CRA Performance Evaluation

§228.43(a)(2)

PUBLIC DISCLOSURE

October 30, 2023

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

BankFirst Financial Services
RSSD #914648

3055 Jefferson Street
Macon, Mississippi 39341

Federal Reserve Bank of St. Louis

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: This institution is rated SATISFACTORY.

The following table shows the performance level of BankFirst Financial Services (BankFirst) with respect to the Lending, Investment, and Service Tests.

Performance Levels	Performance Tests		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding			
High Satisfactory	X		X
Low Satisfactory		X	
Needs to Improve			
Substantial Noncompliance			

*Table header: **BankFirst Financial Services***

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

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

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.

- A high percentage of loans are made in the bank's assessment areas.

- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes.

- The geographic distribution of loans reflects good penetration throughout the assessment areas.

- The bank makes a relatively high level of community development loans.

- The bank makes use of innovative and/or flexible lending products in meeting the credit needs of its assessment areas.

- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.

- Service delivery systems are readily accessible to the bank's assessment areas, and the bank's record of opening and closing branches does not adversely affect the accessibility of its service delivery systems.

- The bank provides a relatively high level of community development services.

INSTITUTION

DESCRIPTION OF INSTITUTION

BankFirst is a full-service retail bank offering both consumer and commercial loan and deposit products. The bank is wholly owned by BankFirst Capital Corporation, a one-bank holding company headquartered in Macon, Mississippi.

Since its previous CRA evaluation on May 10, 2021, the bank has experienced significant asset growth through three acquisitions that have expanded its geographic footprint into several new markets and expanded its existing presence in others. A summary of these acquisitions is as follows:

- July 2022 – *The Citizens Bank of Fayette*. This acquisition added two branches to the bank's network, expanding operations in nonmetropolitan statistical area (nonMSA) portions of Alabama.

- August 2022 – *Mechanics Bank*. This acquisition added six branches to the bank's network throughout nonMSA portions of Mississippi, creating one new assessment area. However, as these branches were acquired shortly before the end of the retail lending test CRA review period, this assessment area is not included in this evaluation.

- October 2022 – *Sycamore Bank*. This acquisition added five branches to the bank's network, all of which are located in the Memphis MSA. These are the bank's first branch locations in the Memphis MSA, and consequently, the bank delineated a new assessment area. However, as these branches were acquired shortly before the end of the retail lending test CRA review period, this assessment area is not included in this evaluation.

During the review period, the bank converted one loan production office (LPO) into a full-service branch, added 13 branches through the three acquisitions, and closed one office. In addition, not included in the branch office totals is one LPO located in Brookhaven, Mississippi, and two newly opened LPOs located in Biloxi, Mississippi, and Birmingham, Alabama. In total, the bank operates 48 branches throughout Mississippi and Alabama and 32 branches in the assessment areas reviewed as part of this evaluation.

The bank's most significant presence remains in the state of Mississippi, which includes the bank's main office and the largest share of the bank's deposit and loan volume. The bank also maintains significant operations in Alabama. In total, the bank has designated nine separate assessment areas, seven of which are reviewed in this evaluation. The composition of each assessment area is detailed in the *General Demographics* section for each separate assessment area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its assessment areas, and the bank is capable of meeting assessment area credit needs based on its available resources and financial products. As of September 30, 2023, the bank reported total assets of $2.7 billion, which represents a 52.3 percent increase since the previous evaluation. As of the same date, loans and leases outstanding were $1.8 billion, while deposits totaled $2.4 billion.

The bank's loan portfolio composition by credit category is displayed in the following table.

Distribution of Total Loans as of September 30, 2023		
Credit Category	**Amount $ (000s)**	**Percentage of Total Loans**
Construction and Development	$130,761	7.3%
Commercial Real Estate	$648,507	36.4%
Multifamily Residential	$130,036	7.3%
1–4 Family Residential	$486,562	27.3%
Farmland	$102,487	5.7%
Farm Loans	$41,214	2.3%
Commercial and Industrial	$161,315	9.0%
Loans to Individuals	$28,772	1.6%
Total Other Loans	$53,435	3.0%
TOTAL	**$1,783,089**	**100%**

As indicated by the table above, a significant portion of the bank's lending resources is directed to commercial real estate loans and loans secured by 1–4 family residential properties. Other significant loan products include commercial and industrial and multifamily residential loans. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity is not captured in the table. The bank originated and sold 733 loans totaling $7.1 million and 351 loans totaling $2.8 million in 2021 and 2022, respectively.

The bank received a Satisfactory rating at its previous CRA evaluation conducted by this Reserve Bank on May 10, 2021.

SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) *Interagency Large Institution CRA Examination Procedures*, which include a Lending Test, Investment Test, and Service Test. Bank performance under these tests is rated at the institution and state levels and is a reflection of the conclusions drawn in seven of the bank's nine assessment areas. Due to the timing of the Mechanics Bank and Sycamore Bank acquisitions and the lack of applicable lending data, the newly delineated assessment areas in the Memphis MSA and portions of nonMSA Mississippi were not included within the bank's Lending Test and Service Test analysis. However, the bank's eligible community development activities from these assessment areas were considered within the respective state level ratings.

The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2022.

Rated Areas	Offices		Deposits as of June 30, 2022		Assessment Area Reviews		
	#	%	$ (000s)	%	Full-Scope	Limited-Scope	TOTAL
Mississippi	16	50%	$952,027	53.1%	2	3	5
Alabama	16	50%	$841,201	46.9%	2	0	2
OVERALL	**32**	**100%**	**$1,793,228**	**100%**	**4**	**3**	**7**

The bank receives an overall CRA rating and individual ratings for the Lending, Investment, and Service Tests at the institution level, as well as for each rated area in which the bank maintains a branch presence. Overall CRA ratings are driven by performance in the various rated areas, which are weighted according to significance based on loan and deposit activity, branch structure, and other factors such as CRA performance history. The bank's institution ratings are a blend of the two rated area ratings, which are weighted when making overall rating decisions. Consequently, performance in the state of Mississippi is given primary consideration, followed closely by Alabama.

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

Lending Test

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

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	• Home mortgage loans reported under the Home Mortgage Disclosure Act (HMDA)	• HMDA: January 1, 2021 – December 31, 2022
Assessment Area Concentration		
Loan Distribution by Borrower's Profile		• Small Business: January 1, 2022 – December 31, 2022
Geographic Distribution of Loans	• Small business loans reported under the CRA	
Community Development Lending Activities		May 10, 2021 – October 29, 2023
Product Innovation[1]		

As shown in the preceding table, HMDA and small business loans were used to evaluate the bank's lending performance, as these loans are considered the bank's core business lines based on lending volume and the bank's business strategy. The weighting given to each product when evaluating

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

the bank's lending performance varied based on loan demand, credit needs, and the bank's business strategy and is discussed at the rated area level. Lastly, equal emphasis is placed on performance in 2021 and 2022 for HMDA loan products. Due to the availability of CRA-reportable data, only the bank's performance in 2022 was considered for small business lending.

The bank's Lending Test performance is evaluated using the following criteria, as applicable:

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

Under the previously noted borrower distribution and geographic distribution criteria, analyses often involve comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate data. Unless otherwise noted, the following are the information sources referenced throughout the evaluation.

- Assessment area demographics are based on 2020 American Community Survey (ACS) data, and business demographics are based on 2021 and 2022 Dun & Bradstreet data.

- Median family incomes are based on the FFIEC's 2021 and 2022 annual estimates. The estimates were used to classify borrowers into low-, moderate-, middle-, and upper-income categories by comparing their reported income to the applicable median family income figure for that area.

- Industry demographics are sourced from the 2022 U.S. Census Bureau Business Patterns data, according to the North American Industry Classification System.

- Unemployment data are sourced from the U.S. Department of Labor, Bureau of Labor Statistics, and are not seasonally adjusted.

- In the evaluation of the bank's distribution of loans to borrowers of different income levels and businesses and farms of different revenue sizes, the demographic figure refers to the percentage of families in that assessment area that are classified as either low- or moderate-income or the percentage of businesses and farms with annual revenues of $1 million or less.

- In the evaluation of the bank's geographic distribution of loans, the demographic figure refers to the percentage of owner-occupied housing units in that assessment area that are in either low- or moderate-income census tracts or the percentage of businesses located in low- and moderate-income (LMI) census tracts.

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[2] This criterion is applicable at the institution level only.

When analyzing bank performance, greater emphasis is placed on annually updated aggregate lending data, which are expected to describe many factors impacting lenders and to predict more relevant comparisons.

Investment Test

All community development investments, including grants and donations, made since the previous CRA evaluation were reviewed and evaluated. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of this review date, were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to assessment area credit and community development needs.

Service Test

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

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

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The bank's performance under the Lending Test is rated high satisfactory. This rating reflects the performance in each rated area shown in the table below, with Mississippi carrying the most weight toward the overall rating. The bank's performance under each of the criteria of the Lending Test is shown in the tables that follow.

Rated Area	Lending Test Rating
Mississippi	High Satisfactory
Alabama	High Satisfactory
OVERALL	**HIGH SATISFACTORY**

Lending Activity

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

Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans inside and outside the bank's assessment areas.

Lending Inside and Outside of Assessment Areas January 1, 2021 through December 31, 2022						
Loan Type	**Inside Assessment Areas**		**Outside Assessment Areas**		**TOTAL**	
HMDA	1,846	74.2%	643	25.8%	2,489	100%
	$372,385	67.7%	$178,052	32.3%	$550,437	100%
Small Business	906	82.7%	189	17.3%	1,095	100%
	$107,686	79.2%	$28,280	20.8%	$135,966	100%
TOTAL LOANS	**2,752**	**76.8%**	**832**	**23.2%**	**3,584**	**100%**
	$480,071	**69.9%**	**$206,332**	**30.1%**	**$686,403**	**100%**

A high percentage of loans were made inside the bank's assessment areas. As shown above, 76.8 percent of the bank's total HMDA and small business loans were made inside the bank's assessment areas, representing 69.9 percent of loans by dollar volume.

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following tables.

Rated Area	Loan Distribution by Borrower's Profile
Mississippi	Good
Alabama	Good
OVERALL	**GOOD**

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

Rated Area	Geographic Distribution of Loans
Mississippi	Good
Alabama	Excellent
OVERALL	**GOOD**

Community Development Lending Activity

Overall, the bank makes a relatively high level of community development loans, as noted in the following table.

Rated Area	Community Development Lending
Mississippi	Relatively High Level
Alabama	Adequate Level
OVERALL	**RELATIVELY HIGH LEVEL**

During the review period, the bank originated or renewed 65 qualifying community development loans inside its assessment areas, totaling $64.8 million. Moreover, the bank is a leader in making community development loans in the Golden Triangle assessment area, which carries the most weight in the Mississippi rated area and, therefore, supports that the bank's overall level of community development lending is at a relatively high level. In addition to meeting the community development lending needs of its own assessment areas, the bank also made one loan totaling $1.3 million outside its assessment areas. This loan was to a Mississippi municipality to purchase an emergency vehicle to revitalize and stabilize the local community, including LMI individuals and geographies.

Product Innovation

Overall, the bank makes use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas.

During the review period, the bank's use of innovative and/or flexible lending practices resulted in 885 loans being originated, totaling $185.4 million. Detailed below are descriptions for each of these practices, listed in order of impact.

- *Community Development Financial Institution (CDFI)* – BankFirst is a designated CDFI. CDFIs have a common goal of expanding economic opportunities in low-income communities by providing access to financial products and services for local residents and businesses. The bank became a CDFI in 2010 and was certified again in 2014.

- *Coronavirus Response and Consolidated Appropriations Act* – BankFirst received the Rapid Response Program grant in 2021. BankFirst originated $6,559,670 in financial products to eligible markets and the bank's approved target markets during 2022.

- *Emergency Capital Investment Program* – As a CDFI, BankFirst received $175 million in funds to provide loans for small businesses, minority-owned businesses, and consumers, especially in low-income and underserved communities, that were disproportionately impacted by the economic effects of the COVID-19 pandemic.

- *Equitable Recovery Program (ERP)* – In April 2023, BankFirst funded $6,197,097 through the ERP in order to strengthen the bank's ability to help census tracts that demonstrate "severe impact" of the COVID-19 pandemic and are low or moderate income to recover from the COVID-19 pandemic.

- *BancLeasing* – This partnership allows BankFirst to provide equipment financing options for businesses where the outright purchase of the equipment would not be financially profitable for that business. Since May 2021, the bank has originated 18 loans totaling $1,835,393.

- *Farm Service Agency (FSA)* – BankFirst has originated 55 FSA-guaranteed loans since May 2021 totaling $25,234,400. These FSA-guaranteed loans have benefited many poultry, cattle, catfish, and row crop farmers in east Mississippi and west Alabama; many of these loans supply area processing plants, thus maintaining the food supply chain.

- *Small Business Administration (SBA) and Paycheck Protection Program (PPP)* – BankFirst is a Preferred SBA 7(a) Lender and has originated 244 SBA-guaranteed loans totaling $87,906,669 since May 2021. Additionally, since the bank's previous examination in May 2021, BankFirst originated 25 PPP loans totaling $557,900.

- *Federal Housing Administration (FHA), Veterans Affairs (VA), and U.S. Department of Agriculture (USDA)* – Since May 10, 2021, the bank has originated 208 FHA loans totaling $43,291,382; 40 USDA Rural Development loans totaling $6,325,796; and 47 VA loans totaling $13,979,997. The bank also originated seven Fannie Mae HomeReady loans for $1,382,056, which helps serve creditworthy low-income borrowers.

- *Financial Institutions Housing Opportunity Pool (FIHOP)* – This organization assists in the construction and development of residential housing throughout the state of Mississippi

to LMI individuals. The program offers flexible lending terms such as below-market interest rates, longer amortization schedules, and 25-year payout terms. BankFirst has a pro rata share in the pool in the amount of $1.5 million. Additionally, the bank participated in one FIHOP loan on November 19, 2021, for $21,863. The bank holds six loans in its loan portfolio resulting from this partnership, with current balances of $151,133.24.

- *Alabama Housing Finance Authority (AHFA)* – This partnership allows BankFirst to use the Step Up program, which is designed for moderate-income homebuyers who can afford a mortgage but need down payment assistance. One homebuyer was provided with a $159,856 first mortgage through the Freddie Mac Home Possible program, which is a program for very low- to low-income borrowers, along with $6,592 AHFA Step Up down payment assistance and a $799.28 Affordable Income Subsidy Grant from AHFA.

- *Mississippi Home Corporation (MHC)* – MHC provides two programs, Mortgage Revenue Bond 7 (MRB7) and Smart6, to qualifying borrowers. MRB7 provides $7,000 to assist borrowers with upfront costs associated with their mortgage purchase as first-time homebuyers whose income is within the income guidelines for the county in which they purchase a home. The bank originated eight MRB7 loans totaling $56,000 within the review period. The Smart6 Mortgage Program provides $6,000 toward the purchase of a borrower's first home or to help them move up to their next one. The bank originated one loan during the review period for $6,000.

INVESTMENT TEST

The bank's performance under the Investment Test is rated low satisfactory, driven primarily by the performance in Mississippi. Overall, the bank made an adequate level of qualified community development investments and grants. The investments and grants exhibit adequate responsiveness to credit and community development needs, and the bank is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

During the review period, the bank made 16 investments totaling $7.2 million, including 2 prior-period investments that were still outstanding totaling $1.2 million. In addition, the bank made 245 donations totaling $129,229. The bank's investment activity consisted of municipal bonds benefiting schools or projects in LMI areas in the bank's assessment areas, as well as mortgage-backed securities (MBS), which are investments in pools of loans made up of affordable housing loans to LMI borrowers.

While not included in the totals above, the bank also made 47 investments totaling $16.3 million outside its assessment areas, including six investments totaling $1.6 million benefitting a broader regional area outside the bank's rated areas. As these six investments benefit more than one rated area, they are discussed at the institution level only. These investments included two SBA pools, one housing authority bond, and three CDFI deposits.

SERVICE TEST

The bank's performance under the Service Test is rated high satisfactory based on the criteria shown in the table below.

Rated Area	Service Test Rating
Mississippi	High Satisfactory
Alabama	High Satisfactory
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the bank's rated areas, as shown in the following tables.

Rated Area	Accessibility of Delivery Systems
Mississippi	Readily Accessible
Alabama	Accessible
OVERALL	**READILY ACCESSIBLE**

The bank currently operates 8 of its 32 branches (25.0 percent) in LMI geographies. These branches are in the Golden Triangle, East Central, Hattiesburg, and Tuscaloosa assessment areas. In addition to branch locations, consideration was also given to the distribution of stand-alone ATMs and the availability of alternative delivery systems, such as online and mobile banking.

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals. The bank opened one branch in a middle-income census tract in the Lee County assessment area, which did not adversely affect the accessibility of its delivery systems. Meanwhile, the bank closed one branch in a moderate-income census tract and opened two branches in middle-income census tracts in its Northwest Alabama assessment area but generally did not adversely affect the accessibility of delivery systems. No other assessment areas saw changes in branch locations, including the Golden Triangle and East Central assessment areas, which were weighted more heavily. Therefore, overall changes in branch locations did not adversely affect the accessibility of delivery systems.

Rated Area	Changes in Branch Locations
Mississippi	Not Adversely Affected
Alabama	Generally Not Adversely Affected
OVERALL	**NOT ADVERSELY AFFECTED**

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. The bank's branch locations are generally open between 9:00 a.m. and 4:30 p.m., with many locations offering extended hours and drive-through services. While the bank's hours vary slightly between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas. The bank offers the same suite of products throughout its entire branch network.

Rated Area	Reasonableness of Business Hours and Services
Mississippi	Do Not Vary in a Way That Inconveniences
Alabama	Do Not Vary in a Way That Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

In addition to standard retail services and community development services, the bank provides the following special retail services, which are offered bank-wide and were also considered as part of the bank's overall evaluation under the Service Test.

- Advantage Credit: This program is used to counsel borrowers when they have credit scores that will not qualify for a secondary market mortgage. The bank uses two simulations:

    o "What If" simulator helps the borrower see how particular financial decisions will impact their credit score before they put them into action. The bank has assisted 53 applicants during the review period.

    o "Wayfinder" simulator helps loan officers analyze a borrower's credit reports and make specific suggestions for changes to improve scores. The bank has assisted 80 applicants using this simulator during the review period.

- Rapid Rescore: This program expedites the updating of information on a credit report following the applicant's plan of action, which has benefited five applicants.

- GreenPath Financial Wellness: This program provides one-one-one financial counseling to applicants and borrowers who need additional assistance, which has assisted one applicant during the review period.

Community Development Services

The bank provides a relatively high level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Mississippi	Relatively High Level
Alabama	Leader in Providing
OVERALL	**RELATIVELY HIGH LEVEL**

In total, bank employees provided 730 community development services to 114 different organizations, totaling 2,716 hours. Many of the bank's typical community development service activities, such as financial literacy events, are performed at in-person meetings or in large gatherings at local schools or community centers. In response to the self-identified decline in services during the COVID-19 pandemic in 2020, the bank implemented a campaign to encourage staff to volunteer at local schools to promote and provide financial literacy education. This resulted in the subsequent uptick in community development services across both of the bank's rated areas since the previous evaluation.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

MISSISSIPPI

CRA RATING FOR MISSISSIPPI: **SATISFACTORY**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Low Satisfactory**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Mississippi include the following:

- The bank's lending levels reflect good responsiveness to the credit needs of its assessment areas.

- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.

- The geographic distribution of loans reflects good penetration throughout the assessment areas.

- The bank makes a relatively high level of community development loans.

- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.

- Service delivery systems are accessible to the bank's assessment areas, and the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.

- The bank conducts a relatively high level of community development services throughout the Mississippi assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Mississippi assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. In all assessment areas, HMDA lending received slightly more weight than small business lending in the analysis.

The bank operates five assessment areas throughout Mississippi, located in two MSAs and three noncontiguous nonMSA portions of the state. Two of the bank's Mississippi assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the Golden Triangle nonMSA assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Mississippi, two community contact interviews were referenced. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to

these needs. Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSISSIPPI

The following table gives additional detail regarding the bank's operations within Mississippi.

Assessment Area	Offices		Deposits As of June 30, 2022		Review Procedures
	#	%	$	%	
Golden Triangle	7	43.8%	$596,538	62.4%	Full-Scope
East Central	4	25.0%	$172,858	18.1%	Full-Scope
Jackson	3	18.8%	$182,582	19.1%	Limited-Scope
Hattiesburg	1	6.2%	$4,049	0.4%	Limited-Scope
Lee County	1	6.2%	$0	0.0%	Limited-Scope
TOTAL	**16**	**100%**	**$956,028**	**100%**	**2 Full-Scope**

The bank operates 16 branches (50.0 percent of total branches) throughout the five CRA assessment areas in the state of Mississippi. Total deposits in the state total $956.0 million, which represents 53.1 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank acquired six branches in its acquisition of Mechanics Bank in August 2022 and five branches through its acquisition of Sycamore Bank in October 2022, which were not reviewed as part of this examination. The bank also operates two LPO locations outside of its assessment areas in Biloxi and Brookhaven, Mississippi. The bank's operations in the state are concentrated in the nonMSA Mississippi assessment areas, where the Golden Triangle nonMSA Mississippi assessment area carried the greatest weight toward determining statewide ratings. During the review period, the bank did not close any branches and converted one LPO to a branch within Mississippi.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

LENDING TEST

The bank's performance under the Lending Test in Mississippi is rated high satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Loans	Relatively High Level
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect good responsiveness to the credit needs of the bank's combined full-scope assessment areas based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Golden Triangle	Excellent
East Central	Adequate
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Lending Activity
Jackson	Exceeds
Hattiesburg	Consistent
Lee County	Consistent

A more detailed analysis of these factors is described in sections for each assessment area that was reviewed using full-scope procedures.

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following tables.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Golden Triangle	Good
East Central	Good
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Jackson	Consistent
Hattiesburg	Below
Lee County	Below

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

Full-Scope Assessment Areas	Geographic Distribution of Loans
Golden Triangle	Good
East Central	Adequate
OVERALL	**GOOD**

Limited-Scope Assessment Areas	Geographic Distribution of Loans
Jackson	Exceeds
Hattiesburg	Consistent
Lee County	Consistent

Community Development Lending Activity

Overall, the bank makes a relatively high level of community development loans, as noted in the following tables.

Full-Scope Assessment Areas	Community Development Lending
Golden Triangle	Leader
East Central	Adequate
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Lending
Jackson	Consistent
Hattiesburg	Consistent
Lee County	Below

During the review period, the bank originated or renewed 57 qualifying community development loans inside its Mississippi assessment areas, totaling $56.5 million. Moreover, the bank is a leader in making community development loans in the Golden Triangle assessment area, which carries the most weight and, therefore, supports that the level of community development lending is at a relatively high level in Mississippi overall.

INVESTMENT TEST

The bank's performance under the Investment Test is rated low satisfactory. Overall, the bank made an adequate level of qualified community development investments and grants. The investments and grants exhibit adequate responsiveness to credit and community development needs, and the bank is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Golden Triangle	Adequate
East Central	Adequate
OVERALL	**ADEQUATE LEVEL**

Limited-Scope Assessment Areas	Investment and Grant Activity
Jackson	Consistent
Hattiesburg	Below
Lee County	Below

During the review period, the bank made 13 investments totaling $6.1 million, including 1 previous-period investment that is still outstanding, totaling $985,543. In addition, the bank made 139 donations totaling $88,450. The bank's investment activity consisted of municipal bonds benefiting schools or projects in LMI areas in the bank's assessment areas, as well as MBS.

While not included in the totals above, the bank also made 16 investments totaling $5.3 million benefitting a broader statewide area. A majority of these investments were made to schools or local municipalities operating in Mississippi.

SERVICE TEST

The bank's performance under the Service Test is rated high satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the full-scope assessment areas, as shown in the following tables.

Full-Scope Assessment Areas	**Accessibility of Delivery Systems**
Golden Triangle	Readily Accessible
East Central	Readily Accessible
OVERALL	**READILY ACCESSIBLE**

Limited-Scope Assessment Areas	**Accessibility of Delivery Systems**
Jackson	Below
Hattiesburg	Consistent
Lee County	Consistent

The bank currently operates 6 of its 16 branches (37.5 percent) in LMI geographies. These branches are in the Golden Triangle, East Central, and Hattiesburg assessment areas. In addition to branch locations, consideration was also given to the availability of alternative delivery systems, such as online and mobile banking.

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	**Changes in Branch Locations**
Golden Triangle	Not Adversely Affected
East Central	Not Adversely Affected
OVERALL	**NOT ADVERSELY AFFECTED**

Limited-Scope Assessment Areas	Changes in Branch Locations
Jackson	Consistent
Hattiesburg	Consistent
Lee County	Consistent

The bank's changes in branch locations during the review period were limited to opening one branch in a middle-income census tract in the Lee County assessment area through the conversion of an existing LPO, which did not adversely affect the accessibility of its delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. The bank's branch locations are generally open between 9:00 a.m. and 4:30 p.m., with many locations offering extended hours and drive-through services. While the bank's hours vary slightly between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas. The bank offers the same suite of products throughout its entire branch network.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Golden Triangle	Do Not Vary in a Way That Inconveniences
East Central	Do Not Vary in a Way That Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Limited-Scope Assessment Areas	Reasonableness of Business Hours and Services
Jackson	Consistent
Hattiesburg	Consistent
Lee County	Consistent

Community Development Services

The bank provides a relatively high level of community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Golden Triangle	Relatively High Level
East Central	Relatively High Level
OVERALL	**RELATIVELY HIGH LEVEL**

Limited-Scope Assessment Areas	Community Development Services
Jackson	Consistent
Hattiesburg	Below
Lee County	Exceeds

In total, bank employees provided 430 community development services to 70 different organizations, totaling 1,750 hours. The majority of these services consisted of staff teaching financial literacy courses at local elementary, middle, and high schools as part of the bank's community development service campaign.

