

PUBLIC DISCLOSURE

October 6, 2025

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

**Commercial Bank
6710 Cumberland Gap Parkway
Harrogate, Tennessee**

RSSD ID NUMBER: 497039

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

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

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INSTITUTION'S CRA RATING

INSTITUTION'S CRA RATING: SATISFACTORY

The following table indicates the performance level of Commercial Bank with respect to the Lending, Investment, and Service Tests.

Commercial Bank			
Performance Levels	Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory			
Low Satisfactory	X	X	X
Needs to Improve			
Substantial Noncompliance			
OVERALL RATING	SATISFACTORY		

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

Major factors contributing to this rating include:

- The geographic distribution of loans reflects adequate penetration throughout the AAs.
- The distribution of borrowers reflects, given the product lines offered, adequate penetration among customers of different income levels and businesses of different sizes.
- The bank made a low level of CD loans.
- The bank made an adequate level of qualified CD investments and grants.
- Retail banking services, which includes accessibility of delivery systems, changes in branch locations, and reasonableness of hours and services, are adequate.
- The bank provided an adequate level of CD services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Commercial Bank is a community bank headquartered in Harrogate, Tennessee. The bank is owned by Commercial Bancgroup, Inc., a one-bank holding company also located in Harrogate. As of December 31, 2024, Commercial Bank had total assets of \$2.3 billion and operated 34 banking offices and 37 ATMs in the states of Tennessee, Kentucky, and North Carolina. Of the 34 offices, 17 are in Tennessee, 13 are in Kentucky, and four are in North Carolina. Commercial Bank offers traditional consumer and commercial products and services to serve customers across its footprint.

For purposes of the CRA, Commercial Bank has defined 10 AAs across three states, which are listed below and described in the applicable *Description of AA* sections of this report.

- Southeast Kentucky
- Knoxville, Tennessee
- Claiborne County, Tennessee
- Johnson City, Tennessee
- Kingsport, Tennessee
- Morristown, Tennessee
- Newport, Tennessee
- Williamson County, Tennessee
- Gaston County, North Carolina
- Cleveland County, North Carolina

North Carolina is a new state for Commercial Bank for this examination. The bank established a presence with two AAs in North Carolina in June 2024 when it completed the acquisition of Alliance Bank and Trust.

Loan Portfolio

The following table and graphs show the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report). As shown, primary loan types include nonfarm/nonresidential real estate and loans secured by one- to four-family dwellings.

COMPOSITION OF LOAN PORTFOLIO		
Loan Type	12/31/2024	
	\$ (000s)	Percent
Construction and Development	198,792	11.1%
Secured by One- to Four- Family Dwellings	367,574	20.6%
Other Real Estate: Farmland	16,745	0.9%
Multifamily	204,731	11.5%
Nonfarm nonresidential	796,134	44.5%
Commercial and Industrial	188,190	10.5%
Loans to Individuals	15,207	0.9%
Agricultural Loans	356	0.0%
Total	\$1,787,729	100.00%

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

Commercial Bank complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its AAs. The bank received a “Needs to Improve” rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta dated July 15, 2024 under the FFIEC Large Institution Examination Procedures.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank’s record of meeting the credit needs of its community, including LMI neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, as well as the economic and demographic characteristics of its defined AAs. Unless otherwise noted, demographic characteristics discussed in the *Description of Operations* section of each AA are derived from 2024 FFIEC Census data, and deposit information is taken from the FDIC Deposit Market Share Report data as of June 30, 2024. Commercial Bank’s CRA performance was evaluated using the Large Institution Examination Procedures, which consist of three separately rated tests: Lending, Investment, and Service.

Commercial Bank is an interstate bank with branches in Tennessee, Kentucky, and North Carolina; therefore, the scope of this evaluation includes a full-scope review of CRA activities in at least one AA in each state. Each of the bank’s AAs are reviewed for lending, investment, and service performance using either full-scope or limited-scope examination procedures. For this exam, full scope reviews were conducted on four of the bank’s 10 AAs: Claiborne County and Knoxville in Tennessee; Southeast Kentucky in Kentucky; and Cleveland County in North Carolina. The other five AAs in Tennessee and one AA in North Carolina were evaluated using limited-scope review procedures. Criteria used to select full-scope AAs include the volume of HMDA-reportable and small business lending by number of loans and dollar amount and as a percentage of statewide lending activity; deposit market share; number of branches; percentage of statewide deposits; and other nonfinancial considerations.

When determining the overall rating for the institution, the greatest weight was placed on performance in Tennessee, which is the state with the greatest concentration of deposits, lending, and branches, followed by Kentucky, and North Carolina. Due to the limited time that Commercial Bank has been in the North Carolina AAs, limited weight was put on performance in the state for this exam.

Lending Test

Under the Lending Test, performance is evaluated using the following criteria and time frames. Small farm, multifamily, and other purpose HMDA-reportable loans were not evaluated due to the low volume of these product types.

Lending Test Performance Criterion	Products Selected for Review	Time Period
Level of Lending Activity	<ul style="list-style-type: none">• HMDA-reportable loans• CRA small business loans	January 1, 2024 through December 31, 2024* *The review period for CD loans was January 1, 2024 through June 30, 2025
AA Concentration		
Geographic Distribution of Loans		
Loan Distribution by Borrower’s Profile		
CD Lending*		
Product Innovation		

For the purposes of this analysis, the term “home mortgage lending” is used to refer to the total of home purchase, refinance, and home improvement loans while “HMDA-reportable lending” refers to the total of all HMDA-

reportable loan types. When determining the conclusions for the Lending Test, the volume of each loan product compared to total loan volume was used to determine how much weight to assign to the performance for each product type. The weighting by product type varied across AAs in the three states.

The Lending Test analyses include comparisons of bank performance in 2024 to applicable AA demographics and the performance of other lenders for the same year. The combined total lending of all other lenders is referred to as aggregate lending throughout the report. Demographic data used for analysis is based on 2024 FFIEC Census data and Dun & Bradstreet (D&B) data. The demographic data for the full-scope AAs is presented in *Appendix C* and the demographic tables for the limited-scope AAs are found in *Appendix D*.

Investment Test

All qualified investments, including grants and donations, made between January 1, 2024 and June 30, 2025 were reviewed. In addition, if applicable, investments made prior to January 1, 2024 but still on the bank's balance sheet as of June 30, 2025 were also considered. Qualified investments and grants were evaluated to determine the overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and CD needs of the bank's AAs.

Service Test

Under the Service Test, performance was evaluated using the following criteria and time frames.

Service Test Performance Criteria	Time Period
Accessibility of Delivery Systems	January 1, 2024 through December 31, 2024* <i>*The review period for CD services was January 1, 2024 through June 30, 2025</i>
Changes in Branch Locations	
Reasonableness of Business Hours and Services	
CD Services*	

Community Contacts

As part of the CRA evaluation, community contacts made within the last 12 to 24 months were reviewed. These contacts were with local community and economic development representatives who are familiar with the economic and demographic characteristics as well as credit and CD opportunities in the AAs. Information obtained from the contacts helped to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contacts is included in the applicable section of the evaluation for each AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

Overall, the Lending Test is rated Low Satisfactory. Lending Test performance was rated High Satisfactory in Kentucky and Low Satisfactory in Tennessee and North Carolina.

Lending Activity

The following table summarizes the bank's lending activity in 2024. As shown, the bank originated slightly more small business loans than HMDA-reportable loans by number of loans during the review period. Lending levels reflect good responsiveness to credit needs and are commensurate with deposits in each state. Detailed information about lending activity can be found in the state and full-scope AA sections of this report.

Summary of Lending Activity

Loan Type	#	%	\$(000s)	%
Total Consumer related	0	0	\$0	0
Home Improvement	5	--	\$308	--
Home Purchase	146	--	\$43,718	--
Multi-Family Housing	6	--	\$8,047	--
Refinancing	61	--	\$9,355	--
Other Purpose Closed-End	20	--	\$1,699	--
Total HMDA related	238	45	\$63,127	58
Total Non-HMDA related	0	0	\$0	0
Small Business	267	--	\$44,689	--
Total Small Business related	267	51	\$44,689	41
Small Farm	20	--	\$1,029	--
Total Small Farm related	20	4	\$1,029	1
TOTAL LOANS	525	100	\$108,845	100

Note: Affiliate loans include only loans originated or purchased within the bank's assessment areas.

AA Concentration

The majority of loans originated were to borrowers and businesses residing in or located within the bank's AAs. As shown in the table below, 78.2 percent of HMDA-reportable loans (by number) and 77.2 percent of small business loans (by number) were to borrowers and businesses located inside the bank's AAs.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	4	80.0	\$281	91.2	1	20.0	\$27	8.8
Home Purchase - Conventional	103	70.5	\$27,050	61.9	43	29.5	\$16,668	38.1
Multi-Family Housing	5	83.3	\$7,927	98.5	1	16.7	\$120	1.5
Other Purpose Closed-End	19	95.0	\$1,621	95.4	1	5.0	\$78	4.6
Refinancing	55	90.2	\$7,921	84.7	6	9.8	\$1,434	15.3
Total HMDA related	186	78.2	\$44,800	71.0	52	21.8	\$18,327	29.0
Small Business	206	77.2	\$31,782	71.1	61	22.8	\$12,907	28.9
Total Small Bus. related	206	77.2	\$31,782	71.1	61	22.8	\$12,907	28.9
Small Farm	17	85.0	\$639	62.1	3	15.0	\$390	37.9
Total Small Farm related	17	85.0	\$639	62.1	3	15.0	\$390	37.9
TOTAL LOANS	409	77.9	\$77,221	70.9	116	22.1	\$31,624	29.1

Note: Affiliate loans not included

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

The geographic distribution of HMDA-reportable and small business loans reflects adequate penetration throughout the AAs, given the opportunity and competition in these markets. The distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different sizes. The analyses of HMDA-reportable and small business lending within each AA are discussed in detail later in this report.

CD Lending

The bank made a low level of CD loans. Since the previous examination, the bank originated 18 qualified CD loans for \$35.3 million in its AAs or a broader statewide or regional area (BSRA) that includes its AAs. Total CD loans included the renewal of a \$6 million loan to a regional CDFI that provides financing to develop affordable housing in the broader regional area that includes the bank's AAs in Tennessee and Kentucky. Additional details on CD loans in each state and AA are discussed later in the report.

Product Innovation

Commercial Bank offers a range of commercial loan products as well as residential mortgages, construction loans, and consumer loans. The bank makes little use of innovative and/or flexible lending practices in serving the credit needs of its AAs, but does offer SBA products that provide small businesses with access to capital with more flexible terms than conventional commercial financing.

The bank offers affordable deposit products, including a checking account with no minimum balance requirements and low monthly service charges. Additionally, the bank provides access to mobile banking for all customers, including access to the Zelle network, as well as mobile deposits and bill payment.

INVESTMENT TEST

Overall, the Investment Test is rated Low Satisfactory. Performance in all three states was rated Low Satisfactory. During the review period, the bank made 37 investments totaling \$23.9 million and total donations of \$184,600. The bank's investments were in municipal bonds that financed community services for LMI individuals; bonds that financed the revitalization and stabilization of LMI communities; and mortgage-backed securities (MBS) that financed affordable housing for LMI individuals. Most of the bank's contributions supported community services for LMI individuals and affordable housing.

SERVICE TEST

Overall, the Service Test is rated Low Satisfactory. Service Test performance in Kentucky was rated High Satisfactory and Low Satisfactory for both Tennessee and North Carolina.

The Service Test evaluates both retail services and CD services. Delivery systems are reasonably accessible to communities and individuals of different income levels across the bank's AAs. Additionally, the bank's record of opening and closing branches or ATMs during the review period generally did not adversely affect the accessibility of its delivery services and the bank's hours and services did not vary in such a way that inconveniences LMI communities and/or individuals across its footprint. The table below provides an overview of the bank's retail delivery systems across all AAs.

Geographic Distribution of Branches & ATMs
All Assessment Areas

Tract Category	Branches							ATMs										
	Total Branches				Drive thru	Extend- ed Hours	Week- end Hours	Total ATMs			Full Service ATMs				Cash only ATMs			
	#	%	Open	Closed				#	#	%	#	%	Open	Closed	#	%	Open	Closed
Low	2	5.9%	0	0	2	2	0	Total	4	10.8%	0	0.0%	0	0	4	10.8%	0	0
DTO	0		0	0	0			SA	2		0		0	0	2		0	0
Moderate	12	35.3%	1	0	11	11	1	Total	12	32.4%	0	0.0%	0	0	12	32.4%	1	1
DTO	0		0	0	0			SA	2		0		0	0	2		1	1
Middle	15	44.1%	1	0	15	14	2	Total	18	48.6%	0	0.0%	0	0	18	48.6%	0	0
DTO	1		0	0	1			SA	5		0		0	0	5		0	0
Upper	4	11.8%	1	0	3	2	0	Total	3	8.1%	0	0.0%	0	0	3	8.1%	0	0
DTO	0		0	0	0			SA	1		0		0	0	1		0	0
Unknown	1	2.9%	1	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0
DTO	0		0	0	0			SA	0		0		0	0	0		0	0
Total	34	100%	4	0	31	29	3	Total	37	100%	0	0.0%	0	0	37	100%	1	1
DTO	1		0	0	1			SA	10		0		0	0	10		1	1

Based on 2024 FFIEC Census Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

The bank provided an adequate level of CD services during the review period. Staff engaged in 456 hours of CD service activities. The majority of the CD service activities were financial education, particularly targeting seniors as well as LMI youth through schools.

RESPONSIVENESS TO SUBSTANTIATED COMPLAINTS

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

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

TENNESSEE

CRA RATING FOR TENNESSEE: SATISFACTORY

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

Major factors contributing to this rating include:

- The geographic distribution of loans reflects adequate penetration throughout Tennessee AAs.
- The distribution of borrowers reflects adequate penetration throughout Tennessee AAs.
- The bank made a low level of CD loans in Tennessee.
- The bank made an adequate level of qualified CD investments and grants that exhibit adequate responsiveness to identified CD needs in Tennessee.
- Retail banking services were adequate throughout Tennessee AAs.
- The bank provided an adequate level of CD service activities in Tennessee.

SCOPE OF EXAMINATION

Scoping considerations, including time periods and products, applicable to the review of Tennessee AAs are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section of this report.

Commercial Bank has seven delineated AAs in Tennessee and the state rating reflects a composite of performance in these AAs. A full-scope review was conducted for the Claiborne County and Knoxville AAs. These AAs were selected for a full-scope review based on the concentration of branches, loans, and deposit activity in these markets. The remaining five AAs (Johnson City, Kingsport, Morristown, Newport, and Williamson County) were reviewed under limited-scope procedures.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

As of December 31, 2024, the bank operates 17 branches in the state, representing 50 percent of its total branches. The bank holds \$1.1 billion in deposits in Tennessee, accounting for 83.8 percent of total deposits. During the review period, Commercial Bank originated or purchased 192 HMDA-reportable and small business loans in Tennessee, accounting for 49 percent of the its total HMDA-reportable and small business loans. Given the concentration of branches, deposits, and loans, performance in the state of Tennessee is weighted most heavily in deriving the overall institution rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

Overview

The Lending Test rating for the state of Tennessee is Low Satisfactory. The rating is derived from performance in each characteristic of the Lending Test applicable to the state, including Lending Activity (adequate); Geographic Distribution (adequate); Borrower Distribution (adequate); and CD Lending (low level). Highlights of each characteristic are found in the sections that follow, with additional descriptions and details within each AA of the state.

Lending Activity

Lending levels reflect adequate responsiveness to the credit needs of Tennessee AAs. The total number and dollar volume of HMDA-reportable and small business loans as well as the percentage of loans and deposits in the state compared to the institution overall was considered in arriving at lending activity conclusions.

The following table displays the volume of lending activity from January 1, 2024 through December 31, 2024 by loan type. As shown, the number and dollar volume of HMDA-reportable loans exceeded the number and dollar volume of small business loans.

Statewide Summary of Lending Activity

Assessment Areas Located in: Tennessee

2024

Loan Type	#	%	\$(000s)	%
HMDA Home Purchase	74	35.9%	22,394	46.5%
HMDA Refinance	29	14.1%	4,961	10.3%
HMDA Home Improvement	3	1.5%	241	0.5%
HMDA Multi-Family	3	1.5%	7,547	15.7%
HMDA Other Purpose LOC	0	0.0%	0	0.0%
HMDA Other Purpose Closed/Exempt	11	5.3%	883	1.8%
HMDA Loan Purpose NA	0	0.0%	0	0.0%
Total HMDA	120	58.3%	36,026	74.9%
Total Small Business	72	35.0%	11,779	24.5%
Total Farm	14	6.8%	311	0.6%
Total Loans	206	100%	48,116	100%

Originations & Purchases

Geographic and Borrower Distribution

The geographic distribution of HMDA-reportable and small business loans reflects adequate penetration throughout Tennessee AAs and the distribution of loans by borrower income and revenue size of businesses is adequate. The analyses of HMDA-reportable and small business lending within the full-scope AAs are discussed in detail later in this report.

CD Lending

Commercial Bank made a low level of CD loans in Tennessee. During the review period, the bank originated 13 loans for \$17.8 million in Tennessee AAs. More information on CD loans can be found in the full-scope AA section of this report.

INVESTMENT TEST

The Investment Test rating for Tennessee is Low Satisfactory. The bank made an adequate level of qualified CD investments and grants in Tennessee, with \$16.5 million in qualified investments and \$121,900 in contributions directly benefiting its AAs in the state. Statewide investments include one investment for \$720,000 to finance mortgages to LMI homeowners in the BSRA that includes the bank's AAs. The bank also placed a \$250,000 deposit in a women-owned depository institution in Tennessee, which helped the institution meet the credit needs of its local community. Finally, the bank contributed \$20,000 to support foodbanks that serve the Knoxville, Claiborne, and Cocke County AAs in Tennessee. The bank was considered responsive to the credit and CD needs of its AAs in Tennessee. Therefore, the bank also received consideration for an investment of \$157,000 in MBS that financed affordable housing for LMI individuals outside of the bank's AAs in Tennessee.

More information on qualified investments and grants can be found in the full-scope AA section of this report.

SERVICE TEST

The Service Test rating for Tennessee is Low Satisfactory.

Retail Services

Delivery systems are reasonably accessible to the geographies and individuals of different income levels in Tennessee AAs and business hours and services do not vary in a way that inconveniences the AAs in the state. As of December 31, 2024, Commercial Bank operated 17 branches in Tennessee. The bank had one branch in a low-income tract and seven branches in moderate-income tracts, representing 47.1 percent of total branches in the state.

A full array of personal and business banking products and services is offered at all locations in Tennessee AAs. Branch hours are similar at all branches throughout the state and do not in a way that inconveniences individual AAs. The bank did not open or close any branch locations during the review period. Additional details on retail services can be found in the full-scope AA sections of this report.

CD Services

The bank provides an adequate level of CD services in Tennessee. During the review period, staff engaged in 66 CD service activities totaling 292 hours in Tennessee. Most of the CD service activities were financial education to LMI youth or seniors.

NONMETROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CLAIBORNE COUNTY

Overview

The AA consists of Claiborne County, Tennessee. As of December 31, 2024, the bank operated four branches in the AA, representing 23.5 percent of its branches in the state of Tennessee and 11.8 percent of total branches. One of the branches in the AA is located in a moderate-income tract and the remaining three are in middle-income tracts. As a percentage within the state of Tennessee, 51.7 percent of deposit dollar volume and 39.1 percent of HMDA-reportable and small business loans by number are located in the Claiborne County AA. As described, Claiborne County is a primary AA for the bank in the state of Tennessee.

The AA's banking market consists of four smaller regional banks operating physical bank branches. Collectively, the four institutions operate 12 branch locations in the AA. Commercial Bank holds the largest deposit market share at 53.5 percent with \$561.8 million in total deposits. First Century Bank, Hearthside Bank Corporation, and First State Bank of the Southeast rank 2nd, 3rd, and 4th in deposit market share, respectively.

HMDA-reportable lending is competitive with 117 institutions reporting a combined 535 HMDA loans in the AA in 2024, of which 86 percent were originated directly by financial institutions. Commercial Bank ranked 2nd out of 117 reporters in 2024 with 6.2 percent of total HMDA-reportable loans in the AA. Hearthside Bank Corporation was the top HMDA reporter in the market in 2024 with 7.1 percent of total HMDA-reportable loans. As described, Commercial Bank's ranking indicates that it is an important contributor for HMDA-reportable lending in the Claiborne County AA.

Commercial Bank ranked 2nd out of 31 reporters with 16.5 percent of small business loans in 2024. Of the four banks operating branches in the AA, only Commercial Bank is required to collect and report data for small business lending. The 31 reporters in the AA include primarily online lenders and credit card banks. When considering this context, Commercial Bank's ranking of 2nd demonstrates that the bank is an important contributor for small business lending in the AA. American Express was the top small business lender in the market for 2024.

AA Demographics

Details on the 2024 demographic data and business information from the FFIEC and D&B that are used to analyze the bank's CRA performance in the AA are included in *Appendix C*.

Demographics, Population, and Income Characteristics

According to FFIEC data from 2024, the Claiborne County AA has a population of 32,043, having grown less than 1.0 percent since 2015. The AA is in the Appalachian region of northeastern Tennessee. The AA boasts a variety of natural and/or scenic landscapes, including campgrounds, marinas, lakes, a national park, hiking, biking, ATV, and water trails, and the Cumberland Gap Tunnel that connects Tennessee and Kentucky through the Appalachian Mountains. Though largely rural, the AA contains supplemental essential services for residents of the area including a municipal airport, arts and recreational programs, and Lincoln Memorial University, a private university offering undergraduate, graduate, and professional programs.

The AA contains nine census tracts, three of which are moderate-income (33.3 percent) and the remaining six tracts are middle-income (66.7 percent). Furthermore, all middle-income census tracts in the AA are designated as distressed by the FFIEC due to poverty rates of 20 percent or more.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated 2024 median family income for nonmetropolitan areas in Tennessee, as shown in the following table.

**Borrower Income Levels
Tennessee State Non-metro**

FFIEC Estimated Median Family Income		Low			Moderate			Middle			Upper		
		0	-	49.99%	50%	-	79.99%	80%	-	119.99%	120%	-	& above
2024	\$69,100	0	-	\$34,549	\$34,550	-	\$55,279	\$55,280	-	\$82,919	\$82,920	-	& above

There were 8,750 families in the AA in 2024; 25.4 percent were low-income, 18.5 percent were moderate-income, 21.8 percent were middle-income, and 34.3 percent were upper-income. The percentage of LMI families in the AA is 43.9 percent. Furthermore, 16.2 percent of the total families in the AA had incomes below the poverty level. As previously noted, all tracts in the AA are either moderate-income or distressed middle-income. The predominately rural nature of the AA combined with the aforementioned data indicates economic challenges exist for families residing in the AA and that lending opportunities may be limited.

Housing Characteristics

There are 15,539 housing units in the AA, of which 61.8 percent are owner-occupied, 25.4 percent are rental, and 12.7 percent are vacant. Notably, over 25 percent of all housing units in the AA are mobile homes, with an even higher percentage of mobile homes in moderate-income tracts (30 percent). This could indicate a need for a different type of financing or housing assistance.

