329	100.0%	100.0%	27	100.0%				108	100.0%					
LOAN SIZE	\$100,000 or Less	87	64.4%	\$3,006	14.8%		14	51.9%	90.9%	\$699	10.8%	30.2%	73	67.6%	85.3%	\$2,307	16.7%	28.8%
	\$100,001 - \$250,000	24	17.8%	\$3,859	19.0%		5	18.5%	4.9%	\$885	13.6%	19.1%	19	17.6%	8.5%	\$2,974	21.5%	22.5%
	\$250,001 - \$1 Million	24	17.8%	\$13,464	66.2%		8	29.6%	4.2%	\$4,910	75.6%	50.7%	16	14.8%	6.2%	\$8,554	61.8%	48.8%
	Total	135	100.0%	\$20,329	100.0%		27	100.0%	100.0%	\$6,494	100.0%	100.0%	108	100.0%	100.0%	\$13,835	100.0%	100.0%
	Rev \$1 Mill or Less	18	58.1%	\$925	23.0%													
LOAN SIZE Rev \$1 Mill or Less	\$100,000 or Less	9	29.0%	\$1,545	38.4%													
	\$100,001 - \$250,000	4	12.9%	\$1,550	38.6%													
	\$250,001 - \$1 Million	31	100.0%	\$4,020	100.0%													
	Total	31	100.0%	\$4,020	100.0%													

Originations & Purchases

Aggregate data is unavailable for loans to businesses with revenue over \$1 million or revenue unknown, and for loan size by revenue. 2020 FFIEC Census Data and 2020 D&B Information