GOLDEN TRIANGLE MISSISSIPPI NONMETROPOLITAN STATISTICAL AREA
(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GOLDEN TRIANGLE ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates seven (21.9 percent) of its total branches in the Golden Triangle assessment area.

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

Each of these offices contains a full-service ATM. Additionally, six of these offices offer video teller hours from 7:30 a.m. to 6:00 p.m. During the review period, the bank did not open or close any branches in this assessment area. Based on the bank's branch network and other service delivery systems, the bank is positioned to deliver financial services to the entire assessment area.

General Demographics

The assessment area consists of Clay, Lowndes, Noxubee, and Oktibbeha counties in nonMSA Mississippi. The assessment area has a total population of 139,588; Lowndes and Oktibbeha counties are the most populous counties in the assessment area, with populations of 58,879 and 51,788, respectively. While most of the assessment area is rural, certain cities, such as Columbus in Lowndes County and Starkville in Oktibbeha County, serve as regional hubs for commercial and banking activity in the surrounding counties.

Of the 13 FDIC-insured depository institutions operating 14 branches throughout the assessment area, BankFirst ranks third in the assessment area by deposit market share (17.1 percent). Deposits held in Golden Triangle represent 33.2 percent of total bank deposits.

In line with its extensive branch presence, the bank also plays an important role in meeting the credit needs of the assessment area. An analysis of 2022 HMDA-reportable loans shows that there were 202 entities with lending activity in the assessment area, of which BankFirst ranked third with 9.2 percent of all HMDA lending activity. The bank ranked second out of 64 institutions with CRA lending activity in the assessment area with 17.6 percent of all CRA lending activity.

The assessment area credit needs include a blend of consumer and commercial loan products. Additionally, a community contact familiar with the assessment area pointed to a need for multifamily affordable home loans and financial literacy training initiatives. While the financial institutions in the area appear active in response to affordable housing initiatives, the community

contact noted that additional community development opportunities are available for financial institutions, particularly in Noxubee County.

Income and Wealth Demographics

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

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	3	7.7%	2,214	7.1%
Moderate	4	10.3%	3,597	11.5%
Middle	14	35.9%	11,041	35.4%
Upper	17	43.6%	13,782	44.2%
Unknown	1	2.6%	542	1.7%
TOTAL	**39**	**100%**	**31,176**	**100%**

As shown above, 18.0 percent of the census tracts in the assessment area are LMI geographies, and 18.6 percent of the family population resides in these tracts. These LMI areas are evenly dispersed between all four counties within the assessment area.

Several of the assessment area census tracts (35.9 percent) are middle income, and 35.4 percent of the family population resides in these tracts. Despite being middle-income geographies, many of these census tracts were designated as distressed, underserved, or both during the review period, as detailed below:

- There are ten census tracts designated as distressed due to poverty in Clay, Noxubee, and Oktibbeha counties.

- One census tract is also designated as distressed due to unemployment in Noxubee County.

Based on 2020 ACS data, the median family income for the assessment area was $57,029. At the same time, the median family income for nonMSA Mississippi was $53,003. More recently, the FFIEC estimates the 2021 and 2022 median family income for nonMSA Mississippi to be $51,400 and $58,800, respectively. The following table displays population percentages of assessment area families by income level compared to the nonMSA Mississippi family populations.

Family Population by Income Level				
	Golden Triangle		NonMSA Mississippi	
Low	6,989	22.4%	89,246	23.6%
Moderate	4,564	14.6%	62,630	16.6%
Middle	5,334	17.1%	68,326	18.1%
Upper	14,289	45.8%	158,072	41.8%
TOTAL	**31,176**	**100%**	**378,274**	**100%**

As shown in the table above, 37.0 percent of families within the assessment area were considered LMI, which is in line with the LMI family percentages of 40.2 percent in nonMSA Mississippi. Additionally, the percentage of families living below the poverty level in the assessment area (16.8 percent) is in line with the level in nonMSA Mississippi (17.0 percent). Considering these factors, the assessment area appears as affluent as nonMSA Mississippi as a whole.

Housing Demographics

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

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)	Housing Cost Burden
Golden Triangle	$129,920	31.9%	$784	18.3%
NonMSA Mississippi	$100,494	40.0%	$691	18.0%

Based on the data in the table above, homeownership is less affordable in the assessment area than in nonMSA Mississippi as a whole. Within the assessment area, homeownership is least affordable in Oktibbeha County based on an affordability ratio of 23.9 percent, while Noxubee County is significantly more affordable at 55.1 percent. In addition, rents are higher in the assessment area than nonMSA Mississippi as a whole, and a similar percentage of renters' housing costs exceed 30 percent of their income. These demographics indicate that homeownership or affordable rental options are likely a challenge for many LMI residents in the area. This was echoed by a community contact, who noted that the housing market appears more robust in areas like Oktibbeha County, where there has been an increase in the construction of single-family homes.

Industry and Employment Demographics

The assessment area economy, while rural, supports a strong small business sector in addition to several large medical and manufacturing entities. County business patterns indicate that there are 52,866 paid employees in the assessment area in both private and government sectors. By percentage of employees, the three largest job categories in the assessment area are government (25.4 percent), manufacturing (14.5 percent), and retail trade (12.4 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and nonMSA Mississippi.

Unemployment Levels			
Dataset	Time Period (Annual Average)		
	2020	2021	2022 YTD (January – August)
Golden Triangle	8.5%	6.1%	4.5%
NonMSA Mississippi	8.1%	5.9%	4.4%

As shown in the table above, unemployment rates in the assessment area were in line or slightly higher than nonMSA Mississippi figures over the review period. Unemployment rates were highest in 2020, which was likely a result of COVID-19-related disruption of local and state economies.

Additionally, while both the assessment area and nonMSA Mississippi saw their unemployment rates increase in 2020, the assessment area figure saw a slightly larger increase when compared to the nonMSA Mississippi figure, which was corroborated by the community contact. Both the assessment area and nonMSA figures have decreased significantly in 2022.

Community Contact Information

One community contact interview was referenced with an individual specializing in rural economic development in the Golden Triangle assessment area. The contact advised that overall, the local economy has been steady, with some counties, such as Oktibbeha, seeing moderate economic growth. Lowndes and Clay counties were noted to be primarily reliant on manufacturing, as evidenced by their major employers, detailed by the contact, including a local tire plant, steel mill, and industrial park.

The contact described Noxubee County as not keeping pace with the surrounding areas economically. Per details from the interviewee, Noxubee County is a farming community that has experienced persistent poverty and few new businesses. Additionally, Noxubee County was identified by the contact as the area with a great need for multifamily affordable housing, whereas Oktibbeha and Lowndes have a more robust and booming housing market. According to the community contact, the largest barriers to LMI borrowers entering the housing market relate to lack of reliable internet access and transportation in rural areas and a need for financial literacy education.

Consistent with previous comments made by the community contact, Noxubee County was noted to have limited access to banking services; however, the contact did note that BankFirst had the largest presence and impact in the county. According to the contact, most banks are active in meeting the credit needs of the community through partnerships with local organizations.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GOLDEN TRIANGLE ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Golden Triangle assessment area.

Lending Test Summary	
Lending Activity	Excellent
Borrower Distribution	Good
Geographic Distribution	Good
Community Development Loans	Leader in Making

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	42	4.6%	2,276	1.6%
Home Purchase	220	23.9%	44,276	30.9%
Multifamily Housing	26	2.8%	24,462	17.1%
Refinancing	216	23.4%	36,106	25.2%
Other Purpose Line of Credit (LOC)	17	1.8%	885	0.6%
Other Purpose Closed/Exempt	5	0.5%	876	0.6%
Total HMDA	**526**	**57.0%**	**108,881**	**75.9%**
Small Business	396	43.0%	34,570	24.1%
TOTAL LOANS	**922**	**100.0%**	**143,451**	**100.00%**

The bank's lending activity in the assessment area represents 38.8 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, the bank operates 21.9 percent of its total branches and holds 33.2 percent of total bank deposits in the assessment area, showing the bank's lending levels exceeded both their share of deposits and branches in the assessment area. In 2022, the bank ranked third out of 202 lenders in HMDA originations and second out of 64 lenders in CRA originations in the assessment area. Therefore, the bank's lending activity levels reflect excellent responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Golden Triangle assessment area.

HMDA Lending

The bank's performance in making home mortgage loans to individuals of different income levels is good overall.

In 2021, the bank originated 4.4 percent of its HMDA loans to low-income borrowers, which exceeds aggregate lending levels (2.6 percent) but is well below the performance of peer institutions in the assessment area, which was 24.5 percent. While the gap between the bank's performance and the demographic figure is large, a significant portion of borrowers in this demographic are unlikely to qualify for a home mortgage loan given the overall poverty level of 16.8 percent in the assessment area; therefore, overall performance is considered good. Similarly, in 2022, the bank originated 4.3 percent of its HMDA loans to low-income borrowers, which was in line with aggregate lending levels (4.1 percent) but was also below the demographic figure (22.4 percent), reflecting good performance.

The distribution of HMDA loans to moderate-income borrowers is considered adequate in 2021 (7.3 percent) and 2022 (10.7 percent), as the bank's performance is slightly below but approaching the aggregate figure in 2021 (9.7 percent) and in 2022 (11.8 percent). The bank's performance is also slightly below the demographic figures in both years, which were 12.9 percent and 14.6 percent, respectively.

Small Business

In 2022, the bank originated 69.2 percent of its small business loans to businesses with annual revenues of $1 million or less, which exceeded aggregate lending levels (52.0 percent) but was below the demographic figure (91.6 percent), reflecting good performance. Therefore, the overall distribution of small business loans by business revenue profile is good.

Geographic Distribution of Loans

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

HMDA Lending

The bank's distribution of HMDA loans reflects good penetration among geographies of different income levels, particularly LMI geographies.

In 2021, the bank originated 5.1 percent of HMDA loans in low-income geographies in the assessment area, which exceeded aggregate performance (2.6 percent) and the percentage of owner-occupied housing in low-income census tracts (3.5 percent), reflecting excellent performance. Similarly, in 2022, the percentage of HMDA loans in low-income geographies

increased to 8.7 percent, which again exceeded both aggregate lending levels (4.3 percent) and the demographic figure (5.1 percent), which is considered excellent.

In both 2021 and 2022, the bank's geographic distribution of HMDA loans in moderate-income census tracts is considered good. The percentage of HMDA loans originated in moderate-income census tracts in 2021 (7.0 percent) and 2022 (7.1 percent) exceeded both aggregate lending levels (6.5 percent in 2021 and 6.7 percent in 2022) but remained slightly below the demographic figure (12.0 percent in both years).

Small Business Lending

In 2022, the bank originated 4.8 percent of small business loans in low-income geographies, which is approaching the aggregate performance (6.2 percent) but is below the demographic levels (8.6 percent), reflecting adequate performance. However, the bank made 12.6 percent of its small business loans in moderate-income geographies in 2022, which exceeds both aggregate performance (9.4 percent) and demographic levels (9.2 percent), reflecting excellent performance.

When considering low- and moderate-income geographies combined, the bank's distribution of small business loans in LMI geographies is good overall.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 96.7 percent of all assessment area census tracts and 100.0 percent of all LMI geographies. Similarly, in 2022, the bank had lending activity in 97.4 percent of census tracts in the assessment area and 100.0 percent of LMI geographies in the assessment area. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank is a leader in making community development loans in the Golden Triangle assessment area. During the review period, the bank made 39 community development loans totaling $43.5 million. These community development loans supported various community development purposes, including affordable housing (3), economic development (4), community service (13), and revitalization and stabilization (19). The most impactful of these loans are discussed below:

- The bank originated three community development loans totaling $4.6 million that provided funding for affordable multifamily housing developments. As corroborated by information provided by the community contact and assessment area housing demographics, there is a need for affordable housing options for LMI borrowers in the assessment area. One loan, totaling $4.4 million, financed a 103-unit multifamily complex in Starkville, Mississippi, as part of the Low-Income Housing Tax Credit program.

- The bank financed several community development loans for various agricultural/farm production and municipal projects that qualified as either revitalization/stabilization of LMI geographies or community service to LMI students. Specifically, a series of 12 loans, totaling $14.8 million, financed the construction of a regional youth sports complex to be

utilized by local students in Lowndes County, where a majority of public school students qualify for free or reduced lunch. These loans are considered impactful given the size of the loans and the overall impact to the assessment area.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants within the Golden Triangle assessment area. During the review period, the bank made five investments totaling $2.6 million, including one investment made prior to the review period still outstanding totaling $985,543. Two of the investments were MBS to help finance affordable housing within the assessment area, which is particularly impactful to the local economy.

In addition to these investments, the bank also made 74 donations totaling $39,360 to various organizations throughout the assessment area. These donations predominantly benefited school districts with a majority of students from LMI families and nonprofit organizations providing community services to LMI families.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Golden Triangle assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

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

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	2	0	2	3	0	**7**
	28.6%	0.0%	28.6%	42.9%	0.0%	**100%**
Census Tracts	7.7%	10.3%	35.9%	43.6%	2.6%	**100%**
Household Population	7.0%	11.1%	37.4%	42.1%	2.4%	**100%**

As shown in the previous table, two of the bank's offices are in LMI geographies, representing 28.6 percent of total branches in the assessment area. By comparison, 18.0 percent of census tracts in the assessment area are LMI, and 18.1 percent of the households reside in those census tracts. Additionally, three of the bank's offices are located less than one mile from a moderate-income census tract and can reasonably serve residents of that tract. Additionally, the bank offers online and mobile banking to all customers in the assessment area. As a result, the bank's service delivery systems are readily accessible in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices in this assessment area during the review period. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. The bank's branches in the assessment area offer relatively consistent lobby hours Monday through Thursday during standard business hours from 9:00 a.m. to 4:00 p.m., with most locations offering extended hours until 5:30 p.m. on Friday. Additionally, six of the seven branches offer drive-through hours Monday through Friday from 7:30 a.m. to 6:00 p.m. None of the bank's branches in the assessment area offer Saturday lobby or drive-through hours. Lastly, all offices in the assessment area offer the same deposit and loan products, and lenders are equally dispersed throughout the bank's branch locations in the assessment area.

Community Development Services

The bank provides an adequate level of community development services in the assessment area. During the review period, bank employees provided 123 community development services to 29 different organizations in the Golden Triangle assessment area, totaling 887.3 hours. Of these efforts, bank employees provided 76 community development services to various community service organizations and schools in the assessment area. These efforts consisted of bank employees providing financial literacy training and education targeted to LMI individuals in addition to financial literacy efforts at several schools with a majority of students receiving free and reduced lunch benefits. Additionally, ten bank employees served as board of directors (board) members and provided technical assistance to ten separate community service and development

organizations that support a variety of community development purposes throughout the assessment area, including two organizations that offer support services to LMI individuals in the Noxubee County area.

EAST CENTRAL MISSISSIPPI NONMETROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EAST CENTRAL ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates four (12.5 percent) of its total branches in the East Central assessment area.

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

Three of the four offices contain a full-service ATM. During the review period, the bank did not open or close any branches in this assessment area. Based on the bank's branch network and other service delivery systems, the bank is positioned to deliver financial services to the entire assessment area.

General Demographics

The assessment area is composed of Jasper, Newton, and Scott counties and has a total population of 65,648. Scott County is the most populous county in the assessment area, with a population of 27,990.

The assessment area hosts a total of 12 FDIC-insured depository institutions that operate 24 branches. BankFirst ranks third in the assessment area by deposit market share (13.8 percent) and is the leader in the assessment area by number of branches. Deposits held in the assessment area represent 9.6 percent of total bank deposits.

In line with its branch presence, the bank also plays an important role in meeting the credit needs of the assessment area. An analysis of 2022 HMDA-reportable loans shows that there were 103 entities with lending activity in the assessment area, of which BankFirst ranked fourth with 4.3 percent of all HMDA lending activity. Similarly, the bank ranked sixth out of 60 institutions with CRA lending activity in the assessment area with 4.1 percent of all CRA lending activity.

The assessment area credit needs include both consumer and commercial loan products. The community contact stressed the need for residential multifamily and single-family construction loans and home improvement loans and financial literacy training initiatives, given the current struggling economic health of the region. Additional opportunities for community development involvement include partnerships with various nonprofit and government assistance entities that currently serve LMI individuals.

Income and Wealth Demographics

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

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	1	4.8%	712	4.1%
Moderate	4	19.0%	2,971	17.0%
Middle	13	61.9%	11,551	66.2%
Upper	2	9.5%	1,342	7.7%
Unknown	1	4.8%	863	4.9%
TOTAL	21	100%	17,439	100%

As shown above, 23.8 percent of the census tracts in the assessment area are LMI geographies, and 21.1 percent of the family population resides in these tracts. These LMI areas are distributed across the assessment area counties. Additionally, middle-income census tracts in Jasper and Newton counties were designated as distressed due to poverty during the review period in 2021 but were no longer designated as distressed or underserved in 2022.

Based on 2020 ACS data, the median family income for the assessment area was $52,253. At the same time, the median family income for nonMSA Mississippi was $53,003. More recently, the FFIEC estimates the 2021 and 2022 median family income for nonMSA Mississippi to be $51,400 and $58,800, respectively. The following table displays population percentages of assessment area families by income level compared to the nonMSA Mississippi family populations.

Family Population by Income Level				
	East Central		NonMSA Mississippi	
Low	4,314	24.7%	89,246	23.6%
Moderate	2,961	17.0%	62,630	16.6%
Middle	3,054	17.5%	68,326	18.1%
Upper	7,110	40.8%	158,072	41.8%
TOTAL	17,439	100%	378,274	100%

As shown in the table above, 41.7 percent of families within the assessment area were considered LMI, which is slightly more than the LMI family percentages of 40.2 percent in nonMSA Mississippi. Similarly, the percentage of families living below the poverty level in the assessment area (18.1 percent) is slightly above the level in nonMSA Mississippi (17.0 percent). Considering these factors, the assessment area appears slightly less affluent than nonMSA Mississippi, corroborating the comments made by the community contact.

Housing Demographics

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

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)	Housing Cost Burden
East Central	$84,452	47.3%	$660	17.0%
NonMSA Mississippi	$100,494	40.0%	$691	18.0%

Based on the data in the table above, homeownership appears more affordable in the assessment area than nonMSA Mississippi as a whole. Median housing values and median gross rents are lower in the assessment area compared to statewide nonMSA figures. Additionally, the assessment area affordability ratio of 47.3 percent is higher than the statewide nonMSA figure (40.0 percent), and a smaller percentage of homeowners' housing costs exceed 30 percent of their income. Affordability levels in the assessment area varied somewhat by county, with housing being most affordable in Scott County (50.9 percent) and the least affordable in Jasper County (42.4 percent).

Industry and Employment Demographics

The assessment area supports a relatively homogenous business sector heavily reliant on manufacturing. County business patterns indicate that there are 21,959 paid employees in the assessment area in both private and government sectors. By percentage of employees, the three largest job categories in the assessment area are manufacturing (39.5 percent), government industries (18.2 percent), and retail trade (9.8 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and nonMSA Mississippi as a whole.

Unemployment Levels			
Dataset	Time Period (Annual Average)		
	2020	2021	2022 YTD (January – August)
East Central	7.0%	5.5%	4.2%
NonMSA Mississippi	8.1%	5.9%	4.4%

As shown in the table above, unemployment rates in the assessment area were slightly lower than statewide nonMSA figures over the review period. Additionally, both the assessment area and statewide nonMSA Mississippi saw substantially higher unemployment rates in 2020, which was likely a result of COVID-19-related disruption of local and state economies. Unemployment levels varied somewhat by county in the assessment area, with the lowest levels being in Scott County and the highest levels being in Jasper County.

Community Contact Information

One community contact interview was referenced with an individual working for a community services agency that serves multiple counties across nonMSA Mississippi. According to the contact, the overall economy is struggling. One manufacturing plant serves as a major employer in Newton County, which the contact noted is more industrialized than Jasper County. Additionally, the contact noted Jasper County's economy is more distressed, and its leading employers are fast food restaurants and convenience stores. The contact also noted that there are

areas of Jasper County that lack a grocery store and pharmacy, and economic development has proved to be a challenge. Further, the contact noted the general lack of housing stock due to the age of housing stock and damage caused by natural disasters.

Similarly, the contact noted differences between the banking environments in Newton and Jasper counties. Jasper County is served primarily by small local banks and credit unions, whereas Newton County has more large banks. The contact identified an opportunity for financial institutions to fund local nonprofit organizations serving LMI individuals in these communities. Lastly, the contact noted a need for financial literacy education in both Newton and Jasper counties.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EAST CENTRAL ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the East Central assessment area.

Lending Test Summary	
Lending Activity	Poor
Borrower Distribution	Good
Geographic Distribution	Adequate
Community Development Loans	Adequate

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	7	5.4%	252	2.3%
Home Purchase	16	12.4%	1,813	16.2%
Multifamily Housing	1	0.8%	218	1.9%
Refinancing	59	45.7%	5,239	46.8%
Other Purpose LOC	4	3.1%	141	1.3%
Other Purpose Closed/Exempt	1	0.8%	54	0.5%
Total HMDA	**88**	**68.2%**	**7,717**	**69.0%**
Small Business	41	31.8%	3,473	31.0%
TOTAL LOANS	**129**	**100.0%**	**11,190**	**100.00%**

The bank's lending activity in the assessment area represents 5.4 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, the bank operates 12.5 percent of its total branches and holds 9.6 percent of total bank deposits in the assessment area. In 2022, the bank ranked fourth out of 103 lenders in HMDA originations and sixth out of 60 lenders in CRA originations in the assessment area. Discussions with bank staff and comments from the community contact noted limited lending opportunity and moderate banking competition in the area as potential reasons for low lending levels; however, given the bank's lending activity compared to its branch presence and deposit volume, the bank's lending activity levels reflect adequate responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the East Central assessment area.

HMDA Lending

When considering low- and moderate-income borrowers combined, the distribution of HMDA loans by borrower's income level is adequate overall.

The distribution of HMDA loans to low-income borrowers is considered good in 2021 (11.4 percent) and 2022 (9.1 percent), as the bank's performance greatly exceeds the performance of peer institutions in the assessment area (4.3 percent in 2021 and 5.0 percent in 2022). However, the bank's performance trails the percentage of families who are low income in both 2021 (22.7 percent) and 2022 (24.7 percent).

The bank originated 9.1 percent of its HMDA loans to moderate-income borrowers in 2021, which is below aggregate lending levels (15.0 percent) and below the demographic figure (21.5 percent), reflecting adequate performance. Similar to the bank's performance in its Golden Triangle assessment area, while the gap between the bank's performance and the demographic figure is large, a significant portion of borrowers in this demographic are unlikely to qualify for a home mortgage loan given the overall poverty level of 18.3 percent in the assessment area. This conclusion is further supported by a community contact statement that indicated increasing housing values have put home purchases out of reach for many LMI residents.

Similarly, the bank's level of lending to moderate-income borrowers in 2022 (11.4 percent) is below aggregate (20.0 percent) and demographic levels (17.0 percent) and, thus, is considered poor.

Small Business

In 2022, the bank originated 85.4 percent of its small business loans to businesses with annual revenues of $1 million or less, which substantially exceeded aggregate lending levels (58.7 percent) and was in line with the demographic figure (89.9 percent), reflecting excellent performance. Therefore, the overall distribution of small business loans by business revenue profile is excellent.

Geographic Distribution of Loans

In the bank's East Central assessment area, there were no low-income census tracts in 2021, and therefore, performance conclusions for that year were based solely on the bank's performance in moderate-income census tracts. Following changes to census data in 2022, one tract was re-designated as low-income, and the bank's performance in that tract was rated along with the bank's performance in moderate-income geographies.

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

HMDA Lending

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

In 2022, the bank did not originate any HMDA loans in the assessment area's only low-income census tract. However, the low level of aggregate lending (2.9 percent) and owner-occupied housing (2.0 percent) in the low-income census tract indicates limited opportunities for HMDA lending. Therefore, the bank's performance is considered adequate.

In 2021, the bank originated 4.5 percent of HMDA loans in moderate-income geographies in the assessment area, which was below the aggregate performance (14.3 percent) and the demographic levels (13.0 percent), reflecting poor performance. In 2022, the percentage of HMDA loans in moderate-income geographies increased to 15.9 percent, which exceeded aggregate lending levels (14.9 percent) and approached the demographic figure (16.7 percent), and is considered good.

Small Business Lending

When considering low- and moderate-income geographies combined, the bank's distribution of small business loans in LMI geographies is good overall.

Similar to the bank's HMDA lending performance, the bank originated no small business loans in the assessment area's only low-income census tract in 2022; however, small business lending is challenging in this tract, as evidenced by the low level of aggregate lending (2.7 percent) and the percentage of small businesses in the low-income census tract (4.9 percent), thus reflecting adequate performance. The bank originated 29.3 percent of small business loans in moderate-income geographies in 2022, which exceeds both aggregate performance (20.2 percent) and the demographic levels (17.0 percent), reflecting excellent performance.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 60.0 percent of all assessment area census tracts and 50.0 percent of all LMI geographies. In 2022, the bank's loan dispersion improved slightly, with lending activity in 71.4 percent of census tracts in the assessment area and 40.0 percent of LMI geographies in the assessment area. The dispersion of the bank's loans was consistent with its branch structure in the assessment area, with loan activity slightly more concentrated in areas within close proximity to a branch location. This dispersion supports the conclusion that the geographic distribution of loans is adequate overall.