The median age of housing stock across Claiborne County is 36 years, though the housing stock in moderate-income tracts is older at 43 years. The older age of homes is typically an indicator of potential opportunities for loans for home improvement purposes.

The median housing value in the AA is \$112,000, which is below the median housing value of \$177,600 for the state of Tennessee and other nonmetropolitan areas of the state at \$132,114. Median gross rent in the AA is \$637 per month, which is lower than the median gross rent for the state of Tennessee (\$897 per month) and slightly lower than other nonmetropolitan areas of the state (\$679 per month). Additionally, the affordability ratio² for the AA (33.9 percent) is higher than the state (30.9 percent) but similar to the affordability ratio of other nonmetropolitan areas of the state (33.0 percent). Median values and rents in the AA indicate that housing is more affordable in the AA when compared to the state of Tennessee and other nonmetropolitan areas of the state.

While housing in the AA is relatively more affordable, housing cost burden is still a concern for low-income renters and owners. Data shows that 59.2 percent of low-income renters and 45.6 percent of low-income homeowners are housing cost-burdened, meaning that housing costs equaled 30 percent or more of household income³. This data indicates that there is need for more affordable housing for low-income individuals in the AA.

Economic Conditions

The Claiborne County AA is heavily reliant on manufacturing, which accounts for approximately 31 percent of all private sector jobs in the AA by number of employees. Data from the Bureau of Labor Statistics (BLS) shows

² Housing affordability ratio is calculated by dividing the median household income by the median housing value. Values closer to 100 percent indicate greater affordability.

³ U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

that the number of manufacturing jobs has steadily declined since 2021. Furthermore, the region relies on tourism. After manufacturing, the largest industry sectors in the AA include retail trade (accounting for 13.5 percent of all private sector jobs) and accommodation and food services (accounting for 8.6 percent of all private sector jobs). According to the 2024 data from D&B, 91.1 percent of all businesses in the AA have revenues under \$1 million and are therefore considered small businesses.

The Appalachian Regional Commission (ARC), a federal-state partnership dedicated to promoting economic development and addressing quality of life issues for Appalachian residents, releases annual listings of each Appalachian county's economic health from best to worst. Every county is designated as either attainment, competitive, transitional, at-risk, or distressed. The ARC bases its classifications on several economic indicators, including poverty rates, per capita income, and the three-year average of unemployment rates. Claiborne County is considered at-risk, though there are three tracts within the county that meet the criteria for distressed.⁴

In September 2024, large portions of the Appalachian Region were devastated by Tropical Storm Helene. As a result of the storm, numerous counties across the Appalachian Region, including Claiborne County, were included in the disaster declaration approved by the Federal Emergency Management Agency (FEMA)⁵.

The following table shows the unemployment rates percentages for the bank's AA, the nonmetropolitan portions of Tennessee, and the state of Tennessee. As shown, unemployment rates in the AA have fluctuated over the past five years. While the AA's 2024 unemployment rate is generally consistent with nonmetropolitan portions of Tennessee and slightly higher than unemployment rates for the state, historically, Claiborne County's unemployment rate was lower than nonmetropolitan portions of Tennessee and the state. This could be an additional indicator of financial constraints and challenges faced by residents of the area.

TN Claiborne 2024 Unemployment Rates					
Area	2020	2021	2022	2023	2024
TN Claiborne 2024	7.3%	4.2%	3.7%	3.8%	4.0%
NonMSA Tennessee	8.0%	4.6%	3.8%	3.7%	3.9%
Tennessee	7.4%	4.5%	3.4%	3.2%	3.4%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Credit and CD Needs

Claiborne County faces socioeconomic barriers rooted in its Appalachian geography and economic history. As noted, the county faces high rates of poverty relative to other areas in the state and has experienced a decline in traditional manufacturing industries.⁶ The county's infrastructure challenges are multifaceted, including aging housing stock, inadequate water and sewer systems, healthcare provider shortages, and broadband access limitations that create digital divides.⁷ Additionally, educational attainment lags behind state metrics, with lower rates of post-secondary completion, which hinders workforce development and economic growth.⁸

⁴ Appalachian Regional Commission. County Economic Status and Distressed Areas by State, FY 2025. www.arc.gov/about-the-appalachian-region/county-economic-status-and-distressed-areas-by-state-fy-2025/. Accessed October 27, 2025

⁵ Federal Disaster Declaration Granted to Additional Tennessee Counties Recovering from Flooding; FEMA-4832-DR, Tennessee Disaster Declaration as of 11/04/2024, [dec_4832.pdf](https://dec.4832.pdf)

⁶ Appalachian Regional Commission, "County Economic Status Report" (Washington, DC: Appalachian Regional Commission, 2022), <https://data.arc.gov/data/> Accessed January 9, 2026/

⁷ Tennessee Housing Development Agency, "Housing Needs Assessment" (Nashville, TN: Tennessee Housing Development Agency, 2020), <https://thda.org/research-reports/housing-needs-assessment>; Tennessee Department of Economic and CD, "Broadband Assessment" (Nashville, TN: Tennessee Department of Economic and CD, 2021), <https://www.tn.gov/ecd/rural-development/tennessee-broadband-program.html>

⁸ U.S. Census Bureau, "American Community Survey" (Washington, DC: U.S. Census Bureau, 2021), <https://www.census.gov/programs-surveys/acs>

The financial services landscape presents particular challenges for both residents and businesses. With limited banking infrastructure and no local CDFIs, many residents are unbanked or underbanked, leading to reliance on high-cost alternative financial services.⁹ Small businesses face capital access constraints, particularly for small-dollar commercial loans that are crucial for startup and growth phases.¹⁰ LMI individuals encounter barriers to credit-building opportunities, affordable small-dollar loans, and financial education resources needed for economic mobility.¹¹

As part of the CRA examination, information was obtained from a local community contact; a real estate company that serves Claiborne and several nearby communities. The individual confirmed that there is a limited supply of housing that is affordable to LMI individuals in the area. They also noted financing for small businesses is a concern, and that strict underwriting standards create challenges for credit-worthy businesses to obtain financing.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Lending levels reflect adequate responsiveness to credit needs of the AA. The geographic distribution of loans reflects adequate penetration throughout the AA and the distribution of borrowers reflects adequate penetration among borrowers of different income levels and businesses of different revenue sizes. The bank made a low level of CD loans in the AA.

The analysis included 36 HMDA-reportable loans and 39 small business loans reported by the bank in the AA during the review period. As a result, performance for small business lending was weighed slightly more when determining conclusions in the AA. During the review period, the bank originated or purchased 33 home mortgage loans, including 23 home purchase loans, 9 home refinance loans, and 1 home improvement loan. Thus, when determining conclusions for home mortgage lending, the greatest weight was assigned to home purchase lending performance given the relative share of this product type relative to all home mortgage lending. Additionally, because there are no low-income tracts in this AA, slightly more weight was placed on the borrower distribution analysis when determining overall Lending Test conclusions.

Lending Activity

Lending activity is adequate. Overall, 19.3 percent of HMDA-reportable and small business loans were made in the AA, compared to 30.3 percent of deposits held in this AA. While the percentage of the bank's lending is below the percentage of its deposits in this AA, lending activity is deemed adequate when considering performance context, including limited lending opportunities in this area. Additionally, the bank is headquartered in Claiborne County and more deposits are likely assigned to the AA.

Geographic Distribution of Loans

The geographic distribution of loans reflects adequate penetration throughout the AA and does not reveal any conspicuous lending gaps. As shown in the tables below, the geographic distribution of both home mortgage lending and small business lending is adequate. There are no low-income tracts in this AA so performance is driven by lending in moderate-income tracts.

⁹ Federal Deposit Insurance Corporation, "Summary of Deposits: Rural Banking Access" (Washington, DC: Federal Deposit Insurance Corporation, 2022), <https://www.fdic.gov/analysis/summary-of-deposits/>

¹⁰ Federal Reserve Bank of Atlanta, "Small Business Credit Survey: Rural Financial Needs" (Atlanta, GA: Federal Reserve Bank of Atlanta, 2021), <https://www.fedsmbbusiness.org/survey> Accessed January 9, 2026

¹¹ Consumer Financial Protection Bureau, "Credit Access in Rural Communities Report" (Washington, DC: CFPB, 2021), <https://www.consumerfinance.gov/data-research/research-reports/>

Home Mortgage Lending

The tables below show the geographic distribution of the bank's home mortgage lending.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Claiborne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank #	Agg %	Bank \$ (000s)	Agg \$ %		
#	%	\$ (000s)	\$ %	#	%	\$ (000s)					\$ %	
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	6	26.1%	1,536	38.6%	21.5%	6	26.1%	15.6%	1,536	38.6%	16.1%
	Middle	17	73.9%	2,443	61.4%	78.5%	17	73.9%	84.4%	2,443	61.4%	83.9%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	23	100%	3,979	100%	100.0%	23	100%	100%	3,979	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	11.1%	86	5.8%	21.5%	1	11.1%	19.1%	86	5.8%	22.2%
	Middle	8	88.9%	1,409	94.2%	78.5%	8	88.9%	80.9%	1,409	94.2%	77.8%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	9	100%	1,495	100%	100.0%	9	100%	100%	1,495	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	21.5%	0	0.0%	23.1%	0	0.0%	13.9%
	Middle	1	100.0%	80	100.0%	78.5%	1	100.0%	76.9%	80	100.0%	86.1%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	80	100%	100.0%	1	100%	100%	80	100%	100%
MULTI FAMILY		Multi-Family Units										
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	100.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	21.5%	0	0.0%	5.9%	0	0.0%	3.4%
	Middle	0	0.0%	0	0.0%	78.5%	0	0.0%	94.1%	0	0.0%	96.6%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Claiborne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Dollar		Owner Occupied Units %	Count		Agg %	Dollar		Agg %
		Count #	%	\$ (000s)	\$ %		Bank #	%		Bank \$ (000s)	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	33.3%	18	10.9%	21.5%	1	33.3%	28.6%	18	10.9%	16.1%
	Middle	2	66.7%	147	89.1%	78.5%	2	66.7%	71.4%	147	89.1%	83.9%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>3</i>	<i>100%</i>	<i>165</i>	<i>100%</i>	<i>100.0%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>165</i>	<i>100%</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	21.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	78.5%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	8	22.2%	1,640	28.7%	21.5%	8	22.2%	16.8%	1,640	28.7%	16.7%
	Middle	28	77.8%	4,079	71.3%	78.5%	28	77.8%	83.2%	4,079	71.3%	83.3%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>36</i>	<i>100%</i>	<i>5,719</i>	<i>100%</i>	<i>100.0%</i>	<i>36</i>	<i>100%</i>	<i>100%</i>	<i>5,719</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

The geographic distribution of home mortgage lending reflects adequate penetration through the AA when compared to demographics and aggregate lending and considering performance context. Specifically, the bank holds the largest concentration of deposits in the AA and is ranked first in HMDA-reportable mortgage lending. For home purchase lending in moderate-income tracts, the bank exceeded aggregate lending and the percentage of owner-occupied units located in those tracts. For refinance lending, the bank's lending in moderate-income tracts was below the percentage of owner-occupied units in these tracts and aggregate lending. However, the bank made a small number of refinance loans in this AA overall, therefore, more weight is placed on the bank's home purchase lending performance.

Small Business Lending

The following table shows the distribution of small business loans across tracts of different income levels.

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Claiborne

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count			Dollar		
		Count	Dollar	Count	Dollar		Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	7	17.9%	271	6.3%	13.2%	7	17.9%	20.1%	271	6.3%	10.1%
	Middle	32	82.1%	4,007	93.7%	86.8%	32	82.1%	78.5%	4,007	93.7%	89.6%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	1.3%	0	0.0%	0.3%
	<i>Total</i>	<i>39</i>	<i>100%</i>	<i>4,278</i>	<i>100%</i>	<i>100.0%</i>	<i>39</i>	<i>100%</i>	<i>100%</i>	<i>4,278</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	3	27.3%	112	40.9%	25.0%	3	27.3%	39.1%	112	40.9%	63.8%
	Middle	8	72.7%	162	59.1%	75.0%	8	72.7%	60.9%	162	59.1%	36.2%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>11</i>	<i>100%</i>	<i>274</i>	<i>100%</i>	<i>100.0%</i>	<i>11</i>	<i>100%</i>	<i>100%</i>	<i>274</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

The geographic distribution of small business lending is adequate. Lending in moderate-income tracts exceeded the percentage of businesses in these tracts but fell below aggregate lending performance. However, all of the middle-income tracts in this AA are considered distressed. Lending in middle-income tracts was also taken into consideration when deriving the final conclusion.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans reflects adequate penetration among customers of different income levels and business revenue sizes. As described in the following sections, home mortgage lending is poor while lending to small businesses is adequate.

Home Mortgage Lending

The tables below show the distribution of HMDA-reportable loans to borrowers of different income levels.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Claiborne

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	#	%	%					\$ (000s)	\$ %
HOME PURCHASE	Low	1	4.3%	34	0.9%	25.4%	1	4.3%	3.0%	34	0.9%	0.9%
	Moderate	4	17.4%	578	14.5%	18.5%	4	17.4%	13.4%	578	14.5%	8.7%
	Middle	5	21.7%	616	15.5%	21.8%	5	21.7%	21.4%	616	15.5%	17.7%
	Upper	12	52.2%	2,618	65.8%	34.3%	12	52.2%	41.9%	2,618	65.8%	51.2%
	Unknown	1	4.3%	133	3.3%	0.0%	1	4.3%	20.3%	133	3.3%	21.4%
	Total	23	100%	3,979	100%	100.0%	23	100%	100%	3,979	100%	100%
REFINANCE	Low	1	11.1%	38	2.5%	25.4%	1	11.1%	11.3%	38	2.5%	3.9%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	18.4%	0	0.0%	14.3%
	Middle	3	33.3%	222	14.8%	21.8%	3	33.3%	22.7%	222	14.8%	19.7%
	Upper	4	44.4%	1,212	81.1%	34.3%	4	44.4%	29.8%	1,212	81.1%	40.6%
	Unknown	1	11.1%	23	1.5%	0.0%	1	11.1%	17.7%	23	1.5%	21.5%
	Total	9	100%	1,495	100%	100.0%	9	100%	100%	1,495	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	25.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	15.4%	0	0.0%	14.8%
	Middle	1	100.0%	80	100.0%	21.8%	1	100.0%	38.5%	80	100.0%	24.6%
	Upper	0	0.0%	0	0.0%	34.3%	0	0.0%	46.2%	0	0.0%	60.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	80	100%	100.0%	1	100%	100%	80	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	25.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	34.3%	0	0.0%	33.3%	0	0.0%	17.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	66.7%	0	0.0%	82.2%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	25.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	17.6%	0	0.0%	5.9%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	5.9%	0	0.0%	2.7%
	Upper	0	0.0%	0	0.0%	34.3%	0	0.0%	76.5%	0	0.0%	91.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Claiborne

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Dollar		Families by Family Income %	Count		Agg	Dollar		Agg
		Count	%	\$ (000s)	\$ %		Bank	%		Bank	%	
		#	%				#	%		\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	25.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	33.3%	27	16.4%	18.5%	1	33.3%	28.6%	27	16.4%	26.6%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	35.7%	0	0.0%	39.4%
	Upper	2	66.7%	138	83.6%	34.3%	2	66.7%	35.7%	138	83.6%	34.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>3</i>	<i>100%</i>	<i>165</i>	<i>100%</i>	<i>100.0%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>165</i>	<i>100%</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	25.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	34.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>
HMDA TOTALS	Low	2	5.6%	72	1.3%	25.4%	2	5.6%	4.8%	72	1.3%	1.5%
	Moderate	5	13.9%	605	10.6%	18.5%	5	13.9%	15.2%	605	10.6%	9.9%
	Middle	9	25.0%	918	16.1%	21.8%	9	25.0%	22.2%	918	16.1%	17.8%
	Upper	18	50.0%	3,968	69.4%	34.3%	18	50.0%	39.9%	3,968	69.4%	48.6%
	Unknown	2	5.6%	156	2.7%	0.0%	2	5.6%	18.0%	156	2.7%	22.2%
	<i>Total</i>	<i>36</i>	<i>100%</i>	<i>5,719</i>	<i>100%</i>	<i>100.0%</i>	<i>36</i>	<i>100%</i>	<i>100%</i>	<i>5,719</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

The distribution of home mortgage loans to LMI borrowers is poor. Home mortgage lending to LMI families was below the percentage of LMI families in the AA and below aggregate lending to moderate-income borrowers. While lending to low-income borrowers exceeded aggregate lending, the bank made only two home mortgage loans to low-income borrowers during the review period. As previously noted above, the bank is ranked first for HMDA-reportable lending in the AA.

Small Business Lending

The table below shows the distribution of small business lending by business revenue and loan size.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Claiborne

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending					
			2024					2024					
			Bank				Total Businesses	Count			Dollar		
Count		Dollar		#	%	%		#	%	%	\$ 000s	\$ %	Agg \$ %
#	%	\$ (000s)	\$ %										
SMALL BUSINESS	Revenue	\$1 Million or Less	24	61.5%	1,580	36.9%	91.1%	24	61.5%	53.5%	1,580	36.9%	39.4%
		Over \$1 Million	10	25.6%	2,549	59.6%	7.0%	10	25.6%		2,549	59.6%	
		Total Rev. available	34	87.2%	4,129	96.5%	98.0%	34	87.2%		4,129	96.5%	
		Rev. Not Known	5	12.8%	149	3.5%	2.0%	5	12.8%		149	3.5%	
		Total	39	100%	4,278	100%	100%	39	100%		4,278	100%	
	Loan Size	\$100,000 or Less	31	79.5%	1,213	28.4%		31	79.5%	93.1%	1,213	28.4%	39.4%
		\$100,001 - \$250,000	2	5.1%	352	8.2%		2	5.1%	3.3%	352	8.2%	15.9%
		\$250,001 - \$1 Million	6	15.4%	2,713	63.4%		6	15.4%	3.6%	2,713	63.4%	44.7%
		Total	39	100%	4,278	100%		39	100%	100%	4,278	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	21	87.5%	828	52.4%		21	87.5%		828	52.4%	
		\$100,001 - \$250,000	2	8.3%	352	22.3%		2	8.3%		352	22.3%	
		\$250,001 - \$1 Million	1	4.2%	400	25.3%		1	4.2%		400	25.3%	
		Total	24	100%	1,580	100%		24	100%		1,580	100%	
SMALL FARM	Revenue	\$1 Million or Less	10	90.9%	258	94.2%	Total Farms 100.0%	10	91%	60.9%	258	94%	84.6%
		Over \$1 Million	1	9.1%	16	5.8%	0.0%	1	9.1%		16	5.8%	
		Total Rev. available	11	100.0%	274	100.0%	100.0%	11	100.0%		274	100.0%	
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%	
		Total	11	100%	274	100%	100%	11	100%		274	100%	
	Loan Size	\$100,000 or Less	11	100.0%	274	100.0%		11	100.0%	95.7%	274	100.0%	66.8%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	4.3%	0	0.0%	33.2%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
		Total	11	100%	274	100%		11	100%	100%	274	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	10	100.0%	258	100.0%		10	100.0%		258	100.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		Total	10	100%	258	100%		10	100%		258	100%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Small business lending to businesses of different sizes is adequate. Lending to small businesses exceeded aggregate lending but fell below the percentage of small businesses located in the AA. The majority of loans originated were in amounts of \$100,000 and less, indicating the bank's willingness to lend in the smaller amounts typically requested by small businesses.

CD Lending

The bank made a low level of CD loans in the Claiborne AA. During the review period, the bank originated or renewed six loans totaling \$161,000 in the AA. Most of the loans were renewals of working capital lines to a nonprofit that subsidizes healthcare to LMI individuals. The bank also provided a loan to a volunteer fire department, which provides essential public services to the distressed non-metro middle income tracts in the AA. As discussed earlier, there are many CD needs and opportunities in the AA and the bank's CD loans demonstrated limited responsiveness to these needs.

INVESTMENT TEST

The bank made an adequate level of qualified investments totaling \$1.5 million that demonstrated responsiveness to credit and CD needs. The bank made three investments in bonds to finance utility improvements in moderate-income and distressed nonmetropolitan middle-income tracts. These investments were responsive to the identified need for infrastructure improvements in the AA. Additionally, the bank made donations totaling \$16,450 to support community services for LMI individuals, including college scholarships as well as housing and social services programs. The donations for college scholarships were responsive to the need for more opportunities for post-secondary education for LMI kids in the AA.

SERVICE TEST

Retail banking services are good and the bank provides an adequate level of CD services.

Retail Banking Services

Service delivery systems are accessible to the geographies and individuals of different income levels throughout Claiborne AA. As shown in the table below, the bank operates one branch in a moderate-income tract (25 percent of total branches), which exceeds the percentage of households and businesses located in these tracts. The bank offers hours and services that do not vary in a way that inconveniences its AA. During the review period, the bank did not open or close any branches.

Geographic Distribution of Branches & ATMs
Assessment Area: TN Claiborne

Tract Category	Branches							ATMs											Demographics			
	TotalBranches				Drive thru	Extended Hours	Week-end Hours	TotalATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Moderate	1	25.0%	0	0	1	1	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	3	33.3%	20.6%	13.2%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle	3	75.0%	0	0	3	3	0	Total	5	100.0%	0	0.0%	0	0	5	100.0%	0	0	6	66.7%	79.4%	86.8%
DTO	0		0	0	0			SA	2		0		0	0	2		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	4	100%	0	0	4	4	0	Total	5	100%	0	0.0%	0	0	5	100%	0	0	9	100%	100%	100%
DTO	0		0	0	0			SA	2		0		0	0	2		0	0				

Based on 2024 FFIEC Census Data

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

CD Services

The bank provides an adequate level of CD services in the AA. Staff provided 116 hours of CD service activities during the review period, nearly all of which were financial education to LMI youth in schools or to seniors at nursing homes.

NONMETROPOLITAN STATEWIDE AREA(S)
LIMITED-SCOPE REVIEW

The following AA was reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution’s CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed that CRA performance in the AA is generally consistent with the areas that received a full-scope review. Please refer to the tables in Appendices D and E for additional information regarding these AAs.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN TENNESSEE NON-METROPOLITAN AAS

Newport AA (Cocke County):

- As of December 31, 2024, Commercial Bank operated two branches in the AA, representing 11.8 percent of its branches in Tennessee.
- As of December 31, 2024, the bank had \$179.3 million in deposits in the AA, representing 16.5 percent of total deposits in Tennessee.

CONCLUSION(S) WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, performance in the AA was evaluated, and compared with the bank’s performance in the AAs that received a full-scope review. The conclusions regarding performance are provided in the table below.

Performance in the Limited-Scope Review Nonmetropolitan AAs			
AA	Lending Test	Investment Test	Service Test
Newport	Consistent	Not Consistent (Above)	Not Consistent (Above)

The performance standards of the Lending Test for the limited-scope non-MSA area include the geographic distribution of loans, the borrower distribution of loans, and CD loans. The geographic distribution of loans was adequate and the borrower distribution of loans was poor. The bank makes a relatively high level of CD loans (\$5 million) in the Newport AA.

The bank made a good level of qualifying investments and grants in the Newport limited non-MSA areas with a total of \$621,600.

The performance standards of the Service Test for the limited-scope non-MSA area included retail banking and CD services. Retail banking services were good in Newport and the bank made a relatively high level of CD services in the AA.

Performance in the nonmetropolitan limited-scope AA did not impact overall performance for the state.

**METROPOLITAN AREA
FULL-SCOPE REVIEW**

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KNOXVILLE

Overview

The Knoxville AA includes Knox and Union counties, which are two of the nine counties in the Knoxville, Tennessee MSA. As of December 31, 2024, the bank operated six branches in the AA, representing 35.3 percent of the its total branches in the state of Tennessee. One branch is located in a moderate-income tract, three are located in middle-income tracts, and two are located in upper-income tracts; the bank has no branches in low-income tracts in this AA. As a percentage within the state of Tennessee, 20.7 percent of the bank's deposit volume and 18.1 percent of its HMDA-reportable and small business loans by number are in the Knoxville AA.

Knoxville is a competitive banking market with 32 financial institutions operating 134 branches in the AA in 2024. Commercial Bank ranked 11th in deposit market share with 1.2 percent of total deposits (\$225 million). First Horizon Bank had the largest deposit market share with 19.1 percent, followed by Truist Bank (16.1 percent), Pinnacle Bank (13.1 percent), and Regions Bank (11 percent).

For HMDA-reportable lending, Commercial Bank ranked 44th out of 481 reporters in 2024 with 0.4 percent of total HMDA-reportable loans originations and purchases. Mortgage Investors Group Inc., PennyMac Loan Services, and Knoxville TVA Employees Credit Union were the top HMDA reporters in the market. For small business lending, Commercial Bank ranked 26th out of 101 reporters in 2024 with 0.1 percent of total small business loans in each year. American Express and JP Mortgage Chase were the top CRA reporters in the market during the review period.

AA Demographics

Details on the 2024 demographic data and business information from the FFIEC and D&B that are used to analyze the bank's CRA performance in the AA are included in *Appendix C*.

AA Population and Income Characteristics

The Knoxville AA had a population of 498,773 in 2020, which represents an increase of 7.6 percent since 2015. The rate of population growth in the AA outpaced the state of Tennessee at 6.3 percent during this same period.¹² The AA contains 126 census tracts: 12 low-income tracts (9.5 percent), 18 moderate-income tracts (14.3 percent), 47 middle-income tracts (37.3 percent), 45 upper-income tracts (35.7 percent), and four unknown-income tracts (3.2 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated 2024 median family income for the Knoxville MSA, which as \$87,700 in 2024 as shown in the table below.

**Borrower Income Levels
Knoxville, TN MSA**

FFIEC Estimated Median Family Income		Low 0 - 49.99%			Moderate 50% - 79.99%			Middle 80% - 119.99%			Upper 120% - & above		
2024	\$87,700	0	-	\$43,849	\$43,850	-	\$70,159	\$70,160	-	\$105,239	\$105,240	-	& above

¹² 2011-2015 U.S. Census Bureau American Community Survey; 2020 U.S. Census Bureau Decennial Census

There were 122,347 families in the AA in 2024, of which 19.4 percent were low-income, 16.2 percent were moderate-income, 19.9 percent were middle-income, and 44.5 percent were upper-income. Of these families, 8.9 percent had incomes below the poverty level. Nearly 50 percent of families living below the poverty line live in LMI tracts, which suggests there may be challenges for lending in these tracts.

Housing Characteristics

There are 217,098 total housing units in the AA, of which 59.4 percent are owner-occupied, 31.4 percent are rental units, and 9.3 percent are vacant. In low-income tracts, 23.9 percent of housing units are owner-occupied, which indicates that there could be fewer opportunities for home purchase lending in low-income tracts. It is also important to note that the housing stock in Knox County looks very different from the housing stock in Union County. While the percentage of units that are owner-occupied is similar in both counties, the percentage of vacant units is higher in Union County (21.3 percent) compared to Knox County (8.7 percent). Additionally, nearly 30 percent of the housing units in Union County are mobile homes. These data points indicate that the two counties in the AA likely have different needs for home mortgage lending and other types of housing assistance.

The median age of housing stock across the AA is 43 years, though the housing stock in low-income tracts is older at 56 years, and the median age in moderate-income tracts is 48 years. The older age of homes in LMI tracts is an indicator of potential need for home improvement loans in these tracts.

The median housing value across the AA is \$190,796, which is higher than the median housing value in Tennessee at \$177,600. Median gross rent in the AA is \$928 per month, which is higher than the median gross rent in Tennessee (\$897 per month). Both the median housing price and median rents are lower in Union County than in Knox County. The affordability ratio¹³ of the AA (30.8 percent) is similar to the affordability ratio for Tennessee (30.9 percent).

Housing cost burden is a concern in the AA, particularly for renters. In 2024, 40.9 percent of renters in the AA were housing cost burdened, meaning that housing costs equaled 30 percent or more of household income. The issue was particularly acute for LMI renters in Knox County where 70.6 percent of low-income renters and 49.4 percent of moderate-income renters were housing cost burdened.¹⁴ Housing was more affordable in Union County, though 47.7 percent of low-income renters were housing cost burdened. This data indicates that there is need for more affordable rental housing for LMI individuals.

Economic Conditions

Knoxville is one of the fastest growing areas in the state of Tennessee.¹⁵ The area is home to the University of Tennessee, which is also one of the largest employers. The region is known for its diverse range of industries, including advanced manufacturing, healthcare, and technology. Some of the largest employers in the region include the U.S. Department of Energy and Y-12 National Security Complex, followed by Covenant Health and the Knox County Schools.¹⁶ According to the BLS, the largest industries in the AA by number of employees during the third quarter of 2024 include healthcare and social assistance, government, retail trade, and accommodations and food service.¹⁷ Healthcare, retail trade and accommodations, and food service tend to offer

¹³ Housing affordability ratio is calculated by dividing the median household income by the median housing value. Values closer to 100 percent indicate greater affordability.

¹⁴ U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

¹⁵ KnoxNews. "Did Knox County see largest population hike in Tennessee? No, but it's high on the list." May 1, 2024. Accessed 9 August 2024. <https://www.knoxnews.com/story/news/local/2024/05/01/knox-county-is-one-of-the-fastest-growing-counties-in-tennessee/73515406007/>

¹⁶ Knoxville Chamber "Fact Sheets." 9 Aug. 2024, <https://www.knoxvillechamber.com/economic-development/data-library/>

¹⁷ Source: Bureau of Labor Statistics(BLS), Quarterly Census of Employment and Wages

lower wage and/or part time positions which could impact employees' ability to save for a down-payment to pursue homeownership or other opportunities to build financial stability.

The following table shows the unemployment rate for the AA, the counties that comprise the AA, the MSA, and the state of Tennessee. As shown, the unemployment rate in 2024 for the AA was below the unemployment rate for the state. Within the AA, however, the unemployment rate was higher in Union County than in Knox County, and slightly higher than the unemployment rate for the state.

TN Knoxville 2024 Unemployment Rates					
Area	2020	2021	2022	2023	2024
TN Knoxville 2024	6.0%	3.5%	3.0%	2.9%	3.0%
Knox County, TN	6.0%	3.5%	2.9%	2.8%	3.0%
Union County, TN	6.2%	3.8%	3.4%	3.3%	3.5%
Knoxville, TN MSA	6.2%	3.7%	3.1%	3.0%	3.2%
Tennessee	7.4%	4.5%	3.4%	3.2%	3.4%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Credit and CD Needs

Knox and Union County, while close geographically, represent contrasting socioeconomic landscapes. Knox County, anchored by Knoxville, demonstrates comparatively stronger economic indicators than the surrounding region. While poverty rates overall are lower in Knox County, there is concentrated economic hardship in specific neighborhoods where rates exceed state figures.¹⁸ The county benefits from relatively robust infrastructure including expanding broadband access and healthcare systems, though challenges persist in affordable housing availability as housing costs have risen faster than wages for many LMI residents.¹⁹

The financial services landscape includes a range of banking options available in most communities, yet some of the economically distressed neighborhoods have experienced branch closures that limit convenient financial services access.²⁰ Housing affordability challenges have intensified in recent years as rising home prices have outpaced income growth, creating barriers to homeownership particularly for first-time homebuyers.²¹

In contrast, Union County exemplifies the challenges facing many rural communities. Persistent poverty rates in Union County exceed state averages, reflecting limited economic diversification and job opportunities.²² The county's infrastructure faces challenges, including inadequate water and sewer systems in certain areas, healthcare provider shortages, and broadband access limitations.²³ Lower educational attainment in Union County creates workforce development barriers as the region attempts to attract new employers.²⁴ The financial services

¹⁸ Appalachian Regional Commission, "County Economic Status Report" (Washington, DC: Appalachian Regional Commission, 2022), <https://www.arc.gov/county-economic-status-and-distressed-areas-in-appalachia/>

¹⁹ Tennessee Housing Development Agency, "Housing Needs Assessment" (Nashville, TN: Tennessee Housing Development Agency, 2020), <https://thda.org/research-reports/housing-needs-assessment>

²⁰ Federal Deposit Insurance Corporation, "How America Banks: Household Use of Banking and Financial Services" (Washington, DC: FDIC, 2022), <https://www.fdic.gov/analysis/household-survey/>

²¹ Housing Assistance Council, "Rural Mortgage Lending Landscape" (Washington, DC: Housing Assistance Council, 2022), <https://ruralhome.org/our-work/research-and-information/>

²² Appalachian Regional Commission, "County Economic Status Report" (Washington, DC: Appalachian Regional Commission, 2022), <https://www.arc.gov/county-economic-status-and-distressed-areas-in-appalachia/>

²³ Tennessee Housing Development Agency, "Housing Needs Assessment" (Nashville, TN: Tennessee Housing Development Agency, 2020), <https://thda.org/research-reports/housing-needs-assessment>

²⁴ U.S. Census Bureau, "American Community Survey" (Washington, DC: U.S. Census Bureau, 2021), <https://www.census.gov/programs-surveys/acs>

landscape in Union County is more constrained, with fewer physical banking locations serving the predominantly rural population, which may contribute to higher rates of unbanked and underbanked households who rely on high-cost alternative financial services.²⁵ Small businesses in Union County may face more constraints in accessing credit that impedes economic development.²⁶ The disparity between Union and Knox Counties illustrates the persistent urban-rural divide that characterizes many parts of the broader region in East Tennessee.

As part of the CRA examination, information was obtained from two community contacts, including an individual engaged in revitalization and affordable housing efforts throughout the Knoxville MSA. The contact confirmed that Knoxville and Knox County are experiencing population growth. To accommodate the influx of new residents, the City of Knoxville is undertaking the Western Heights neighborhood revitalization project worth over \$20 million, aiming to enhance opportunities for success within the city. The contact also stated that there are numerous affordable housing projects underway in Knoxville, and the city has allocated \$40 million towards affordable housing development since 2020. This initiative has led to the construction or ongoing development of over 2,300 affordable housing units. However, many residents are struggling financially. Competition in the housing market has intensified, with households making under \$20,000 competing against those with incomes exceeding \$50,000 for limited housing options.

Affordable housing has become the primary CD need in Knoxville, as home prices have increased since the end of the Covid-19 pandemic. Challenges facing affordable housing developments include high material and labor costs, a shortage of available and affordable lots for development and the process of obtaining building permits. The contact expressed concerns about banks not offering suitable programs or products for LMI consumers. The contact suggested that banks could be more responsive by understanding the specific needs of the community and creating tailored products and programs to address these needs, including homebuyer assistance programs.

A second community contact focused on economic development in the Knoxville region. This individual also discussed the impact of the rapid growth in Knoxville. They indicated that access to capital for entrepreneurs was a key need in the area, particularly for entrepreneurs looking to start businesses who need loans between \$5,000 to \$50,000. To help address this need, several banks have partnered with a regional CDFI to capitalize a loan fund for minority, women, and veteran-owned businesses, and the contact noted that there is always a need for more banks to participate in these funds. This contact also discussed several redevelopment areas throughout Knoxville, and the need for more workforce housing. New affordable housing is particularly important to support efforts to attract new jobs, and there are many opportunities for banks to engage in providing support for affordable housing programs.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Lending levels reflect good responsiveness to credit needs of the AA. The geographic distribution of loans reflects adequate penetration throughout the AA and the distribution of borrowers reflects adequate penetration among customers of different income levels and businesses of different revenue sizes. The bank made a low level of CD loans in the AA.

²⁵ Federal Deposit Insurance Corporation, "How America Banks: Household Use of Banking and Financial Services" (Washington, DC: FDIC, 2022), <https://www.fdic.gov/analysis/household-survey/>

²⁶ Federal Reserve System, "Small Business Credit Survey: Report on Rural Employer Firms" (Washington, DC: Federal Reserve System, 2022), <https://www.fedsmallbusiness.org/reports/survey>

The analysis included 55 HMDA-reportable loans and 16 small business loans reported by the bank in the AA during the review period. As a result, performance for HMDA-reportable lending was weighed more heavily when determining conclusions in the AA. During the review period, the bank originated or purchased 50 home mortgage loans, including 36 home purchase loans, 12 home refinance loans, and two home improvement loans. Thus, when determining conclusions for home mortgage lending, the greatest weight was assigned to home purchase lending performance given the relative share of this product type relative to all home mortgage lending.

Lending Activity

Lending activity is good. Overall, 18.1 percent of HMDA-reportable and small business loans were made in the AA, compared to 12.1 percent of deposits held in this AA.

Geographic Distribution of Loans

The geographic distribution of loans reflects adequate penetration throughout the AA and does not reveal any conspicuous lending gaps. While the bank did not have lending activity in all AA census tracts, maps did not indicate an absence of loans across LMI tracts, particularly when taking into consideration the location of the bank branches in more rural and suburban areas within the AA.

Home Mortgage Lending

The tables below show the geographic distribution of the bank's home mortgage lending.

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	2	5.6%	445	3.1%	3.5%	2	5.6%	5.1%	445	3.1%	3.1%
	Moderate	5	13.9%	1,227	8.6%	13.0%	5	13.9%	13.9%	1,227	8.6%	10.7%
	Middle	14	38.9%	5,214	36.6%	40.7%	14	38.9%	37.9%	5,214	36.6%	33.2%
	Upper	15	41.7%	7,374	51.7%	42.8%	15	41.7%	42.9%	7,374	51.7%	52.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.2%	0	0.0%	0.2%
	Total	36	100%	14,260	100%	100.0%	36	100%	100%	14,260	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	4.6%	0	0.0%	3.6%
	Moderate	4	33.3%	417	17.4%	13.0%	4	33.3%	14.9%	417	17.4%	12.1%
	Middle	5	41.7%	885	37.0%	40.7%	5	41.7%	42.6%	885	37.0%	38.4%
	Upper	3	25.0%	1,090	45.6%	42.8%	3	25.0%	37.8%	1,090	45.6%	45.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.0%
	Total	12	100%	2,392	100%	100.0%	12	100%	100%	2,392	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	3.8%	0	0.0%	2.9%
	Moderate	2	100.0%	161	100.0%	13.0%	2	100.0%	11.7%	161	100.0%	8.2%
	Middle	0	0.0%	0	0.0%	40.7%	0	0.0%	38.3%	0	0.0%	29.9%
	Upper	0	0.0%	0	0.0%	42.8%	0	0.0%	46.1%	0	0.0%	59.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	161	100%	100.0%	2	100%	100%	161	100%	100%
MULTI FAMILY		Multi-Family Units										
	Low	0	0.0%	0	0.0%	19.5%	0	0.0%	15.9%	0	0.0%	2.6%
	Moderate	0	0.0%	0	0.0%	14.1%	0	0.0%	26.1%	0	0.0%	18.2%
	Middle	2	100.0%	1,564	100.0%	29.7%	2	100.0%	29.0%	1,564	100.0%	35.7%
	Upper	0	0.0%	0	0.0%	31.7%	0	0.0%	26.1%	0	0.0%	34.5%
	Unknown	0	0.0%	0	0.0%	5.0%	0	0.0%	2.9%	0	0.0%	9.1%
	Total	2	100%	1,564	100%	100.0%	2	100%	100%	1,564	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	3.1%	0	0.0%	1.3%
	Moderate	0	0.0%	0	0.0%	13.0%	0	0.0%	9.1%	0	0.0%	5.7%
	Middle	0	0.0%	0	0.0%	40.7%	0	0.0%	34.4%	0	0.0%	24.5%
	Upper	0	0.0%	0	0.0%	42.8%	0	0.0%	53.5%	0	0.0%	68.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	4.5%	0	0.0%	4.2%
	Moderate	2	66.7%	365	71.2%	13.0%	2	66.7%	13.2%	365	71.2%	10.5%
	Middle	1	33.3%	148	28.8%	40.7%	1	33.3%	42.1%	148	28.8%	34.1%
	Upper	0	0.0%	0	0.0%	42.8%	0	0.0%	40.1%	0	0.0%	51.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	3	100%	513	100%	100.0%	3	100%	100%	513	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	3.5%	0	0.0%	5.6%	0	0.0%	1.7%
	Moderate	0	0.0%	0	0.0%	13.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	40.7%	0	0.0%	72.2%	0	0.0%	52.8%
	Upper	0	0.0%	0	0.0%	42.8%	0	0.0%	22.2%	0	0.0%	45.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	2	3.6%	445	2.4%	3.5%	2	3.6%	4.8%	445	2.4%	3.1%
	Moderate	13	23.6%	2,170	11.5%	13.0%	13	23.6%	13.8%	2,170	11.5%	11.8%
	Middle	22	40.0%	7,811	41.3%	40.7%	22	40.0%	39.1%	7,811	41.3%	34.2%
	Upper	18	32.7%	8,464	44.8%	42.8%	18	32.7%	42.3%	8,464	44.8%	49.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	1.4%
	Total	55	100%	18,890	100%	100.0%	55	100%	100%	18,890	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Home mortgage lending reflects adequate distribution across tracts of different income levels when compared to AA demographics and aggregate lending. The bank's home purchase lending in LMI tracts exceeded the percentage of owner-occupied units in those tracts and was similar to, or exceeded aggregate lending. While the bank made no refinance loans in low-income tracts, the bank's refinance lending in moderate-income tracts exceeded both the demographic and aggregate lending performance.

Small Business Lending

The table below shows the geographic distribution of small business loans.

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Knoxville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count			Dollar		
		Count	Dollar	Count	Dollar		Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	6.0%	0	0.0%	4.3%	0	0.0%	4.3%
	Moderate	2	12.5%	650	17.6%	11.1%	2	12.5%	11.5%	650	17.6%	13.5%
	Middle	8	50.0%	1,469	39.9%	32.5%	8	50.0%	30.7%	1,469	39.9%	27.1%
	Upper	5	31.3%	1,542	41.8%	49.4%	5	31.3%	52.7%	1,542	41.8%	54.3%
	Unknown	1	6.3%	25	0.7%	1.1%	1	6.3%	0.4%	25	0.7%	0.7%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.4%	0	0.0%	0.1%
	<i>Total</i>	<i>16</i>	<i>100%</i>	<i>3,686</i>	<i>100%</i>	<i>100.0%</i>	<i>16</i>	<i>100%</i>	<i>100%</i>	<i>3,686</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	3.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	50.0%	19	82.6%	10.6%	1	50.0%	19.6%	19	82.6%	52.3%
	Middle	1	50.0%	4	17.4%	46.6%	1	50.0%	50.0%	4	17.4%	22.4%
	Upper	0	0.0%	0	0.0%	37.9%	0	0.0%	30.4%	0	0.0%	25.3%
	Unknown	0	0.0%	0	0.0%	1.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>23</i>	<i>100%</i>	<i>100.0%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>23</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

The geographic distribution of the bank's small business lending is adequate. The bank made no loans in low-income tracts but with two loans in moderate-income tracts, the percentage of the bank's lending in moderate-income tracts exceeded the percentage of businesses in these tracts and exceeded aggregate lending performance.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of borrowers reflects adequate penetration among customers of different income levels and business revenue sizes. As discussed in the sections below, overall performance for both home mortgage lending and small business lending is adequate.

Home Mortgage Lending

The tables below show the distribution of the bank's HMDA-reportable lending across borrower income levels.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg	%	Bank		Agg
#	%	\$ (000s)	\$ %	#	%	\$ (000s)				\$ %	\$ %	
HOME PURCHASE	Low	1	2.8%	150	1.1%	19.4%	1	2.8%	3.2%	150	1.1%	1.4%
	Moderate	4	11.1%	712	5.0%	16.2%	4	11.1%	13.2%	712	5.0%	8.2%
	Middle	10	27.8%	2,678	18.8%	19.9%	10	27.8%	19.8%	2,678	18.8%	16.0%
	Upper	18	50.0%	9,695	68.0%	44.5%	18	50.0%	41.7%	9,695	68.0%	52.0%
	Unknown	3	8.3%	1,025	7.2%	0.0%	3	8.3%	22.1%	1,025	7.2%	22.4%
	Total	36	100%	14,260	100%	100.0%	36	100%	100%	14,260	100%	100%
REFINANCE	Low	4	33.3%	302	12.6%	19.4%	4	33.3%	8.9%	302	12.6%	4.5%
	Moderate	2	16.7%	279	11.7%	16.2%	2	16.7%	17.9%	279	11.7%	12.2%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	20.2%	0	0.0%	16.8%
	Upper	6	50.0%	1,811	75.7%	44.5%	6	50.0%	32.0%	1,811	75.7%	38.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	21.0%	0	0.0%	28.2%
	Total	12	100%	2,392	100%	100.0%	12	100%	100%	2,392	100%	100%
HOME IMPROVEMENT	Low	2	100.0%	161	100.0%	19.4%	2	100.0%	6.4%	161	100.0%	2.5%
	Moderate	0	0.0%	0	0.0%	16.2%	0	0.0%	14.5%	0	0.0%	8.2%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	23.9%	0	0.0%	17.0%
	Upper	0	0.0%	0	0.0%	44.5%	0	0.0%	51.0%	0	0.0%	64.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.2%	0	0.0%	7.9%
	Total	2	100%	161	100%	100.0%	2	100%	100%	161	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	19.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	16.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.5%	0	0.0%	7.2%	0	0.0%	0.2%
	Unknown	2	100.0%	1,564	100.0%	0.0%	2	100.0%	92.8%	1,564	100.0%	99.8%
	Total	2	100%	1,564	100%	100.0%	2	100%	100%	1,564	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	19.4%	0	0.0%	5.6%	0	0.0%	2.6%
	Moderate	0	0.0%	0	0.0%	16.2%	0	0.0%	16.6%	0	0.0%	8.4%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	21.9%	0	0.0%	12.5%
	Upper	0	0.0%	0	0.0%	44.5%	0	0.0%	50.7%	0	0.0%	69.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	5.2%	0	0.0%	7.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Knoxville

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	19.4%	0	0.0%	7.5%	0	0.0%	4.9%
	Moderate	1	33.3%	39	7.6%	16.2%	1	33.3%	19.2%	39	7.6%	13.3%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	21.4%	0	0.0%	13.1%
	Upper	2	66.7%	474	92.4%	44.5%	2	66.7%	44.6%	474	92.4%	57.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	7.2%	0	0.0%	11.0%
	Total	3	100%	513	100%	100.0%	3	100%	100%	513	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	19.4%	0	0.0%	5.6%	0	0.0%	1.7%
	Moderate	0	0.0%	0	0.0%	16.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	19.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.5%	0	0.0%	5.6%	0	0.0%	12.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	88.9%	0	0.0%	85.8%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	7	12.7%	613	3.2%	19.4%	7	12.7%	5.1%	613	3.2%	1.9%
	Moderate	7	12.7%	1,030	5.5%	16.2%	7	12.7%	14.7%	1,030	5.5%	7.8%
	Middle	10	18.2%	2,678	14.2%	19.9%	10	18.2%	20.3%	2,678	14.2%	13.8%
	Upper	26	47.3%	11,980	63.4%	44.5%	26	47.3%	40.6%	11,980	63.4%	43.1%
	Unknown	5	9.1%	2,589	13.7%	0.0%	5	9.1%	19.3%	2,589	13.7%	33.4%
	Total	55	100%	18,890	100%	100.0%	55	100%	100%	18,890	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

As shown, the distribution of home mortgage loans to LMI borrowers is adequate, considering the low volume of home mortgage loans in the AA during the review period. Home mortgage lending to low-income borrowers is below the percentage of low-income families in the AA but above the aggregate lending performance. Performance for refinance loans and home improvement loans to low-income families was particularly strong compared to aggregate. Home mortgage lending to moderate-income borrowers is below the demographic benchmark and below aggregate lending performance.