Community Development Lending Activity

The bank made an adequate level of community development loans in the East Central assessment area. During the review period, the bank made nine community development loans totaling $682,649. These community development loans supported the revitalization and stabilization of LMI areas.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants within the East Central assessment area. During the review period, the bank made two investments totaling $2.0 million in newly qualified investments, including $1.3 million in MBS investments, during the current review period. These investments support permanent financing for affordable housing loans for LMI individuals in the assessment area. The total dollar volume of the bank's investments helps address the need for affordable housing noted by the community contact.

In addition to these investments, the bank also made 14 donations totaling $13,200 to various organizations throughout the assessment area. These donations predominantly benefited school districts with a majority of students from LMI families and nonprofit organizations providing community services to LMI families.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the East Central assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Relatively High Level

Accessibility of Delivery Systems

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

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	3	0	0	1	**4**
	0.0%	75.0%	0.0%	0.0%	25.0%	**100%**
Census Tracts	4.8%	19.0%	61.9%	9.5%	4.8%	**100%**
Household Population	3.1%	16.9%	66.3%	8.4%	5.2%	**100%**

The bank operates three branches in LMI census tracts, representing 75.0 percent of total branches in the assessment area. By comparison, 23.8 percent of census tracts in the assessment area are LMI, and 20.0 percent of the households reside in those census tracts. As a result, the bank's service delivery systems are readily accessible in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices in this assessment area during the review period. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. All branches in the assessment area are open Monday through Friday. While there are slight variations in lobby hours, the offering of extended hours, and the availability of drive-through teller services, the variations do not explicitly inconvenience low- or moderate-income geographies or individuals. Lastly, all offices in the assessment area offer the same deposit and loan products, and lenders are equally dispersed throughout the bank's branch locations in the assessment area.

Community Development Services

The bank provides a relatively high level of community development services in the assessment area. During the review period, bank employees provided 82 community development services to ten different organizations in the East Central assessment area, totaling 262 hours. Most notably, these efforts consisted of 57 community development services where bank employees provided financial literacy efforts at several schools with a majority of students qualifying for free and reduced lunch benefits, which was noted as a need by the community contact.

JACKSON, MISSISSIPPI
METROPOLITAN STATISTICAL AREA
(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSON ASSESSMENT AREA

BankFirst operates three branches in this assessment area, which includes the entireties of Hinds, Madison, and Rankin counties, three of the seven counties in the Jackson, Mississippi MSA. The bank did not open or close any branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	17	28	40	43	2	**130**
	13.1%	21.5%	30.8%	33.1%	1.5%	**100%**
Family Population	9,565	21,466	43,875	47,724	207	**122,837**
	7.8%	17.5%	35.7%	38.9%	0.2%	**100%**
Household Population	17,607	35,963	63,526	67,303	1,252	**185,651**
	9.5%	19.4%	34.2%	36.3%	0.7%	**100%**
Business Institutions	1,744	4,779	7,678	10,102	894	**25,197**
	6.9%	19.0%	30.5%	40.1%	3.5%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	25,734	19,063	23,785	54,255	**122,837**
	21.0%	15.5%	19.4%	44.2%	**100%**
Household Population	42,263	28,679	31,371	83,338	**185,651**
	22.8%	15.5%	16.9%	44.9%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSON ASSESSMENT AREA

LENDING TEST

BankFirst's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Mississippi, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

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

During the review period, the bank made four community development loans totaling $6.0 million. Three noteworthy loans totaling $4.8 million qualified for a community development purpose of affordable housing, financing three affordable housing complexes in the assessment area.

INVESTMENT TEST

During the review period, the bank made three community development investments totaling $1.0 million, all of which were made in the current period. Furthermore, 36 donations were made totaling $28,035. This performance is consistent with the overall adequate level of investments and grants made by the bank in the Mississippi rated area.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the Golden Triangle and East Central assessment areas, as shown in the table below.

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

During the review period, bank employees provided 125 services to 19 organizations, totaling 390 hours. This is in line with peer performance and consistent with the bank's relatively high performance in the Mississippi rated area.

HATTIESBURG, MISSISSIPPI
METROPOLITAN STATISTICAL AREA
(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HATTIESBURG ASSESSMENT AREA

BankFirst operates one branch in this assessment area, which includes the entireties of Lamar and Forrest counties, two of four counties in the Hattiesburg, Mississippi MSA. The bank did not open or close any branches in this assessment area during the review period. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	Low-	Moderate-	Middle-	Upper-	Unknown-	TOTAL
Census Tracts	0	9	13	13	3	**38**
	0.0%	23.7%	34.2%	34.2%	7.9%	**100%**
Family Population	0	5,613	10,884	15,948	1,458	**33,903**
	0.0%	16.6%	32.1%	47.0%	4.3%	**100%**
Household Population	0	10,527	16,165	21,172	21,172	**50,583**
	0.0%	20.8%	32.0%	41.9%	5.4%	**100%**
Business Institutions	0	1,245	1,594	2,196	320	**5,355**
	0.0%	23.2%	29.8%	41.0%	6.0%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	Low-	Moderate-	Middle-	Upper-	TOTAL
Family Population	7,528	4,761	6,608	15,006	**33,903**
	22.2%	14.0%	19.5%	44.3%	**100%**
Household Population	13,474	6,579	8,755	21,775	**50,583**
	26.6%	13.0%	17.3%	43.1%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HATTIESBURG ASSESSMENT AREA

LENDING TEST

BankFirst's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Mississippi, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

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

During the review period, the bank made five community development loans totaling $6.3 million, qualifying for a community development purpose of affordable housing. One noteworthy loan totaling $3.4 million financed the purchase of an 80-unit affordable housing complex in a low-income census tract.

INVESTMENT TEST

During the review period, the bank made one current-period community development investment totaling $250,000. Furthermore, four donations were made totaling $4,156. This performance falls below the adequate level of investments and grants made by the bank in the Mississippi rated area.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the state of Mississippi, as shown in the table below.

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

During the review period, bank employees provided 36 services to five organizations totaling 83 hours. This falls below the bank's relatively high performance in the Mississippi rated area.

LEE COUNTY, MISSISSIPPI NONMETROPOLITAN STATISTICAL AREA

(Limited-Scope Review)

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

BankFirst operates one branch in this assessment area, which includes the entirety of Lee County, Mississippi. This branch was opened in 2022 after the bank converted its LPO to a full-service branch. The tables below detail key demographics relating to this assessment area.

Assessment Area Demographics by Geography Income Level						
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	**TOTAL**
Census Tracts	0	0	10	12	1	**23**
	0.0%	0.0%	43.5%	52.2%	4.3%	**100%**
Family Population	0	0	8,605	12,815	0	**21,420**
	0.0%	0.0%	40.2%	59.8%	0.0%	**100%**
Household Population	0	0	14,048	17,818	0	**31,866**
	0.0%	0.0%	44.1%	55.9%	0.0%	**100%**
Business Institutions	0	0	1,913	1,684	14	**3,611**
	0.0%	0.0%	53.0%	46.6%	0.4%	**100%**

Assessment Area Demographics by Population Income Level					
Dataset	**Low-**	**Moderate-**	**Middle-**	**Upper-**	**TOTAL**
Family Population	3,268	2,530	3,935	11,687	**21,420**
	15.3%	11.8%	18.4%	54.6%	**100%**
Household Population	5,954	3,752	4,548	17,612	**31,866**
	18.7%	11.8%	14.3%	55.3%	**100%**

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE LEE COUNTY ASSESSMENT AREA

LENDING TEST

BankFirst's overall lending performance in this assessment area is consistent with Lending Test performance in the state of Mississippi, as displayed in the table below. For more detailed information related to Lending Test performance, see Appendix C.

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

During the review period, the bank did not make any community development loans in the Lee County assessment area.

INVESTMENT TEST

During the review period, the bank made two current-period community development investments totaling $275,000. Furthermore, 11 donations were made totaling $3,700. This performance falls below the adequate level of investments and grants made by the bank in the Golden Triangle and East Central full-scope assessment areas.

SERVICE TEST

The bank's Service Test performance in this assessment area is consistent with the service performance in the state of Mississippi, as shown in the table below.

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

During the review period, bank employees provided 64 services to seven organizations. This performance exceeds the performance of peers in the area and the relatively high level of services performed in the full-scope Golden Triangle and East Central assessment areas.

ALABAMA

CRA RATING FOR ALABAMA: **SATISFACTORY**
The Lending Test is rated: **High Satisfactory**
The Investment Test is rated: **Low Satisfactory**
The Service Test is rated: **High Satisfactory**

The major factors supporting the rating for the state of Alabama include the following:

- The bank's lending levels reflect adequate responsiveness to the credit needs of its assessment areas.

- The distribution of loans by borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes.

- The geographic distribution of loans reflects excellent penetration throughout the assessment areas.

- The bank makes an adequate level of community development loans.

- The bank makes an adequate level of qualified community development investments and grants and is rarely in the leadership position.

- Service delivery systems are accessible to the bank's assessment areas, and the bank's record of opening and closing branches generally has not adversely affected the accessibility of its service delivery systems.

- The bank is a leader in providing community development services throughout the Alabama assessment areas.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of Alabama assessment areas are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. In all assessment areas, HMDA lending received slightly more weight than small business lending in the analysis.

The bank operates two assessment areas throughout Alabama, located in one noncontiguous nonMSA and one MSA portion of the state. Both of the bank's Alabama assessment areas were reviewed under full-scope procedures. When considering branch structure and loan/deposit activity, CRA performance in the Northwest Alabama nonMSA assessment area carried the greatest weight when forming overall state conclusions.

To augment the evaluation of the full-scope review assessment areas in Alabama, three community contact interviews were referenced. These interviews were used to ascertain specific community credit needs and provided context with which to evaluate the bank's responsiveness to these needs.

Details from these interviews are included in the *Description of Institution's Operations* sections, as applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

The following table gives additional detail regarding the bank's operations within Alabama.

Assessment Area	Offices		Deposits As of June 30, 2022		Review Procedures
	#	%	$	%	
Northwest Alabama	11	68.8%	$489,689	58.2%	Full-Scope
Tuscaloosa	5	31.2%	$351,512	41.8%	Full-Scope
TOTAL	**16**	**100%**	**$841,201**	**100%**	**2 Full-Scope**

The bank operates 16 branches (50 percent of total branches) throughout the two CRA assessment areas in the state of Alabama. Total deposits in the state total $841.2 million, which represents 46.8 percent of total bank deposits. In addition to the branch locations shown in the table above, the bank also operates one LPO location, located outside the bank's assessment areas in Birmingham, Alabama, and one stand-alone, full-service ATM. The bank's operations in the state are concentrated in the Northwest Alabama assessment area, which carried the greatest weight toward determining statewide ratings. During the review period, the bank closed one branch and opened two branches in the Northwest Alabama assessment area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The bank's performance under the Lending Test in Alabama is rated high satisfactory. The rating reflects performance under the following criteria applicable to large banks.

Lending Test Summary	
Lending Activity	Adequate
Borrower Distribution	Good
Geographic Distribution	Excellent
Community Development Loans	Adequate Level
OVERALL	**HIGH SATISFACTORY**

Lending Activity

Overall, lending levels reflect adequate responsiveness to the credit needs of the bank's combined assessment areas based on loan activity reviewed under the Lending Test. The tables below display the bank's lending activity performance by assessment area.

Full-Scope Assessment Areas	Lending Activity
Northwest Alabama	Poor
Tuscaloosa	Good
OVERALL	**ADEQUATE**

A more detailed analysis of these factors is described in sections for each assessment area that was reviewed using full-scope procedures.

Borrower and Geographic Distribution

Overall, performance by borrower's income or revenue profile is good, as shown in the following table.

Full-Scope Assessment Areas	Loan Distribution by Borrower's Profile
Northwest Alabama	Good
Tuscaloosa	Adequate
OVERALL	**GOOD**

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

Full-Scope Assessment Areas	Geographic Distribution of Loans
Northwest Alabama	Excellent
Tuscaloosa	Good
OVERALL	**EXCELLENT**

Community Development Lending Activity

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

Full-Scope Assessment Areas	Community Development Lending
Northwest Alabama	Adequate
Tuscaloosa	Adequate
OVERALL	**ADEQUATE LEVEL**

During the review period, the bank originated eight qualifying community development loans inside its assessment areas, totaling $8.3 million.

INVESTMENT TEST

The bank's performance under the Investment Test is rated low satisfactory. Overall, the bank made an adequate level of qualified community development investments and grants. The investments and grants exhibit adequate responsiveness to credit and community development needs, and the bank is rarely in a leadership position. The bank makes occasional use of innovative and/or complex investments to support community development initiatives. The following tables display investment and grant activity performance for each assessment area.

Full-Scope Assessment Areas	Investment and Grant Activity
Northwest Alabama	Adequate
Tuscaloosa	Adequate
OVERALL	**ADEQUATE LEVEL**

During the review period, the bank made three investments totaling $1.1 million, including one investment made in the previous period totaling $255,409. In addition, the bank made 106 donations totaling $40,778. The bank's investment activity consisted of municipal bonds benefiting schools or projects in LMI areas in the bank's assessment areas.

While not included in the totals above, the bank also made 25 investments totaling $9.4 million benefitting a broader statewide area. These investments consist primarily of school and municipal bonds, along with one MSB to promote affordable housing in the state.

SERVICE TEST

The bank's performance under the Service Test is rated high satisfactory based on the criteria shown in the table below.

Service Test Summary	
Accessibility of Delivery Systems	Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader
OVERALL	**HIGH SATISFACTORY**

Accessibility of Delivery Systems

The bank's delivery systems are accessible to the geographies and individuals of different income levels in the bank's full-scope assessment areas, as shown in the following table.

Full-Scope Assessment Areas	Accessibility of Delivery Systems
Northwest NonMSA Alabama	Reasonably Accessible
Tuscaloosa MSA	Readily Accessible
OVERALL	**ACCESSIBLE**

The bank currently operates 2 of its 16 branches (12.5 percent) in LMI geographies. These branches are in the Tuscaloosa assessment area. In addition to branch locations, consideration was also given to the distribution of stand-alone ATMs and the availability of alternative delivery systems, such as online and mobile banking.

Changes in Branch Locations

The bank's record of opening and closing branches has generally not adversely affected the accessibility of the bank's delivery systems, particularly to LMI geographies and individuals.

Full-Scope Assessment Areas	Changes in Branch Locations
Northwest Alabama	Generally Not Adversely Affected
Tuscaloosa	Not Adversely Affected
OVERALL	**GENERALLY NOT ADVERSELY AFFECTED**

The bank closed one branch in a moderate-income census tract and opened two branches in middle-income census tracts in its Northwest Alabama assessment area, but these changes generally did not adversely affect the accessibility of delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

The bank's hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly LMI geographies or individuals. The bank's branch locations are generally open between 8:00 a.m. and 4:00 p.m., with many locations offering extended hours and drive-through services. While the bank's hours vary slightly between assessment areas, they do not vary in a way that inconveniences certain portions of its assessment areas. The bank offers the same suite of products throughout its entire branch network.

Full-Scope Assessment Areas	Reasonableness of Business Hours and Services
Northwest Alabama	Do Not Vary in a Way That Inconveniences
Tuscaloosa	Do Not Vary in a Way That Inconveniences
OVERALL	**DO NOT VARY IN A WAY THAT INCONVENIENCES**

Community Development Services

The bank is a leader in providing community development services, as shown below.

Full-Scope Assessment Areas	Community Development Services
Northwest Alabama	Leader
Tuscaloosa	Leader
OVERALL	**Leader**

In total, bank employees provided 300 community development services to 44 different organizations, totaling 967 hours. Similar to Mississippi, the majority of these services consisted of staff teaching financial literacy courses at local elementary, middle, and high schools with a majority of students qualifying for free and reduced lunch benefits as part of the bank's community development service campaign. Overall, this level of community development services exceeds the bank's performance at the previous evaluation.

NORTHWEST ALABAMA NONMETROPOLITAN STATISTICAL AREA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTHWEST ALABAMA ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates 11 (34.4 percent) of its total branches in the Northwest Alabama assessment area.

Branch Locations by Census Tract Income Level			
Low-Income	**Moderate-Income**	**Middle-Income**	**Upper-Income**
0	0	10	1

One of these offices contains a full-service ATM, and six of these offices contain a cash-dispensing-only ATM. During the review period, the bank opened two branches and closed one branch in this assessment area. Based on the bank's branch network and other service delivery systems, the bank is positioned to deliver financial services to the entire assessment area.

General Demographics

The assessment area is comprised of Winston, Walker, Marion, and Fayette counties in nonMSA Alabama. The assessment area has a total population of 134,544; Walker County is the most populous county in the assessment area, with a population of 65,342. Most of the assessment area is rural, with some small cities serving as regional hubs, such as Jasper in Walker County.

The assessment area hosts 16 FDIC-insured depository institutions that operate 43 branches total. BankFirst ranks second by deposit market share (17.5 percent) and ranks first by total branches in the assessment area. Deposits held in the Northwest Alabama assessment area represent 27.2 percent of total bank deposits.

In line with its extensive branch presence, the bank also plays an important role in meeting the credit needs of the assessment area. An analysis of 2022 HMDA-reportable loans shows that there were 230 entities with lending activity in the assessment area, of which BankFirst ranked second with 5.0 percent of all HMDA loans. The bank ranked fourth out of 68 institutions with CRA lending activity in the assessment area with 6.9 percent of all CRA loans.

The assessment area credit needs include both consumer and commercial loan products. Community contacts familiar with the assessment area pointed to a need for affordable housing construction loans and rural entrepreneurship and financial literacy training initiatives. Additionally, both contacts noted that community development opportunities are available for financial institutions through partnerships with local nonprofit agencies.

Income and Wealth Demographics

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

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	0	0.0%	0	0.0%
Moderate	5	11.4%	3,365	9.3%
Middle	34	77.3%	29,065	79.9%
Upper	5	11.4%	3,944	10.8%
Unknown	0	0.0%	0	0.0%
TOTAL	**44**	**100%**	**36,374**	**100%**

As shown above, 11.4 percent of the census tracts in the assessment area are moderate income geographies, and 9.3 percent of the family population resides in these tracts. These LMI geographies are dispersed across Marion, Winston, and Walker counties.

A substantial majority of the assessment area census tracts and family population are middle income. Despite being middle-income geographies, seven census tracts in Marion and Fayette counties were designated as underserved due to their remote rural location in Marion County during the review period.

Based on 2020 ACS data, the median family income for the assessment area was $55,748. At the same time, the median family income for nonMSA Alabama was $55,960. More recently, the FFIEC estimates the 2021 and 2022 median family income for nonMSA Alabama to be $53,400 and $63,200, respectively. The following table displays population percentages of assessment area families by income level compared to the nonMSA Alabama family populations.

Family Population by Income Level				
	Assessment Area		NonMSA Alabama	
Low	7,673	21.1%	66,320	22.1%
Moderate	6,240	17.2%	52,313	17.4%
Middle	7,654	21.0%	57,864	19.3%
Upper	14,807	40.7%	123,581	41.2%
TOTAL	**36,374**	**100%**	**300,078**	**100%**

As shown in the table above, 38.3 percent of families within the assessment area were considered LMI, which is slightly below the LMI family percentages of 39.5 percent in nonMSA Alabama. Additionally, the percentage of families living below the poverty level in the assessment area (12.5 percent) falls below the level in nonMSA Alabama (14.1 percent). Considering these factors, the assessment area appears slightly more affluent than nonMSA Alabama.

Housing Demographics

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

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)	Housing Cost Burden
Northwest Alabama	$98,442	44.0%	$583	16.2%
NonMSA Alabama	$108,930	39.0%	$643	16.3%

Based on the data in the table above, homeownership is more affordable in the assessment area than statewide nonMSA. Median housing costs and median rental costs are lower in the assessment area than statewide nonMSA Alabama. Additionally, the assessment area has a higher affordability ratio compared to statewide nonMSA Alabama. Within the assessment area, homeownership is most affordable in Winston County based on an affordability ratio of 47.0 percent, while Walker County is least affordable with an affordability ratio of 41.8 percent.

Industry and Employment Demographics

The assessment area supports a relatively homogenous business community, focused primarily on manufacturing. County business patterns indicate that there are 41,383 paid employees in the assessment area in both private and government sectors. By percentage of employees, the three largest job categories in the assessment area are manufacturing (28.9 percent), government industries (17.7 percent), and retail trade (14.0 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area as a whole and nonMSA Alabama.

Unemployment Levels			
Dataset	Time Period (Annual Average)		
	2020	2021	2022 YTD (January – August)
Northwest Alabama	5.9%	3.2%	2.7%
NonMSA Alabama	6.4%	3.5%	3.0%

As shown in the table above, unemployment rates in the assessment area were slightly below nonMSA Alabama figures over the review period. Both the assessment area and nonMSA Alabama saw their unemployment rates increase in 2020, which was likely a result of COVID-19-related disruption of local and state economies. However, the statewide nonMSA figure saw a more significant increase when compared to the assessment area. Unemployment rates were generally highest in Walker County and lowest in Winston County during the review period.

Community Contact Information

Two community contact interviews were completed as part of this evaluation. One interview was with an individual specializing in small business development, and one was with an individual working for a community services agency. Both community contact interviewees categorized the local economy as relatively homogenous. One contact emphasized the strong manufacturing

presence in the area; however, the small business development contact also noted low labor force participation rates and limited workforce education as barriers to economic growth in the area. Additionally, one contact identified a shortage of affordable housing stock in the area for low-income borrowers. Both contacts noted opportunities for more involvement with local economic development and community service organizations to alleviate these barriers. One contact identified community development lending and financial literacy programs as the most impactful within the assessment area. The second contact supplemented this list with a need for engagement in economic development programs specific to the credit needs of the community, including rural entrepreneurship and workforce education.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NORTHWEST ALABAMA ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Northwest Alabama assessment area.

Lending Test Summary	
Lending Activity	Poor
Borrower Distribution	Good
Geographic Distribution	Excellent
Community Development Loans	Adequate

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	25	7.0%	1,349	4.3%
Home Purchase	56	15.8%	7,941	25.4%
Refinancing	170	47.9%	15,763	50.5%
Other Purpose LOC	3	0.8%	110	0.3%
Other Purpose Closed/Exempt	4	1.1%	205	0.7%
Total HMDA	**258**	**72.7%**	**25,368**	**81.3%**
Small Business	97	27.3%	5,852	18.7%
TOTAL LOANS	**355**	**100.0%**	**31,220**	**100.0%**

The bank's lending activity in the assessment area represents 14.9 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, the bank operates 34.4 percent of its total branches and holds 27.2 percent of total bank deposits in the assessment area. In 2022, the bank ranked second out of 230 lenders in HMDA originations and fourth out of 68 lenders in CRA originations in the assessment area. Given the level of the bank's lending activity compared to its branch presence and deposit volume, the bank's lending activity levels reflect poor responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is good in the Northwest Alabama assessment area.

HMDA Lending

The bank's overall HMDA lending is considered good.

The bank originated 6.5 percent of its HMDA loans to low-income borrowers in 2021, which exceeds aggregate lending levels (3.5 percent) and trails the percentage of families who are low income (21.7 percent), ultimately reflecting good performance. The bank's level of lending to low-income borrowers in 2022 increased to 20.1 percent, greatly exceeding aggregate lending levels (6.9 percent) and falling in line with demographic levels (21.1 percent) and, thus, is considered excellent.

In 2021, the bank originated 10.5 percent of its HMDA loans to moderate-income borrowers, which is approaching the aggregate lending level (12.8 percent) but is below the demographic figure (19.0 percent) and is considered adequate. In 2022, the bank made 14.9 percent of its HMDA loans to moderate-income borrowers, which is comparable to both the aggregate lending level (17.7 percent) and the demographic figure (17.2 percent) and is considered good.

Small Business

In 2022, the bank originated 88.7 percent of its small business loans to businesses with annual revenues of $1 million or less, which substantially exceeded aggregate lending levels (48.8 percent) and matches the demographic figure (88.7 percent), reflecting excellent performance. Therefore, the overall distribution of small business loans by business revenue profile is excellent.

Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is excellent. As previously mentioned, the assessment area has no low-income census tracts in both 2021 and 2022. Therefore, only the bank's performance in moderate-income census tracts was considered.

HMDA Lending

The bank's distribution of HMDA loans reflects excellent penetration among geographies of different income levels, particularly moderate-income geographies.

In 2021, the bank originated 23.4 percent of HMDA loans in moderate-income geographies in the assessment area, which greatly exceeded the aggregate performance (9.4 percent) and the demographic levels (14.7 percent), reflecting excellent performance. In 2022, the percentage of HMDA loans in moderate-income geographies declined to 11.9 percent but continued to exceed both aggregate lending levels (6.6 percent) and the demographic figure (9.3 percent) and is considered excellent.

Small Business Lending

The percentage of small business loans originated in moderate-income census tracts in 2022 (11.3 percent) exceeded aggregate lending levels (8.1 percent) and the demographic figure (6.8 percent)

for moderate-income geographies This reflects excellent performance in moderate-income geographies and in the bank's distribution of small business loans overall.