Small Business Lending

The table below shows the distribution of small business lending to businesses of different sizes.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Knoxville

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending					
			2024					2024					
			Bank				Total Businesses	Count			Dollar		
			Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%			\$ 000s	\$ %		\$ %
SMALL BUSINESS	Revenue	\$1 Million or Less	10	62.5%	1,934	52.5%	90.3%	10	62.5%	48.7%	1,934	52.5%	30.5%
		Over \$1 Million	5	31.3%	1,227	33.3%	9.0%	5	31.3%		1,227	33.3%	
		Total Rev. available	15	93.8%	3,161	85.8%	99.3%	15	93.8%		3,161	85.8%	
		Rev. Not Known	1	6.3%	525	14.2%	0.7%	1	6.3%		525	14.2%	
		Total	16	100%	3,686	100%	100%	16	100%		3,686	100%	
	Loan Size	\$100,000 or Less	7	43.8%	240	6.5%		7	43.8%	90.9%	240	6.5%	29.9%
		\$100,001 - \$250,000	2	12.5%	362	9.8%		2	12.5%	4.4%	362	9.8%	15.9%
		\$250,001 - \$1 Million	7	43.8%	3,084	83.7%		7	43.8%	4.6%	3,084	83.7%	54.2%
		Total	16	100%	3,686	100%		16	100%	100%	3,686	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	5	50.0%	175	9.0%		5	50.0%		175	9.0%	
		\$100,001 - \$250,000	1	10.0%	200	10.3%		1	10.0%		200	10.3%	
		\$250,001 - \$1 Million	4	40.0%	1,559	80.6%		4	40.0%		1,559	80.6%	
		Total	10	100%	1,934	100%		10	100%		1,934	100%	
SMALL FARM	Revenue	\$1 Million or Less	1	50.0%	4	17.4%	Total Farms 95.0%	1	50%	60.9%	4	17%	49.5%
		Over \$1 Million	0	0.0%	0	0.0%	1.9%	0	0.0%		0	0.0%	
		Total Rev. available	1	50.0%	4	17.4%	96.9%	1	50.0%		4	17.4%	
		Not Known	1	50.0%	19	82.6%	3.1%	1	50.0%		19	82.6%	
		Total	2	100%	23	100%	100%	2	100%		23	100%	
	Loan Size	\$100,000 or Less	2	100.0%	23	100.0%		2	100.0%	93.5%	23	100.0%	44.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	2.2%	0	0.0%	10.9%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	4.3%	0	0.0%	45.1%
		Total	2	100%	23	100%		2	100%	100%	23	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	1	100.0%	4	100.0%		1	100.0%		4	100.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		Total	1	100%	4	100%		1	100%		4	100%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Lending to small businesses is adequate. The bank's lending exceeded aggregate lending but fell below the percentage of small businesses located in the AA. More than half of the bank's loans originated were in amounts \$250,000 and less, indicating the bank's willingness to lend in the smaller amounts typically requested by small businesses.

CD Lending

The bank made a low level of CD loans in the Knoxville AA. During the review period, the bank originated or renewed two loans totaling \$1.8 million in the AA, including one loan for \$350,000 to finance the construction of new rental housing that is affordable to LMI individuals. The loan was responsive to the need for more affordable housing in the AA. As discussed earlier, there are various CD needs and opportunities for CD lending in the Knoxville AA and the bank's CD lending demonstrates limited responsiveness to this range of needs.

INVESTMENT TEST

The bank made an adequate level of qualified investments totaling nearly \$6 million in the Knoxville AA. The bank invested \$5.7 million in MBS that financed affordable housing for LMI individuals and a \$235,000 investment in a bond that financed construction of a school that serves a majority of LMI students. In addition, the bank made donations totaling \$31,000 that benefited the AAs. The donations primarily supported college scholarships for LMI students, as well as support for organizations that serve homeless individuals, provide homeownership counseling, and offer other community services targeted to LMI individuals. These investments demonstrated limited responsiveness to CD needs in the AA.

SERVICE TEST

Retail banking services are poor and the bank provides a limited level of CD services in the AA.

Retail Banking Services

Service delivery systems are unreasonably inaccessible to portions of the bank's geographies and individuals of different income levels throughout the Knoxville AA. In deriving this conclusion, the distribution of the bank's branches by census tract income level was compared to the distribution of households and businesses among the tract categories in the AA. The bank operates six branches in the AA. The bank had no branches in low-income tracts, where 8.1 percent of households and 6 percent of businesses are located. The bank had one branch in a moderate-income tract (16.7 percent of total branches), which exceeded the percentage of households and businesses located in these tracts. However, the one branch in a moderate-income tract is located in Union County, while the majority of LMI tracts in the AA are in Knox County, which limits the accessibility of this branch to LMI geographies and individuals in the AA.

The bank did not open or close any branches during the review period. Additionally, the bank offers similar hours and products and services across all branches in the AA. Therefore, services do not vary in a way that inconveniences the AA, particularly LMI geographies or individuals.

The table below shows the distribution of branches and ATMs along with households and businesses by tract category.

Geographic Distribution of Branches & ATMs
Assessment Area: TN Knoxville

Tract Category	Branches							ATMs										Demographics				
	Total Branches				Drive thru	Extended Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs			Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
Low	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	12	9.5%	8.1%	6.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Moderate	1	16.7%	0	0	1	1	0	Total	1	14.3%	0	0.0%	0	0	1	14.3%	0	0	18	14.3%	14.3%	11.1%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle	3	50.0%	0	0	3	3	0	Total	4	57.1%	0	0.0%	0	0	4	57.1%	0	0	47	37.3%	39.3%	32.5%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				
Upper	2	33.3%	0	0	2	2	0	Total	2	28.6%	0	0.0%	0	0	2	28.6%	0	0	45	35.7%	37.3%	49.4%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	3.2%	1.0%	1.1%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	6	100%	0	0	6	6	0	Total	7	100%	0	0.0%	0	0	7	100%	0	0	126	100%	100%	100%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				

Based on 2024 FFIEC Census Data

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

DTO - Drive thru only is a subset of total branches

SA = Stand Alone ATM is a subset of total ATMs

CD Services

The bank provides a limited level of CD services in the AA. During the review period, bank employees engaged in 67 hours of CD service activities, all of which were either financial education for LMI youth through schools or LMI seniors.

**METROPOLITAN AREA(S)
LIMITED-SCOPE REVIEW**

The following AA(s) were reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution's CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review indicates the bank's CRA performance in these AAs is generally consistent with the areas that received a full-scope review. Refer to the tables in Appendices D and E for additional information regarding these AAs.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE METROPOLITAN AAS

Johnson City AA (Washington County):

- As of December 31, 2024, Commercial Bank operated one branch in the AA, representing 5.9 percent of its branches in Tennessee.
- As of December 31, 2024, the bank had \$4.5 million in deposits in the AA, representing 0.4 percent of total deposits in Tennessee.

Kingsport AA (Sullivan County):

- As of December 31, 2024, Commercial Bank operated one branch in the AA, representing 5.9 percent of its branches in Tennessee.
- As of December 31, 2024, the bank had \$32.5 million in deposits in the AA, representing 3 percent of total deposits in Tennessee.

Morristown AA (Hamblen County):

- As of December 31, 2024, Commercial Bank operated two branches in the AA, representing 11.8 percent of its branches in Tennessee.
- As of December 31, 2024, the bank had \$49.7 million in deposits in the AA, representing 3.7 percent of total deposits in Tennessee.

Williamson County AA (Williamson County):

- As of December 31, 2024, Commercial Bank operated one branch in the AA, representing 5.9 percent of its branches in Tennessee.
- As of December 31, 2024, the bank had \$34.3 million in deposits in the AA, representing 3.2 percent of total deposits in Tennessee.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, performance in each AA was evaluated, and compared with the bank's performance in the AAs that received a full-scope review. The conclusions regarding performance are provided in the tables below.

Performance in the Limited-Scope Review Metropolitan AAs			
AA	Lending Test	Investment Test	Service Test
Johnson City	Consistent	Consistent	Consistent
Kingsport	Not Consistent (below)	Consistent	Consistent
Morristown	Consistent	Consistent	Not Consistent (above)
Williamson County	Consistent	Consistent	Not Consistent (below)

The performance standards of the Lending Test for limited-scope MSA AAs include the geographic distribution of loans, the borrower distribution of loans, and CD loans. For the geographic distribution of loans, performance was adequate in the Morristown and Johnson City AAs and poor in the Kingsport AA. The geographic distribution of loans was not evaluated in the Williamson County AA as there are no low-income tracts in the AA and aggregate performance indicated that there was limited opportunity for lending in moderate-income tracts. Borrower distribution was adequate in Williamson County AAs and poor in remaining limited scope AAs. The bank made an adequate level of CD loans in the Johnson City AA (\$4.8 million) but few, if any CD loans in the remaining AAs.

Qualifying amounts and conclusions for the bank's investment and grant activity in limited-scope MSA areas were as follows: \$1.6 million in Johnson City (adequate); \$806,000 in Kingsport (adequate); \$1.1 million in Morristown (adequate); and \$3.9 million in Williamson-Rutherford counties (adequate).

The performance standards of the Service Test for limited-scope MSA AAs include retail banking and CD services. Conclusions for retail banking services were as follows: good in Johnson City and Morristown; adequate in Kingsport; and poor in Williamson County. The bank made an adequate level of CD services in Morristown (12 hours), and few, if any CD service activities in Johnson City, Kingsport or Williamson County.

Performance in the metropolitan limited-scope AAs did not impact overall performance for the state.

KENTUCKY

CRA RATING FOR KENTUCKY: SATISFACTORY

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

Major factors contributing to this rating include:

- The geographic distribution of loans reflects good penetration in Kentucky.
- The distribution of borrowers reflects good penetration among customers of different income levels and businesses of different sizes.
- The bank made an adequate level of CD loans in Kentucky.
- The bank made an adequate level of qualified CD investments and grants in Kentucky.
- Retail banking services are good in Kentucky.
- The bank provided an adequate level of CD services in Kentucky.

SCOPE OF EXAMINATION

Commercial Bank's one AA in Kentucky is the Southeast Kentucky nonmetropolitan AA. This AA was reviewed using full-scope examination procedures and conclusions for the state of Kentucky are based on performance in this AA. Scoping considerations, including time periods and products, applicable to the review of the AAs are consistent with the overall CRA examination scope as presented in the *Institution, Scope of Examination* section. To augment this evaluation, recently conducted community contact interviews were reviewed.

DESCRIPTION OF INSTITUTION'S OPERATIONS SOUTHEAST KENTUCKY NON-METROPOLITAN AA

Overview

The Southeast Kentucky AA includes Bell, Harlan, Knox, Laurel and Whitley counties, located in a nonmetropolitan area in southeast Kentucky. As of December 31, 2024, the bank operates 13 branches in the AA, including one in a low-income tract, four in moderate-income tracts, and eight in middle-income tracts. As this is the only AA in Kentucky, 100 percent of the bank's deposit volume and lending in the state is in this AA.

Small community banks are the primary banks in the AA. Overall, there are 15 institutions in the AA with 69 branches and total deposits of \$3.3 billion. Commercial Bank the holds the largest volume of deposits in the AA with \$520.9 million as of June 30, 2024, or 16 percent of total deposits. Community Trust Bank has 13.2 percent of deposits followed by Cumberland Valley National Bank & Trust (11.6 percent) and Forcht Bank (10.8 percent).

For HMDA-reportable lending, Commercial Bank ranked 10th out of 176 reporters in 2024 with 2.5 percent of total HMDA-reportable originations and purchases. Community Trust Bank, L&N Federal Credit Union, Rocket Mortgage, and Vanderbilt Mortgage and Finance were the top HMDA reporters in the market during the review

period. For small business lending, Commercial Bank ranked 9th out of 63 reporters in 2024 with approximately 2.3 percent of total small business loans. American Express, JP Mortgage Chase, and Capital One were the top reporters in the market during the review period.

AA Demographics

Details on the 2024 demographic data and business information from the FFIEC and D&B that are used to analyze the bank's CRA performance in the AA are included in *Appendix C*.

AA Population and Income Characteristics

The 2020 population in the AA was 180,446 in 2020, which represents a decline of 1.8 percent since 2015. The population loss in Bell County during this time period was 13.8 percent, while Harlan and Knox counties also lost more than five percent of their populations. Other nonmetropolitan areas in Kentucky experienced minor population losses during this period, while overall, population in the state increased by 2.5 percent.²⁷

The AA contains 59 census tracts: four low-income tracts (6.8 percent), 24 moderate-income tracts (40.7 percent), 25 middle-income tracts (42.4 percent), and six upper-income tracts (10.2 percent). Bell, Harlan, Knox, Laurel and Whitley counties are all considered distressed nonmetropolitan counties due to high poverty rates, though Bell, Harlan and Knox County also experienced elevated unemployment and Harlan County has experienced population loss. Harlan County is also considered an underserved, remote rural area.

For purposes of classifying borrower income, this evaluation uses the FFIEC 2024 statewide median family income for the non-metropolitan areas in Kentucky. As the following table shows, the median family income was \$66,100.

**Borrower Income Levels
Kentucky State Non-metro**

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2024	\$66,100	0	- \$33,049	\$33,050	- \$52,879	\$52,880	- \$79,319	\$79,320	- & above

Within the AA, it is important to note the wide variation in the median family income. Harlan County has the lowest median family income in 2020 at \$35,908, which represents a five percent decline compared to 2015. Laurel and Whitley counties have the highest median family incomes in the AA, yet even these counties still fall below the median family income for non-MSA Kentucky which was \$54,327 in 2020.²⁸

There were 47,756 families in the AA in 2020. Of these families, 30.4 percent were low-income, 18.6 percent were moderate-income, 17.4 percent were middle-income, and 33.5 percent were upper-income. In the AA, 23 percent of families had income below the poverty level though the percentage of families below the poverty level was higher in Bell and Harlan counties. The majority of families living below the poverty line live in LMI geographies, which suggests lending challenges exist in these areas.

²⁷ Source: 2011-2015 U.S. Census Bureau American Community Survey; 2020 U.S. Census Bureau Decennial Census

²⁸ 2011 - 2015 U.S. Census Bureau American Community Survey; 2016 - 2020 U.S. Census Bureau American Community Survey
Median Family Incomes have been inflation-adjusted and are expressed in 2020 dollars.

Housing Characteristics

There are 83,043 total housing units in the AA, of which 56.3 percent are owner-occupied, 26.4 percent are rental units, and 17.3 percent are vacant. Notably, across the AA, nearly 25 percent of all housing units are mobile homes, which could indicate a need for a different type of financing or housing assistance.

The median age of housing stock across the AA is 43 years, though the housing stock in low-income tracts is older at 53 years. The older age of homes throughout the AA is an indicator of potential opportunities for more home improvement lending.

The median housing value across the AA is \$89,905, which is below the median housing value in Kentucky of \$147,100 and other nonmetropolitan areas of the state at \$105,427. The median house value varies widely in the AA, from a low of \$62,800 in Bell County to \$116,300 in Laurel County. Median gross rent in the AA was \$610 per month, which is less than the median gross rent in Kentucky (\$783 per month) and in non-metropolitan Kentucky (\$652 per month). The affordability ratio²⁹ of the AA (38.6 percent) is higher than the affordability ratio for the state (35.5 percent), indicating that housing is more affordable in the AA than elsewhere in the state, particularly in Bell and Harlan counties.

Housing cost burden is a concern in the AA, particularly for low-income renters and owners. Approximately 53 percent of low-income renters and 47.5 percent of low-income homeowners in the AA were housing cost burdened, meaning that housing costs equaled 30 percent or more of household income.³⁰ This data indicates that there is great need for more affordable housing, particularly for low-income individuals in the AA.

Economic Conditions

The Southeast Kentucky AA is located within the Appalachian Region. The region has traditionally relied on coal mining and other manufacturing and has faced challenges in recent years with the decline in the coal industry. According to a community contact, at one time, the coal industry provided high paying jobs from \$80,000 to \$100,000. With the loss of jobs in this sector and limited opportunities in other industry sectors, some skilled workers have left the area, and those that remain are trying to survive on much lower-paying jobs. The region is focused on efforts to recruit new industries and workforce development to help workers transition to new opportunities. The largest industry sectors across the AA are accommodation and food service, administrative services, and health care and social services. The growth of accommodation and food service reflects the new emphasis on tourism focused on the natural landscape of the region.

This region in southeastern Kentucky has historically struggled with intergenerational poverty, high rates of unemployment, population decline, and lower educational attainment. The population in this area is highly dependent on federal transfer payments such as Medicaid, food stamps, and the Earned Income Tax Credit.³¹ The ARC, a federal-state partnership dedicated to promoting economic development and addressing quality of life issues for Appalachian residents, releases annual listings of each Appalachian county's economic health from best to worst. Every county is designated as either attainment, competitive, transitional, at-risk, or distressed. The ARC bases its classifications on several economic indicators, including poverty rates, per capita market income, and the three-year average of unemployment rates. Bell, Harlan, Knox and Whitley counties are all considered distressed, while Laurel County is considered at-risk, though there are multiple tracts within the county that meet the criteria for distressed.³²

²⁹ Housing affordability ratio is calculated by dividing the median household income by the median housing value. Values closer to 100 percent indicate greater affordability.

³⁰ U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

³¹ New York Times. December 21, 2018. Where Government Is a Dirty Word, but Its Checks Pay the Bills - The New York Times ([nytimes.com](https://www.nytimes.com)) accessed August 24, 2024

³² Appalachian Regional Commission. County Economic Status and Distressed Areas by State, FY 2025.

Eastern Kentucky has been devastated by the opioid crisis. The Centers for Disease Control and Prevention (CDC) identified 220 counties in 26 states as the most vulnerable to other types of addiction-related health issues as a result of the opioid epidemic.³³ All counties in this AA were included on the CDC list, and Bell and Knox counties were listed in the top ten most vulnerable counties nationwide. The opioid epidemic has contributed to lower rates of labor force participation and created challenges in local communities. According to a community contact, local schools have been particularly hard hit because many students are not being cared for at home and need additional assistance from schools for food, afterschool care, and other services that schools do not have the funding to provide. More support is needed for the schools to serve these vulnerable children.

This region in Kentucky is particularly prone to flooding due to the topography and legacy impacts of coal mining. As a result, there is a need for additional assistance to help not just with the recovery from past flooding, but also to help communities and residents, particularly LMI residents, prepare for future flooding events.³⁴

The following table shows the unemployment rates for the AA, the counties that comprise the AA, nonMSA Kentucky, and the state of Kentucky. The unemployment rates reflect the economic conditions. In 2024, the unemployment rate for the AA exceeded the unemployment rate for the state of Kentucky. Within the AA, the unemployment rate was highest in Harlan County at 7.2 percent, which exceeded the unemployment rate for the state at 5.1 percent and the unemployment rate for other nonmetropolitan areas in the state at 5.7 percent. It's also important to note that the unemployment rate increased sharply in the AA between 2023 and 2024.

KY Southeast KY 2024 Unemployment Rates					
Area	2020	2021	2022	2023	2024
KY Southeast KY 2024	7.5%	5.1%	4.8%	5.2%	6.3%
Bell County, KY	8.2%	5.8%	5.4%	6.0%	6.9%
Harlan County, KY	10.0%	6.9%	5.6%	5.9%	7.2%
Knox County, KY	7.8%	5.8%	5.2%	5.6%	7.1%
Laurel County, KY	6.9%	4.4%	4.5%	5.1%	6.2%
Whitley County, KY	6.8%	4.6%	4.2%	4.5%	5.3%
NonMSA Kentucky	6.9%	4.8%	4.5%	4.8%	5.7%
Kentucky	6.5%	4.5%	4.0%	4.3%	5.1%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

According to the 2024 data from D&B, 91.4 percent of all businesses in the AA have revenues under \$1 million and are therefore considered small businesses. A community contact noted that the region is full of creative people and small businesses but there is a lack of opportunity and available capital for these individuals to grow their small business ideas.

Credit and CD Needs

As discussed above, the Southeast Kentucky AA exemplifies the socioeconomic challenges facing many rural Appalachian communities in Kentucky. Persistent poverty rates across the counties in the AA significantly exceed state averages, reflecting limited economic diversification following the dramatic decline of the coal industry that has eliminated thousands of well-paying jobs over the past decade.³⁵ The region's infrastructure challenges mirror those of similar rural Appalachian areas, including aging housing stock, inadequate water and

County Economic Status and Distressed Areas in Appalachian Kentucky, Fiscal Year 2023 (arc.gov). Accessed January 9, 2026

³³ Centers for Disease Control and Prevention: <https://www.cdc.gov/pwld/vulnerable-counties-data.htm>

³⁴ Klesta, Matt. Cleveland Federal Reserve Bank. September 23, 2023. Resilience and Recovery: Insights from the July 2022 Eastern Kentucky Flood (clevelandfed.org). Accessed August January 9, 2026.

³⁵ Appalachian Regional Commission, "County Economic Status Report" (Washington, DC: Appalachian Regional Commission, 2022), <https://data.arc.gov/data/> Accessed January 9, 2026.

sewer systems, healthcare provider shortages, and broadband limitations that create substantial digital divides.³⁶ Educational attainment lags behind state metrics, hindering workforce development and economic mobility in a region struggling to transition to new economic drivers.³⁷ The financial services landscape presents barriers for residents, with a notable decline in bank branches over recent years leaving multiple communities without a physical banking presence, contributing to higher rates of unbanked or underbanked households who must rely on high-cost alternative financial services.³⁸ Lower-than-average credit scores often found in higher poverty rural areas combined with the absence of targeted down payment assistance programs and specialized mortgage products may constrain homeownership opportunities for the LMI population.³⁹

Small businesses across AA also face credit access constraints. Traditional banks typically have requirements that create barriers for newer businesses in these communities, contributing to small business lending volumes below state averages.⁴⁰ The limited presence of CDFIs serving the area may leave a financing gap for businesses seeking smaller-dollar loans most needed by rural entrepreneurs.⁴¹ Access to technical assistance is also more limited throughout this part of Appalachia, which leaves many business owners without assistance needed to build creditworthiness or navigate available financing options.⁴² These financial service gaps, combined with infrastructure limitations (particularly the region's broadband access challenges) and workforce deficiencies evidenced by low labor force participation rates, create persistent barriers to economic resilience and growth that characterize many rural counties in the region.⁴³

As part of the CRA examination, information was obtained from interviews with several community contacts to provide additional information on the AA. In general, these contacts confirmed the challenges facing the region discussed above. One contact with a foundation that serves Appalachian Kentucky, including three of the counties in the AA, noted a number of specific CD needs in the region. First, the contact indicated that there is a great need for workforce development. In part, this is to address the transition away from the coal industry. However, it's also challenging to get people to work, and the contact indicated that this could be due to the fear of the "benefits cliff." These individuals may be concerned that if they increase their income, they will lose access to needed federal assistance for healthcare or childcare. The contact also noted that there is a need for more assistance to schools, to help the students who have been impacted by the opioid epidemic as discussed above. Finally, the contact confirmed that there is an opportunity for a CDFI or other financial institution to help connect resources, to develop programs, and to provide other services for small businesses. There is also a need for more flexible loan products, or a revolving loan fund, to provide more affordable access to capital for small businesses.

³⁶ U.S. Census Bureau, "American Community Survey 5-Year Estimates" (Washington, DC: U.S. Census Bureau, 2020), <https://www.census.gov/programs-surveys/acs>

³⁷ Kentucky Council on Postsecondary Education, "County Educational Attainment Profiles" (Frankfort, KY: Kentucky CPE, 2021), <https://cpe.ky.gov/data/reports/>

³⁸ Federal Deposit Insurance Corporation, "How America Banks: Household Use of Banking and Financial Services" (Washington, DC: FDIC, 2019), <https://www.fdic.gov/analysis/household-survey/>

³⁹ Federal Reserve Bank of New York, "Community Credit: A New Perspective on America's Communities" (New York, NY: Federal Reserve Bank of New York, 2021), <https://www.newyorkfed.org/data-and-statistics/data-visualization/community-credit-profiles>. Accessed January 9, 2026

⁴⁰ Federal Reserve System, "Small Business Credit Survey: Report on Rural Employer Firms" (Washington, DC: Federal Reserve System, 2022), <https://www.fedsmallbusiness.org/reports/survey>

⁴¹ SCORE Association, "Megaphone of Main Street: Rural Small Business Report" (Washington, DC: SCORE, 2022), <https://www.score.org/megaphone-main-street-data-reports>

⁴² Consumer Financial Protection Bureau, "Challenges in Rural Banking Access" (Washington, DC: CFPB, 2021), <https://www.consumerfinance.gov/data-research/research-reports/>

⁴³ Kentucky Center for Statistics, "Labor Market Information" (Frankfort, KY: Kentucky Center for Statistics, 2021), <https://kystats.ky.gov/KYLMI>

A second community contact was with a regional organization focused on strengthening the economic development capacity of eastern Kentucky. This contact focused specifically on the need for better broadband infrastructure and the opportunity for banks to get engaged and support efforts to expand access to broadband. The contact also mentioned the need for support for workforce development initiatives.

A third community contact focused on affordable housing noted that there is need for more housing assistance, particularly assistance to help LMI families repair and rehab their existing homes. There is very little new housing built in the area, so renovations are most important to allow individuals to remain in their homes.

None of the contacts identified any issues with local financial institutions, though it was noted there are more opportunities for them to get involved. One contact felt banks were not engaged with reaching out to LMI individuals or small businesses, and that left a gap between the more vulnerable residents and banks. This contact indicated that more collaboration and engagement is needed, and more flexible products would help meet the needs of this community.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

The Lending Test rating in Kentucky is High Satisfactory. Lending levels reflect good responsiveness to credit needs of the Southeast Kentucky AA. The geographic distribution of loans reflects good penetration throughout the AA and the distribution of borrowers reflects good penetration among customers of different income levels and businesses of different revenue sizes. The bank makes an adequate level of CD loans in the AA.

Lending Activity

Lending activity is good. Overall, 28.6 percent of total HMDA-reportable and small business loans were made in the AA, compared to 28.1 percent of total deposits held in this AA.

The following table displays the volume of lending activity from January 1, 2024 through December 31, 2024, by loan type. As shown, in Kentucky the number and dollar volume of HMDA-reportable loans exceeded the number and dollar volume of small business loans. Therefore, the bank's HMDA-reportable lending performance was weighed more heavily in deriving lending test conclusions in Kentucky. During the review period, the bank originated or purchased 55 home mortgage loans, including 29 home purchase loans, 25 home refinance loans, and one home improvement loan. When determining conclusions for home mortgage lending, similar weight was assigned to home purchase and home refinance lending.

Statewide Summary of Lending Activity
Assessment Areas Located in: Kentucky

2024

Loan Type	#	%	\$(000s)	%
HMDA Home Purchase	29	25.4%	4,656	31.9%
HMDA Refinance	25	21.9%	2,260	15.5%
HMDA Home Improvement	1	0.9%	40	0.3%
HMDA Multi-Family	2	1.8%	380	2.6%
HMDA Other Purpose LOC	0	0.0%	0	0.0%
HMDA Other Purpose Closed/Exempt	8	7.0%	738	5.1%
HMDA Loan Purpose NA	0	0.0%	0	0.0%
Total HMDA	65	57.0%	8,074	55.3%
Total Small Business	47	41.2%	6,438	44.1%
Total Farm	2	1.8%	100	0.7%
Total Loans	114	100%	14,612	100%

Originations & Purchases

Geographic Distribution of Loans

The geographic distribution of loans reflects good penetration throughout the AA. No conspicuous lending gaps were identified based on an analysis of the dispersion of the loan products reviewed. While the bank did not have lending activity in all AA census tracts, this is a rural area with limited opportunities in all tracts. As described in the sections below, the geographic distribution of both home mortgage lending and small business lending is good.

Home Mortgage Lending

The tables below show the geographic distribution of home mortgage lending.

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

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank #	Agg %	Bank		Agg \$ %	
#	%	\$ (000s)	\$ %	#	%	\$ (000s)			\$ %			
HOME PURCHASE	Low	2	6.9%	175	3.8%	5.9%	2	6.9%	5.0%	175	3.8%	4.0%
	Moderate	12	41.4%	1,886	40.5%	40.3%	12	41.4%	33.5%	1,886	40.5%	28.8%
	Middle	14	48.3%	1,869	40.1%	44.6%	14	48.3%	49.1%	1,869	40.1%	52.0%
	Upper	1	3.4%	726	15.6%	9.3%	1	3.4%	12.3%	726	15.6%	15.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.1%	0	0.0%	0.1%
	Total	29	100%	4,656	100%	100.0%	29	100%	100%	4,656	100%	100%
REFINANCE	Low	3	12.0%	286	12.7%	5.9%	3	12.0%	3.1%	286	12.7%	3.3%
	Moderate	12	48.0%	764	33.8%	40.3%	12	48.0%	28.7%	764	33.8%	26.2%
	Middle	10	40.0%	1,210	53.5%	44.6%	10	40.0%	53.2%	1,210	53.5%	52.5%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	15.0%	0	0.0%	18.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	25	100%	2,260	100%	100.0%	25	100%	100%	2,260	100%	100%
HOME IMPROVEMENT	Low	1	100.0%	40	100.0%	5.9%	1	100.0%	4.0%	40	100.0%	4.9%
	Moderate	0	0.0%	0	0.0%	40.3%	0	0.0%	37.1%	0	0.0%	38.2%
	Middle	0	0.0%	0	0.0%	44.6%	0	0.0%	43.7%	0	0.0%	43.5%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	15.2%	0	0.0%	13.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	40	100%	100.0%	1	100%	100%	40	100%	100%
MULTI FAMILY	Low	1	50.0%	200	52.6%	12.6%	1	50.0%	12.5%	200	52.6%	12.0%
	Moderate	0	0.0%	0	0.0%	44.2%	0	0.0%	12.5%	0	0.0%	10.4%
	Middle	1	50.0%	180	47.4%	32.9%	1	50.0%	56.3%	180	47.4%	47.8%
	Upper	0	0.0%	0	0.0%	10.3%	0	0.0%	18.8%	0	0.0%	29.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	380	100%	100.0%	2	100%	100%	380	100%	100%
	Multi-Family Units											
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	5.9%	0	0.0%	1.2%	0	0.0%	1.0%
	Moderate	0	0.0%	0	0.0%	40.3%	0	0.0%	28.6%	0	0.0%	23.9%
	Middle	0	0.0%	0	0.0%	44.6%	0	0.0%	54.0%	0	0.0%	60.0%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	16.1%	0	0.0%	15.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: KY Southeast KY

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Owner Occupied Units			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	2	25.0%	274	37.1%	5.9%	2	25.0%	4.7%	274	37.1%	5.8%
	Moderate	2	25.0%	127	17.2%	40.3%	2	25.0%	39.1%	127	17.2%	36.8%
	Middle	4	50.0%	337	45.7%	44.6%	4	50.0%	45.3%	337	45.7%	48.6%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	10.9%	0	0.0%	8.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	8	100%	738	100%	100.0%	8	100%	100%	738	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	5.9%	0	0.0%	14.3%	0	0.0%	12.6%
	Moderate	0	0.0%	0	0.0%	40.3%	0	0.0%	28.6%	0	0.0%	31.4%
	Middle	0	0.0%	0	0.0%	44.6%	0	0.0%	57.1%	0	0.0%	56.0%
	Upper	0	0.0%	0	0.0%	9.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	9	13.8%	975	12.1%	5.9%	9	13.8%	4.4%	975	12.1%	4.1%
	Moderate	26	40.0%	2,777	34.4%	40.3%	26	40.0%	32.4%	2,777	34.4%	27.9%
	Middle	29	44.6%	3,596	44.5%	44.6%	29	44.6%	49.9%	3,596	44.5%	51.9%
	Upper	1	1.5%	726	9.0%	9.3%	1	1.5%	13.3%	726	9.0%	16.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	65	100%	8,074	100%	100.0%	65	100%	100%	8,074	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Home mortgage lending reflects good distribution across tracts of different income levels when compared to AA demographics and aggregate lending. The percentage of lending in LMI tracts exceeded the percentage of owner-occupied units in these tracts and the performance of aggregate lenders for both home purchase and refinance loans.

Small Business Lending

The table below shows the geographic distribution of small business loans.

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: KY Southeast KY

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Dollar		Total Businesses	Count			Dollar		
		Count					Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	3	6.4%	524	8.1%	5.6%	3	6.4%	4.7%	524	8.1%	5.7%
	Moderate	16	34.0%	3,815	59.3%	28.8%	16	34.0%	30.1%	3,815	59.3%	35.4%
	Middle	26	55.3%	1,829	28.4%	55.7%	26	55.3%	53.5%	1,829	28.4%	50.3%
	Upper	2	4.3%	270	4.2%	9.9%	2	4.3%	10.8%	270	4.2%	8.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.9%	0	0.0%	0.2%
	Total	47	100%	6,438	100%	100.0%	47	100%	100%	6,438	100%	100%
SMALL FARM				Total Farms								
	Low	0	0.0%	0	0.0%	4.2%	0	0.0%	3.4%	0	0.0%	0.2%
	Moderate	1	50.0%	50	50.0%	36.8%	1	50.0%	41.4%	50	50.0%	43.7%
	Middle	1	50.0%	50	50.0%	52.6%	1	50.0%	51.7%	50	50.0%	54.6%
	Upper	0	0.0%	0	0.0%	6.3%	0	0.0%	3.4%	0	0.0%	1.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	100	100%	100.0%	2	100%	100%	100	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

The geographic distribution of small business lending is good. The percentage of small business loans in LMI tracts exceeded the percentage of small businesses in these tracts and exceeded aggregate lending performance.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans reflects good penetration among borrowers of different income levels and businesses of different revenue size. As discussed in the following sections, the distribution of home mortgage loans was adequate and the distribution of small business loans was excellent.

Home Mortgage Lending

The tables below show the distribution of HMDA-reportable lending across borrower income levels.

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: KY Southeast KY

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg %	Bank		Agg %	
#	%	\$ (000s)	\$ %	#	%	\$ (000s)			\$ %	\$ %		
HOME PURCHASE	Low	1	3.4%	47	1.0%	30.4%	1	3.4%	3.5%	47	1.0%	1.3%
	Moderate	2	6.9%	135	2.9%	18.6%	2	6.9%	16.1%	135	2.9%	9.9%
	Middle	7	24.1%	475	10.2%	17.4%	7	24.1%	24.7%	475	10.2%	22.4%
	Upper	18	62.1%	3,959	85.0%	33.5%	18	62.1%	33.5%	3,959	85.0%	43.7%
	Unknown	1	3.4%	40	0.9%	0.0%	1	3.4%	22.2%	40	0.9%	22.7%
	Total	29	100%	4,656	100%	100.0%	29	100%	100%	4,656	100%	100%
REFINANCE	Low	2	8.0%	130	5.8%	30.4%	2	8.0%	5.8%	130	5.8%	3.1%
	Moderate	8	32.0%	396	17.5%	18.6%	8	32.0%	14.8%	396	17.5%	8.9%
	Middle	4	16.0%	355	15.7%	17.4%	4	16.0%	23.2%	355	15.7%	19.4%
	Upper	7	28.0%	1,128	49.9%	33.5%	7	28.0%	39.2%	1,128	49.9%	44.9%
	Unknown	4	16.0%	251	11.1%	0.0%	4	16.0%	17.0%	251	11.1%	23.7%
	Total	25	100%	2,260	100%	100.0%	25	100%	100%	2,260	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	30.4%	0	0.0%	10.6%	0	0.0%	5.3%
	Moderate	1	100.0%	40	100.0%	18.6%	1	100.0%	10.6%	40	100.0%	10.0%
	Middle	0	0.0%	0	0.0%	17.4%	0	0.0%	23.2%	0	0.0%	18.7%
	Upper	0	0.0%	0	0.0%	33.5%	0	0.0%	53.0%	0	0.0%	62.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.6%	0	0.0%	3.9%
	Total	1	100%	40	100%	100.0%	1	100%	100%	40	100%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	30.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	33.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	2	100.0%	380	100.0%	0.0%	2	100.0%	100.0%	380	100.0%	100.0%
	Total	2	100%	380	100%	100.0%	2	100%	100%	380	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	30.4%	0	0.0%	6.2%	0	0.0%	4.2%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	13.0%	0	0.0%	11.2%
	Middle	0	0.0%	0	0.0%	17.4%	0	0.0%	30.4%	0	0.0%	25.7%
	Upper	0	0.0%	0	0.0%	33.5%	0	0.0%	47.8%	0	0.0%	57.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.5%	0	0.0%	1.7%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: KY Southeast KY

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Families by			Count		Dollar			
		Count	Dollar	\$ (000s)	\$ %		Bank	Agg	Bank	Agg		
		#	%			%	#	%	\$ (000s)	\$ %	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	1	12.5%	25	3.4%	30.4%	1	12.5%	12.5%	25	3.4%	6.7%
	Moderate	1	12.5%	153	20.7%	18.6%	1	12.5%	17.2%	153	20.7%	15.9%
	Middle	0	0.0%	0	0.0%	17.4%	0	0.0%	18.8%	0	0.0%	17.5%
	Upper	6	75.0%	560	75.9%	33.5%	6	75.0%	48.4%	560	75.9%	57.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.1%	0	0.0%	2.8%
	<i>Total</i>	<i>8</i>	<i>100%</i>	<i>738</i>	<i>100%</i>	<i>100.0%</i>	<i>8</i>	<i>100%</i>	<i>100%</i>	<i>738</i>	<i>100%</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	30.4%	0	0.0%	14.3%	0	0.0%	11.4%
	Moderate	0	0.0%	0	0.0%	18.6%	0	0.0%	14.3%	0	0.0%	23.7%
	Middle	0	0.0%	0	0.0%	17.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	33.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	71.4%	0	0.0%	65.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>
HMDA TOTALS	Low	4	6.2%	202	2.5%	30.4%	4	6.2%	4.8%	202	2.5%	1.9%
	Moderate	12	18.5%	724	9.0%	18.6%	12	18.5%	15.2%	724	9.0%	9.5%
	Middle	11	16.9%	830	10.3%	17.4%	11	16.9%	24.3%	830	10.3%	20.9%
	Upper	31	47.7%	5,647	69.9%	33.5%	31	47.7%	36.9%	5,647	69.9%	43.3%
	Unknown	7	10.8%	671	8.3%	0.0%	7	10.8%	18.8%	671	8.3%	24.4%
	<i>Total</i>	<i>65</i>	<i>100%</i>	<i>8,074</i>	<i>100%</i>	<i>100.0%</i>	<i>65</i>	<i>100%</i>	<i>100%</i>	<i>8,074</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

As shown, the distribution of home mortgage loans to LMI borrowers is adequate given the bank's market presence. Home mortgage lending to low-income borrowers is below the percentage of low-income families in the AA but exceeds the aggregate lending performance. Home mortgage lending to moderate-income borrowers is similar to the demographic and exceeds aggregate lending performance. Home purchase lending, which is the bank's largest home mortgage product for the AA, is below the aggregate for LMI borrowers, while refinance lending to moderate-income borrowers was particularly strong.

Small Business Lending

The table below shows the distribution of small business loans to businesses of different sizes.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: KY Southeast KY

PRODUCT TYPE			Bank Lending & Demographic Data						Bank & Aggregate Lending					
			2024						2024					
			Bank				Total Businesses	Count			Dollar			
Count		Dollar		Bank	Agg	Bank		Agg						
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %				
SMALL BUSINESS	Revenue	\$1 Million or Less	34	72.3%	4,573	71.0%	90.3%	34	72.3%	41.9%	4,573	71.0%	37.5%	
		Over \$1 Million	12	25.5%	1,490	23.1%	7.9%	12	25.5%		1,490	23.1%		
		Total Rev. available	46	97.9%	6,063	94.2%	98.2%	46	97.9%		6,063	94.2%		
		Rev. Not Known	1	2.1%	375	5.8%	1.8%	1	2.1%		375	5.8%		
		Total	47	100%	6,438	100%	100%	47	100%		6,438	100%		
	Loan Size	\$100,000 or Less	32	68.1%	1,500	23.3%		32	68.1%	94.7%	1,500	23.3%	47.8%	
		\$100,001 - \$250,000	8	17.0%	1,432	22.2%		8	17.0%	3.6%	1,432	22.2%	20.3%	
		\$250,001 - \$1 Million	7	14.9%	3,506	54.5%		7	14.9%	1.7%	3,506	54.5%	31.9%	
		Total	47	100%	6,438	100%		47	100%	100%	6,438	100%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	24	70.6%	1,065	23.3%		24	70.6%		1,065	23.3%		
		\$100,001 - \$250,000	5	14.7%	877	19.2%		5	14.7%		877	19.2%		
		\$250,001 - \$1 Million	5	14.7%	2,631	57.5%		5	14.7%		2,631	57.5%		
		Total	34	100%	4,573	100%		34	100%		4,573	100%		
SMALL FARM	Revenue	\$1 Million or Less	2	100.0%	100	100.0%	Total Farms 100.0%	2	100.0%	44.8%	100	100.0%	38.7%	
		Over \$1 Million	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		
		Total Rev. available	2	100.0%	100	100.0%	100.0%	2	100.0%		100	100.0%		
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		
		Total	2	100%	100	100%	100%	2	100%		100	100%		
	Loan Size	\$100,000 or Less	2	100.0%	100	100.0%		2	100.0%	93.1%	100	100.0%	56.9%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	3.4%	0	0.0%	15.5%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	3.4%	0	0.0%	27.6%	
		Total	2	100%	100	100%		2	100%	100%	100	100%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	2	100.0%	100	100.0%		2	100.0%		100	100.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		Total	2	100%	100	100%		2	100%		100	100%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Lending to small businesses is excellent. The percentage of loans to businesses with revenue less than \$1 million was less than the percentage of businesses small businesses in the AA but exceeded aggregate lending performance. Additionally, most of the loans were in amounts of \$250,000 and less, indicating the bank's willingness to lend in the smaller amounts typically requested by small businesses. The bank's lending to small businesses is particularly responsive to the need for greater access to capital for small businesses in the AA.

CD Lending

The bank made an adequate level of CD loans in the Southeast Kentucky AA and demonstrates adequate responsiveness to the CD credit needs in the AA. During the review period, the bank made four loans totaling \$5.7 million in the AA. The bank provided two loans for \$1.1 million to finance affordable multi-family housing, including a loan to one property that accepts Section 8 vouchers. The bank also made one loan for \$3.6 million to develop a new industrial park in the AA that was partially financed by a grant from the state to encourage job creation in this underserved area. This loan was responsive to the needs discussed above for more investment in infrastructure to support economic development in the area. While the level of CD lending has improved since the prior exam, it remains below that of peer institutions serving the AA and the broader area that includes the AA. Given the bank holds the greatest deposit share in the AA, performance relative to peer institutions is particularly relevant in this analysis.

INVESTMENT TEST

The Investment Test rating for Kentucky is Low Satisfactory. The bank made an adequate level of qualified CD investments totaling \$2.6 million. All investments were either MBS backed by loans to LMI borrowers or bonds to finance renovations at schools where the majority of students receive free and reduced-price lunch. Additionally, the bank had grants totaling \$43,400. The majority of donations were college scholarships to students eligible for free or reduced-price lunch or a Pell grant or were first generation college students. These donations were responsive to the need in the AA to support post-secondary education options for young people. The bank also made several donations to support emergency utility assistance, down payment assistance, and after school programs. The level of investments and the demonstrated responsiveness to CD needs falls below that of peer institutions. Given Commercial Bank is the largest bank in the area, performance relative to peer institutions is particularly important.

SERVICE TEST

The Service Test rating is High Satisfactory for Kentucky. As described below, retail banking services are good and the bank provides an adequate level of CD services in the AA.

Retail Banking Services

Retail delivery systems are readily accessible to the bank's geographies and individuals of different income levels throughout the Southeast Kentucky AA. As shown in the table below, the bank operates one branch in a low-income tract and four in moderate-income tracts, which represents 38.5 percent of all branches in the AA. By comparison, 47.2 percent of households and 34.4 percent of businesses are located in these tracts. While the percentage of branches in LMI tracts is less than the percentage of households, the branches are located along primary roads and in population centers throughout the AA, which maximizes the accessibility of these branches to all communities throughout this very rural AA.

The bank offers hours and services that do not vary in a way that inconveniences any portion of the AA. The bank did not open or close any branches in the AA during the review period.