An analysis of the dispersion of both loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 47.4 percent of all assessment area census tracts and 80.0 percent of all LMI geographies. In 2022, the bank's lending activity increased to 50.0 percent of census tracts in the assessment area and 80.0 percent of LMI geographies. This dispersion supports the conclusion that the geographic distribution of loans is excellent overall.

Community Development Lending Activity

The bank made an adequate level of community development loans in the Northwest Alabama assessment area. During the review period, the bank made two community development loans totaling $2.1 million. One loan supported the community service purpose by financing expenses at a local school with a majority of students qualifying for free and reduced lunch benefits. The second loan qualified as revitalization/stabilization of LMI geographies through the creation of jobs within a certified HUBZone.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants within the Northwest Alabama assessment area. During the review period, the bank made two investments totaling $755,409, one of which was made prior to the review period still outstanding totaling $255,409. Both investments were bonds to improve a local school district with a majority of students coming from LMI families.

In addition to these investments, the bank also made 56 donations totaling $14,253 to various organizations throughout the assessment area. These donations predominantly benefited school districts with a majority of students from LMI families and nonprofit organizations providing community services to LMI families.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Northwest Alabama assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Reasonably Accessible
Changes in Branch Locations	Generally Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

The bank operates 11 branches in the Northwest Alabama assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

Branch Distribution by Geography Income Level						
Dataset	**Geography Income Level**					**TOTAL**
	Low-	**Moderate-**	**Middle-**	**Upper-**	**Unknown-**	
Branches	0	0	10	1	0	**11**
	0.0%	0.0%	90.9%	9.1%	0.0%	**100%**
Census Tracts	0.0%	11.4%	77.3%	11.4%	0.0%	**100%**
Household Population	0.0%	9.1%	79.5%	11.4%	0.0%	**100%**

As shown in the previous table, none of the bank's offices are in LMI geographies. The majority of census tracts (77.3 percent) and households (79.5 percent) are located in middle-income census tracts, of which the bank proportionally has 90.9 percent of its offices, including one underserved middle-income census tract. There are no low-income census tracts within the bank's assessment area, which contains a limited proportion of moderate-income census tracts (11.4 percent) and households (9.1 percent). Additionally, the bank offers access to mobile and online banking to all customers in the assessment area. As a result, the bank's service delivery systems are reasonably accessible in the assessment area.

Changes in Branch Locations

During the review period, the bank opened two branch locations in middle-income census tracts. The bank closed one branch location in a moderate-income census tract, which represented the bank's only branch in LMI geographies in the assessment area. At the time of the branch's closing in 2021, this was located in a middle-income census tract but was reclassified as moderate-income in 2022. As a result, the bank's record of opening and closing offices in this assessment area has generally not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. All 11 of the bank's branches are open Monday through Friday (typically from 8:30 a.m. to 4:30 p.m.), and most locations offer extended drive-through hours until 5:00 p.m. on Friday. Lastly, all offices in the assessment area offer the same deposit and loan products, and lenders are equally dispersed throughout the bank's branch locations in the assessment area.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 164 community development services to 20 different organizations in the Northwest Alabama assessment area, totaling 545 hours. Most notably, the bank's employees provided 127 community development services in the assessment area through financial literacy efforts at several schools with a majority of students from LMI families. Additionally, seven bank employees served on the board and provided technical assistance to eight separate organizations that facilitate a variety of community service and economic development efforts within the assessment area.

TUSCALOOSA, ALABAMA
METROPOLITAN STATISTICAL AREA
(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TUSCALOOSA ASSESSMENT AREA

Bank Structure

As shown in the table below, the bank operates five (15.6 percent) of its total branches in the Tuscaloosa assessment area.

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

Each of these offices contains an ATM, two of which are full service. During the review period, the bank did not open or close any branches in this assessment area. Based on the bank's branch network and other service delivery systems, the bank is positioned to deliver financial services to the entire assessment area.

General Demographics

This assessment area is composed of the entireties of Tuscaloosa and Pickens counties, two of the four counties in the Tuscaloosa, Alabama MSA. According to 2020 ACS data, the assessment area population is 246,159, which is heavily concentrated in Tuscaloosa County (227,036). Located in Tuscaloosa County is the University of Alabama, with a total student enrollment of 38,644 as of 2022.

The banking industry in the Tuscaloosa assessment area is competitive. Of the 21 FDIC-insured depository institutions with a branch presence in this assessment area, the bank ranked sixth in deposit market share, encompassing 6.8 percent of total deposit dollars. While 21 depository institutions operate a branch in the assessment area, a much higher number of institutions reported loan activity in the assessment area. An analysis of 2022 HMDA-reportable loans shows that 304 institutions had loan activity in the assessment area, of which the bank ranked sixth with 3.2 percent of total HMDA loans. The bank ranked seventh out of 85 institutions with CRA loan activity in the assessment area, accounting for 3.6 percent of total CRA loan activity.

As the assessment area covers a diverse metropolitan area, credit needs are varied and include a blend of credit products for individuals and businesses of various income/revenue levels. The community contact noted specific credit-related needs in the assessment area, including access to capital for small business start-ups and workforce development programs. The contact also indicated that there are ample opportunities to collaborate with local organizations on community development projects.

Income and Wealth Demographics

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

Assessment Area Demographics by Geography Income Level				
	Census Tracts		Family Population	
Low	5	7.7%	3,017	5.7%
Moderate	12	18.5%	7,786	14.6%
Middle	27	41.5%	23,271	43.7%
Upper	17	26.2%	17,583	33.0%
Unknown	4	6.2%	1,569	2.9%
TOTAL	**65**	**100%**	**53,226**	**100%**

As shown above, 26.2 percent of the census tracts in the assessment area are LMI geographies, but only 20.3 percent of the family population resides in these tracts. These LMI areas are concentrated in the city of Tuscaloosa in Tuscaloosa County.

Based on 2020 ACS data, the median family income for the assessment area was $69,564. At the same time, the median family income for the state of Alabama was $66,772. More recently, the FFIEC estimates the 2021 and 2022 median family income for the Tuscaloosa MSA as a whole to be $66,100 and $73,000, respectively. The following table displays population percentages of assessment area families by income level compared to the state of Alabama family populations.

Family Population by Income Level				
	Assessment Area		Alabama	
Low	12,104	22.7%	275,821	22.3%
Moderate	8,615	16.2%	212,313	17.2%
Middle	9,976	18.7%	240,271	19.5%
Upper	22,531	42.3%	506,147	41.0%
TOTAL	**53,226**	**100%**	**1,234,552**	**100%**

As shown in the table above, 38.9 percent of families within the assessment area were considered LMI, which is in line with the LMI family percentages of 39.5 percent in the state of Alabama. Similarly, the percentage of families living below the poverty level in the assessment area (11.9 percent) is comparable to the level in the state of Alabama (11.6 percent). Considering these factors, the assessment area appears to be of similar affluence as the state of Alabama.

Housing Demographics

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

Housing Demographics				
Dataset	Median Housing Value	Affordability Ratio	Median Gross Rent (monthly)	Housing Cost Burden
Tuscaloosa	$172,248	30.8%	$847	18.6%
Alabama	$149,600	34.8%	$811	16.8%

Based on the data in the table above, homeownership is less affordable in the assessment area than in the state of Alabama as a whole. While median family income levels in the assessment area are comparable to the statewide levels, median housing values are higher in the assessment area, resulting in a lower affordability ratio. There is also considerable difference between the two counties that comprise the Tuscaloosa assessment area. The median housing value ($179,000), median gross rent ($861), and affordability ratio (30.3 percent) indicate less affordability in Tuscaloosa County compared to the median housing value ($100,000), median gross rent ($468), and affordability ratio (40.3 percent) in Pickens County. While housing is more affordable in Pickens County compared to the state of Alabama ($149,600 median housing value, $811 median gross rent, and 34.8 percent affordability ratio), Tuscaloosa drives the overall affordability ratio of the assessment area, which indicates housing is less affordable than the state of Alabama. Thus, housing is less affordable in the assessment area than the state overall.

Industry and Employment Demographics

The assessment area supports a large and diverse business community, including a strong small business sector. County business patterns indicate that there are 96,257 paid employees in the assessment area in both private and government sectors. By percentage of employees, the three largest job categories in the assessment area are government industries (23.9 percent), manufacturing (18.3 percent), and retail trade (11.3 percent). The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Alabama.

Unemployment Levels			
Dataset	**Time Period (Annual Average)**		
	2020	**2021**	**2022 YTD (January – August)**
Tuscaloosa	7.3%	3.7%	2.9%
Alabama	6.5%	3.4%	2.9%

As shown in the table above, unemployment rates in the assessment area were slightly higher than statewide figures in 2020 and 2021 but match statewide unemployment in year-to-date 2022 data. Both the assessment area and the state of Alabama saw their unemployment rates increase in 2020, which was likely a result of COVID-19-related disruption of local and state economies. However, the assessment area figure saw a slightly greater increase in unemployment when compared to the statewide figure.

Community Contact Information

For the Tuscaloosa assessment area, one community contact interview was completed as part of this evaluation with an individual specializing in small business development. The community contact interviewee categorized current economic conditions as strong with noticeable growth over the past decade. The drivers of growth, as described by the contact, include a growing and diverse small business sector and an advanced manufacturing industry. Additionally, the population of the area has grown; however, the contact noted that the overall population has begun to skew younger due to the large student population at the University of Alabama. Per the contact, this has presented a barrier to attracting new businesses, as the job participation level is low given the number of

college students in the labor pool, which hinders the availability of human capital for incoming businesses.

When describing the credit needs of the assessment area, the contact described a need for greater access to capital, both for start-up ventures and to sustain and grow existing small businesses. Additionally, the contact noted the need for workforce development programs and affordable housing given the high level of poverty and low labor participation rate. The contact noted that the general banking needs of LMI people and small businesses were being met by local financial institutions through various means. This includes traditional delivery channels such as ATMs and mobile banking, as well as alternative financing options through private equity and regional commissioning organizations. Regarding the performance of local financial institutions, the contact noted that many banks are active and supportive of community development projects and noted there are opportunities for financial institutions to further collaborate with organizations in the area of small business development.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TUSCALOOSA ASSESSMENT AREA

LENDING TEST

The following table displays the bank's performance under the Lending Test in the Tuscaloosa assessment area.

Lending Test Summary	
Lending Activity	Good
Borrower Distribution	Adequate
Geographic Distribution	Good
Community Development Loans	Adequate

Lending Activity

The following table displays the combined 2021 and 2022 lending volume by number and dollar volume.

Summary of Lending Activity January 1, 2021 through December 31, 2022				
Loan Type	**#**	**%**	**$ (000s)**	**%**
Home Improvement	10	2.2%	767	0.7%
Home Purchase	155	33.5%	41,824	38.3%
Multifamily Housing	21	4.5%	19,095	17.5%
Refinancing	109	23.6%	17,839	16.3%
Other Purpose LOC	12	2.6%	1,100	1.0%
Other Purpose Closed/Exempt	6	1.3%	789	0.7%
Total HMDA	**313**	**67.7%**	**81,414**	**74.5%**
Small Business	149	32.3%	27,867	25.5%
TOTAL LOANS	**462**	**100.0%**	**109,281**	**100.0%**

The bank's lending activity in the assessment area represents 19.4 percent of total 2021 and 2022 HMDA and CRA loans. By comparison, the bank operates 15.6 percent of its total branches and holds 19.6 percent of total bank deposits in the assessment area. In 2022, the bank ranked sixth out of 304 lenders in HMDA originations and seventh out of 85 lenders in CRA originations in the assessment area. The bank's lending levels were in line with the share of deposits in the assessment area and slightly higher than the proportion of branches in the assessment area. Therefore, the bank's lending activity levels reflect good responsiveness to the credit needs of the assessment area.

Loan Distribution by Borrower's Profile

Overall, the bank's loan distribution by borrower's profile is adequate in the Tuscaloosa assessment area.

HMDA Lending

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

The bank's performance in making home mortgage loans to individuals of different income levels is adequate overall. The bank originated 4.0 percent of its HMDA loans to low-income borrowers in 2021, which is in line with aggregate lending levels (4.0 percent) and significantly trails the percentage of families who are low income (22.9 percent), reflecting adequate performance. Similarly, the bank's level of lending to low-income borrowers in 2022 (4.7 percent) is in line with aggregate performance (4.6 percent) and again significantly trails demographic levels (22.7 percent) and, thus, is considered adequate.

The bank originated 5.1 percent of its HMDA loans to moderate-income borrowers in 2021, which was below the performance of peer institutions in the assessment area (13.8 percent) and the percentage of assessment area families who are moderate income (15.3 percent). Therefore, the bank's performance is considered poor. In 2022, the bank's lending to moderate-income borrowers increased to 11.2 percent, which is approaching and compares more favorably to aggregate lending levels (16.4 percent) and the demographic figure (16.2 percent), reflecting adequate performance.

Small Business

In 2022, the bank originated 68.5 percent of its small business loans to businesses with annual revenues of $1 million or less, which exceeded aggregate lending levels (50.3 percent) but was below the demographic figure (91.0 percent), reflecting good performance. Therefore, the overall distribution of small business loans by business revenue profile is good.

Geographic Distribution of Loans

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

HMDA Lending

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

In 2021, the bank originated no HMDA loans in low-income census tracts, which is in line with the low level of aggregate lending (0.2 percent) and the percentage of owner-occupied housing in low-income census tracts (1.0 percent), thus reflecting adequate performance. In 2022, the percentage of HMDA loans in low-income geographies increased to 6.1 percent, which exceeds the aggregate lending levels (2.1 percent) and the demographic figure (4.0 percent) and is considered excellent.

The percentage of HMDA loans originated in moderate-income census tracts in 2021 (14.1 percent) exceeds aggregate lending levels (9.6 percent) and is slightly below the percentage of owner-occupied housing in low-income census tracts (17.5 percent), reflecting good performance. The bank's performance lending in moderate-income geographies in 2022 (8.9 percent) was in line with both the aggregate lending level (8.0 percent) and the demographic figure (11.8 percent), similarly reflecting good performance.

Small Business Lending

The percentage of small business loans originated in low-income census tracts in 2022 (6.0 percent) and moderate-income census tracts (19.5 percent) exceeds both the aggregate lending levels (4.8 percent in low-income census tracts and 13.4 percent in moderate-income census tracts) and the demographic figure for low- and moderate-income geographies (5.5 percent and 13.3 percent, respectively). This reflects excellent performance in both low- and moderate-income census tracts and for the bank's distribution of small business loans in LMI geographies overall.

An analysis of the dispersion of all three loan products throughout the assessment area did not reveal evidence of conspicuous lending gaps in LMI geographies. In 2021, the bank had loan activity in 67.3 percent of all assessment area census tracts and 50.0 percent of all LMI geographies. In 2022, the bank's performance greatly improved, with lending activity in 96.9 percent of census tracts in the assessment area and 88.2 percent of LMI geographies. This dispersion supports the conclusion that the geographic distribution of loans is good overall.

Community Development Lending Activity

The bank made an adequate level of community development loans in the Tuscaloosa assessment area. During the review period, the bank made six community development loans totaling $6.2 million. These community development loans supported various community development purposes, including economic development (two), community service (two), and revitalization and stabilization (two).

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants within the Tuscaloosa assessment area. During the review period, the bank made one newly qualified municipal bond totaling $325,000 to improve school districts in Tuscaloosa County with a majority of students coming from LMI families. In addition to these investments, the bank also made 50 donations totaling $26,525 to various organizations throughout the assessment area. These donations predominantly benefited school districts with a majority of students from LMI families and nonprofit organizations providing community services to LMI families.

SERVICE TEST

The following table displays the bank's performance under the Service Test in the Tuscaloosa assessment area.

Service Test Summary	
Accessibility of Delivery Systems	Readily Accessible
Changes in Branch Locations	Not Adversely Affected
Reasonableness of Business Hours and Services	Do Not Vary in a Way That Inconveniences
Community Development Services	Leader

Accessibility of Delivery Systems

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

Branch Distribution by Geography Income Level						
Dataset	Geography Income Level					TOTAL
	Low-	Moderate-	Middle-	Upper-	Unknown-	
Branches	0	2	2	1	0	**5**
	0.0%	40.0%	40.0%	20.0%	0.0%	**100%**
Census Tracts	7.7%	18.5%	41.5%	26.2%	6.2%	**100%**
Household Population	6.7%	14.9%	45.9%	28.7%	3.9%	**100%**

As shown in the previous table, two of the bank's offices are in LMI geographies, representing 40.0 percent of total branches in the assessment area. By comparison, 26.2 percent of census tracts in the assessment area are LMI, and 21.6 percent of the households reside in those census tracts. Additionally, the remaining three bank offices are located less than one mile from at minimum one LMI census tract. As a result, the bank's service delivery systems are readily accessible in the assessment area.

Changes in Branch Locations

The bank did not open or close any offices in this assessment area during the review period. As a result, the bank's record of opening and closing offices in this assessment area has not adversely affected the accessibility of delivery systems, particularly to LMI geographies and LMI individuals.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. The bank's branches in the assessment area generally maintain the same hours Monday through Friday, with extended hours

offered on Friday. In addition, all branches in the assessment area offer the same deposit and loan products, and lenders are equally dispersed throughout the bank's branch locations in the assessment area.

Community Development Services

The bank is a leader in providing community development services in the assessment area. During the review period, bank employees provided 136 community development services to 24 different organizations in the Tuscaloosa assessment area, totaling 421 hours. Most notably, nine bank employees served on the board and provided technical assistance to 17 separate community service and development organizations that support a variety of community development purposes throughout the assessment area. This made up 101 of the 136 community development services in the assessment area and totaled 260 of the 421 service hours.

SCOPE OF EXAMINATION TABLES

Scope of Examination	
TIME PERIOD REVIEWED	January 1, 2021 – December 31, 2022 for HMDA January 1, 2022 – December 31, 2022 for small business May 10, 2021 – October 29, 2023 for community development loans, investment, and service activities
FINANCIAL INSTITUTION BankFirst Financial Services Macon, Mississippi	**PRODUCTS REVIEWED** HMDA Small Business

AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
N/A	N/A	N/A

Assessment Area – Examination Scope Details					
Assessment Area	**Rated Area**	**# of Offices**	**Deposits $ (000s) (as of June 30, 2022)**	**Branches Visited**	**CRA Review Procedures**
Golden Triangle	Mississippi	7	$596,538	1	Full-Scope
East Central	Mississippi	4	$172,858	0	Full-Scope
Jackson	Mississippi	3	$182,582	0	Limited-Scope
Hattiesburg	Mississippi	1	$4,049	0	Limited-Scope
Lee County	Mississippi	1	$0	0	Limited-Scope
Northwest Alabama	Alabama	11	$489,689	0	Full-Scope
Tuscaloosa MSA	Alabama	5	$351,512	0	Full-Scope
OVERALL		**32**	**$1,797,228**	**1**	**4 Full-Scope**

SUMMARY OF STATE RATINGS

State	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Mississippi	High Satisfactory	Low Satisfactory	High Satisfactory	**Satisfactory**
Alabama	High Satisfactory	Low Satisfactory	High Satisfactory	**Satisfactory**

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

State	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Mississippi	9	3	4	16	**Satisfactory**
Alabama	9	3	4	16	**Satisfactory**

LENDING PERFORMANCE TABLES BY ASSESSMENT AREA

MISSISSIPPI

GOLDEN TRIANGLE ASSESSMENT AREA

Geographic Distribution of 2021 Home Mortgage Lending Assessment Area: Golden Triangle							
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	9	6.8%	3.2%	583	2.2%	1.8%	3.5%
	Moderate	10	7.6%	6.6%	661	2.5%	4.3%	12.0%
	Middle	58	43.9%	45.4%	11,415	42.6%	42.9%	50.7%
	Upper	55	41.7%	44.7%	14,141	52.8%	51.0%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**132**	**100.0%**	**100.0%**	**26,800**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	4	3.3%	1.8%	165	0.9%	1.5%	3.5%
	Moderate	8	6.6%	6.1%	589	3.1%	3.9%	12.0%
	Middle	65	53.3%	46.9%	8,521	45.3%	43.4%	50.7%
	Upper	45	36.9%	45.2%	9,527	50.7%	51.2%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**122**	**100.0%**	**100.0%**	**18,802**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	1.7%	0	0.0%	1.8%	3.5%
	Moderate	0	0.0%	10.3%	0	0.0%	3.3%	12.0%
	Middle	3	100.0%	50.0%	129	100.0%	49.9%	50.7%
	Upper	0	0.0%	37.9%	0	0.0%	45.0%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**129**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	1.0%	0	0.0%	0.3%	3.5%
	Moderate	0	0.0%	9.4%	0	0.0%	9.1%	12.0%
	Middle	0	0.0%	49.0%	0	0.0%	41.9%	50.7%
	Upper	0	0.0%	40.6%	0	0.0%	48.7%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	3.5%
	Moderate	1	50.0%	7.5%	84	36.2%	4.0%	12.0%
	Middle	0	0.0%	50.0%	0	0.0%	40.0%	50.7%
	Upper	1	50.0%	42.5%	148	63.8%	56.0%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**232**	**100.0%**	**100.0%**	**100.0%**

Product Type	Census Tract Income Level	Bank Loans #	Bank Loans #%	Aggregate HMDA Data #%	Bank Loans $	Bank Loans $%	Aggregate HMDA Data $ %	Owner-Occupied Units %
Purpose Not Applicable	Low	0	0.0%	3.7%	0	0.0%	2.8%	3.5%
	Moderate	0	0.0%	14.8%	0	0.0%	13.6%	12.0%
	Middle	0	0.0%	40.7%	0	0.0%	30.4%	50.7%
	Upper	0	0.0%	40.7%	0	0.0%	53.1%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	1	7.1%	9.1%	124	0.6%	2.0%	7.4%
	Moderate	0	0.0%	4.5%	0	0.0%	0.8%	13.6%
	Middle	7	50.0%	47.7%	13,170	65.6%	45.1%	54.3%
	Upper	6	42.9%	38.6%	6,784	33.8%	52.0%	24.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**14**	**100.0%**	**100.0%**	**20,078**	**100.0%**	**100.0%**	**100.0%**
Total	Low	14	5.1%	2.6%	872	1.3%	1.7%	3.5%
	Moderate	19	7.0%	6.5%	1,334	2.0%	3.9%	12.0%
	Middle	133	48.7%	46.2%	33,235	50.3%	43.2%	50.7%
	Upper	107	39.2%	44.6%	30,600	46.3%	51.2%	33.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**273**	**100.0%**	**100.0%**	**66,041**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Home Mortgage Lending Assessment Area: Golden Triangle								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	9	10.2%	4.4%	790	4.5%	2.1%	5.1%
	Moderate	6	6.8%	5.9%	1,149	6.6%	5.5%	12.0%
	Middle	29	33.0%	32.1%	5,064	29.0%	28.6%	37.4%
	Upper	40	45.5%	55.1%	10,168	58.2%	61.6%	43.6%
	Unknown	4	4.5%	2.5%	305	1.7%	2.2%	1.8%
	TOTAL	**88**	**100.0%**	**100.0%**	**17,476**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	9	9.6%	3.9%	576	3.3%	1.8%	5.1%
	Moderate	9	9.6%	9.3%	866	5.0%	7.5%	12.0%
	Middle	27	28.7%	33.2%	3,289	19.0%	30.2%	37.4%
	Upper	44	46.8%	51.3%	12,297	71.1%	59.1%	43.6%
	Unknown	5	5.3%	2.4%	276	1.6%	1.3%	1.8%
	TOTAL	**94**	**100.0%**	**100.0%**	**17,304**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	1	2.6%	4.3%	30	1.4%	2.2%	5.1%
	Moderate	2	5.1%	7.0%	45	2.1%	4.4%	12.0%
	Middle	16	41.0%	38.3%	971	45.2%	36.8%	37.4%
	Upper	18	46.2%	46.1%	1,054	49.1%	53.5%	43.6%
	Unknown	2	5.1%	4.3%	47	2.2%	3.1%	1.8%
	TOTAL	**39**	**100.0%**	**100.0%**	**2,147**	**100.0%**	**100.0%**	**100.0%**