Geographic Distribution of Branches & ATMS
Assessment Area: KY Southeast KY

Tract Category	Branches							ATMs										Demographics				
	TotalBranches				Drive thru	Extend- ed Hours	Week- end Hours	Total ATMs			Full Service ATMs				Cash only ATMs			Census Tracts		House holds	Total Businesses	
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed					
																		#	%	#	%	#
Low	1	7.7%	0	0	1	1	0	Total	3	17.6%	0	0.0%	0	0	3	17.6%	0	0	4	6.8%	6.7%	5.6%
DTO	0		0	0	0			SA	2		0		0	0	2		0	0				
Moderate	4	30.8%	0	0	3	4	1	Total	4	23.5%	0	0.0%	0	0	4	23.5%	0	0	24	40.7%	40.5%	28.8%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle	8	61.5%	0	0	8	8	2	Total	9	52.9%	0	0.0%	0	0	9	52.9%	0	0	25	42.4%	44.4%	55.7%
DTO	1		0	0	1			SA	2		0		0	0	2		0	0				
Upper	0	0.0%	0	0	0	0	0	Total	1	5.9%	0	0.0%	0	0	1	5.9%	0	0	6	10.2%	8.5%	9.9%
DTO	0		0	0	0			SA	1		0		0	0	1		0	0				
Unknown	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
DTO	0		0	0	0			SA	0		0		0	0	0		0	0				
Total	13	100%	0	0	12	13	3	Total	17	100%	0	0.0%	0	0	17	100%	0	0	59	100%	100%	100%
DTO	1		0	0	1			SA	5		0		0	0	5		0	0				

Based on 2024 FFIEC Census Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

CD Services

The bank provided an adequate level of CD services in the AA. During the review period, bank employees provided 46 CD service activities totaling 153 hours. All activities were focused on financial education for LMI youth or seniors.

NORTH CAROLINA

CRA RATING FOR NORTH CAROLINA: SATISFACTORY

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

Major factors contributing to this rating include:

- The geographic distribution of loans reflects adequate penetration throughout North Carolina AAs.
- The distribution of borrowers reflects good penetration among businesses of different sizes throughout the North Carolina AAs.
- The bank made a low level of CD loans in the North Carolina AAs.
- The bank made an adequate level of qualified CD investments and grants in the North Carolina AAs.
- Retail banking services were adequate throughout the North Carolina AAs.
- The bank provided a limited level of CD services in the North Carolina AAs.

SCOPE OF EXAMINATION

Scoping considerations presented in the *Institution, Scope of Examination* section are applicable to the review of the North Carolina AAs with one exception for the product lines reviewed. Commercial Bank acquired Alliance Bank & Trust in 2024. Alliance Bank & Trust was not required to report HMDA data at the time of acquisition. Therefore, for this exam, the only product line reviewed for North Carolina AAs was small business lending. The time frame for the review and other considerations are consistent with the scope of this examination.

Commercial Bank has two delineated AAs in North Carolina and the state rating reflects a composite of performance in these AAs. A full-scope review was conducted for the Cleveland nonMSA AA, which was selected based on the concentration of branches, loans, and deposit activity in the AA. Gaston, the other AA in the state, was reviewed under limited-scope procedures.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH CAROLINA

As of December 31, 2024, the bank operates four branches in the state, representing 12 percent of its total branches. The bank holds \$246.7 million in deposits accounting for 13.3 percent of its total deposits. During the review period, Commercial Bank reported 87 small business loans in North Carolina, accounting for 22 percent of total loans. Given the concentration of branches, deposits, and loans in the state, performance in North Carolina carries the least weight when deriving the overall institution rating.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

LENDING TEST

Overview

The Lending Test rating for the state of North Carolina is Low Satisfactory. The rating is derived from performance in each characteristic of the Lending Test applicable to the state, including Lending Activity (good); Geographic Distribution (adequate); Borrower Distribution (good); and CD Lending (low level). Additional details are provided below and in the full-scope section of the report.

Lending Activity

Lending levels reflect good responsiveness to the credit needs of North Carolina AAs. The total number and dollar volume of small business loans as well as the percentage of deposits in the state compared to the institution overall was considered in arriving at lending activity conclusions.

The following table displays the volume of lending activity from January 1, 2024 through December 31, 2024 by loan type. As discussed earlier, only small business lending was evaluated in North Carolina.

Statewide Summary of Lending Activity
Assessment Areas Located in: North Carolina
2024

Loan Type	#	%	\$(000s)	%
HMDA Home Purchase	0	0.0%	0	0.0%
HMDA Refinance	1	1.1%	700	4.8%
HMDA Home Improvement	0	0.0%	0	0.0%
HMDA Multi-Family	0	0.0%	0	0.0%
HMDA Other Purpose LOC	0	0.0%	0	0.0%
HMDA Other Purpose Closed/Exempt	0	0.0%	0	0.0%
HMDA Loan Purpose NA	0	0.0%	0	0.0%
Total HMDA	1	1.1%	700	4.8%
Total Small Business	87	97.8%	13,565	93.6%
Total Farm	1	1.1%	228	1.6%
Total Loans	89	100%	14,493	100%

Originations & Purchases

Geographic and Borrower Distribution

The geographic distribution of small business loans reflects adequate dispersion throughout the AAs in North Carolina and the distribution of borrowers by business revenue size is good. The analysis of small business lending within the full-scope AA is discussed later in this report.

CD Lending

Commercial Bank made a low level of CD loans in North Carolina. During the review period, the bank originated one loan in the state for \$12 million. This loan benefited the Gaston AA, providing financing for a business that met the SBA size standard as a small business and helped retain jobs for LMI individuals in the AA.

INVESTMENT TEST

The Investment Test rating for North Carolina is Low Satisfactory. The bank made an adequate level of qualified CD investments and grants in North Carolina totaling \$4.9 million in qualified investments and \$19,250 in contributions directly benefiting the two AAs in the state. More information on qualified investments and grants can be found in the full-scope AA section of this report.

SERVICE TEST

The Service Test rating for North Carolina is Low Satisfactory.

Retail Services

Delivery systems are reasonably accessible to the geographies and individuals of different income levels in North Carolina and business hours and services do not vary in a way that inconveniences the AAs in the state. As of December 31, 2024, Commercial Bank operated four branches in North Carolina. The bank had one branch in a moderate-income tract representing 25 percent of the branches in the state.

Commercial Bank acquired Alliance Bank and Trust in 2024 and therefore improved the accessibility of its delivery systems in the North Carolina AAs via acquisition of existing branches. The bank does not offer ATMs at any of the branches in North Carolina, so alternative delivery systems are limited. Additional details on retail services can be found in the full-scope AA section of this report.

CD Services

The bank provides few, if any, CD services in North Carolina. During the review period, staff engaged in two CD service activities totaling 11 hours.

NONMETROPOLITAN AREA FULL-SCOPE REVIEW

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CLEVELAND COUNTY

Overview

The AA consists of Cleveland County, North Carolina and is a new AA for Commercial Bank resulting from its acquisition of Alliance Bank & Trust Company in July 2024. As of December 31, 2024, the bank operated two branches in the AA, representing 50 percent of its branches in the state of North Carolina and 5.9 percent of total branches. One of the branches in the AA is located in a middle-income tract and the other is located in an upper-income tract. As a percentage within the state of North Carolina, 62 percent of deposit dollar volume and 61.4 percent of HMDA-reportable and small business loans by number are located in the Cleveland County AA. As described, Cleveland County is the primary AA for the bank in the state of North Carolina.

The AA is a competitive banking market with predominantly national and large regional banks. There are nine financial institutions operating 17 branch locations within the Cleveland County AA. As of June 30, 2024, Alliance Bank & Trust Company (acquired by Commercial Bank in July 2024) ranked 4th in total deposits, holding 10.8 percent deposit market share with \$152.9 million in total deposits. Bank OZK holds the largest deposit market share (35.3 percent) followed by Truist Bank (19.5 percent) and The Fidelity Bank (11.7 percent).

Prior to being acquired, Alliance Bank & Trust Company was neither a HMDA- nor CRA-reporting institution⁴⁴ and prior to July 2024, Commercial Bank did not originate loans in the AA because it had no offices in Cleveland County. Thus, in 2024, there were no HMDA-reportable loans reported for either institution in the AA while there were 54 small business loans reported by Commercial Bank. The top HMDA reporters in the market were State Employees Federal Credit Union, Rocket Mortgage, United Shore Financial Service, and Truiliant Federal Credit Union. American Express was the top small business reporter in the market for 2024, followed by Synchrony Bank and JPMorgan Chase Bank.

Demographics, Population, and Income Characteristics

The Cleveland County AA had a population of 99,519 in 2020, having grown 2.4 percent since 2015. The AA is rural and located in the foothills of the Blue Ridge Mountains in western North Carolina. The AA is centrally located between three larger metropolitan areas (Charlotte, Asheville, and Greenville) and includes a variety of natural landscapes. Though largely rural, the AA has a regional airport, arts and recreational programs, and several postsecondary education programs offering undergraduate, graduate, and doctoral/professional programs.

The AA contains 24 census tracts: one low-income tract (4.2 percent), four moderate-income tracts (16.7 percent), 14 middle-income tracts (58.3 percent) and five upper-income tracts (20.8 percent).

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated 2024 median family income for nonmetropolitan areas in North Carolina, as shown in the following table.

⁴⁴ Alliance Bank & Trust Company was primarily a commercial lender but did not meet the asset size threshold required to report small business loans under the CRA and did not meet the volume thresholds required to report loans under the HMDA.

Borrower Income Levels
North Carolina State Non-metro

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2024	\$71,500	0	- \$35,749	\$35,750	- \$57,199	\$57,200	- \$85,799	\$85,800	- & above

There were 24,337 families in the AA; 24.8 percent were low-income, 18.3 percent were moderate-income, 18.1 percent were middle-income, and 38.9 percent were upper-income. Of these families, 15.5 percent had incomes below the poverty level. The predominately rural nature of the AA combined with the aforementioned data indicates economic challenges exist for families residing in the AA and that lending opportunities may be limited.

Housing Characteristics

There are 43,714 housing units in the AA, of which 56.4 percent are owner-occupied, 26.1 percent are rental, and 17.4 percent are vacant. In the low-income tract, 46.2 percent of total units are rental units and 24.2 percent are vacant. In moderate-income tracts, 33.2 percent of total units are rental units and 20.5 percent are vacant. This data suggests that mortgage lending opportunities may be more limited in LMI tracts. Additionally, over 20 percent of homes in moderate-income tracts are mobile homes, which could indicate a need for a different type of financing or housing assistance in these tracts.

The median age of housing stock across the AA is 46 years, though the housing stock in the low-income tract is older at 61 years. The older age of homes is typically an indicator of potential opportunities for loans for home improvement purposes.

The median housing value in the AA is \$129,964, which is well below the median housing value of \$182,100 for the state of North Carolina and other nonmetropolitan areas of the state at \$137,020. Median gross rent in the AA is \$694 per month, which is lower than the median gross rent for the state of North Carolina (\$932 per month) and lower than other nonmetropolitan areas of the state (\$734 per month). Additionally, the affordability ratio⁴⁵ of the AA (33.4 percent) is higher than the affordability ratio for the state (31.1 percent) but similar to the affordability ratio of other nonmetropolitan areas of the state (33 percent). Median housing values and rents in the AA indicate that housing is more affordable in the AA when compared to the state of North Carolina and other nonmetropolitan areas of the state.

While overall housing in the AA is more affordable than housing for the overall state and nonmetropolitan portions of the state, the higher median housing value in the low-income tract coupled with the 70.4 percent rental/vacancy rate for housing in the tract indicates that owner-occupied housing activity in the tract is sparse and likely unattainable for LMI residents. Additionally, housing cost burden is a concern in the AA for low-income renters and owners. Data shows that 66.6 percent of low-income renters and 52.6 percent of low-income homeowners are housing cost-burdened, meaning that housing costs equal 30 percent or more of household income⁴⁶. This data indicates that there is need for more affordable housing for low-income individuals in the AA.

⁴⁵ Housing affordability ratio is calculated by dividing the median household income by the median housing value. Values closer to 100 percent indicate greater affordability.

⁴⁶ U.S. Department of Housing and Urban Development (HUD), 2017-2021 Comprehensive Housing Affordability Strategy

Economic Conditions

The Cleveland County AA is heavily reliant on manufacturing and the textile industry⁴⁷. Data from the BLS shows that the number of manufacturing jobs has steadily declined since 2022. Manufacturing accounts for approximately 25 percent of all private sector jobs by number of employees, followed by retail trade (accounting for 14.3 percent of all private sector jobs) and health care and social assistance (11.2 percent). Key employers in the AA include Nippon Electric Glass, ABB, Eaton Corporation, STI Fabrics, and Greenheck Fan Corporation.⁴⁸ According to the 2024 data from D&B, 90.3 percent of all businesses in the AA have revenues under \$1 million and are therefore considered small businesses.

As previously described, the ARC releases annual listings of each Appalachian county's economic health from best to worst. Cleveland County is considered at-risk, with nine tracts in the county that meet the criteria for distressed.⁴⁹ In September 2024, large portions of the region were devastated by Tropical Storm Helene. As a result of the storm, numerous counties across the Appalachian Region, including Cleveland County, were included in the disaster declaration approved by FEMA.

The following table shows the unemployment rates percentages for the bank's AA, the nonmetropolitan portions of North Carolina, and the overall state. As shown, unemployment rates in the AA have fluctuated over the past five years and appear to be improving. The AA's unemployment rates are generally consistent with nonmetropolitan portions of North Carolina and slightly higher than unemployment rates for the state.

NC Cleveland 2024 Unemployment Rates					
Area	2020	2021	2022	2023	2024
NC Cleveland 2024	8.5%	5.9%	4.3%	3.8%	4.0%
NonMSA North Carolina	7.4%	5.4%	4.1%	3.8%	3.9%
North Carolina	7.2%	4.9%	3.7%	3.5%	3.6%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Credit and CD Needs

Cleveland County, as noted above, is facing similar challenges to other counties in the region following the decline of manufacturing. The county's poverty rate exceeds state averages, reflecting ongoing economic adjustment after textile and manufacturing job losses over recent decades and the need for more workforce development opportunities.⁵⁰ While the region has experienced some growth, the economic benefits have not reached all residents.⁵¹ Infrastructure in Cleveland County is mixed, with relatively strong transportation networks due to proximity to major highways, but challenges remain for broadband access in rural portions of the county and aging water/sewer systems in some communities.⁵² The financial services landscape has experienced

⁴⁷ Cleveland County Economic Development Partnership. Key Industries, www.chooseclevelandcountync.com/key-industries/. Accessed October 27, 2025

⁴⁸ Cleveland County Economic Development Partnership. Major Employers. www.chooseclevelandcountync.com/why-cleveland-county/major-employers/. Accessed October 27, 2025

⁴⁹ Appalachian Regional Commission. County Economic Status and Distressed Areas by State, FY 2025. www.arc.gov/about-the-appalachian-region/county-economic-status-and-distressed-areas-by-state-fy-2025/. Accessed October 27, 2025

⁵⁰ U.S. Census Bureau, "Small Area Income and Poverty Estimates" (Washington, DC: U.S. Census Bureau, 2021), <https://www.census.gov/programs-surveys/saipe.html>.

⁵¹ North Carolina Department of Commerce, "County Economic Indicators" (Raleigh, NC: NC Department of Commerce, 2022), <https://www.nccommerce.com/data-tools-reports/economic-development-reports>

⁵² Appalachian Regional Commission, "County Infrastructure Report" (Washington, DC: Appalachian Regional Commission, 2021), <https://www.arc.gov/report/a-twenty-year-review-revisiting-the-drinking-water-and-wastewater-infrastructure-funding-needs-and-gaps-in-the-appalachian-region/>

some consolidation, with branch closures contributing to financial access barriers for vulnerable populations.⁵³ Housing affordability challenges have intensified in recent years as the county experiences population growth from the Charlotte metropolitan region, putting pressure on housing stock and creating barriers for LMI residents.⁵⁴

Small businesses in Cleveland County face financing challenges that may impede broader economic development efforts. Like many other rural counties, limited access to capital may be a constraint for small businesses seeking to grow.⁵⁵ Technical assistance resources for business planning, financial management, and market expansion are available but there is a need for a more robust entrepreneurial ecosystem.⁵⁶ Financial services gaps combined with workforce development needs to assist individuals transitioning from traditional manufacturing to newer industry sectors may create barriers to more inclusive economic growth across Cleveland County.⁵⁷

As part of the CRA examination, information was obtained from an interview with a community contact providing affordable housing assistance to a broader region that includes the Cleveland AA. This individual confirmed that the community faces significant challenges due to the decline in factory jobs. Many individuals now rely on part-time work, or minimum-wage jobs. The contact noted more financing to support affordable housing development and rehabilitation is needed and referenced the need for homebuyer counseling and financial education, which is not as widely available due to the rural nature of the area.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Lending levels reflect good responsiveness to credit needs of the AA. The geographic distribution of loans reflects adequate penetration throughout the AA and the distribution of borrowers reflects good penetration among businesses of different revenue sizes. The bank makes a low level of CD loans in the AA.

Lending Activity

Lending activity is good. Overall, 13.8 percent small business loans were made in the AA, compared to 8.2 percent of deposits held in this AA. The lending analysis is based on 87 small business loans reported in the AA during the review period.

Geographic Distribution of Loans

The geographic distribution of small business loans reflects adequate penetration throughout the AA and does not reveal any conspicuous lending gaps. As shown in the table below, the percentage of small business loans in low-income tracts exceeded the percentage of small businesses in these tracts and exceeded aggregate lending performance. Lending in moderate-income tracts fell below both comparators.

⁵³ Federal Deposit Insurance Corporation, "How America Banks: Household Use of Banking and Financial Services" (Washington, DC: FDIC, 2022), <https://www.fdic.gov/analysis/household-survey/>

⁵⁴ North Carolina Housing Coalition, "Housing Needs Assessment" (Raleigh, NC: North Carolina Housing Coalition, 2021), <https://nchousing.org/research-data/>

⁵⁵ SCORE Association, "Megaphone of Main Street: Small Business Report" (Washington, DC: SCORE, 2022), <https://www.score.org/megaphone-main-street-data-reports>

⁵⁶ Consumer Financial Protection Bureau, "Small Business Lending Landscapes" (Washington, DC: CFPB, 2021), https://files.consumerfinance.gov/f/documents/201705_cfpb_Key-Dimensions-Small-Business-Lending-Landscape.pdf

⁵⁷ SCORE Association, "Megaphone of Main Street: Small Business Report" (Washington, DC: SCORE, 2022), <https://www.score.org/megaphone-main-street-data-reports>

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: NC Cleveland

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count		Dollar		Bank	Agg
		Count	Dollar	Count	Dollar		Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ 000s	\$ %	\$ %	
SMALL BUSINESSES	Low	5	9.3%	802	10.0%	6.8%	5	9.3%	4.7%	802	10.0%	6.5%
	Moderate	7	13.0%	1,825	22.7%	17.8%	7	13.0%	17.0%	1,825	22.7%	18.0%
	Middle	32	59.3%	4,345	54.1%	49.9%	32	59.3%	54.3%	4,345	54.1%	44.4%
	Upper	10	18.5%	1,065	13.3%	25.6%	10	18.5%	23.5%	1,065	13.3%	31.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.5%	0	0.0%	0.1%
	Total	54	100%	8,037	100%	100.0%	54	100%	100%	8,037	100%	100%
SMALL FARM				Total Farms								
	Low	0	0.0%	0	0.0%	1.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	23.1%	0	0.0%	14.3%	0	0.0%	7.2%
	Middle	1	100.0%	228	100.0%	64.1%	1	100.0%	82.9%	228	100.0%	90.0%
	Upper	0	0.0%	0	0.0%	11.5%	0	0.0%	2.9%	0	0.0%	2.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	228	100%	100.0%	1	100%	100%	228	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of borrowers reflects good penetration among businesses of different revenue sizes. As shown in the table below, small business lending to businesses with less than \$1 million in revenue was less than the percentage of such businesses in the AA but exceeded aggregate lending performance. Additionally, 83.3 percent of the bank's lending to businesses with revenue under \$1 million was in amounts less than \$250,000, indicating the bank's willingness to lend in the smaller amounts typically requested by small businesses. Lending to small businesses is particularly responsive to the need for greater access to capital for small businesses in the AA.

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: NC Cleveland

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending					
			2024					2024					
			Bank				Total Businesses	Count			Dollar		
			Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%	%			\$ 000s	\$ %		\$ %
SMALL BUSINESS	Revenue	\$1 Million or Less	35	64.8%	5,832	72.6%	90.3%	35	64.8%	49.1%	5,832	72.6%	36.0%
		Over \$1 Million	18	33.3%	2,169	27.0%	8.1%	18	33.3%		2,169	27.0%	
		Total Rev. available	53	98.1%	8,001	99.6%	98.4%	53	98.1%		8,001	99.6%	
		Rev. Not Known	1	1.9%	36	0.4%	1.6%	1	1.9%		36	0.4%	
		Total	54	100%	8,037	100%	100%	54	100%		8,037	100%	
	Loan Size	\$100,000 or Less	35	64.8%	1,720	21.4%		35	64.8%	92.3%	1,720	21.4%	38.4%
		\$100,001 - \$250,000	10	18.5%	1,981	24.6%		10	18.5%	4.5%	1,981	24.6%	19.1%
		\$250,001 - \$1 Million	9	16.7%	4,336	54.0%		9	16.7%	3.2%	4,336	54.0%	42.5%
		Total	54	100%	8,037	100%		54	100%	100%	8,037	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	21	60.0%	1,045	17.9%		21	60.0%		1,045	17.9%	
		\$100,001 - \$250,000	8	22.9%	1,651	28.3%		8	22.9%		1,651	28.3%	
		\$250,001 - \$1 Million	6	17.1%	3,136	53.8%		6	17.1%		3,136	53.8%	
		Total	35	100%	5,832	100%		35	100%		5,832	100%	
SMALL FARM	Revenue	\$1 Million or Less	1	100.0%	228	100.0%	Total Farms 98.7%	1	100%	37.1%	228	100%	53.3%
		Over \$1 Million	0	0.0%	0	0.0%	1.3%	0	0.0%		0	0.0%	
		Total Rev. available	1	100.0%	228	100.0%	100.0%	1	100.0%		228	100.0%	
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%	
		Total	1	100%	228	100%	100%	1	100%		228	100%	
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	94.3%	0	0.0%	69.3%
		\$100,001 - \$250,000	1	100.0%	228	100.0%		1	100.0%	5.7%	228	100.0%	30.7%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
		Total	1	100%	228	100%		1	100%	100%	228	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$100,001 - \$250,000	1	100.0%	228	100.0%		1	100.0%		228	100.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		Total	1	100%	228	100%		1	100%		228	100%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

CD Lending

The bank made no CD loans in the Cleveland AA during the review period. However, as noted above, the bank only started seeking out CD loan opportunities after the acquisition of Alliance Bank & Trust, which was completed in the middle of 2024. It often takes time to develop CD lending opportunities in an AA.

INVESTMENT TEST

The bank made an adequate level of qualified investments totaling \$873,250 in the AA. The bank made two investments in MBS that financed affordable housing for LMI individuals. Additionally, the bank made donations totaling \$10,750 to support community services for LMI individuals, including college scholarships for LMI youth as well as donations to social service, after school, and energy relief programs. Notably, the bank made a \$1,000 donation to a local foundation to provide food and to support food trucks traveling to communities devastated by Hurricane Helene.

SERVICE TEST

Retail banking services are adequate and the bank provides a limited level of CD services.

Retail Banking Services

Retail service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels throughout Cleveland AA. The bank operates two branches in the AA; one is in a middle-income tract and one in an upper-income tract. This AA is rural and sparsely populated, with just one low-income tract and four moderate-income tracts. There are three cities in the AA and the bank has a branch in two of the three (Shelby and Kings Mountain). The bank's branch in Shelby is in an upper-income tract, adjacent to the one low-income tract in the AA, so it is accessible to residents of that tract. Based on these considerations, accessibility is considered reasonable even though the bank does not have any branches in LMI tracts.

The bank's record of opening branches in this AA during the review period improved the accessibility of its delivery systems. As noted, the new branches were the result of the acquisition of Alliance Bank & Trust. The bank offers the same hours and services at both branches in the AA, so services do not vary in a way that inconveniences its AA. The bank offers no weekend hours at branches in this AA.

Geographic Distribution of Branches & ATMS
Assessment Area: NC Cleveland

Tract Category	Branches							ATMs										Demographics				
	Total Branches				Drive thru	Extended Hours	Week-end Hours	Total ATMs			Full Service ATMs				Cash only ATMs				Census Tracts		House holds	Total Businesses
	#	%	Open	Closed				#	%	#	%	Open	Closed	#	%	Open	Closed	#	%			
	#	%	Open	Closed	#	%	Open	Closed	#	%	Open	Closed	#	%	Open	Closed	#	%				
Low DTO	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	1	4.2%	3.5%	6.8%
	0		0	0	0			SA	0		0		0	0	0		0	0				
Moderate DTO	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	4	16.7%	17.2%	17.8%
	0		0	0	0			SA	0		0		0	0	0		0	0				
Middle DTO	1	50.0%	1	0	1	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	14	58.3%	61.2%	49.9%
	0		0	0	0			SA	0		0		0	0	0		0	0				
Upper DTO	1	50.0%	1	0	1	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	5	20.8%	18.1%	25.6%
	0		0	0	0			SA	0		0		0	0	0		0	0				
Unknown DTO	0	0.0%	0	0	0	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	0	0.0%	0.0%	0.0%
	0		0	0	0			SA	0		0		0	0	0		0	0				
Total DTO	2	100%	2	0	2	0	0	Total	0	0.0%	0	0.0%	0	0	0	0.0%	0	0	24	100%	100%	100%
	0		0	0	0			SA	0		0		0	0	0		0	0				

Based on 2024 FFIEC Census Data
Closed branches/ATMs are only included in "closed" columns and are not included in any other totals.
DTO - Drive thru only is a subset of total branches
SA = Stand Alone ATM is a subset of total ATMs

CD Services

The bank provides a limited level of CD services in the AA. Bank employees provided 11 hours of CD services during the review period. All of the hours were financial education in schools serving a majority of students eligible for free or reduced-price lunch.

METROPOLITAN AREA(S)
LIMITED-SCOPE REVIEW

The following AA(s) were reviewed using limited-scope examination procedures. Through these procedures, conclusions regarding the institution’s CRA performance are drawn from the review of available facts and data, including performance and demographic information. The limited-scope review revealed the bank’s CRA performance in these AAs is generally consistent with the areas that received a full-scope review. Refer to the tables in Appendices D and E for additional information regarding these AAs.

DESCRIPTION OF INSTITUTION’S OPERATIONS IN NORTH CAROLINA METROPOLITAN AA

Gaston AA (Gaston County):

- As of December 31, 2024, Commercial Bank operated two branches in the AA, representing 50 percent of its branches in North Carolina.
- As of December 31, 2024, the bank had \$93.8 million in deposits in the AA, representing 38 percent of total deposits in North Carolina.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Through the use of available facts and data, including performance and demographic information, performance in each AA was evaluated, and compared with the bank’s performance in the AAs that received a full-scope review. The conclusions regarding performance are provided in the tables below.

Performance in the Limited-Scope Review Metropolitan AAs			
AA	Lending Test	Investment Test	Service Test
Gaston	Consistent	Consistent	Consistent

The performance standards of the Lending Test for limited-scope MSA areas include geographic distribution of loans, borrower distribution of loans, and CD loans. Geographic distribution of loans was excellent in the Gaston AA and borrower distribution was adequate. The bank had an adequate level of CD loans (\$12 million).

The bank made an adequate level of qualifying investment and grants (\$4 million).

The performance standards of the Service Test for limited-scope MSA areas included retail banking and CD services. The bank’s retail services were adequate in the Gaston AA and the bank had few, if any, CD services.

Performance in the metropolitan limited-scope AA did not impact overall performance for the state.

APPENDIX A: SCOPE OF EXAMINATION

TIME PERIOD REVIEWED		
January 1, 2024 to December 31, 2024 – Retail Lending and Retail Services		
January 1, 2024 to June 30, 2025 – CD Loans, Investments, and Services		
FINANCIAL INSTITUTION		PRODUCTS REVIEWED
Commercial Bank (Harrogate, Tennessee)		HMDA-reportable and small business loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP	PRODUCTS REVIEWED
N/A	N/A	

LIST OF AAS AND TYPE OF EXAMINATION				
AA	Rated Area	# of Offices	CRA Review Procedures	Branches Visted
Southeast Kentucky	Kentucky	13	Full scope review	--
Knoxville	Tennessee	6	Full scope review	--
Claiborne	Tennessee	4	Full scope review	--
Johnson City	Tennessee	1	Limited scope review	--
Kingsport	Tennessee	1	Limited scope review	--
Morristown	Tennessee	2	Limited scope review	--
Newport	Tennessee	2	Limited scope review	--
Williamson County	Tennessee	1	Limited scope review	--
Gaston	North Carolina	2	Limited scope review	--
Cleveland	North Carolina	2	Full scope review	--

APPENDIX B: SUMMARY OF STATE RATINGS

State	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Tennessee	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Kentucky	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
North Carolina	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory

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

State	Lending Test Rating	Investment Test Rating	Service Test Rating	Total Points	Overall Rating
Tennessee	6	3	3	12	Satisfactory
Kentucky	9	3	4	16	Satisfactory
North Carolina	6	3	3	12	Satisfactory

APPENDIX C: FULL SCOPE ASSESSMENT DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Claiborne

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,221	25.4%
Moderate-income	3	33.3%	1,839	21.0%	428	23.3%	1,617	18.5%
Middle-income	6	66.7%	6,911	79.0%	992	14.4%	1,907	21.8%
Upper-income	0	0.0%	0	0.0%	0	0.0%	3,005	34.3%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	9	100.0%	8,750	100.0%	1,420	16.2%	8,750	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	3,178	2,063	21.5%	64.9%	734	23.1%	381	12.0%
Middle-income	12,361	7,545	78.5%	61.0%	3,219	26.0%	1,597	12.9%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	15,539	9,608	100.0%	61.8%	3,953	25.4%	1,978	12.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	87	13.2%	83	13.8%	3	6.5%	1	7.7%
Middle-income	573	86.8%	518	86.2%	43	93.5%	12	92.3%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	660	100.0%	601	100.0%	46	100.0%	13	100.0%
	Percentage of Total Businesses:			91.1%		7.0%		2.0%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	6	25.0%	6	25.0%	0	0.0%	0	0.0%
Middle-income	18	75.0%	18	75.0%	0	0.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	24	100.0%	24	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:			100.0%		0.0%		0.0%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX C: FULL SCOPE ASSESSMENT DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Knoxville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	12	9.5%	7,531	6.2%	3,006	39.9%	23,758	19.4%
Moderate-income	18	14.3%	15,763	12.9%	2,334	14.8%	19,787	16.2%
Middle-income	47	37.3%	48,812	39.9%	3,996	8.2%	24,355	19.9%
Upper-income	45	35.7%	50,102	41.0%	1,509	3.0%	54,447	44.5%
Unknown-income	4	3.2%	139	0.1%	19	13.7%	0	0.0%
Total Assessment Area	126	100.0%	122,347	100.0%	10,864	8.9%	122,347	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	19,057	4,556	3.5%	23.9%	11,422	59.9%	3,079	16.2%
Moderate-income	31,386	16,703	13.0%	53.2%	11,479	36.6%	3,204	10.2%
Middle-income	85,342	52,440	40.7%	61.4%	25,000	29.3%	7,902	9.3%
Upper-income	78,993	55,154	42.8%	69.8%	18,249	23.1%	5,590	7.1%
Unknown-income	2,320	40	0.0%	1.7%	1,956	84.3%	324	14.0%
Total Assessment Area	217,098	128,893	100.0%	59.4%	68,106	31.4%	20,099	9.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	1,126	6.0%	971	5.7%	147	8.7%	8	6.1%
Moderate-income	2,081	11.1%	1,839	10.8%	224	13.2%	18	13.7%
Middle-income	6,106	32.5%	5,581	32.8%	492	29.0%	33	25.2%
Upper-income	9,293	49.4%	8,421	49.6%	804	47.5%	68	51.9%
Unknown-income	210	1.1%	179	1.1%	27	1.6%	4	3.1%
Total Assessment Area	18,816	100.0%	16,991	100.0%	1,694	100.0%	131	100.0%
	Percentage of Total Businesses:			90.3%		9.0%		0.7%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	3.7%	6	3.9%	0	0.0%	0	0.0%
Moderate-income	17	10.6%	14	9.2%	1	33.3%	2	40.0%
Middle-income	75	46.6%	72	47.1%	0	0.0%	3	60.0%
Upper-income	61	37.9%	60	39.2%	1	33.3%	0	0.0%
Unknown-income	2	1.2%	1	0.7%	1	33.3%	0	0.0%
Total Assessment Area	161	100.0%	153	100.0%	3	100.0%	5	100.0%
	Percentage of Total Farms:			95.0%		1.9%		3.1%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX C: FULL SCOPE ASSESSMENT DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: KY Southeast KY

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	4	6.8%	3,293	6.9%	1,379	41.9%	14,532	30.4%
Moderate-income	24	40.7%	19,374	40.6%	5,775	29.8%	8,896	18.6%
Middle-income	25	42.4%	20,760	43.5%	3,367	16.2%	8,320	17.4%
Upper-income	6	10.2%	4,329	9.1%	467	10.8%	16,008	33.5%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	59	100.0%	47,756	100.0%	10,988	23.0%	47,756	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	6,083	2,759	5.9%	45.4%	1,838	30.2%	1,486	24.4%
Moderate-income	33,442	18,833	40.3%	56.3%	8,967	26.8%	5,642	16.9%
Middle-income	36,797	20,856	44.6%	56.7%	9,612	26.1%	6,329	17.2%
Upper-income	6,721	4,338	9.3%	64.5%	1,471	21.9%	912	13.6%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	83,043	46,786	100.0%	56.3%	21,888	26.4%	14,369	17.3%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	255	5.6%	225	5.4%	26	7.2%	4	4.9%
Moderate-income	1,320	28.8%	1,178	28.5%	121	33.4%	21	25.6%
Middle-income	2,548	55.7%	2,305	55.8%	195	53.9%	48	58.5%
Upper-income	454	9.9%	425	10.3%	20	5.5%	9	11.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	4,577	100.0%	4,133	100.0%	362	100.0%	82	100.0%
	Percentage of Total Businesses:			90.3%		7.9%		1.8%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	4	4.2%	4	4.2%	0	0.0%	0	0.0%
Moderate-income	35	36.8%	35	36.8%	0	0.0%	0	0.0%
Middle-income	50	52.6%	50	52.6%	0	0.0%	0	0.0%
Upper-income	6	6.3%	6	6.3%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	95	100.0%	95	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:			100.0%		0.0%		0.0%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX C: FULL SCOPE ASSESSMENT DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: NC Cleveland

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	4.2%	615	2.5%	126	20.5%	6,032	24.8%
Moderate-income	4	16.7%	3,822	15.7%	790	20.7%	4,453	18.3%
Middle-income	14	58.3%	15,676	64.4%	2,437	15.5%	4,397	18.1%
Upper-income	5	20.8%	4,224	17.4%	417	9.9%	9,455	38.9%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	24	100.0%	24,337	100.0%	3,770	15.5%	24,337	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,677	498	2.0%	29.7%	774	46.2%	405	24.2%
Moderate-income	7,798	3,610	14.6%	46.3%	2,590	33.2%	1,598	20.5%
Middle-income	26,561	16,090	65.2%	60.6%	5,994	22.6%	4,477	16.9%
Upper-income	7,678	4,472	18.1%	58.2%	2,061	26.8%	1,145	14.9%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	43,714	24,670	100.0%	56.4%	11,419	26.1%	7,625	17.4%
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	198	6.8%	168	6.3%	26	11.0%	4	8.5%
Moderate-income	521	17.8%	457	17.3%	57	24.1%	7	14.9%
Middle-income	1,462	49.9%	1,344	50.8%	91	38.4%	27	57.4%
Upper-income	750	25.6%	678	25.6%	63	26.6%	9	19.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	2,931	100.0%	2,647	100.0%	237	100.0%	47	100.0%
	Percentage of Total Businesses:			90.3%			8.1%	1.6%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	1.3%	1	1.3%	0	0.0%	0	0.0%
Moderate-income	18	23.1%	18	23.4%	0	0.0%	0	0.0%
Middle-income	50	64.1%	50	64.9%	0	0.0%	0	0.0%
Upper-income	9	11.5%	8	10.4%	1	100.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	78	100.0%	77	100.0%	1	100.0%	0	0.0%
	Percentage of Total Farms:			98.7%			1.3%	0.0%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX D: LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Johnson City

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	2	6.3%	1,585	4.7%	588	37.1%	6,738	19.9%
Moderate-income	9	28.1%	7,277	21.5%	1,252	17.2%	5,313	15.7%
Middle-income	8	25.0%	11,042	32.6%	790	7.2%	6,875	20.3%
Upper-income	12	37.5%	13,972	41.2%	814	5.8%	14,950	44.1%
Unknown-income	1	3.1%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	32	100.0%	33,876	100.0%	3,444	10.2%	33,876	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	3,016	778	2.2%	25.8%	1,819	60.3%	419	13.9%
Moderate-income	15,852	6,470	18.5%	40.8%	7,349	46.4%	2,033	12.8%
Middle-income	18,391	12,894	36.8%	70.1%	3,904	21.2%	1,593	8.7%
Upper-income	23,519	14,862	42.5%	63.2%	6,527	27.8%	2,130	9.1%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	60,778	35,004	100.0%	57.6%	19,599	32.2%	6,175	10.2%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	92	2.2%	77	2.0%	12	3.6%	3	9.1%
Moderate-income	1,233	28.9%	1,123	28.8%	105	31.3%	5	15.2%
Middle-income	1,075	25.2%	990	25.4%	75	22.4%	10	30.3%
Upper-income	1,851	43.3%	1,696	43.5%	140	41.8%	15	45.5%
Unknown-income	19	0.4%	16	0.4%	3	0.9%	0	0.0%
Total Assessment Area	4,270	100.0%	3,902	100.0%	335	100.0%	33	100.0%
	Percentage of Total Businesses:			91.4%		7.8%		0.8%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	1	1.1%	1	1.1%	0	0.0%	0	0.0%
Moderate-income	21	22.3%	17	19.5%	1	50.0%	3	60.0%
Middle-income	30	31.9%	28	32.2%	0	0.0%	2	40.0%
Upper-income	42	44.7%	41	47.1%	1	50.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	94	100.0%	87	100.0%	2	100.0%	5	100.0%
	Percentage of Total Farms:			92.6%		2.1%		5.3%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX D: LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Kingsport

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	2.5%	502	1.2%	200	39.8%	9,110	21.3%
Moderate-income	8	20.0%	6,892	16.1%	1,418	20.6%	7,365	17.2%
Middle-income	22	55.0%	24,722	57.8%	2,970	12.0%	8,686	20.3%
Upper-income	9	22.5%	10,677	25.0%	426	4.0%	17,632	41.2%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	40	100.0%	42,793	100.0%	5,014	11.7%	42,793	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	1,346	404	0.8%	30.0%	763	56.7%	179	13.3%
Moderate-income	14,508	6,399	13.3%	44.1%	5,913	40.8%	2,196	15.1%
Middle-income	42,228	28,452	59.2%	67.4%	9,113	21.6%	4,663	11.0%
Upper-income	17,436	12,816	26.7%	73.5%	2,785	16.0%	1,835	10.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	75,518	48,071	100.0%	63.7%	18,574	24.6%	8,873	11.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	494	9.1%	435	8.8%	55	12.5%	4	10.0%
Moderate-income	853	15.7%	772	15.6%	78	17.7%	3	7.5%
Middle-income	2,879	53.0%	2,623	53.0%	229	51.9%	27	67.5%
Upper-income	1,207	22.2%	1,122	22.7%	79	17.9%	6	15.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	5,433	100.0%	4,952	100.0%	441	100.0%	40	100.0%
Percentage of Total Businesses:				91.1%		8.1%		0.7%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	3	3.5%	3	3.7%	0	0.0%	0	0.0%
Middle-income	65	76.5%	62	76.5%	0	0.0%	3	75.0%
Upper-income	17	20.0%	16	19.8%	0	0.0%	1	25.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	85	100.0%	81	100.0%	0	0.0%	4	100.0%
Percentage of Total Farms:				95.3%		0.0%		4.7%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX D: LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Morristown

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	1	8.3%	754	4.7%	384	50.9%	3,504	21.8%
Moderate-income	3	25.0%	3,748	23.3%	894	23.9%	3,133	19.5%
Middle-income	6	50.0%	8,900	55.3%	502	5.6%	3,075	19.1%
Upper-income	2	16.7%	2,685	16.7%	167	6.2%	6,375	39.6%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	12	100.0%	16,087	100.0%	1,947	12.1%	16,087	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	1,409	438	2.7%	31.1%	801	56.8%	170	12.1%
Moderate-income	6,773	3,298	20.2%	48.7%	2,785	41.1%	690	10.2%
Middle-income	14,619	9,617	58.8%	65.8%	3,488	23.9%	1,514	10.4%
Upper-income	4,439	2,996	18.3%	67.5%	1,067	24.0%	376	8.5%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	27,240	16,349	100.0%	60.0%	8,141	29.9%	2,750	10.1%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	278	14.4%	239	13.7%	37	21.3%	2	16.7%
Moderate-income	547	28.4%	489	28.1%	57	32.8%	1	8.3%
Middle-income	784	40.7%	731	42.0%	47	27.0%	6	50.0%
Upper-income	317	16.5%	281	16.1%	33	19.0%	3	25.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	1,926	100.0%	1,740	100.0%	174	100.0%	12	100.0%
	Percentage of Total Businesses:			90.3%		9.0%		0.6%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	1	4.2%	1	4.2%	0	0.0%	0	0.0%
Moderate-income	2	8.3%	2	8.3%	0	0.0%	0	0.0%
Middle-income	18	75.0%	18	75.0%	0	0.0%	0	0.0%
Upper-income	3	12.5%	3	12.5%	0	0.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	24	100.0%	24	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:			100.0%		0.0%		0.0%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX D: LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Newport

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	2,434	25.5%
Moderate-income	3	33.3%	4,210	44.1%	808	19.2%	2,303	24.1%
Middle-income	5	55.6%	5,343	55.9%	583	10.9%	1,922	20.1%
Upper-income	0	0.0%	0	0.0%	0	0.0%	2,894	30.3%
Unknown-income	1	11.1%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	9	100.0%	9,553	100.0%	1,391	14.6%	9,553	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	7,924	3,884	39.4%	49.0%	2,371	29.9%	1,669	21.1%
Middle-income	9,716	5,980	60.6%	61.5%	1,936	19.9%	1,800	18.5%
Upper-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	17,640	9,864	100.0%	55.9%	4,307	24.4%	3,469	19.7%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	481	60.1%	434	58.9%	39	84.8%	8	47.1%
Middle-income	316	39.5%	300	40.7%	7	15.2%	9	52.9%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	3	0.4%	3	0.4%	0	0.0%	0	0.0%
Total Assessment Area	800	100.0%	737	100.0%	46	100.0%	17	100.0%
Percentage of Total Businesses:				92.1%		5.8%		2.1%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	9	24.3%	9	25.7%	0	0.0%	0	0.0%
Middle-income	27	73.0%	25	71.4%	2	100.0%	0	0.0%
Upper-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Unknown-income	1	2.7%	1	2.9%	0	0.0%	0	0.0%
Total Assessment Area	37	100.0%	35	100.0%	2	100.0%	0	0.0%
Percentage of Total Farms:				94.6%		5.4%		0.0%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX D: LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: TN Williamson

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	6,186	9.7%
Moderate-income	1	2.2%	1,277	2.0%	197	15.4%	6,186	9.7%
Middle-income	7	15.2%	8,844	13.9%	335	3.8%	9,568	15.0%
Upper-income	38	82.6%	53,726	84.1%	1,494	2.8%	41,907	65.6%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	46	100.0%	63,847	100.0%	2,026	3.2%	63,847	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Moderate-income	2,006	1,086	1.7%	54.1%	754	37.6%	166	8.3%
Middle-income	13,124	8,560	13.3%	65.2%	3,756	28.6%	808	6.2%
Upper-income	69,452	54,731	85.0%	78.8%	12,154	17.5%	2,567	3.7%
Unknown-income	0	0	0.0%	0.0%	0	0.0%	0	0.0%
Total Assessment Area	84,582	64,377	100.0%	76.1%	16,664	19.7%	3,541	4.2%
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	182	1.5%	169	1.5%	10	0.9%	3	3.0%
Middle-income	1,901	15.2%	1,710	15.1%	181	16.8%	10	9.9%
Upper-income	10,433	83.4%	9,457	83.4%	888	82.3%	88	87.1%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	12,516	100.0%	11,336	100.0%	1,079	100.0%	101	100.0%
	Percentage of Total Businesses:			90.6%		8.6%		0.8%
	Total Farms by Tract		Farms by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Moderate-income	4	2.2%	4	2.2%	0	0.0%	0	0.0%
Middle-income	23	12.4%	23	12.4%	0	0.0%	0	0.0%
Upper-income	159	85.5%	158	85.4%	1	100.0%	0	0.0%
Unknown-income	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Total Assessment Area	186	100.0%	185	100.0%	1	100.0%	0	0.0%
	Percentage of Total Farms:			99.5%		0.5%		0.0%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX D: LIMITED SCOPE ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report