		#	#%	%	$	$%	$%	%
Other Purpose LOC	Low	2	11.8%	5.0%	34	3.8%	2.6%	5.1%
	Moderate	0	0.0%	3.1%	0	0.0%	4.3%	12.0%
	Middle	3	17.6%	31.1%	89	10.1%	31.1%	37.4%
	Upper	12	70.6%	60.2%	762	86.1%	61.8%	43.6%
	Unknown	0	0.0%	0.6%	0	0.0%	0.2%	1.8%
	TOTAL	**17**	**100.0%**	**100.0%**	**885**	**100.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	2.4%	0	0.0%	0.3%	5.1%
	Moderate	0	0.0%	9.5%	0	0.0%	8.7%	12.0%
	Middle	1	33.3%	28.6%	339	52.6%	35.2%	37.4%
	Upper	2	66.7%	54.8%	305	47.4%	53.2%	43.6%
	Unknown	0	0.0%	4.8%	0	0.0%	2.6%	1.8%
	TOTAL	**3**	**100.0%**	**100.0%**	**644**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	6.9%	0	0.0%	4.8%	5.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	12.0%
	Middle	0	0.0%	55.2%	0	0.0%	52.2%	37.4%
	Upper	0	0.0%	37.9%	0	0.0%	43.0%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	1.8%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	1	8.3%	8.3%	114	2.6%	0.9%	12.5%
	Moderate	1	8.3%	8.3%	91	2.1%	5.8%	5.0%
	Middle	7	58.3%	47.2%	2,174	49.6%	36.6%	32.5%
	Upper	2	16.7%	27.8%	1,693	38.6%	54.2%	48.8%
	Unknown	1	8.3%	8.3%	312	7.1%	2.4%	1.2%
	TOTAL	**12**	**100.0%**	**100.0%**	**4,384**	**100.0%**	**100.0%**	**100.0%**
Total	Low	22	8.7%	4.3%	1,544	3.6%	2.0%	5.1%
	Moderate	18	7.1%	6.7%	2,151	5.0%	5.9%	12.0%
	Middle	83	32.8%	33.0%	11,926	27.8%	29.9%	37.4%
	Upper	118	46.6%	53.4%	26,279	61.3%	60.2%	43.6%
	Unknown	12	4.7%	2.5%	940	2.2%	2.0%	1.8%
	TOTAL	**253**	**100.0%**	**100.0%**	**42,840**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Small Business Lending Assessment Area: Golden Triangle						
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**#%**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	19	4.8%	6.2%	$2,967	8.6%	4.6%	8.6%
Moderate	50	12.6%	9.4%	$4,681	13.5%	8.9%	9.2%
Middle	194	49.0%	40.6%	$16,882	48.8%	45.5%	43.0%
Upper	121	30.6%	39.8%	$9,387	27.2%	38.8%	35.6%
Unknown	12	3.0%	4.0%	$653	1.9%	2.1%	3.7%
TOTAL	**396**	**100.0%**	**100.0%**	**$34,570**	**100.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
Product Type		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	1	0.8%	2.3%	120	0.4%	0.9%	24.5%
	Moderate	8	6.1%	12.7%	783	2.9%	7.0%	12.9%
	Middle	11	8.3%	17.9%	1,621	6.0%	13.7%	17.0%
	Upper	84	63.6%	49.6%	20,982	78.3%	61.1%	45.7%
	Unknown	28	21.2%	17.4%	3,294	12.3%	17.2%	0.0%
	TOTAL	**132**	**100.0%**	**100.0%**	**26,800**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	11	9.0%	2.8%	469	2.5%	1.1%	24.5%
	Moderate	11	9.0%	6.6%	1,152	6.1%	3.8%	12.9%
	Middle	10	8.2%	13.1%	1,019	5.4%	9.2%	17.0%
	Upper	64	52.5%	50.4%	12,651	67.3%	55.3%	45.7%
	Unknown	26	21.3%	27.2%	3,511	18.7%	30.6%	0.0%
	TOTAL	**122**	**100.0%**	**100.0%**	**18,802**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	10.3%	0	0.0%	5.9%	24.5%
	Moderate	1	33.3%	13.8%	51	39.5%	7.5%	12.9%
	Middle	0	0.0%	19.0%	0	0.0%	12.6%	17.0%
	Upper	1	33.3%	48.3%	22	17.1%	64.1%	45.7%
	Unknown	1	33.3%	8.6%	56	43.4%	9.9%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**129**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	3.1%	0	0.0%	1.4%	24.5%
	Moderate	0	0.0%	3.1%	0	0.0%	1.0%	12.9%
	Middle	0	0.0%	10.4%	0	0.0%	8.4%	17.0%
	Upper	0	0.0%	72.9%	0	0.0%	79.9%	45.7%
	Unknown	0	0.0%	10.4%	0	0.0%	9.4%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	2.5%	0	0.0%	0.4%	24.5%
	Moderate	0	0.0%	5.0%	0	0.0%	4.3%	12.9%
	Middle	0	0.0%	10.0%	0	0.0%	5.7%	17.0%
	Upper	2	100.0%	62.5%	232	100.0%	68.1%	45.7%
	Unknown	0	0.0%	20.0%	0	0.0%	21.5%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**232**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	6.9%	0	0.0%	4.8%	5.1%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	12.0%
	Middle	0	0.0%	55.2%	0	0.0%	52.2%	37.4%
	Upper	0	0.0%	37.9%	0	0.0%	43.0%	43.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	1.8%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

Table title: **Borrower Distribution of 2021 Home Mortgage Lending** / **Assessment Area: Golden Triangle**

	Census Tract Income Level	#	#%	#%	$	$%	$%	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	7.4%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	13.6%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	54.3%
	Upper	0	0.0%	2.3%	0	0.0%	0.3%	24.7%
	Unknown	14	100.0%	97.7%	20,078	100.0%	99.7%	0.0%
	TOTAL	**14**	**100.0%**	**100.0%**	**20,078**	**100.0%**	**100.0%**	**100.0%**
Total	Low	12	4.4%	2.6%	589	0.9%	1.0%	24.5%
	Moderate	20	7.3%	9.7%	1,986	3.0%	5.3%	12.9%
	Middle	21	7.7%	15.4%	2,640	4.0%	10.9%	17.0%
	Upper	151	55.3%	49.7%	33,887	51.3%	54.8%	45.7%
	Unknown	69	25.3%	22.5%	26,939	40.8%	28.0%	0.0%
	TOTAL	**273**	**100.0%**	**100.0%**	**66,041**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Home Mortgage Lending
Assessment Area: Golden Triangle

Product Type	Census Tract Income Level	Bank Loans #	Bank Loans #%	Aggregate HMDA Data #%	Bank Loans $	Bank Loans $%	Aggregate HMDA Data $%	Owner-Occupied Units %
Home Purchase	Low	3	3.4%	2.8%	274	1.6%	1.2%	22.4%
	Moderate	5	5.7%	13.3%	674	3.9%	7.7%	14.6%
	Middle	10	11.4%	20.1%	1,917	11.0%	16.5%	17.1%
	Upper	52	59.1%	46.2%	12,659	72.4%	56.7%	45.8%
	Unknown	18	20.5%	17.6%	1,952	11.2%	17.9%	0.0%
	TOTAL	**88**	**100.0%**	**100.0%**	**17,476**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	5	5.3%	6.8%	208	1.2%	2.9%	22.4%
	Moderate	15	16.0%	10.6%	1,201	6.9%	6.6%	14.6%
	Middle	13	13.8%	16.7%	1,470	8.5%	12.0%	17.1%
	Upper	45	47.9%	48.8%	12,721	73.5%	61.3%	45.8%
	Unknown	16	17.0%	17.2%	1,704	9.8%	17.2%	0.0%
	TOTAL	**94**	**100.0%**	**100.0%**	**17,304**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	2	5.1%	6.1%	62	2.9%	3.3%	22.4%
	Moderate	5	12.8%	12.2%	142	6.6%	5.6%	14.6%
	Middle	3	7.7%	18.3%	65	3.0%	16.7%	17.1%
	Upper	24	61.5%	53.9%	1,362	63.4%	62.3%	45.8%
	Unknown	5	12.8%	9.6%	516	24.0%	12.1%	0.0%
	TOTAL	**39**	**100.0%**	**100.0%**	**2,147**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	1	5.9%	2.5%	23	2.6%	1.3%	22.4%
	Moderate	2	11.8%	6.8%	40	4.5%	3.5%	14.6%
	Middle	1	5.9%	16.1%	24	2.7%	10.0%	17.1%
	Upper	11	64.7%	67.7%	732	82.7%	81.3%	45.8%
	Unknown	2	11.8%	6.8%	66	7.5%	4.0%	0.0%
	TOTAL	**17**	**100.0%**	**100.0%**	**885**	**100.0%**	**100.0%**	**100.0%**

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Other Purpose Closed/Exempt	Low	0	0.0%	14.3%	0	0.0%	9.2%	22.4%
	Moderate	0	0.0%	9.5%	0	0.0%	6.9%	14.6%
	Middle	1	33.3%	19.0%	41	6.4%	12.4%	17.1%
	Upper	2	66.7%	50.0%	603	93.6%	63.5%	45.8%
	Unknown	0	0.0%	7.1%	0	0.0%	8.0%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**644**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.4%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	14.6%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.1%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	45.8%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	12.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	5.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	32.5%
	Upper	1	8.3%	5.6%	91	2.1%	1.4%	48.8%
	Unknown	11	91.7%	94.4%	4,293	97.9%	98.6%	1.2%
	TOTAL	**12**	**100.0%**	**100.0%**	**4,384**	**100.0%**	**100.0%**	**100.0%**
Total	Low	11	4.3%	4.1%	567	1.3%	1.6%	22.4%
	Moderate	27	10.7%	11.8%	2,057	4.8%	6.7%	14.6%
	Middle	28	11.1%	18.4%	3,517	8.2%	14.0%	17.1%
	Upper	135	53.4%	47.5%	28,168	65.8%	54.2%	45.8%
	Unknown	52	20.6%	18.2%	8,531	19.9%	23.4%	0.0%
	TOTAL	**253**	**100.0%**	**100.0%**	**42,840**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Small Business Loans Assessment Area: Golden Triangle							
Business Revenue and Loan Size		**Count**		**Dollars**			**Total Businesses**
		Bank	**Aggregate**	**Bank**		**Aggregate**	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	274	69.2%	52.0%	$18,720	54.2%	42.5%	91.6%
	Over $1 Million/ Unknown	122	30.8%	48.0%	$15,850	45.8%	57.5%	8.4%
	TOTAL	**396**	**100.0%**	**100.0%**	**$34,570**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	317	80.1%	89.8%	$12,460	36.0%	32.2%	
	$100,001– $250,000	47	11.9%	5.4%	$7,780	22.5%	18.1%	
	$250,001– $1 Million	32	8.1%	4.8%	$14,330	41.5%	49.7%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**396**	**100.0%**	**100.0%**	**$34,570**	**100.0%**	**100.0%**	
Loan Size	**Revenue $1 Million or Less** $100,000 or Less	226	82.5%		$7,294	39.0%		
	$100,001– $250,000	34	12.4%		$5,595	29.9%		
	$250,001– $1 Million	14	5.1%		$5,831	31.1%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**274**	**100.0%**		**$18,720**	**100.0%**		

EAST CENTRAL ASSESSMENT AREA

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	11.1%	14.5%	203	27.4%	14.9%	13.0%
	Middle	8	88.9%	81.3%	537	72.6%	81.3%	81.5%
	Upper	0	0.0%	3.9%	0	0.0%	3.7%	5.6%
	Unknown	0	0.0%	0.4%	0	0.0%	0.2%	0.0%
	TOTAL	**9**	**100.0%**	**100.0%**	**740**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	3.0%	14.2%	145	4.3%	12.4%	13.0%
	Middle	28	84.8%	79.5%	2,495	73.8%	80.0%	81.5%
	Upper	4	12.1%	6.3%	743	22.0%	7.6%	5.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**33**	**100.0%**	**100.0%**	**3,383**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	15.6%	0	0.0%	14.2%	13.0%
	Middle	2	100.0%	80.0%	50	100.0%	82.5%	81.5%
	Upper	0	0.0%	4.4%	0	0.0%	3.3%	5.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**50**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	15.0%	0	0.0%	17.4%	13.0%
	Middle	0	0.0%	80.0%	0	0.0%	79.2%	81.5%
	Upper	0	0.0%	5.0%	0	0.0%	3.3%	5.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	16.7%	0	0.0%	5.9%	13.0%
	Middle	0	0.0%	72.2%	0	0.0%	85.9%	81.5%
	Upper	0	0.0%	11.1%	0	0.0%	8.2%	5.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	8.3%	0	0.0%	13.0%	13.0%
	Middle	0	0.0%	83.3%	0	0.0%	68.7%	81.5%
	Upper	0	0.0%	8.3%	0	0.0%	18.3%	5.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

Table title: **Geographic Distribution of 2021 Home Mortgage Lending — Assessment Area: East Central**

	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.0%	0	0.0%	9.7%	12.6%
	Middle	0	0.0%	90.0%	0	0.0%	90.3%	87.4%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	4.5%	14.3%	348	8.3%	13.5%	13.0%
	Middle	38	86.4%	80.3%	3,082	73.9%	80.7%	81.5%
	Upper	4	9.1%	5.2%	743	17.8%	5.7%	5.6%
	Unknown	0	0.0%	0.2%	0	0.0%	0.1%	0.0%
	TOTAL	**44**	**100.0%**	**100.0%**	**4,173**	**100.0%**	**100.0%**	**100.0%**

		Geographic Distribution of 2022 Home Mortgage Lending Assessment Area: East Central						
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	2.7%	0	0.0%	2.1%	2.0%
	Moderate	0	0.0%	17.3%	0	0.0%	14.7%	16.7%
	Middle	6	85.7%	66.9%	909	84.7%	69.0%	67.8%
	Upper	0	0.0%	8.1%	0	0.0%	9.5%	8.0%
	Unknown	1	14.3%	5.0%	164	15.3%	4.7%	5.6%
	TOTAL	**7**	**100.0%**	**100.0%**	**1,073**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	2.7%	0	0.0%	2.9%	2.0%
	Moderate	4	15.4%	13.3%	205	11.0%	11.6%	16.7%
	Middle	17	65.4%	72.0%	1,065	57.4%	71.5%	67.8%
	Upper	2	7.7%	8.8%	190	10.2%	9.6%	8.0%
	Unknown	3	11.5%	3.2%	396	21.3%	4.4%	5.6%
	TOTAL	**26**	**100.0%**	**100.0%**	**1,856**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	4.3%	0	0.0%	3.8%	2.0%
	Moderate	1	20.0%	10.6%	25	12.4%	8.0%	16.7%
	Middle	4	80.0%	74.5%	177	87.6%	79.4%	67.8%
	Upper	0	0.0%	6.4%	0	0.0%	4.4%	8.0%
	Unknown	0	0.0%	4.3%	0	0.0%	4.4%	5.6%
	TOTAL	**5**	**100.0%**	**100.0%**	**202**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	9.1%	0	0.0%	6.2%	2.0%
	Moderate	1	25.0%	6.1%	20	14.2%	11.5%	16.7%
	Middle	1	25.0%	72.7%	30	21.3%	73.7%	67.8%
	Upper	0	0.0%	3.0%	0	0.0%	3.7%	8.0%
	Unknown	2	50.0%	9.1%	91	64.5%	4.9%	5.6%
	TOTAL	**4**	**100.0%**	**100.0%**	**141**	**100.0%**	**100.0%**	**100.0%**

		#	#%	%	$	$%	$%	% of Bus.
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	2.0%
	Moderate	0	0.0%	9.1%	0	0.0%	10.0%	16.7%
	Middle	0	0.0%	69.7%	0	0.0%	64.8%	67.8%
	Upper	1	100.0%	12.1%	54	100.0%	14.1%	8.0%
	Unknown	0	0.0%	9.1%	0	0.0%	11.2%	5.6%
	TOTAL	**1**	**100.0%**	**100.0%**	**54**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	2.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.7%
	Middle	0	0.0%	100.0%	0	0.0%	100.0%	67.8%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	8.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	5.6%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	11.7%
	Moderate	1	100.0%	50.0%	218	100.0%	69.4%	9.5%
	Middle	0	0.0%	50.0%	0	0.0%	30.6%	66.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	12.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**218**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	2.9%	0	0.0%	2.5%	2.0%
	Moderate	7	15.9%	14.9%	468	13.2%	13.4%	16.7%
	Middle	28	63.6%	69.6%	2,181	61.5%	70.1%	67.8%
	Upper	3	6.8%	8.2%	244	6.9%	9.3%	8.0%
	Unknown	6	13.6%	4.5%	651	18.4%	4.7%	5.6%
	TOTAL	**44**	**100.0%**	**100.0%**	**3,544**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Small Business Lending Assessment Area: East Central							
Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	#%	%	$ (000s)	$ %	$ %	
Low	0	0.0%	2.7%	$0	0.0%	3.8%	4.9%
Moderate	12	29.3%	20.2%	$840	24.2%	19.9%	17.0%
Middle	22	53.7%	60.9%	$2,415	69.5%	65.9%	68.0%
Upper	0	0.0%	11.9%	$0	0.0%	6.6%	6.7%
Unknown	7	17.1%	4.4%	$218	6.3%	3.8%	3.3%
TOTAL	**41**	**100.0%**	**100.0%**	**$3,473**	**100.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
Product Type		**#**	**#%**	**#%**	**$**	**$%**	**$ %**	**%**
Borrower Distribution of 2021 Home Mortgage Lending Assessment Area: East Central								
Home Purchase	Low	1	11.1%	3.6%	70	9.5%	1.8%	22.7%
	Moderate	0	0.0%	19.8%	0	0.0%	13.2%	21.5%
	Middle	2	22.2%	24.1%	164	22.2%	20.7%	18.2%
	Upper	6	66.7%	37.9%	506	68.4%	46.6%	37.7%
	Unknown	0	0.0%	14.6%	0	0.0%	17.7%	0.0%
	TOTAL	**9**	**100.0%**	**100.0%**	**740**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	2	6.1%	4.2%	42	1.2%	1.8%	22.7%
	Moderate	4	12.1%	10.5%	145	4.3%	5.7%	21.5%
	Middle	5	15.2%	15.3%	438	12.9%	11.6%	18.2%
	Upper	19	57.6%	51.9%	2,566	75.8%	59.0%	37.7%
	Unknown	3	9.1%	18.1%	192	5.7%	21.8%	0.0%
	TOTAL	**33**	**100.0%**	**100.0%**	**3,383**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	2	100.0%	13.3%	50	100.0%	6.6%	22.7%
	Moderate	0	0.0%	24.4%	0	0.0%	19.4%	21.5%
	Middle	0	0.0%	24.4%	0	0.0%	27.3%	18.2%
	Upper	0	0.0%	22.2%	0	0.0%	23.8%	37.7%
	Unknown	0	0.0%	15.6%	0	0.0%	22.9%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**50**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.7%
	Moderate	0	0.0%	10.0%	0	0.0%	7.2%	21.5%
	Middle	0	0.0%	15.0%	0	0.0%	14.3%	18.2%
	Upper	0	0.0%	75.0%	0	0.0%	78.5%	37.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	16.7%	0	0.0%	6.6%	22.7%
	Moderate	0	0.0%	11.1%	0	0.0%	9.5%	21.5%
	Middle	0	0.0%	11.1%	0	0.0%	16.3%	18.2%
	Upper	0	0.0%	55.6%	0	0.0%	66.2%	37.7%
	Unknown	0	0.0%	5.6%	0	0.0%	1.3%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.7%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	21.5%
	Middle	0	0.0%	8.3%	0	0.0%	18.3%	18.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	37.7%
	Unknown	0	0.0%	91.7%	0	0.0%	81.7%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%

Product Type	Income Level	#	#%	Agg HMDA #%	$	$%	Agg HMDA $%	Owner-Occ %
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.0%	0	0.0%	2.7%	12.6%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	87.4%
	Upper	0	0.0%	30.0%	0	0.0%	20.3%	0.0%
	Unknown	0	0.0%	60.0%	0	0.0%	77.1%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Total	Low	5	11.4%	4.3%	162	3.9%	1.9%	22.7%
	Moderate	4	9.1%	15.0%	145	3.5%	9.3%	21.5%
	Middle	7	15.9%	19.2%	602	14.4%	15.8%	18.2%
	Upper	25	56.8%	44.5%	3,072	73.6%	52.3%	37.7%
	Unknown	3	6.8%	17.1%	192	4.6%	20.8%	0.0%
	TOTAL	**44**	**100.0%**	**100.0%**	**4,173**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Home Mortgage Lending Assessment Area: East Central								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	2.7%	0	0.0%	1.1%	24.7%
	Moderate	0	0.0%	22.3%	0	0.0%	15.4%	17.0%
	Middle	2	28.6%	23.8%	126	11.7%	21.0%	17.5%
	Upper	5	71.4%	32.9%	947	88.3%	42.9%	40.8%
	Unknown	0	0.0%	18.3%	0	0.0%	19.6%	0.0%
	TOTAL	**7**	**100.0%**	**100.0%**	**1,073**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	3	11.5%	7.2%	94	5.1%	3.3%	24.7%
	Moderate	4	15.4%	16.8%	230	12.4%	11.8%	17.0%
	Middle	1	3.8%	17.1%	50	2.7%	16.2%	17.5%
	Upper	14	53.8%	50.4%	1,194	64.3%	58.4%	40.8%
	Unknown	4	15.4%	8.5%	288	15.5%	10.2%	0.0%
	TOTAL	**26**	**100.0%**	**100.0%**	**1,856**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	8.5%	0	0.0%	3.9%	24.7%
	Moderate	1	20.0%	21.3%	30	14.9%	13.7%	17.0%
	Middle	0	0.0%	19.1%	0	0.0%	18.0%	17.5%
	Upper	3	60.0%	36.2%	95	47.0%	39.1%	40.8%
	Unknown	1	20.0%	14.9%	77	38.1%	25.3%	0.0%
	TOTAL	**5**	**100.0%**	**100.0%**	**202**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	1	25.0%	6.1%	20	14.2%	2.0%	24.7%
	Moderate	0	0.0%	15.2%	0	0.0%	17.5%	17.0%
	Middle	0	0.0%	18.2%	0	0.0%	14.5%	17.5%
	Upper	2	50.0%	54.5%	91	64.5%	63.6%	40.8%
	Unknown	1	25.0%	6.1%	30	21.3%	2.4%	0.0%
	TOTAL	**4**	**100.0%**	**100.0%**	**141**	**100.0%**	**100.0%**	**100.0%**

Other Purpose Closed/Exempt	Low	0	0.0%	12.1%	0	0.0%	7.7%	24.7%
	Moderate	0	0.0%	27.3%	0	0.0%	22.6%	17.0%
	Middle	0	0.0%	18.2%	0	0.0%	19.8%	17.5%
	Upper	1	100.0%	39.4%	54	100.0%	47.7%	40.8%
	Unknown	0	0.0%	3.0%	0	0.0%	2.1%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**54**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	24.7%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	17.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	40.8%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	11.7%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	9.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	66.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	12.3%
	Unknown	1	100.0%	100.0%	218	100.0%	100.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**218**	**100.0%**	**100.0%**	**100.0%**
Total	Low	4	9.1%	5.0%	114	3.2%	2.1%	24.7%
	Moderate	5	11.4%	20.0%	260	7.3%	14.2%	17.0%
	Middle	3	6.8%	20.6%	176	5.0%	19.0%	17.5%
	Upper	25	56.8%	40.2%	2,381	67.2%	48.3%	40.8%
	Unknown	7	15.9%	14.2%	613	17.3%	16.4%	0.0%
	TOTAL	**44**	**100.0%**	**100.0%**	**3,544**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Small Business Loans Assessment Area: East Central							
Business Revenue and Loan Size		**Count**		**Dollars**			**Total Businesses**
		Bank	**Aggregate**	**Bank**		**Aggregate**	
		#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue	$1 Million or Less	35	85.4%	58.7%	$2,684	77.3%	48.9%	89.9%
	Over $1 Million/ Unknown	6	14.6%	41.3%	$789	22.7%	51.1%	10.1%
	TOTAL	**41**	**100.0%**	**100.0%**	**$3,473**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	32	78.0%	90.1%	$857	24.7%	38.2%	
	$100,001– $250,000	4	9.8%	7.2%	$565	16.3%	30.4%	
	$250,001– $1 Million	5	12.2%	2.7%	$2,051	59.1%	31.5%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**41**	**100.0%**	**100.0%**	**$3,473**	**100.0%**	**100.0%**	
Loan Size **Revenue $1 Million or Less**	$100,000 or Less	28	80.0%		$734	27.3%		
	$100,001– $250,000	4	11.4%		$565	21.1%		
	$250,001– $1 Million	3	8.6%		$1,385	51.6%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**35**	**100.0%**		**$2,684**	**100.0%**		

JACKSON ASSESSMENT AREA

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	0.7%	0	0.0%	0.3%	5.1%
	Moderate	3	11.5%	4.2%	172	2.5%	2.2%	12.9%
	Middle	3	11.5%	29.0%	177	2.6%	22.7%	35.2%
	Upper	20	76.9%	66.1%	6,425	94.8%	74.8%	46.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**26**	**100.0%**	**100.0%**	**6,774**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	1	2.9%	0.5%	25	0.3%	0.4%	5.1%
	Moderate	3	8.8%	3.4%	602	6.4%	1.6%	12.9%
	Middle	4	11.8%	27.2%	572	6.1%	21.1%	35.2%
	Upper	26	76.5%	69.0%	8,161	87.2%	77.0%	46.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**34**	**100.0%**	**100.0%**	**9,360**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	6.5%	0	0.0%	1.3%	5.1%
	Moderate	1	100.0%	17.1%	55	100.0%	5.2%	12.9%
	Middle	0	0.0%	23.6%	0	0.0%	20.5%	35.2%
	Upper	0	0.0%	52.8%	0	0.0%	73.0%	46.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**55**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	1.1%	0	0.0%	0.7%	5.1%
	Moderate	0	0.0%	4.0%	0	0.0%	2.0%	12.9%
	Middle	0	0.0%	24.5%	0	0.0%	21.8%	35.2%
	Upper	0	0.0%	70.4%	0	0.0%	75.5%	46.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	0.8%	0	0.0%	0.3%	5.1%
	Moderate	0	0.0%	8.0%	0	0.0%	2.4%	12.9%
	Middle	0	0.0%	24.0%	0	0.0%	19.1%	35.2%
	Upper	1	100.0%	67.2%	548	100.0%	78.1%	46.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**548**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	2.0%	0	0.0%	1.7%	5.1%
	Moderate	0	0.0%	10.0%	0	0.0%	5.2%	12.9%
	Middle	0	0.0%	47.4%	0	0.0%	42.5%	35.2%
	Upper	0	0.0%	40.6%	0	0.0%	50.7%	46.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

Table title: **Geographic Distribution of 2021 Home Mortgage Lending — Assessment Area: Jackson**

		#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	7.4%	0	0.0%	3.2%	15.4%
	Moderate	1	100.0%	24.5%	276	100.0%	7.6%	26.4%
	Middle	0	0.0%	34.0%	0	0.0%	72.6%	39.9%
	Upper	0	0.0%	34.0%	0	0.0%	16.6%	18.3%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**276**	**100.0%**	**100.0%**	**100.0%**
Total	Low	1	1.6%	0.8%	25	0.1%	0.6%	5.1%
	Moderate	8	12.7%	4.3%	1,105	6.5%	2.4%	12.9%
	Middle	7	11.1%	28.1%	749	4.4%	26.3%	35.2%
	Upper	47	74.6%	66.8%	15,134	89.0%	70.7%	46.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**63**	**100.0%**	**100.0%**	**17,013**	**100.0%**	**100.0%**	**100.0%**

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	5	6.5%	0.9%	478	2.5%	0.4%	4.8%
	Moderate	14	18.2%	8.4%	1,858	9.6%	5.0%	13.5%
	Middle	16	20.8%	33.8%	3,697	19.1%	26.9%	37.7%
	Upper	42	54.5%	56.9%	13,326	68.8%	67.7%	43.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.1%	0.1%
	TOTAL	**77**	**100.0%**	**100.0%**	**19,359**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	6	19.4%	2.4%	235	3.4%	0.9%	4.8%
	Moderate	2	6.5%	7.6%	133	1.9%	3.8%	13.5%
	Middle	2	6.5%	33.4%	494	7.2%	27.9%	37.7%
	Upper	21	67.7%	56.6%	6,018	87.5%	67.3%	43.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.1%
	TOTAL	**31**	**100.0%**	**100.0%**	**6,880**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	1	6.7%	3.6%	40	3.6%	1.1%	4.8%
	Moderate	6	40.0%	12.3%	213	19.2%	6.1%	13.5%
	Middle	1	6.7%	26.8%	20	1.8%	18.6%	37.7%
	Upper	7	46.7%	57.1%	838	75.4%	72.4%	43.8%
	Unknown	0	0.0%	0.2%	0	0.0%	1.9%	0.1%
	TOTAL	**15**	**100.0%**	**100.0%**	**1,111**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	1.5%	0	0.0%	0.6%	4.8%
	Moderate	0	0.0%	4.5%	0	0.0%	3.2%	13.5%
	Middle	1	10.0%	26.9%	200	19.4%	22.6%	37.7%
	Upper	9	90.0%	67.0%	832	80.6%	73.7%	43.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	**10**	**100.0%**	**100.0%**	**1,032**	**100.0%**	**100.0%**	**100.0%**

Table title (for second table): **Geographic Distribution of 2022 Home Mortgage Lending Assessment Area: Jackson**

		#	#%	%	$	$ %	$ %	%
Other Purpose Closed/Exempt	Low	0	0.0%	2.4%	0	0.0%	1.0%	4.8%
	Moderate	1	100.0%	12.8%	31	100.0%	5.4%	13.5%
	Middle	0	0.0%	29.3%	0	0.0%	19.3%	37.7%
	Upper	0	0.0%	54.9%	0	0.0%	74.2%	43.8%
	Unknown	0	0.0%	0.6%	0	0.0%	0.1%	0.1%
	TOTAL	**1**	**100.0%**	**100.0%**	**31**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	1.4%	0	0.0%	37.3%	4.8%
	Moderate	0	0.0%	20.5%	0	0.0%	6.7%	13.5%
	Middle	0	0.0%	43.8%	0	0.0%	26.4%	37.7%
	Upper	0	0.0%	34.2%	0	0.0%	29.6%	43.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.1%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	14.3%	0	0.0%	8.9%	16.0%
	Moderate	2	100.0%	28.6%	8,640	100.0%	29.5%	36.8%
	Middle	0	0.0%	31.2%	0	0.0%	34.9%	25.4%
	Upper	0	0.0%	24.7%	0	0.0%	26.6%	18.8%
	Unknown	0	0.0%	1.3%	0	0.0%	0.0%	3.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**8,640**	**100.0%**	**100.0%**	**100.0%**
Total	Low	12	8.8%	1.5%	753	2.0%	1.7%	4.8%
	Moderate	25	18.4%	8.4%	10,875	29.3%	7.3%	13.5%
	Middle	20	14.7%	33.0%	4,411	11.9%	27.7%	37.7%
	Upper	79	58.1%	57.1%	21,014	56.7%	63.3%	43.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.1%	0.1%
	TOTAL	**136**	**100.0%**	**100.0%**	**37,053**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Small Business Lending Assessment Area: Jackson						
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	#%	%	$ (000s)	$ %	$ %	
Low	3	2.3%	4.5%	$972	4.3%	3.6%	6.9%
Moderate	30	22.7%	15.5%	$5,199	23.2%	17.9%	19.0%
Middle	22	16.7%	29.9%	$4,431	19.8%	30.2%	30.5%
Upper	76	57.6%	46.5%	$11,634	51.9%	44.6%	40.1%
Unknown	1	0.8%	3.6%	$163	0.7%	3.8%	3.5%
TOTAL	**132**	**100.0%**	**100.0%**	**$22,399**	**100.0%**	**100.0%**	**100.0%**

		Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
Borrower Distribution of 2021 Home Mortgage Lending **Assessment Area: Jackson**								
Product Type	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	4.7%	0	0.0%	2.3%	21.2%
	Moderate	2	7.7%	17.9%	274	4.0%	12.2%	15.9%
	Middle	0	0.0%	21.0%	0	0.0%	18.9%	17.7%
	Upper	14	53.8%	36.3%	4,361	64.4%	47.7%	45.3%
	Unknown	10	38.5%	20.1%	2,139	31.6%	19.1%	0.0%
	TOTAL	**26**	**100.0%**	**100.0%**	**6,774**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	2	5.9%	3.8%	247	2.6%	1.8%	21.2%
	Moderate	0	0.0%	9.9%	0	0.0%	6.1%	15.9%
	Middle	2	5.9%	17.7%	432	4.6%	13.4%	17.7%
	Upper	20	58.8%	44.4%	7,133	76.2%	53.3%	45.3%
	Unknown	10	29.4%	24.2%	1,548	16.5%	25.4%	0.0%
	TOTAL	**34**	**100.0%**	**100.0%**	**9,360**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	6.1%	0	0.0%	3.2%	21.2%
	Moderate	0	0.0%	7.7%	0	0.0%	3.6%	15.9%
	Middle	0	0.0%	15.9%	0	0.0%	13.7%	17.7%
	Upper	0	0.0%	50.8%	0	0.0%	69.8%	45.3%
	Unknown	1	100.0%	19.5%	55	100.0%	9.7%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**55**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	3.5%	0	0.0%	1.6%	21.2%
	Moderate	0	0.0%	8.8%	0	0.0%	4.5%	15.9%
	Middle	0	0.0%	13.6%	0	0.0%	8.7%	17.7%
	Upper	0	0.0%	69.2%	0	0.0%	80.8%	45.3%
	Unknown	0	0.0%	4.8%	0	0.0%	4.4%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	5.6%	0	0.0%	2.7%	21.2%
	Moderate	0	0.0%	18.4%	0	0.0%	11.3%	15.9%
	Middle	0	0.0%	21.6%	0	0.0%	14.9%	17.7%
	Upper	1	100.0%	43.2%	548	100.0%	60.2%	45.3%
	Unknown	0	0.0%	11.2%	0	0.0%	11.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**548**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.4%	0	0.0%	0.2%	21.2%
	Moderate	0	0.0%	0.4%	0	0.0%	0.3%	15.9%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.7%
	Upper	0	0.0%	0.8%	0	0.0%	1.1%	45.3%
	Unknown	0	0.0%	98.4%	0	0.0%	98.4%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	15.4%
	Moderate	0	0.0%	1.1%	0	0.0%	0.0%	26.4%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	39.9%
	Upper	0	0.0%	3.2%	0	0.0%	0.8%	18.3%
	Unknown	1	100.0%	95.7%	276	100.0%	99.2%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**276**	**100.0%**	**100.0%**	**100.0%**
Total	Low	2	3.2%	4.2%	247	1.5%	1.9%	21.2%
	Moderate	2	3.2%	13.5%	274	1.6%	8.4%	15.9%
	Middle	2	3.2%	18.8%	432	2.5%	14.8%	17.7%
	Upper	35	55.6%	40.9%	12,042	70.8%	46.4%	45.3%
	Unknown	22	34.9%	22.6%	4,018	23.6%	28.5%	0.0%
	TOTAL	**63**	**100.0%**	**100.0%**	**17,013**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Home Mortgage Lending Assessment Area: Jackson								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	3	3.9%	4.1%	258	1.3%	1.6%	20.9%
	Moderate	4	5.2%	18.5%	618	3.2%	11.9%	15.5%
	Middle	7	9.1%	20.5%	1,589	8.2%	18.1%	19.4%
	Upper	34	44.2%	37.4%	12,027	62.1%	50.7%	44.2%
	Unknown	29	37.7%	19.4%	4,867	25.1%	17.7%	0.0%
	TOTAL	**77**	**100.0%**	**100.0%**	**19,359**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	4	12.9%	6.6%	100	1.5%	2.7%	20.9%
	Moderate	0	0.0%	14.6%	0	0.0%	9.7%	15.5%
	Middle	3	9.7%	19.4%	725	10.5%	15.2%	19.4%
	Upper	14	45.2%	42.5%	3,764	54.7%	56.1%	44.2%
	Unknown	10	32.3%	16.8%	2,291	33.3%	16.3%	0.0%
	TOTAL	**31**	**100.0%**	**100.0%**	**6,880**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	7.2%	0	0.0%	2.9%	20.9%
	Moderate	0	0.0%	13.6%	0	0.0%	7.7%	15.5%
	Middle	1	6.7%	13.4%	175	15.8%	9.0%	19.4%
	Upper	8	53.3%	51.5%	723	65.1%	70.1%	44.2%
	Unknown	6	40.0%	14.3%	213	19.2%	10.3%	0.0%
	TOTAL	**15**	**100.0%**	**100.0%**	**1,111**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	4.7%	0	0.0%	2.9%	20.9%
	Moderate	1	10.0%	10.0%	20	1.9%	5.5%	15.5%
	Middle	2	20.0%	17.6%	225	21.8%	12.7%	19.4%
	Upper	7	70.0%	63.0%	787	76.3%	75.1%	44.2%
	Unknown	0	0.0%	4.6%	0	0.0%	3.7%	0.0%
	TOTAL	**10**	**100.0%**	**100.0%**	**1,032**	**100.0%**	**100.0%**	**100.0%**

Other Purpose Closed/Exempt	Low	1	100.0%	9.8%	31	100.0%	4.4%	20.9%
	Moderate	0	0.0%	17.7%	0	0.0%	9.8%	15.5%
	Middle	0	0.0%	20.7%	0	0.0%	16.9%	19.4%
	Upper	0	0.0%	45.1%	0	0.0%	62.7%	44.2%
	Unknown	0	0.0%	6.7%	0	0.0%	6.3%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**31**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.7%	0	0.0%	0.1%	20.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.5%
	Middle	0	0.0%	2.1%	0	0.0%	1.0%	19.4%
	Upper	0	0.0%	0.7%	0	0.0%	0.8%	44.2%
	Unknown	0	0.0%	96.6%	0	0.0%	98.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	16.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	36.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	25.4%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	18.8%
	Unknown	2	100.0%	100.0%	8,640	100.0%	100.0%	3.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**8,640**	**100.0%**	**100.0%**	**100.0%**
Total	Low	8	5.9%	5.0%	389	1.0%	1.8%	20.9%
	Moderate	5	3.7%	16.4%	638	1.7%	9.9%	15.5%
	Middle	13	9.6%	19.4%	2,714	7.3%	15.2%	19.4%
	Upper	63	46.3%	40.6%	17,301	46.7%	47.2%	44.2%
	Unknown	47	34.6%	18.6%	16,011	43.2%	26.0%	0.0%
	TOTAL	**136**	**100.0%**	**100.0%**	**37,053**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Small Business Loans Assessment Area: Jackson							
Business Revenue and Loan Size		Count		Aggregate	Dollars		Aggregate	Total Businesses
		Bank		Aggregate	Bank		Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	97	73.5%	46.9%	$15,386	68.7%	37.6%	92.6%
	Over $1 Million/ Unknown	35	26.5%	53.1%	$7,013	31.3%	62.4%	7.4%
	TOTAL	132	100.0%	100.0%	$22,399	100.0%	100.0%	100.0%
Loan Size	$100,000 or Less	69	52.3%	89.6%	$3,476	15.5%	29.5%	
	$100,001– $250,000	32	24.2%	5.6%	$5,263	23.5%	19.3%	
	$250,001– $1 Million	31	23.5%	4.9%	$13,660	61.0%	51.2%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	132	100.0%	100.0%	$22,399	100.0%	100.0%	
Loan Size — Revenue $1 Million or Less	$100,000 or Less	55	56.7%		$2,740	17.8%		
	$100,001– $250,000	22	22.7%		$3,857	25.1%		
	$250,001– $1 Million	20	20.6%		$8,789	57.1%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	97	100.0%		$15,386	100.0%		

HATTIESBURG ASSESSMENT AREA

Geographic Distribution of 2021 Home Mortgage Lending **Assessment Area: Hattiesburg**								
Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	1.2%	0	0.0%	0.7%	4.5%
	Moderate	0	0.0%	4.5%	0	0.0%	3.8%	8.6%
	Middle	4	40.0%	45.2%	441	25.8%	38.9%	47.0%
	Upper	6	60.0%	49.1%	1,266	74.2%	56.6%	39.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**10**	**100.0%**	**100.0%**	**1,707**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	1.4%	0	0.0%	0.8%	4.5%
	Moderate	0	0.0%	3.6%	0	0.0%	2.8%	8.6%
	Middle	2	50.0%	40.0%	405	51.1%	35.5%	47.0%
	Upper	2	50.0%	55.0%	388	48.9%	60.9%	39.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**4**	**100.0%**	**100.0%**	**793**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	2.3%	0	0.0%	2.5%	4.5%
	Moderate	0	0.0%	9.2%	0	0.0%	6.8%	8.6%
	Middle	0	0.0%	47.1%	0	0.0%	51.0%	47.0%
	Upper	0	0.0%	41.4%	0	0.0%	39.8%	39.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	2.1%	0	0.0%	1.0%	4.5%
	Moderate	0	0.0%	4.9%	0	0.0%	3.0%	8.6%
	Middle	0	0.0%	49.0%	0	0.0%	44.3%	47.0%
	Upper	0	0.0%	44.1%	0	0.0%	51.7%	39.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	2.7%	0	0.0%	0.7%	4.5%
	Moderate	0	0.0%	5.4%	0	0.0%	2.0%	8.6%
	Middle	0	0.0%	45.9%	0	0.0%	53.7%	47.0%
	Upper	0	0.0%	45.9%	0	0.0%	43.6%	39.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	4.5%
	Moderate	0	0.0%	2.1%	0	0.0%	0.6%	8.6%
	Middle	0	0.0%	44.7%	0	0.0%	41.5%	47.0%
	Upper	0	0.0%	53.2%	0	0.0%	57.9%	39.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	2	100.0%	25.0%	4,970	100.0%	21.3%	34.6%
	Moderate	0	0.0%	11.8%	0	0.0%	4.8%	10.0%
	Middle	0	0.0%	50.0%	0	0.0%	64.4%	41.3%
	Upper	0	0.0%	13.2%	0	0.0%	9.5%	14.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**4,970**	**100.0%**	**100.0%**	**100.0%**
Total	Low	2	12.5%	1.6%	4,970	66.5%	2.7%	4.5%
	Moderate	0	0.0%	4.3%	0	0.0%	3.5%	8.6%
	Middle	6	37.5%	43.2%	846	11.3%	40.1%	47.0%
	Upper	8	50.0%	51.0%	1,654	22.1%	53.7%	39.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**16**	**100.0%**	**100.0%**	**7,470**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Home Mortgage Lending Assessment Area: Hattiesburg								
Product Type	**Census Tract Income Level**	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Owner-Occupied Units**
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	2	4.1%	11.4%	263	2.0%	8.2%	11.1%
	Middle	14	28.6%	33.4%	2,878	21.5%	28.3%	34.5%
	Upper	33	67.3%	54.6%	10,247	76.5%	63.3%	51.7%
	Unknown	0	0.0%	0.6%	0	0.0%	0.2%	2.7%
	TOTAL	**49**	**100.0%**	**100.0%**	**13,388**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.5%	0	0.0%	7.1%	11.1%
	Middle	2	40.0%	32.2%	207	5.7%	25.0%	34.5%
	Upper	3	60.0%	56.4%	3,445	94.3%	67.7%	51.7%
	Unknown	0	0.0%	0.9%	0	0.0%	0.3%	2.7%
	TOTAL	**5**	**100.0%**	**100.0%**	**3,652**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	4.5%	0	0.0%	2.2%	11.1%
	Middle	3	42.9%	33.8%	375	49.9%	28.1%	34.5%
	Upper	3	42.9%	60.2%	300	39.9%	68.7%	51.7%
	Unknown	1	14.3%	1.5%	77	10.2%	1.1%	2.7%
	TOTAL	**7**	**100.0%**	**100.0%**	**752**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	100.0%	9.2%	80	100.0%	7.3%	11.1%
	Middle	0	0.0%	21.4%	0	0.0%	12.9%	34.5%
	Upper	0	0.0%	68.8%	0	0.0%	79.8%	51.7%
	Unknown	0	0.0%	0.6%	0	0.0%	0.1%	2.7%
	TOTAL	**1**	**100.0%**	**100.0%**	**80**	**100.0%**	**100.0%**	**100.0%**

		#	#%	%	$	$ %	%	%
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	9.6%	0	0.0%	7.8%	11.1%
	Middle	0	0.0%	36.5%	0	0.0%	21.1%	34.5%
	Upper	0	0.0%	53.8%	0	0.0%	71.1%	51.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	2.7%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	5.0%	0	0.0%	4.1%	11.1%
	Middle	0	0.0%	35.0%	0	0.0%	21.8%	34.5%
	Upper	0	0.0%	60.0%	0	0.0%	74.0%	51.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	2.7%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	3	60.0%	40.8%	3,257	71.1%	27.0%	48.8%
	Middle	0	0.0%	24.5%	0	0.0%	36.9%	17.8%
	Upper	1	20.0%	28.6%	1,031	22.5%	31.5%	23.7%
	Unknown	1	20.0%	6.1%	292	6.4%	4.6%	9.7%
	TOTAL	**5**	**100.0%**	**100.0%**	**4,580**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	6	9.0%	11.1%	3,600	16.0%	9.7%	11.1%
	Middle	19	28.4%	32.5%	3,460	15.4%	28.0%	34.5%
	Upper	40	59.7%	55.6%	15,023	66.9%	61.6%	51.7%
	Unknown	2	3.0%	0.8%	369	1.6%	0.7%	2.7%
	TOTAL	**67**	**100.0%**	**100.0%**	**22,452**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Small Business Lending
Assessment Area: Hattiesburg

Census Tract Income Level	Bank Small Business Loans		Aggregate of Peer Data	Bank Small Business Loans		Aggregate of Peer Data	% of Businesses
	#	#%	%	$ (000s)	$ %	$ %	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	5	12.5%	19.1%	$657	8.5%	19.0%	23.2%
Middle	8	20.0%	28.4%	$838	10.8%	29.8%	29.8%
Upper	26	65.0%	47.8%	$6,046	77.8%	47.1%	41.0%
Unknown	1	2.5%	4.8%	$226	2.9%	4.1%	6.0%
TOTAL	**40**	**100.0%**	**100.0%**	**$7,767**	**100.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
Borrower Distribution of 2021 Home Mortgage Lending **Assessment Area: Hattiesburg**								
Product Type	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	3.3%	0	0.0%	1.5%	23.8%
	Moderate	0	0.0%	16.1%	0	0.0%	10.9%	14.1%
	Middle	5	50.0%	21.4%	1,023	59.9%	19.0%	18.7%
	Upper	4	40.0%	41.4%	595	34.9%	51.8%	43.4%
	Unknown	1	10.0%	17.8%	89	5.2%	16.8%	0.0%
	TOTAL	**10**	**100.0%**	**100.0%**	**1,707**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	3.2%	0	0.0%	1.3%	23.8%
	Moderate	0	0.0%	10.2%	0	0.0%	6.2%	14.1%
	Middle	0	0.0%	14.6%	0	0.0%	10.9%	18.7%
	Upper	3	75.0%	47.1%	576	72.6%	55.8%	43.4%
	Unknown	1	25.0%	24.9%	217	27.4%	25.8%	0.0%
	TOTAL	**4**	**100.0%**	**100.0%**	**793**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	5.7%	0	0.0%	7.4%	23.8%
	Moderate	0	0.0%	12.6%	0	0.0%	6.3%	14.1%
	Middle	0	0.0%	19.5%	0	0.0%	17.7%	18.7%
	Upper	0	0.0%	55.2%	0	0.0%	62.6%	43.4%
	Unknown	0	0.0%	6.9%	0	0.0%	6.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	3.5%	0	0.0%	1.5%	23.8%
	Moderate	0	0.0%	9.1%	0	0.0%	4.2%	14.1%
	Middle	0	0.0%	18.9%	0	0.0%	12.2%	18.7%
	Upper	0	0.0%	67.1%	0	0.0%	80.9%	43.4%
	Unknown	0	0.0%	1.4%	0	0.0%	1.2%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	10.8%	0	0.0%	5.2%	23.8%
	Moderate	0	0.0%	21.6%	0	0.0%	8.6%	14.1%
	Middle	0	0.0%	27.0%	0	0.0%	17.9%	18.7%
	Upper	0	0.0%	40.5%	0	0.0%	68.3%	43.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	23.8%
	Moderate	0	0.0%	2.1%	0	0.0%	1.7%	14.1%
	Middle	0	0.0%	2.1%	0	0.0%	1.9%	18.7%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	43.4%
	Unknown	0	0.0%	95.7%	0	0.0%	96.4%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	34.6%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	10.0%
	Middle	0	0.0%	1.5%	0	0.0%	0.1%	41.3%
	Upper	0	0.0%	4.4%	0	0.0%	0.8%	14.1%
	Unknown	2	100.0%	94.1%	4,970	100.0%	99.1%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**4,970**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	3.3%	0	0.0%	1.3%	23.8%
	Moderate	0	0.0%	13.1%	0	0.0%	7.9%	14.1%
	Middle	5	31.3%	18.0%	1,023	13.7%	13.9%	18.7%
	Upper	7	43.8%	43.9%	1,171	15.7%	48.7%	43.4%
	Unknown	4	25.0%	21.7%	5,276	70.6%	28.1%	0.0%
	TOTAL	**16**	**100.0%**	**100.0%**	**7,470**	**100.0%**	**100.0%**	**100.0%**

**Borrower Distribution of 2022 Home Mortgage Lending** **Assessment Area: Hattiesburg**							

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	3.2%	0	0.0%	1.3%	22.2%
	Moderate	6	12.2%	16.1%	1,309	9.8%	9.8%	14.0%
	Middle	6	12.2%	20.8%	1,259	9.4%	17.2%	19.5%
	Upper	16	32.7%	41.0%	6,536	48.8%	54.0%	44.3%
	Unknown	21	42.9%	18.9%	4,284	32.0%	17.7%	0.0%
	TOTAL	**49**	**100.0%**	**100.0%**	**13,388**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	3.9%	0	0.0%	1.6%	22.2%
	Moderate	1	20.0%	10.7%	127	3.5%	6.2%	14.0%
	Middle	0	0.0%	19.9%	0	0.0%	14.9%	19.5%
	Upper	0	0.0%	47.5%	0	0.0%	58.0%	44.3%
	Unknown	4	80.0%	18.0%	3,525	96.5%	19.4%	0.0%
	TOTAL	**5**	**100.0%**	**100.0%**	**3,652**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	5.3%	0	0.0%	3.2%	22.2%
	Moderate	1	14.3%	11.3%	100	13.3%	5.9%	14.0%
	Middle	1	14.3%	15.8%	100	13.3%	10.9%	19.5%
	Upper	3	42.9%	58.6%	273	36.3%	68.3%	44.3%
	Unknown	2	28.6%	9.0%	279	37.1%	11.6%	0.0%
	TOTAL	**7**	**100.0%**	**100.0%**	**752**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	4.6%	0	0.0%	2.0%	22.2%
	Moderate	0	0.0%	8.1%	0	0.0%	4.4%	14.0%
	Middle	0	0.0%	16.8%	0	0.0%	9.2%	19.5%
	Upper	1	100.0%	65.9%	80	100.0%	81.0%	44.3%
	Unknown	0	0.0%	4.6%	0	0.0%	3.4%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**80**	**100.0%**	**100.0%**	**100.0%**

Other Purpose Closed/Exempt	Low	0	0.0%	7.7%	0	0.0%	4.8%	22.2%
	Moderate	0	0.0%	13.5%	0	0.0%	9.4%	14.0%
	Middle	0	0.0%	21.2%	0	0.0%	16.8%	19.5%
	Upper	0	0.0%	50.0%	0	0.0%	65.9%	44.3%
	Unknown	0	0.0%	7.7%	0	0.0%	3.2%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	5.0%	0	0.0%	1.5%	22.2%
	Moderate	0	0.0%	5.0%	0	0.0%	4.0%	14.0%
	Middle	0	0.0%	5.0%	0	0.0%	3.1%	19.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	44.3%
	Unknown	0	0.0%	85.0%	0	0.0%	91.4%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	48.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	17.8%
	Upper	0	0.0%	2.0%	0	0.0%	0.6%	23.7%
	Unknown	5	100.0%	98.0%	4,580	100.0%	99.4%	9.7%
	TOTAL	**5**	**100.0%**	**100.0%**	**4,580**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	3.6%	0	0.0%	1.3%	22.2%
	Moderate	8	11.9%	13.8%	1,536	6.8%	7.8%	14.0%
	Middle	7	10.4%	19.8%	1,359	6.1%	14.7%	19.5%
	Upper	20	29.9%	43.9%	6,889	30.7%	50.3%	44.3%
	Unknown	32	47.8%	18.9%	12,668	56.4%	25.8%	0.0%
	TOTAL	**67**	**100.0%**	**100.0%**	**22,452**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Small Business Loans Assessment Area: Hattiesburg							
Business Revenue and Loan Size		Count			Dollars		Total Businesses
		Bank	Aggregate	Bank		Aggregate	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	10	25.0%	50.0%	$1,375	17.7%	39.2%	91.8%
	Over $1 Million/ Unknown	30	75.0%	50.0%	$6,392	82.3%	60.8%	8.2%
	TOTAL	40	100.0%	100.0%	$7,767	100.0%	100.0%	100.0%
Loan Size	$100,000 or Less	26	65.0%	89.2%	$969	12.5%	29.9%	
	$100,001–$250,000	5	12.5%	5.6%	$910	11.7%	17.5%	
	$250,001–$1 Million	9	22.5%	5.2%	$5,888	75.8%	52.6%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	40	100.0%	100.0%	$7,767	100.0%	100.0%	
Loan Size Revenue $1 Million or Less	$100,000 or Less	7	70.0%		$195	14.2%		
	$100,001–$250,000	1	10.0%		$149	10.8%		
	$250,001–$1 Million	2	20.0%		$1,031	75.0%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	10	100.0%		$1,375	100.0%		

LEE COUNTY ASSESSMENT AREA

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	5.2%	0	0.0%	4.3%	6.3%
	Middle	0	0.0%	29.2%	0	0.0%	24.5%	35.7%
	Upper	0	0.0%	65.6%	0	0.0%	71.1%	58.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	25.0%	4.1%	37	6.6%	2.8%	6.3%
	Middle	1	25.0%	27.3%	208	37.1%	22.0%	35.7%
	Upper	2	50.0%	68.5%	315	56.3%	75.2%	58.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	4	100.0%	100.0%	560	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	3.5%	0	0.0%	2.6%	6.3%
	Middle	0	0.0%	35.3%	0	0.0%	38.5%	35.7%
	Upper	0	0.0%	61.2%	0	0.0%	59.0%	58.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	4.1%	0	0.0%	2.8%	6.3%
	Middle	0	0.0%	29.4%	0	0.0%	21.7%	35.7%
	Upper	0	0.0%	66.5%	0	0.0%	75.5%	58.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	7.7%	0	0.0%	17.9%	6.3%
	Middle	0	0.0%	46.2%	0	0.0%	34.6%	35.7%
	Upper	0	0.0%	46.2%	0	0.0%	47.5%	58.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	6.5%	0	0.0%	6.8%	6.3%
	Middle	0	0.0%	45.2%	0	0.0%	44.8%	35.7%
	Upper	0	0.0%	48.4%	0	0.0%	48.4%	58.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	0	0.0%	100.0%	0	0.0%	100.0%	100.0%

Geographic Distribution of 2021 Home Mortgage Lending — Assessment Area: Lee County

	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	18.2%	0	0.0%	17.8%	14.7%
	Middle	1	50.0%	45.5%	1,996	75.4%	51.2%	57.6%
	Upper	1	50.0%	36.4%	650	24.6%	31.0%	27.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**2,646**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	16.7%	4.7%	37	1.2%	4.0%	6.3%
	Middle	2	33.3%	28.8%	2,204	68.7%	24.2%	35.7%
	Upper	3	50.0%	66.5%	965	30.1%	71.8%	58.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**6**	**100.0%**	**100.0%**	**3,206**	**100.0%**	**100.0%**	**100.0%**

**Geographic Distribution of 2022 Home Mortgage Lending** **Assessment Area: Lee County**							
Product Type	**Census Tract Income Level**	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Owner-Occupied Units**
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	3	100.0%	35.8%	673	100.0%	31.0%	40.1%
	Upper	0	0.0%	64.2%	0	0.0%	69.0%	59.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**673**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	34.5%	0	0.0%	30.6%	40.1%
	Upper	2	100.0%	65.5%	599	100.0%	69.4%	59.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**599**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	2	40.0%	39.1%	70	27.8%	33.9%	40.1%
	Upper	3	60.0%	60.9%	182	72.2%	66.1%	59.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**5**	**100.0%**	**100.0%**	**252**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	32.8%	0	0.0%	34.1%	40.1%
	Upper	1	100.0%	67.2%	45	100.0%	65.9%	59.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**45**	**100.0%**	**100.0%**	**100.0%**

	Income Level	#	#%	%	$	$ %	$ %	%
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	30.0%	0	0.0%	30.3%	40.1%
	Upper	0	0.0%	70.0%	0	0.0%	69.7%	59.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	40.9%	0	0.0%	31.7%	40.1%
	Upper	0	0.0%	59.1%	0	0.0%	68.3%	59.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	1	100.0%	61.1%	810	100.0%	84.8%	58.9%
	Upper	0	0.0%	38.9%	0	0.0%	15.2%	41.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**810**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	6	50.0%	35.5%	1,553	65.3%	35.5%	40.1%
	Upper	6	50.0%	64.5%	826	34.7%	64.5%	59.9%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**12**	**100.0%**	**100.0%**	**2,379**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Small Business Lending Assessment Area: Lee County							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**#%**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Middle	31	81.6%	47.3%	$3,484	90.2%	53.0%	53.0%
Upper	7	18.4%	51.3%	$377	9.8%	46.1%	46.6%
Unknown	0	0.0%	1.4%	$0	0.0%	0.9%	0.4%
TOTAL	**38**	**100.0%**	**100.0%**	**$3,861**	**100.0%**	**100.0%**	**100.0%**

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	0	0.0%	1.7%	0	0.0%	0.7%	18.6%
	Moderate	0	0.0%	16.2%	0	0.0%	10.3%	13.1%
	Middle	0	0.0%	24.1%	0	0.0%	19.6%	16.5%
	Upper	0	0.0%	44.9%	0	0.0%	56.7%	51.7%
	Unknown	0	0.0%	13.1%	0	0.0%	12.7%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	2.5%	0	0.0%	1.0%	18.6%
	Moderate	0	0.0%	9.3%	0	0.0%	5.3%	13.1%
	Middle	0	0.0%	17.4%	0	0.0%	12.4%	16.5%
	Upper	3	75.0%	51.6%	523	93.4%	61.9%	51.7%
	Unknown	1	25.0%	19.3%	37	6.6%	19.3%	0.0%
	TOTAL	**4**	**100.0%**	**100.0%**	**560**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	18.6%
	Moderate	0	0.0%	11.8%	0	0.0%	6.2%	13.1%
	Middle	0	0.0%	14.1%	0	0.0%	6.5%	16.5%
	Upper	0	0.0%	62.4%	0	0.0%	62.9%	51.7%
	Unknown	0	0.0%	11.8%	0	0.0%	24.4%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.6%	0	0.0%	0.1%	18.6%
	Moderate	0	0.0%	6.5%	0	0.0%	2.9%	13.1%
	Middle	0	0.0%	14.7%	0	0.0%	6.0%	16.5%
	Upper	0	0.0%	67.6%	0	0.0%	82.3%	51.7%
	Unknown	0	0.0%	10.6%	0	0.0%	8.6%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	7.7%	0	0.0%	1.4%	18.6%
	Moderate	0	0.0%	30.8%	0	0.0%	28.7%	13.1%
	Middle	0	0.0%	7.7%	0	0.0%	5.7%	16.5%
	Upper	0	0.0%	53.8%	0	0.0%	64.2%	51.7%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	18.6%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	13.1%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	16.5%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	51.7%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

Table title: **Borrower Distribution of 2021 Home Mortgage Lending** / **Assessment Area: Lee County**

Product Type	Income	#	#%	HMDA #%	$	$%	HMDA $%	Owner %
Multifamily	Low	0	0.0%	4.5%	0	0.0%	0.3%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	14.7%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	57.6%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	27.7%
	Unknown	2	100.0%	95.5%	2,646	100.0%	99.7%	0.0%
	TOTAL	2	100.0%	100.0%	2,646	100.0%	100.0%	100.0%
Total	Low	0	0.0%	2.0%	0	0.0%	0.8%	18.6%
	Moderate	0	0.0%	12.1%	0	0.0%	7.6%	13.1%
	Middle	0	0.0%	19.8%	0	0.0%	15.3%	16.5%
	Upper	3	50.0%	49.0%	523	16.3%	57.9%	51.7%
	Unknown	3	50.0%	17.2%	2,683	83.7%	18.3%	0.0%
	TOTAL	6	100.0%	100.0%	3,206	100.0%	100.0%	100.0%

Borrower Distribution of 2022 Home Mortgage Lending
Assessment Area: Lee County

Product Type	Census Tract Income Level	Bank Loans #	Bank Loans #%	Aggregate HMDA Data #%	Bank Loans $	Bank Loans $%	Aggregate HMDA Data $ %	Owner-Occupied Units %
Home Purchase	Low	0	0.0%	2.9%	0	0.0%	1.2%	15.3%
	Moderate	0	0.0%	16.6%	0	0.0%	10.4%	11.8%
	Middle	1	33.3%	23.2%	204	30.3%	19.9%	18.4%
	Upper	0	0.0%	40.5%	0	0.0%	53.1%	54.6%
	Unknown	2	66.7%	16.7%	469	69.7%	15.4%	0.0%
	TOTAL	3	100.0%	100.0%	673	100.0%	100.0%	100.0%
Refinance	Low	0	0.0%	5.1%	0	0.0%	2.3%	15.3%
	Moderate	0	0.0%	10.1%	0	0.0%	5.8%	11.8%
	Middle	0	0.0%	18.3%	0	0.0%	14.7%	18.4%
	Upper	1	50.0%	50.3%	160	26.7%	60.8%	54.6%
	Unknown	1	50.0%	16.2%	439	73.3%	16.3%	0.0%
	TOTAL	2	100.0%	100.0%	599	100.0%	100.0%	100.0%
Home Improvement	Low	0	0.0%	5.4%	0	0.0%	1.7%	15.3%
	Moderate	0	0.0%	10.9%	0	0.0%	5.6%	11.8%
	Middle	2	40.0%	18.5%	61	24.2%	13.0%	18.4%
	Upper	2	40.0%	57.6%	151	59.9%	73.2%	54.6%
	Unknown	1	20.0%	7.6%	40	15.9%	6.5%	0.0%
	TOTAL	5	100.0%	100.0%	252	100.0%	100.0%	100.0%
Other Purpose LOC	Low	0	0.0%	2.5%	0	0.0%	0.8%	15.3%
	Moderate	0	0.0%	8.8%	0	0.0%	4.9%	11.8%
	Middle	0	0.0%	12.3%	0	0.0%	7.2%	18.4%
	Upper	1	100.0%	64.7%	45	100.0%	78.3%	54.6%
	Unknown	0	0.0%	11.8%	0	0.0%	8.8%	0.0%
	TOTAL	1	100.0%	100.0%	45	100.0%	100.0%	100.0%

Other Purpose Closed/Exempt	Low	0	0.0%	10.0%	0	0.0%	3.5%	15.3%
	Moderate	0	0.0%	10.0%	0	0.0%	5.7%	11.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	80.0%	0	0.0%	90.8%	54.6%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	15.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	11.8%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	18.4%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	54.6%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	58.9%
	Upper	0	0.0%	5.6%	0	0.0%	0.7%	41.1%
	Unknown	1	100.0%	94.4%	810	100.0%	99.3%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**810**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	3.7%	0	0.0%	1.4%	15.3%
	Moderate	0	0.0%	13.3%	0	0.0%	7.9%	11.8%
	Middle	3	25.0%	20.0%	265	11.1%	16.2%	18.4%
	Upper	4	33.3%	46.0%	356	15.0%	51.9%	54.6%
	Unknown	5	41.7%	17.1%	1,758	73.9%	22.5%	0.0%
	TOTAL	**12**	**100.0%**	**100.0%**	**2,379**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Small Business Loans Assessment Area: Hattiesburg							
Business Revenue and Loan Size		**Count**		**Dollars**			**Total Businesses**
		Bank	**Aggregate**	**Bank**		**Aggregate**	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	12	31.6%	49.5%	$813	21.1%	40.5%	90.1%
	Over $1 Million/ Unknown	26	68.4%	50.5%	$3,048	78.9%	59.5%	9.9%
	TOTAL	**38**	**100.0%**	**100.0%**	**$3,861**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	33	86.8%	86.7%	$1,622	42.0%	27.3%	
	$100,001–$250,000	2	5.3%	7.4%	$266	6.9%	21.3%	
	$250,001–$1 Million	3	7.9%	5.9%	$1,973	51.1%	51.4%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**38**	**100.0%**	**100.0%**	**$3,861**	**100.0%**	**100.0%**	
Loan Size Revenue $1 Million or Less	$100,000 or Less	10	83.3%		$368	45.3%		
	$100,001–$250,000	1	8.3%		$140	17.2%		
	$250,001–$1 Million	1	8.3%		$305	37.5%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**12**	**100.0%**		**$813**	**100.0%**		

ALABAMA
NORTHWEST ALABAMA ASSESSMENT AREA

	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
Product Type		**#**	**#%**	**#%**	**$**	**$%**	**$ %**	**%**
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	6	19.4%	9.2%	424	9.0%	5.9%	14.7%
	Middle	25	80.6%	80.2%	4,312	91.0%	83.0%	76.9%
	Upper	0	0.0%	10.7%	0	0.0%	11.1%	8.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**31**	**100.0%**	**100.0%**	**4,736**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	23	26.1%	9.7%	1,061	11.7%	6.0%	14.7%
	Middle	62	70.5%	80.6%	7,555	83.0%	84.4%	76.9%
	Upper	3	3.4%	9.7%	486	5.3%	9.6%	8.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**88**	**100.0%**	**100.0%**	**9,102**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	3.0%	0	0.0%	3.8%	14.7%
	Middle	1	50.0%	84.8%	14	21.5%	89.2%	76.9%
	Upper	1	50.0%	12.1%	51	78.5%	6.9%	8.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**65**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	11.4%	0	0.0%	9.7%	14.7%
	Middle	0	0.0%	85.7%	0	0.0%	88.6%	76.9%
	Upper	0	0.0%	2.9%	0	0.0%	1.8%	8.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	10.5%	0	0.0%	5.9%	14.7%
	Middle	3	100.0%	81.6%	172	100.0%	81.1%	76.9%
	Upper	0	0.0%	7.9%	0	0.0%	13.0%	8.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**172**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	17.1%	0	0.0%	13.4%	14.7%
	Middle	0	0.0%	71.4%	0	0.0%	67.4%	76.9%
	Upper	0	0.0%	11.4%	0	0.0%	19.2%	8.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	20.4%
	Middle	0	0.0%	25.0%	0	0.0%	13.3%	63.7%
	Upper	0	0.0%	75.0%	0	0.0%	86.7%	16.0%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	29	23.4%	9.4%	1,485	10.6%	5.9%	14.7%
	Middle	91	73.4%	80.3%	12,053	85.6%	82.8%	76.9%
	Upper	4	3.2%	10.3%	537	3.8%	11.3%	8.4%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**124**	**100.0%**	**100.0%**	**14,075**	**100.0%**	**100.0%**	**100.0%**

**Geographic Distribution of 2022 Home Mortgage Lending Assessment Area: Northwest Alabama**							
Product Type	**Census Tract Income Level**	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Owner-Occupied Units**
		#	**#%**	**#%**	**$**	**$%**	**$ %**	**%**
Home Purchase	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	4.0%	6.4%	43	1.3%	4.5%	9.3%
	Middle	20	80.0%	77.0%	2,394	74.7%	73.8%	79.9%
	Upper	4	16.0%	16.5%	768	24.0%	21.7%	10.8%
	Unknown	0	0.0%	0.1%	0	0.0%	0.0%	0.0%
	TOTAL	**25**	**100.0%**	**100.0%**	**3,205**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	14	17.1%	6.7%	1,065	16.0%	4.2%	9.3%
	Middle	64	78.0%	78.7%	4,591	68.9%	77.3%	79.9%
	Upper	4	4.9%	14.6%	1,005	15.1%	18.4%	10.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**82**	**100.0%**	**100.0%**	**6,661**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	1	4.3%	4.3%	18	1.4%	3.6%	9.3%
	Middle	20	87.0%	79.6%	1,166	90.8%	78.9%	79.9%
	Upper	2	8.7%	16.1%	100	7.8%	17.5%	10.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**23**	**100.0%**	**100.0%**	**1,284**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	4.3%	0	0.0%	5.4%	9.3%
	Middle	3	100.0%	74.3%	110	100.0%	76.8%	79.9%
	Upper	0	0.0%	21.4%	0	0.0%	17.8%	10.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**110**	**100.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	#	#%	%	$	$ %	$ %	% of Businesses
Other Purpose Closed/Exempt	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	13.5%	0	0.0%	5.7%	9.3%
	Middle	1	100.0%	76.9%	33	100.0%	88.9%	79.9%
	Upper	0	0.0%	9.6%	0	0.0%	5.4%	10.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**33**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	14.3%	0	0.0%	9.1%	9.3%
	Middle	0	0.0%	66.7%	0	0.0%	64.1%	79.9%
	Upper	0	0.0%	19.0%	0	0.0%	26.8%	10.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	20.0%	0	0.0%	2.3%	4.0%
	Middle	0	0.0%	60.0%	0	0.0%	25.6%	79.2%
	Upper	0	0.0%	20.0%	0	0.0%	72.1%	16.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	16	11.9%	6.6%	1,126	10.0%	4.4%	9.3%
	Middle	108	80.6%	77.4%	8,294	73.4%	74.4%	79.9%
	Upper	10	7.5%	16.0%	1,873	16.6%	21.2%	10.8%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**134**	**100.0%**	**100.0%**	**11,293**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Small Business Lending Assessment Area: Northwest Alabama							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**#%**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	0	0.0%	0.0%	$0	0.0%	0.0%	0.0%
Moderate	11	11.3%	8.1%	$393	6.7%	4.2%	6.8%
Middle	75	77.3%	73.3%	$5,218	89.2%	74.6%	75.8%
Upper	11	11.3%	16.5%	$241	4.1%	20.7%	17.4%
Unknown	0	0.0%	2.1%	$0	0.0%	0.5%	0.0%
TOTAL	**97**	**100.0%**	**100.0%**	**$5,852**	**100.0%**	**100.0%**	**100.0%**

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Borrower Distribution of 2021 Home Mortgage Lending **Assessment Area: Northwest Alabama**								
Home Purchase	Low	1	3.2%	3.6%	19	0.4%	1.4%	21.7%
	Moderate	4	12.9%	16.0%	218	4.6%	8.9%	19.0%
	Middle	11	35.5%	21.1%	1,229	26.0%	15.9%	19.2%
	Upper	14	45.2%	41.3%	3,048	64.4%	55.0%	40.1%
	Unknown	1	3.2%	18.0%	222	4.7%	18.8%	0.0%
	TOTAL	**31**	**100.0%**	**100.0%**	**4,736**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	7	8.0%	3.0%	257	2.8%	1.1%	21.7%
	Moderate	7	8.0%	8.4%	255	2.8%	4.5%	19.0%
	Middle	26	29.5%	18.0%	1,476	16.2%	13.1%	19.2%
	Upper	42	47.7%	49.4%	5,761	63.3%	59.6%	40.1%
	Unknown	6	6.8%	21.1%	1,353	14.9%	21.6%	0.0%
	TOTAL	**88**	**100.0%**	**100.0%**	**9,102**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	9.1%	0	0.0%	3.7%	21.7%
	Moderate	1	50.0%	15.2%	14	21.5%	11.6%	19.0%
	Middle	0	0.0%	16.7%	0	0.0%	17.9%	19.2%
	Upper	1	50.0%	53.0%	51	78.5%	59.0%	40.1%
	Unknown	0	0.0%	6.1%	0	0.0%	7.6%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**65**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	5.7%	0	0.0%	2.9%	21.7%
	Moderate	0	0.0%	8.6%	0	0.0%	2.7%	19.0%
	Middle	0	0.0%	14.3%	0	0.0%	4.6%	19.2%
	Upper	0	0.0%	71.4%	0	0.0%	89.8%	40.1%
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	7.9%	0	0.0%	2.2%	21.7%
	Moderate	1	33.3%	23.7%	48	27.9%	11.6%	19.0%
	Middle	1	33.3%	13.2%	29	16.9%	9.6%	19.2%
	Upper	1	33.3%	47.4%	95	55.2%	71.5%	40.1%
	Unknown	0	0.0%	7.9%	0	0.0%	5.1%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**172**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	21.7%
	Moderate	0	0.0%	8.6%	0	0.0%	7.2%	19.0%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.2%
	Upper	0	0.0%	5.7%	0	0.0%	6.6%	40.1%
	Unknown	0	0.0%	85.7%	0	0.0%	86.2%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

Product Type	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	20.4%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	63.7%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	16.0%
	Unknown	0	0.0%	100.0%	0	0.0%	100.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Total	Low	8	6.5%	3.5%	276	2.0%	1.3%	21.7%
	Moderate	13	10.5%	12.8%	535	3.8%	7.0%	19.0%
	Middle	38	30.6%	19.4%	2,734	19.4%	14.4%	19.2%
	Upper	58	46.8%	44.8%	8,955	63.6%	56.3%	40.1%
	Unknown	7	5.6%	19.5%	1,575	11.2%	20.9%	0.0%
	TOTAL	**124**	**100.0%**	**100.0%**	**14,075**	**100.0%**	**100.0%**	**100.0%**

Product Type	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	6	24.0%	6.0%	175	5.5%	2.5%	21.1%
	Moderate	1	4.0%	20.0%	86	2.7%	11.6%	17.2%
	Middle	7	28.0%	20.6%	1,180	36.8%	16.4%	21.0%
	Upper	11	44.0%	34.2%	1,764	55.0%	50.2%	40.7%
	Unknown	0	0.0%	19.3%	0	0.0%	19.3%	0.0%
	TOTAL	**25**	**100.0%**	**100.0%**	**3,205**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	18	22.0%	8.6%	969	14.5%	3.4%	21.1%
	Moderate	16	19.5%	14.4%	640	9.6%	8.6%	17.2%
	Middle	15	18.3%	20.7%	1,042	15.6%	16.5%	21.0%
	Upper	32	39.0%	44.2%	3,990	59.9%	56.8%	40.7%
	Unknown	1	1.2%	12.2%	20	0.3%	14.8%	0.0%
	TOTAL	**82**	**100.0%**	**100.0%**	**6,661**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	3	13.0%	10.8%	64	5.0%	5.0%	21.1%
	Moderate	3	13.0%	17.2%	101	7.9%	14.9%	17.2%
	Middle	4	17.4%	19.4%	138	10.7%	14.1%	21.0%
	Upper	10	43.5%	43.0%	795	61.9%	53.2%	40.7%
	Unknown	3	13.0%	9.7%	186	14.5%	12.8%	0.0%
	TOTAL	**23**	**100.0%**	**100.0%**	**1,284**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	1.4%	0	0.0%	1.4%	21.1%
	Moderate	0	0.0%	4.3%	0	0.0%	2.2%	17.2%
	Middle	2	66.7%	17.1%	85	77.3%	9.4%	21.0%
	Upper	1	33.3%	74.3%	25	22.7%	86.0%	40.7%
	Unknown	0	0.0%	2.9%	0	0.0%	1.0%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**110**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Home Mortgage Lending
Assessment Area: Northwest Alabama

Other Purpose Closed/Exempt	Low	0	0.0%	13.5%	0	0.0%	6.8%	21.1%
	Moderate	0	0.0%	19.2%	0	0.0%	10.3%	17.2%
	Middle	1	100.0%	28.8%	33	100.0%	14.3%	21.0%
	Upper	0	0.0%	34.6%	0	0.0%	66.2%	40.7%
	Unknown	0	0.0%	3.8%	0	0.0%	2.5%	0.0%
	TOTAL	**1**	**100.0%**	**100.0%**	**33**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	4.8%	0	0.0%	2.6%	21.1%
	Moderate	0	0.0%	4.8%	0	0.0%	5.8%	17.2%
	Middle	0	0.0%	4.8%	0	0.0%	6.4%	21.0%
	Upper	0	0.0%	4.8%	0	0.0%	7.3%	40.7%
	Unknown	0	0.0%	81.0%	0	0.0%	78.0%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.0%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	4.0%
	Middle	0	0.0%	20.0%	0	0.0%	2.3%	79.2%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	16.8%
	Unknown	0	0.0%	80.0%	0	0.0%	97.7%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Total	Low	27	20.1%	6.9%	1,208	10.7%	2.8%	21.1%
	Moderate	20	14.9%	17.7%	827	7.3%	10.5%	17.2%
	Middle	29	21.6%	20.5%	2,478	21.9%	16.0%	21.0%
	Upper	54	40.3%	38.2%	6,574	58.2%	51.9%	40.7%
	Unknown	4	3.0%	16.7%	206	1.8%	18.8%	0.0%
	TOTAL	**134**	**100.0%**	**100.0%**	**11,293**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Small Business Loans Assessment Area: Northwest Alabama							
Business Revenue and Loan Size		**Count**		**Dollars**			**Total Businesses**
		Bank	**Aggregate**	**Bank**		**Aggregate**	
		#	%	%	$ (000s)	$ %	$ %	%
Business Revenue	$1 Million or Less	86	88.7%	48.8%	$3,774	64.5%	36.2%	88.7%
	Over $1 Million/ Unknown	11	11.3%	51.2%	$2,078	35.5%	63.8%	11.3%
	TOTAL	**97**	**100.0%**	**100.0%**	**$5,852**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	85	87.6%	91.2%	$2,579	44.1%	32.6%	
	$100,001–$250,000	8	8.2%	4.8%	$1,344	23.0%	19.0%	
	$250,001–$1 Million	4	4.1%	4.0%	$1,929	33.0%	48.4%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**97**	**100.0%**	**100.0%**	**$5,852**	**100.0%**	**100.0%**	
Loan Size **Revenue $1 Million or Less**	$100,000 or Less	80	93.0%		$2,375	62.9%		
	$100,001–$250,000	5	5.8%		$753	20.0%		
	$250,001–$1 Million	1	1.2%		$646	17.1%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**86**	**100.0%**		**$3,774**	**100.0%**		

TUSCALOOSA ASSESSMENT AREA

<table>
<tr><td colspan="8" align="center">Geographic Distribution of 2021 Home Mortgage Lending
Assessment Area: Tuscaloosa</td></tr>
<tr>
<td rowspan="2">Product Type</td>
<td rowspan="2">Census Tract Income Level</td>
<td colspan="2">Bank Loans</td>
<td>Aggregate HMDA Data</td>
<td colspan="2">Bank Loans</td>
<td>Aggregate HMDA Data</td>
<td>Owner-Occupied Units</td>
</tr>
<tr>
<td>#</td>
<td>#%</td>
<td>#%</td>
<td>$</td>
<td>$%</td>
<td>$ %</td>
<td>%</td>
</tr>
<tr><td rowspan="6">Home Purchase</td><td>Low</td><td>0</td><td>0.0%</td><td>0.1%</td><td>0</td><td>0.0%</td><td>0.0%</td><td>1.0%</td></tr>
<tr><td>Moderate</td><td>7</td><td>14.3%</td><td>11.0%</td><td>1,588</td><td>11.4%</td><td>7.2%</td><td>17.5%</td></tr>
<tr><td>Middle</td><td>13</td><td>26.5%</td><td>37.4%</td><td>3,183</td><td>22.9%</td><td>32.2%</td><td>41.3%</td></tr>
<tr><td>Upper</td><td>28</td><td>57.1%</td><td>50.6%</td><td>8,545</td><td>61.4%</td><td>59.3%</td><td>39.7%</td></tr>
<tr><td>Unknown</td><td>1</td><td>2.0%</td><td>0.8%</td><td>591</td><td>4.2%</td><td>1.2%</td><td>0.5%</td></tr>
<tr><td>TOTAL</td><td>49</td><td>100.0%</td><td>100.0%</td><td>13,907</td><td>100.0%</td><td>100.0%</td><td>100.0%</td></tr>
<tr><td rowspan="6">Refinance</td><td>Low</td><td>0</td><td>0.0%</td><td>0.1%</td><td>0</td><td>0.0%</td><td>0.0%</td><td>1.0%</td></tr>
<tr><td>Moderate</td><td>4</td><td>10.3%</td><td>7.3%</td><td>1,383</td><td>16.6%</td><td>5.2%</td><td>17.5%</td></tr>
<tr><td>Middle</td><td>15</td><td>38.5%</td><td>34.2%</td><td>2,190</td><td>26.3%</td><td>30.0%</td><td>41.3%</td></tr>
<tr><td>Upper</td><td>20</td><td>51.3%</td><td>57.8%</td><td>4,753</td><td>57.1%</td><td>63.6%</td><td>39.7%</td></tr>
<tr><td>Unknown</td><td>0</td><td>0.0%</td><td>0.5%</td><td>0</td><td>0.0%</td><td>1.2%</td><td>0.5%</td></tr>
<tr><td>TOTAL</td><td>39</td><td>100.0%</td><td>100.0%</td><td>8,326</td><td>100.0%</td><td>100.0%</td><td>100.0%</td></tr>
<tr><td rowspan="6">Home Improvement</td><td>Low</td><td>0</td><td>0.0%</td><td>1.0%</td><td>0</td><td>0.0%</td><td>0.5%</td><td>1.0%</td></tr>
<tr><td>Moderate</td><td>1</td><td>50.0%</td><td>12.7%</td><td>21</td><td>24.1%</td><td>7.2%</td><td>17.5%</td></tr>
<tr><td>Middle</td><td>1</td><td>50.0%</td><td>33.3%</td><td>66</td><td>75.9%</td><td>35.9%</td><td>41.3%</td></tr>
<tr><td>Upper</td><td>0</td><td>0.0%</td><td>51.0%</td><td>0</td><td>0.0%</td><td>51.0%</td><td>39.7%</td></tr>
<tr><td>Unknown</td><td>0</td><td>0.0%</td><td>2.0%</td><td>0</td><td>0.0%</td><td>5.5%</td><td>0.5%</td></tr>
<tr><td>TOTAL</td><td>2</td><td>100.0%</td><td>100.0%</td><td>87</td><td>100.0%</td><td>100.0%</td><td>100.0%</td></tr>
<tr><td rowspan="6">Other Purpose LOC</td><td>Low</td><td>0</td><td>0.0%</td><td>0.9%</td><td>0</td><td>0.0%</td><td>0.3%</td><td>1.0%</td></tr>
<tr><td>Moderate</td><td>0</td><td>0.0%</td><td>5.4%</td><td>0</td><td>0.0%</td><td>4.1%</td><td>17.5%</td></tr>
<tr><td>Middle</td><td>0</td><td>0.0%</td><td>33.0%</td><td>0</td><td>0.0%</td><td>28.0%</td><td>41.3%</td></tr>
<tr><td>Upper</td><td>0</td><td>0.0%</td><td>60.7%</td><td>0</td><td>0.0%</td><td>67.7%</td><td>39.7%</td></tr>
<tr><td>Unknown</td><td>0</td><td>0.0%</td><td>0.0%</td><td>0</td><td>0.0%</td><td>0.0%</td><td>0.5%</td></tr>
<tr><td>TOTAL</td><td>0</td><td>0.0%</td><td>100.0%</td><td>0</td><td>0.0%</td><td>100.0%</td><td>100.0%</td></tr>
<tr><td rowspan="6">Other Purpose Closed/Exempt</td><td>Low</td><td>0</td><td>0.0%</td><td>1.1%</td><td>0</td><td>0.0%</td><td>0.1%</td><td>1.0%</td></tr>
<tr><td>Moderate</td><td>1</td><td>33.3%</td><td>9.1%</td><td>55</td><td>11.5%</td><td>5.5%</td><td>17.5%</td></tr>
<tr><td>Middle</td><td>1</td><td>33.3%</td><td>39.8%</td><td>125</td><td>26.2%</td><td>33.3%</td><td>41.3%</td></tr>
<tr><td>Upper</td><td>1</td><td>33.3%</td><td>50.0%</td><td>298</td><td>62.3%</td><td>61.1%</td><td>39.7%</td></tr>
<tr><td>Unknown</td><td>0</td><td>0.0%</td><td>0.0%</td><td>0</td><td>0.0%</td><td>0.0%</td><td>0.5%</td></tr>
<tr><td>TOTAL</td><td>3</td><td>100.0%</td><td>100.0%</td><td>478</td><td>100.0%</td><td>100.0%</td><td>100.0%</td></tr>
<tr><td rowspan="6">Purpose Not Applicable</td><td>Low</td><td>0</td><td>0.0%</td><td>0.8%</td><td>0</td><td>0.0%</td><td>0.6%</td><td>1.0%</td></tr>
<tr><td>Moderate</td><td>0</td><td>0.0%</td><td>19.1%</td><td>0</td><td>0.0%</td><td>12.2%</td><td>17.5%</td></tr>
<tr><td>Middle</td><td>0</td><td>0.0%</td><td>44.3%</td><td>0</td><td>0.0%</td><td>41.3%</td><td>41.3%</td></tr>
<tr><td>Upper</td><td>0</td><td>0.0%</td><td>35.9%</td><td>0</td><td>0.0%</td><td>45.9%</td><td>39.7%</td></tr>
<tr><td>Unknown</td><td>0</td><td>0.0%</td><td>0.0%</td><td>0</td><td>0.0%</td><td>0.0%</td><td>0.5%</td></tr>
<tr><td>TOTAL</td><td>0</td><td>0.0%</td><td>100.0%</td><td>0</td><td>0.0%</td><td>100.0%</td><td>100.0%</td></tr>
</table>

	Census Tract Income Level	#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	0.5%
	Moderate	1	16.7%	36.4%	468	10.5%	21.8%	34.5%
	Middle	5	83.3%	51.5%	4,002	89.5%	69.8%	47.6%
	Upper	0	0.0%	9.1%	0	0.0%	7.1%	10.2%
	Unknown	0	0.0%	3.0%	0	0.0%	1.3%	7.1%
	TOTAL	**6**	**100.0%**	**100.0%**	**4,470**	**100.0%**	**100.0%**	**100.0%**
Total	Low	0	0.0%	0.2%	0	0.0%	0.0%	1.0%
	Moderate	14	14.1%	9.6%	3,515	12.9%	7.4%	17.5%
	Middle	35	35.4%	36.1%	9,566	35.1%	33.8%	41.3%
	Upper	49	49.5%	53.5%	13,596	49.9%	57.6%	39.7%
	Unknown	1	1.0%	0.7%	591	2.2%	1.2%	0.5%
	TOTAL	**99**	**100.0%**	**100.0%**	**27,268**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Home Mortgage Lending Assessment Area: Tuscaloosa								
Product Type	**Census Tract Income Level**	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Owner-Occupied Units**
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	1	0.9%	2.1%	14	0.1%	1.1%	4.0%
	Moderate	4	3.8%	8.1%	514	1.8%	5.6%	11.8%
	Middle	39	36.8%	40.7%	8,368	30.0%	35.4%	46.1%
	Upper	57	53.8%	43.3%	18,002	64.5%	53.4%	35.3%
	Unknown	5	4.7%	5.8%	1,019	3.7%	4.6%	2.9%
	TOTAL	**106**	**100.0%**	**100.0%**	**27,917**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	7	10.0%	2.0%	376	4.0%	0.7%	4.0%
	Moderate	11	15.7%	8.4%	825	8.7%	5.3%	11.8%
	Middle	31	44.3%	44.2%	3,353	35.2%	39.9%	46.1%
	Upper	18	25.7%	41.8%	4,333	45.5%	50.8%	35.3%
	Unknown	3	4.3%	3.6%	626	6.6%	3.2%	2.9%
	TOTAL	**70**	**100.0%**	**100.0%**	**9,513**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	1.0%	0	0.0%	0.6%	4.0%
	Moderate	0	0.0%	5.0%	0	0.0%	4.3%	11.8%
	Middle	1	12.5%	34.7%	35	5.1%	33.5%	46.1%
	Upper	7	87.5%	57.8%	645	94.9%	59.1%	35.3%
	Unknown	0	0.0%	1.5%	0	0.0%	2.5%	2.9%
	TOTAL	**8**	**100.0%**	**100.0%**	**680**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	0.0%	0	0.0%	0.0%	4.0%
	Moderate	1	8.3%	2.2%	20	1.8%	1.2%	11.8%
	Middle	5	41.7%	33.0%	288	26.2%	26.9%	46.1%
	Upper	6	50.0%	63.0%	792	72.0%	70.6%	35.3%
	Unknown	0	0.0%	1.8%	0	0.0%	1.2%	2.9%
	TOTAL	**12**	**100.0%**	**100.0%**	**1,100**	**100.0%**	**100.0%**	**100.0%**

Other Purpose Closed/Exempt	Low	0	0.0%	1.7%	0	0.0%	1.1%	4.0%
	Moderate	2	66.7%	10.1%	39	12.5%	7.4%	11.8%
	Middle	0	0.0%	28.6%	0	0.0%	27.2%	46.1%
	Upper	1	33.3%	57.1%	272	87.5%	61.5%	35.3%
	Unknown	0	0.0%	2.5%	0	0.0%	2.9%	2.9%
	TOTAL	**3**	**100.0%**	**100.0%**	**311**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	4.7%	0	0.0%	2.7%	4.0%
	Moderate	0	0.0%	14.1%	0	0.0%	12.5%	11.8%
	Middle	0	0.0%	35.9%	0	0.0%	33.6%	46.1%
	Upper	0	0.0%	42.2%	0	0.0%	47.3%	35.3%
	Unknown	0	0.0%	3.1%	0	0.0%	4.0%	2.9%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	5	33.3%	19.6%	1,321	9.0%	8.1%	8.3%
	Moderate	1	6.7%	8.9%	39	0.3%	7.3%	16.1%
	Middle	5	33.3%	46.4%	7,982	54.6%	21.5%	48.1%
	Upper	2	13.3%	17.9%	4,096	28.0%	52.1%	16.2%
	Unknown	2	13.3%	7.1%	1,187	8.1%	11.0%	11.3%
	TOTAL	**15**	**100.0%**	**100.0%**	**14,625**	**100.0%**	**100.0%**	**100.0%**
Total	Low	13	6.1%	2.1%	1,711	3.2%	1.8%	4.0%
	Moderate	19	8.9%	8.0%	1,437	2.7%	5.7%	11.8%
	Middle	81	37.9%	40.9%	20,026	37.0%	34.5%	46.1%
	Upper	91	42.5%	44.1%	28,140	52.0%	53.1%	35.3%
	Unknown	10	4.7%	4.9%	2,832	5.2%	4.9%	2.9%
	TOTAL	**214**	**100.0%**	**100.0%**	**54,146**	**100.0%**	**100.0%**	**100.0%**

Geographic Distribution of 2022 Small Business Lending Assessment Area: Tuscaloosa							
Census Tract Income Level	**Bank Small Business Loans**		**Aggregate of Peer Data**	**Bank Small Business Loans**		**Aggregate of Peer Data**	**% of Businesses**
	#	**#%**	**%**	**$ (000s)**	**$ %**	**$ %**	
Low	9	6.0%	4.8%	$3,121	11.2%	7.2%	5.5%
Moderate	29	19.5%	13.4%	$6,482	23.3%	16.1%	13.3%
Middle	66	44.3%	43.8%	$10,534	37.8%	43.6%	45.7%
Upper	41	27.5%	33.0%	$6,460	23.2%	29.2%	29.9%
Unknown	4	2.7%	5.0%	$1,270	4.6%	3.9%	5.5%
TOTAL	**149**	**100.0%**	**100.0%**	**$27,867**	**100.0%**	**100.0%**	**100.0%**

	Census Tract Income Level	Bank Loans		Aggregate HMDA Data	Bank Loans		Aggregate HMDA Data	Owner-Occupied Units
Borrower Distribution of 2021 Home Mortgage Lending **Assessment Area: Tuscaloosa**								
Product Type		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	1	2.0%	4.6%	237	1.7%	2.4%	22.9%
	Moderate	4	8.2%	17.3%	585	4.2%	12.8%	15.3%
	Middle	9	18.4%	19.7%	2,051	14.7%	18.2%	17.8%
	Upper	32	65.3%	32.9%	10,259	73.8%	40.8%	44.1%
	Unknown	3	6.1%	25.6%	775	5.6%	25.7%	0.0%
	TOTAL	**49**	**100.0%**	**100.0%**	**13,907**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	3	7.7%	3.3%	380	4.6%	1.7%	22.9%
	Moderate	1	2.6%	10.1%	59	0.7%	6.7%	15.3%
	Middle	8	20.5%	17.2%	1,238	14.9%	13.6%	17.8%
	Upper	14	35.9%	34.3%	3,911	47.0%	42.1%	44.1%
	Unknown	13	33.3%	35.1%	2,738	32.9%	35.9%	0.0%
	TOTAL	**39**	**100.0%**	**100.0%**	**8,326**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	4.9%	0	0.0%	2.9%	22.9%
	Moderate	0	0.0%	13.7%	0	0.0%	9.1%	15.3%
	Middle	0	0.0%	16.7%	0	0.0%	18.9%	17.8%
	Upper	1	50.0%	55.9%	66	75.9%	58.3%	44.1%
	Unknown	1	50.0%	8.8%	21	24.1%	10.8%	0.0%
	TOTAL	**2**	**100.0%**	**100.0%**	**87**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	7.1%	0	0.0%	4.6%	22.9%
	Moderate	0	0.0%	12.5%	0	0.0%	8.3%	15.3%
	Middle	0	0.0%	20.5%	0	0.0%	17.5%	17.8%
	Upper	0	0.0%	58.0%	0	0.0%	68.0%	44.1%
	Unknown	0	0.0%	1.8%	0	0.0%	1.6%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Other Purpose Closed/Exempt	Low	0	0.0%	8.0%	0	0.0%	3.8%	22.9%
	Moderate	0	0.0%	9.1%	0	0.0%	4.9%	15.3%
	Middle	1	33.3%	14.8%	125	26.2%	10.9%	17.8%
	Upper	2	66.7%	60.2%	353	73.8%	74.8%	44.1%
	Unknown	0	0.0%	8.0%	0	0.0%	5.5%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**478**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	0.0%	0	0.0%	0.0%	22.9%
	Moderate	0	0.0%	0.8%	0	0.0%	0.7%	15.3%
	Middle	0	0.0%	1.5%	0	0.0%	2.2%	17.8%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	44.1%
	Unknown	0	0.0%	97.7%	0	0.0%	97.2%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**

		#	#%	#%	$	$%	$ %	%
Multifamily	Low	0	0.0%	3.0%	0	0.0%	0.2%	0.5%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	34.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	47.6%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	10.2%
	Unknown	6	100.0%	97.0%	4,470	100.0%	99.8%	7.1%
	TOTAL	**6**	**100.0%**	**100.0%**	**4,470**	**100.0%**	**100.0%**	**100.0%**
Total	Low	4	4.0%	4.0%	617	2.3%	2.0%	22.9%
	Moderate	5	5.1%	13.8%	644	2.4%	9.4%	15.3%
	Middle	18	18.2%	18.3%	3,414	12.5%	15.1%	17.8%
	Upper	49	49.5%	33.7%	14,589	53.5%	38.8%	44.1%
	Unknown	23	23.2%	30.2%	8,004	29.4%	34.7%	0.0%
	TOTAL	**99**	**100.0%**	**100.0%**	**27,268**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Home Mortgage Lending Assessment Area: Tuscaloosa								
Product Type	**Census Tract Income Level**	**Bank Loans**		**Aggregate HMDA Data**	**Bank Loans**		**Aggregate HMDA Data**	**Owner-Occupied Units**
		#	#%	#%	$	$%	$ %	%
Home Purchase	Low	2	1.9%	3.7%	287	1.0%	1.8%	22.7%
	Moderate	14	13.2%	17.9%	2,564	9.2%	13.0%	16.2%
	Middle	15	14.2%	20.4%	3,751	13.4%	18.7%	18.7%
	Upper	52	49.1%	34.8%	16,767	60.1%	43.8%	42.3%
	Unknown	23	21.7%	23.2%	4,548	16.3%	22.7%	0.0%
	TOTAL	**106**	**100.0%**	**100.0%**	**27,917**	**100.0%**	**100.0%**	**100.0%**
Refinance	Low	6	8.6%	7.1%	462	4.9%	3.6%	22.7%
	Moderate	8	11.4%	15.7%	1,089	11.4%	11.2%	16.2%
	Middle	6	8.6%	18.4%	702	7.4%	15.9%	18.7%
	Upper	26	37.1%	34.9%	3,836	40.3%	45.8%	42.3%
	Unknown	24	34.3%	23.9%	3,424	36.0%	23.4%	0.0%
	TOTAL	**70**	**100.0%**	**100.0%**	**9,513**	**100.0%**	**100.0%**	**100.0%**
Home Improvement	Low	0	0.0%	4.0%	0	0.0%	1.8%	22.7%
	Moderate	0	0.0%	7.0%	0	0.0%	4.6%	16.2%
	Middle	1	12.5%	14.1%	60	8.8%	10.9%	18.7%
	Upper	5	62.5%	64.8%	335	49.3%	69.3%	42.3%
	Unknown	2	25.0%	10.1%	285	41.9%	13.4%	0.0%
	TOTAL	**8**	**100.0%**	**100.0%**	**680**	**100.0%**	**100.0%**	**100.0%**
Other Purpose LOC	Low	0	0.0%	3.5%	0	0.0%	1.1%	22.7%
	Moderate	2	16.7%	10.6%	65	5.9%	6.6%	16.2%
	Middle	4	33.3%	22.0%	108	9.8%	13.4%	18.7%
	Upper	6	50.0%	59.0%	927	84.3%	75.9%	42.3%
	Unknown	0	0.0%	4.8%	0	0.0%	2.9%	0.0%
	TOTAL	**12**	**100.0%**	**100.0%**	**1,100**	**100.0%**	**100.0%**	**100.0%**

Other Purpose Closed/Exempt	Low	2	66.7%	8.4%	39	12.5%	5.7%	22.7%
	Moderate	0	0.0%	14.3%	0	0.0%	12.5%	16.2%
	Middle	0	0.0%	25.2%	0	0.0%	19.6%	18.7%
	Upper	1	33.3%	42.0%	272	87.5%	43.8%	42.3%
	Unknown	0	0.0%	10.1%	0	0.0%	18.4%	0.0%
	TOTAL	**3**	**100.0%**	**100.0%**	**311**	**100.0%**	**100.0%**	**100.0%**
Purpose Not Applicable	Low	0	0.0%	1.6%	0	0.0%	0.9%	22.7%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.2%
	Middle	0	0.0%	1.6%	0	0.0%	2.5%	18.7%
	Upper	0	0.0%	0.0%	0	0.0%	0.0%	42.3%
	Unknown	0	0.0%	96.9%	0	0.0%	96.6%	0.0%
	TOTAL	**0**	**0.0%**	**100.0%**	**0**	**0.0%**	**100.0%**	**100.0%**
Multifamily	Low	0	0.0%	0.0%	0	0.0%	0.0%	8.3%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	16.1%
	Middle	0	0.0%	1.8%	0	0.0%	0.2%	48.1%
	Upper	1	6.7%	10.7%	500	3.4%	2.4%	16.2%
	Unknown	14	93.3%	87.5%	14,125	96.6%	97.4%	11.3%
	TOTAL	**15**	**100.0%**	**100.0%**	**14,625**	**100.0%**	**100.0%**	**100.0%**
Total	Low	10	4.7%	4.6%	788	1.5%	2.0%	22.7%
	Moderate	24	11.2%	16.4%	3,718	6.9%	10.9%	16.2%
	Middle	26	12.1%	19.5%	4,621	8.5%	15.7%	18.7%
	Upper	91	42.5%	36.1%	22,637	41.8%	40.0%	42.3%
	Unknown	63	29.4%	23.3%	22,382	41.3%	31.4%	0.0%
	TOTAL	**214**	**100.0%**	**100.0%**	**54,146**	**100.0%**	**100.0%**	**100.0%**

Borrower Distribution of 2022 Small Business Loans Assessment Area: Tuscaloosa							
Business Revenue and Loan Size		**Count**		**Dollars**			**Total Businesses**
		Bank	**Aggregate**	**Bank**		**Aggregate**	
		#	**%**	**%**	**$ (000s)**	**$ %**	**$ %**	**%**
Business Revenue	$1 Million or Less	102	68.5%	50.3%	$15,545	55.8%	38.0%	91.0%
	Over $1 Million/ Unknown	47	31.5%	49.7%	$12,322	44.2%	62.0%	9.0%
	TOTAL	**149**	**100.0%**	**100.0%**	**$27,867**	**100.0%**	**100.0%**	**100.0%**
Loan Size	$100,000 or Less	83	55.7%	87.7%	$3,692	13.2%	28.1%	
	$100,001– $250,000	29	19.5%	6.3%	$5,023	18.0%	18.7%	
	$250,001– $1 Million	37	24.8%	6.0%	$19,152	68.7%	53.2%	
	Over $1 Million	0	0.0%	0.0%	$0	0.0%	0.0%	
	TOTAL	**149**	**100.0%**	**100.0%**	**$27,867**	**100.0%**	**100.0%**	
Loan Size **Revenue $1 Million or Less**	$100,000 or Less	63	61.8%		$2,438	15.7%		
	$100,001– $250,000	19	18.6%		$3,109	20.0%		
	$250,001– $1 Million	20	19.6%		$9,998	64.3%		
	Over $1 Million	0	0.0%		$0	0.0%		
	TOTAL	**102**	**100.0%**		**$15,545**	**100.0%**		

GLOSSARY

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

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

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

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals; (2) community services targeted to low- or moderate-income individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of $1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

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

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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

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

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

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

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

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

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

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

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

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

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

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

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

Multifamily: Refers to a residential structure that contains five or more units.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

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

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

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

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

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

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were $1 million or less.

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

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

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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