Assessment Area: NC Gaston

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	6	7.1%	3,386	6.0%	638	18.8%	15,479	27.5%
Moderate-income	31	36.5%	22,083	39.2%	3,167	14.3%	11,154	19.8%
Middle-income	32	37.6%	20,315	36.1%	1,403	6.9%	12,198	21.7%
Upper-income	13	15.3%	9,821	17.4%	364	3.7%	17,468	31.0%
Unknown-income	3	3.5%	694	1.2%	145	20.9%	0	0.0%
Total Assessment Area	85	100.0%	56,299	100.0%	5,717	10.2%	56,299	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied			Rental		Vacant	
		#	%	%	#	%	#	%
Low-income	7,063	2,606	4.6%	36.9%	3,328	47.1%	1,129	16.0%
Moderate-income	38,778	20,825	37.0%	53.7%	14,304	36.9%	3,649	9.4%
Middle-income	32,925	21,558	38.3%	65.5%	8,444	25.6%	2,923	8.9%
Upper-income	13,703	10,760	19.1%	78.5%	2,126	15.5%	817	6.0%
Unknown-income	1,428	536	1.0%	37.5%	799	56.0%	93	6.5%
Total Assessment Area	93,897	56,285	100.0%	59.9%	29,001	30.9%	8,611	9.2%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	727	10.4%	606	9.5%	115	21.7%	6	8.2%
Moderate-income	2,541	36.3%	2,309	36.1%	211	39.7%	21	28.8%
Middle-income	2,257	32.2%	2,101	32.8%	127	23.9%	29	39.7%
Upper-income	1,097	15.7%	1,039	16.2%	46	8.7%	12	16.4%
Unknown-income	380	5.4%	343	5.4%	32	6.0%	5	6.8%
Total Assessment Area	7,002	100.0%	6,398	100.0%	531	100.0%	73	100.0%
	Percentage of Total Businesses:			91.4%		7.6%		1.0%
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million			Over \$1 Million		Revenue Not Reported	
		#	%	#	%	#	%	#
Low-income	3	5.3%	3	5.3%	0	0.0%	0	0.0%
Moderate-income	20	35.1%	20	35.1%	0	0.0%	0	0.0%
Middle-income	23	40.4%	23	40.4%	0	0.0%	0	0.0%
Upper-income	10	17.5%	10	17.5%	0	0.0%	0	0.0%
Unknown-income	1	1.8%	1	1.8%	0	0.0%	0	0.0%
Total Assessment Area	57	100.0%	57	100.0%	0	0.0%	0	0.0%
	Percentage of Total Farms:			100.0%		0.0%		0.0%

Based on 2024 FFIEC Census Data and 2024 D&B Information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Johnson City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank #	Agg %	Bank		Agg \$ %	
#	%	\$ (000s)	\$ %	#	%	\$ (000s)			\$ %			
HOME PURCHASE	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	2.1%	0	0.0%	1.2%
	Moderate	1	100.0%	170	100.0%	18.5%	1	100.0%	24.6%	170	100.0%	20.9%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	27.4%	0	0.0%	25.5%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	45.9%	0	0.0%	52.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	170	100%	100.0%	1	100%	100%	170	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	1.6%	0	0.0%	1.3%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	21.8%	0	0.0%	17.7%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	34.9%	0	0.0%	33.2%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	41.7%	0	0.0%	47.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	2.0%	0	0.0%	1.3%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	16.9%	0	0.0%	13.1%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	32.6%	0	0.0%	27.5%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	48.5%	0	0.0%	58.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI-FAMILY	Low	0	0.0%	0	0.0%	11.2%	0	0.0%	9.1%	0	0.0%	7.0%
	Moderate	0	0.0%	0	0.0%	30.8%	0	0.0%	33.3%	0	0.0%	9.8%
	Middle	1	100.0%	5,983	100.0%	14.7%	1	100.0%	24.2%	5,983	100.0%	38.2%
	Upper	0	0.0%	0	0.0%	43.3%	0	0.0%	33.3%	0	0.0%	45.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	5,983	100%	100.0%	1	100%	100%	5,983	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	3.1%	0	0.0%	1.2%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	16.3%	0	0.0%	13.3%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	30.1%	0	0.0%	24.3%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	50.5%	0	0.0%	61.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Johnson City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	2.2%	0	0.0%	1.4%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	14.3%	0	0.0%	11.9%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	32.4%	0	0.0%	28.9%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	51.1%	0	0.0%	57.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	18.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	36.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	100.0%	0	0.0%	100.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	2.1%	0	0.0%	2.3%
	Moderate	1	50.0%	170	2.8%	18.5%	1	50.0%	22.3%	170	2.8%	17.7%
	Middle	1	50.0%	5,983	97.2%	36.8%	1	50.0%	30.0%	5,983	97.2%	29.3%
	Upper	0	0.0%	0	0.0%	42.5%	0	0.0%	45.6%	0	0.0%	50.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	6,153	100%	100.0%	2	100%	100%	6,153	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Johnson City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	2.8%	0	0.0%	1.1%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	15.1%	0	0.0%	9.2%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	20.7%	0	0.0%	16.9%
	Upper	1	100.0%	170	100.0%	44.1%	1	100.0%	44.0%	170	100.0%	55.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	17.4%	0	0.0%	17.3%
	Total	1	100%	170	100%	100.0%	1	100%	100%	170	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	6.1%	0	0.0%	2.7%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	19.3%	0	0.0%	13.5%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	20.5%	0	0.0%	17.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	33.3%	0	0.0%	40.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	20.8%	0	0.0%	26.2%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	7.0%	0	0.0%	3.1%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	19.5%	0	0.0%	12.3%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	18.9%	0	0.0%	14.4%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	52.3%	0	0.0%	68.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.3%	0	0.0%	2.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	6.1%	0	0.0%	1.5%
	Unknown	1	100.0%	5,983	100.0%	0.0%	1	100.0%	93.9%	5,983	100.0%	98.5%
	Total	1	100%	5,983	100%	100.0%	1	100%	100%	5,983	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	9.2%	0	0.0%	5.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	14.3%	0	0.0%	8.3%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	25.0%	0	0.0%	18.3%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	44.4%	0	0.0%	59.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	7.1%	0	0.0%	8.6%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Johnson City

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Dollar		Families by Family Income %	Count		Agg	Dollar		Agg
		Count #	%	\$ (000s)	\$ %		Bank #	%		Bank \$ (000s)	\$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	9.9%	0	0.0%	4.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	19.8%	0	0.0%	11.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	27.5%	0	0.0%	24.2%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	40.7%	0	0.0%	59.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.2%	0	0.0%	1.2%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	44.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>
HMDA TOTALS	Low	0	0.0%	0	0.0%	19.9%	0	0.0%	4.7%	0	0.0%	1.4%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	16.5%	0	0.0%	8.3%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	20.9%	0	0.0%	13.9%
	Upper	1	50.0%	170	2.8%	44.1%	1	50.0%	41.8%	170	2.8%	43.3%
	Unknown	1	50.0%	5,983	97.2%	0.0%	1	50.0%	16.1%	5,983	97.2%	33.1%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>6,153</i>	<i>100%</i>	<i>100.0%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>6,153</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Johnson City

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count		Agg	Dollar		Agg
		Count	Dollar	Count	Dollar		Bank	%		Bank	%	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	2.2%	0	0.0%	1.6%	0	0.0%	1.9%
	Moderate	0	0.0%	0	0.0%	28.9%	0	0.0%	22.8%	0	0.0%	23.5%
	Middle	0	0.0%	0	0.0%	25.2%	0	0.0%	25.2%	0	0.0%	24.4%
	Upper	1	100.0%	372	100.0%	43.3%	1	100.0%	49.6%	372	100.0%	49.9%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.6%	0	0.0%	0.2%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.3%	0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>372</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>372</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	1.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	22.3%	0	0.0%	16.0%	0	0.0%	1.9%
	Middle	0	0.0%	0	0.0%	31.9%	0	0.0%	44.0%	0	0.0%	39.6%
	Upper	0	0.0%	0	0.0%	44.7%	0	0.0%	40.0%	0	0.0%	58.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Johnson City

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending					
			2024					2024					
			Bank				Total Businesses	Count			Dollar		
			Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	%	#	%	%					\$ 000s	\$ %
SMALL BUSINESS	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	91.4%	0	0.0%	53.8%	0	0.0%	38.6%
		Over \$1 Million	1	100.0%	372	100.0%	7.8%	1	100.0%		372	100.0%	
		Total Rev. available	1	100.0%	372	100.0%	99.2%	1	100.0%		372	100.0%	
		Rev. Not Known	0	0.0%	0	0.0%	0.8%	0	0.0%		0	0.0%	
		Total	1	100%	372	100%	100%	1	100%		372	100%	
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	90.8%	0	0.0%	32.1%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	4.7%	0	0.0%	17.3%
		\$250,001 - \$1 Million	1	100.0%	372	100.0%		1	100.0%	4.5%	372	100.0%	50.6%
		Total	1	100%	372	100%		1	100%	100%	372	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		Total	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms 92.6%	0	0.0%	68.0%	0	0.0%	86.8%
		Over \$1 Million	0	0.0%	0	0.0%	2.1%	0	0.0%		0	0.0%	
		Total Rev. available	0	0.0%	0	0.0%	94.7%	0	0.0%		0	0.0%	
		Not Known	0	0.0%	0	0.0%	5.3%	0	0.0%		0	0.0%	
		Total	0	0.0%	0	0.0%	100%	0	0.0%		0	0.0%	
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	80.0%	0	0.0%	26.9%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	12.0%	0	0.0%	28.7%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	8.0%	0	0.0%	44.4%
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		Total	0	0.0%	0	0.0%		0	0.0%		0	0.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Kingsport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			#	%	Agg %	Bank		Agg \$ %
#	%	\$ (000s)	\$ %	\$ (000s)	\$ %							
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	1.3%	0	0.0%	1.2%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	18.1%	0	0.0%	12.7%
	Middle	1	50.0%	433	71.2%	59.2%	1	50.0%	53.7%	433	71.2%	54.1%
	Upper	1	50.0%	175	28.8%	26.7%	1	50.0%	27.0%	175	28.8%	32.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	608	100%	100.0%	2	100%	100%	608	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	1.6%	0	0.0%	0.9%
	Moderate	1	100.0%	90	100.0%	13.3%	1	100.0%	14.4%	90	100.0%	12.8%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	56.2%	0	0.0%	55.5%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	27.7%	0	0.0%	30.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	90	100%	100.0%	1	100%	100%	90	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.9%	0	0.0%	0.4%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	17.3%	0	0.0%	11.3%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	53.9%	0	0.0%	57.6%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	27.9%	0	0.0%	30.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Multi-Family Units											
	Low	0	0.0%	0	0.0%	5.7%	0	0.0%	13.3%	0	0.0%	62.6%
	Moderate	0	0.0%	0	0.0%	32.1%	0	0.0%	46.7%	0	0.0%	20.9%
	Middle	0	0.0%	0	0.0%	45.9%	0	0.0%	40.0%	0	0.0%	16.5%
	Upper	0	0.0%	0	0.0%	16.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%	
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.6%	0	0.0%	0.3%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	10.7%	0	0.0%	6.4%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	52.5%	0	0.0%	55.6%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	36.2%	0	0.0%	37.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Kingsport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	15.2%	0	0.0%	11.6%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	59.6%	0	0.0%	60.5%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	25.2%	0	0.0%	27.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	13.3%	0	0.0%	20.0%	0	0.0%	7.9%
	Middle	0	0.0%	0	0.0%	59.2%	0	0.0%	80.0%	0	0.0%	92.1%
	Upper	0	0.0%	0	0.0%	26.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.8%	0	0.0%	1.3%	0	0.0%	4.1%
	Moderate	1	33.3%	90	12.9%	13.3%	1	33.3%	16.7%	90	12.9%	13.0%
	Middle	1	33.3%	433	62.0%	59.2%	1	33.3%	54.6%	433	62.0%	52.9%
	Upper	1	33.3%	175	25.1%	26.7%	1	33.3%	27.4%	175	25.1%	30.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	3	100%	698	100%	100.0%	3	100%	100%	698	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Kingsport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Families by Family Income			Count			Dollar		
		Count	Dollar				Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$(000s)	\$ %	\$ %
HOME PURCHASE	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	3.0%	0	0.0%	1.3%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	15.5%	0	0.0%	9.5%
	Middle	1	50.0%	175	28.8%	20.3%	1	50.0%	21.5%	175	28.8%	17.4%
	Upper	1	50.0%	433	71.2%	41.2%	1	50.0%	41.5%	433	71.2%	52.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	18.6%	0	0.0%	19.4%
	Total	2	100%	608	100%	100.0%	2	100%	100%	608	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	9.0%	0	0.0%	4.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	17.5%	0	0.0%	10.9%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	18.5%	0	0.0%	15.8%
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	30.2%	0	0.0%	34.2%
	Unknown	1	100.0%	90	100.0%	0.0%	1	100.0%	24.8%	90	100.0%	35.1%
	Total	1	100%	90	100%	100.0%	1	100%	100%	90	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	9.2%	0	0.0%	7.4%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	16.3%	0	0.0%	9.8%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	20.6%	0	0.0%	18.1%
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	47.0%	0	0.0%	56.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	6.9%	0	0.0%	8.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	26.7%	0	0.0%	6.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	73.3%	0	0.0%	93.1%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	11.9%	0	0.0%	6.9%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	16.9%	0	0.0%	10.6%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	15.3%	0	0.0%	11.3%
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	50.8%	0	0.0%	66.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	5.1%	0	0.0%	4.9%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Kingsport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	10.9%	0	0.0%	6.8%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	19.1%	0	0.0%	14.2%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	24.8%	0	0.0%	26.5%
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	42.6%	0	0.0%	50.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	2.6%	0	0.0%	1.5%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	41.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	21.3%	0	0.0%	5.9%	0	0.0%	2.3%
	Moderate	0	0.0%	0	0.0%	17.2%	0	0.0%	16.2%	0	0.0%	9.5%
	Middle	1	33.3%	175	25.1%	20.3%	1	33.3%	20.5%	175	25.1%	16.3%
	Upper	1	33.3%	433	62.0%	41.2%	1	33.3%	39.5%	433	62.0%	46.3%
	Unknown	1	33.3%	90	12.9%	0.0%	1	33.3%	17.9%	90	12.9%	25.7%
	Total	3	100%	698	100%	100.0%	3	100%	100%	698	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Kingsport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count		Agg	Dollar		Agg
		Count	Dollar	Count	Dollar		Bank	%		Bank	%	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	9.1%	0	0.0%	5.0%	0	0.0%	7.4%
	Moderate	0	0.0%	0	0.0%	15.7%	0	0.0%	13.2%	0	0.0%	15.4%
	Middle	1	33.3%	22	2.5%	53.0%	1	33.3%	57.4%	22	2.5%	60.4%
	Upper	2	66.7%	850	97.5%	22.2%	2	66.7%	24.2%	850	97.5%	16.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.3%	0	0.0%	0.1%
	<i>Total</i>	<i>3</i>	<i>100%</i>	<i>872</i>	<i>100%</i>	<i>100.0%</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>872</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	3.5%	0	0.0%	6.5%	0	0.0%	0.3%
	Middle	0	0.0%	0	0.0%	76.5%	0	0.0%	67.7%	0	0.0%	82.3%
	Upper	0	0.0%	0	0.0%	20.0%	0	0.0%	25.8%	0	0.0%	17.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Kingsport

PRODUCT TYPE			Bank Lending & Demographic Data						Bank & Aggregate Lending					
			2024						2024					
			Bank				Total Businesses	Count			Dollar			
			Count		Dollar			Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%	%			\$ 000s	\$ %		\$ %	
SMALL BUSINESS	Revenue	\$1 Million or Less	1	33.3%	136	15.6%	91.1%	1	33.3%	48.1%	136	15.6%	35.7%	
		Over \$1 Million	1	33.3%	714	81.9%	8.1%	1	33.3%		714	81.9%		
		Total Rev. available	2	66.7%	850	97.5%	99.3%	2	66.7%		850	97.5%		
		Rev. Not Known	1	33.3%	22	2.5%	0.7%	1	33.3%		22	2.5%		
		Total	3	100%	872	100%	100%	3	100%		872	100%		
	Loan Size	\$100,000 or Less	1	33.3%	22	2.5%		1	33.3%	92.5%	22	2.5%	37.1%	
		\$100,001 - \$250,000	1	33.3%	136	15.6%		1	33.3%	4.0%	136	15.6%	18.1%	
		\$250,001 - \$1 Million	1	33.3%	714	81.9%		1	33.3%	3.5%	714	81.9%	44.9%	
		Total	3	100%	872	100%		3	100%	100%	872	100%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$100,001 - \$250,000	1	100.0%	136	100.0%		1	100.0%		136	100.0%		
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		Total	1	100%	136	100%		1	100%		136	100%		
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms 95.3%	0	0.0%	64.5%	0	0.0%	46.6%	
		Over \$1 Million	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		
		Total Rev. available	0	0.0%	0	0.0%	95.3%	0	0.0%		0	0.0%		
		Not Known	0	0.0%	0	0.0%	4.7%	0	0.0%		0	0.0%		
		Total	0	0.0%	0	0.0%	100%	0	0.0%		0	0.0%		
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	67.7%	0	0.0%	13.1%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	25.8%	0	0.0%	51.2%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	6.5%	0	0.0%	35.7%	
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		Total	0	0.0%	0	0.0%		0	0.0%		0	0.0%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Morristown

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			#	%	Agg %	Bank		Agg %
#	%	\$ (000s)	\$ %	\$ (000s)	\$ %							
HOME PURCHASE	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	3.0%	0	0.0%	1.9%
	Moderate	1	14.3%	115	5.6%	20.2%	1	14.3%	19.4%	115	5.6%	15.8%
	Middle	6	85.7%	1,936	94.4%	58.8%	6	85.7%	58.8%	1,936	94.4%	61.4%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	18.7%	0	0.0%	20.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	7	100%	2,051	100%	100.0%	7	100%	100%	2,051	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	0.9%	0	0.0%	0.4%
	Moderate	2	40.0%	165	18.5%	20.2%	2	40.0%	17.4%	165	18.5%	14.2%
	Middle	3	60.0%	729	81.5%	58.8%	3	60.0%	61.7%	729	81.5%	61.3%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	20.0%	0	0.0%	24.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	5	100%	894	100%	100.0%	5	100%	100%	894	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	1.6%	0	0.0%	0.6%
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	18.9%	0	0.0%	19.4%
	Middle	0	0.0%	0	0.0%	58.8%	0	0.0%	60.7%	0	0.0%	54.7%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	18.9%	0	0.0%	25.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	13.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	30.7%	0	0.0%	22.2%	0	0.0%	2.9%
	Middle	0	0.0%	0	0.0%	46.8%	0	0.0%	33.3%	0	0.0%	13.6%
	Upper	0	0.0%	0	0.0%	8.8%	0	0.0%	44.4%	0	0.0%	83.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	2.0%	0	0.0%	3.5%
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	17.6%	0	0.0%	16.1%
	Middle	0	0.0%	0	0.0%	58.8%	0	0.0%	56.9%	0	0.0%	49.5%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	23.5%	0	0.0%	30.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Morristown

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %		#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	4.5%	0	0.0%	5.7%
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	18.2%	0	0.0%	18.4%
	Middle	1	100.0%	40	100.0%	58.8%	1	100.0%	65.9%	40	100.0%	64.2%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	11.4%	0	0.0%	11.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	40	100%	100.0%	1	100%	100%	40	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	20.2%	0	0.0%	20.0%	0	0.0%	10.6%
	Middle	0	0.0%	0	0.0%	58.8%	0	0.0%	80.0%	0	0.0%	89.4%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	2.7%	0	0.0%	2.2%	0	0.0%	1.4%
	Moderate	3	23.1%	280	9.4%	20.2%	3	23.1%	18.6%	280	9.4%	14.4%
	Middle	10	76.9%	2,705	90.6%	58.8%	10	76.9%	60.0%	2,705	90.6%	57.1%
	Upper	0	0.0%	0	0.0%	18.3%	0	0.0%	19.2%	0	0.0%	27.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	13	100%	2,985	100%	100.0%	13	100%	100%	2,985	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Morristown

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg %	Bank		Agg %	
#	%	\$ (000s)	\$ %	#	%	\$ (000s)			\$ %			
HOME PURCHASE	Low	0	0.0%	0	0.0%	21.8%	0	0.0%	3.4%	0	0.0%	1.7%
	Moderate	2	28.6%	435	21.2%	19.5%	2	28.6%	18.6%	435	21.2%	13.5%
	Middle	3	42.9%	756	36.9%	19.1%	3	42.9%	27.4%	756	36.9%	25.3%
	Upper	2	28.6%	860	41.9%	39.6%	2	28.6%	31.0%	860	41.9%	39.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	19.6%	0	0.0%	20.2%
	Total	7	100%	2,051	100%	100.0%	7	100%	100%	2,051	100%	100%
REFINANCE	Low	1	20.0%	82	9.2%	21.8%	1	20.0%	9.6%	82	9.2%	4.7%
	Moderate	1	20.0%	169	18.9%	19.5%	1	20.0%	17.7%	169	18.9%	12.3%
	Middle	2	40.0%	243	27.2%	19.1%	2	40.0%	22.2%	243	27.2%	19.3%
	Upper	1	20.0%	400	44.7%	39.6%	1	20.0%	31.2%	400	44.7%	36.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	19.2%	0	0.0%	26.9%
	Total	5	100%	894	100%	100.0%	5	100%	100%	894	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	21.8%	0	0.0%	9.0%	0	0.0%	5.0%
	Moderate	0	0.0%	0	0.0%	19.5%	0	0.0%	16.4%	0	0.0%	11.3%
	Middle	0	0.0%	0	0.0%	19.1%	0	0.0%	23.8%	0	0.0%	22.9%
	Upper	0	0.0%	0	0.0%	39.6%	0	0.0%	46.7%	0	0.0%	57.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	4.1%	0	0.0%	3.4%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	21.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	19.1%	0	0.0%	11.1%	0	0.0%	0.2%
	Upper	0	0.0%	0	0.0%	39.6%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	88.9%	0	0.0%	99.8%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	21.8%	0	0.0%	2.0%	0	0.0%	1.0%
	Moderate	0	0.0%	0	0.0%	19.5%	0	0.0%	19.6%	0	0.0%	13.5%
	Middle	0	0.0%	0	0.0%	19.1%	0	0.0%	21.6%	0	0.0%	11.7%
	Upper	0	0.0%	0	0.0%	39.6%	0	0.0%	45.1%	0	0.0%	60.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	11.8%	0	0.0%	13.5%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Morristown

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	21.8%	0	0.0%	11.4%	0	0.0%	5.7%
	Moderate	0	0.0%	0	0.0%	19.5%	0	0.0%	18.2%	0	0.0%	20.3%
	Middle	1	100.0%	40	100.0%	19.1%	1	100.0%	29.5%	40	100.0%	21.4%
	Upper	0	0.0%	0	0.0%	39.6%	0	0.0%	29.5%	0	0.0%	42.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	11.4%	0	0.0%	10.4%
	Total	1	100%	40	100%	100.0%	1	100%	100%	40	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	21.8%	0	0.0%	40.0%	0	0.0%	40.6%
	Moderate	0	0.0%	0	0.0%	19.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	19.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	39.6%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	60.0%	0	0.0%	59.4%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	1	7.7%	82	2.7%	21.8%	1	7.7%	6.1%	82	2.7%	2.5%
	Moderate	3	23.1%	604	20.2%	19.5%	3	23.1%	18.0%	604	20.2%	12.0%
	Middle	6	46.2%	1,039	34.8%	19.1%	6	46.2%	25.1%	1,039	34.8%	21.3%
	Upper	3	23.1%	1,260	42.2%	39.6%	3	23.1%	32.4%	1,260	42.2%	36.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	18.4%	0	0.0%	28.1%
	Total	13	100%	2,985	100%	100.0%	13	100%	100%	2,985	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Morristown

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count		Agg	Dollar		
		Count	Dollar	Count	Dollar		Bank	%		Bank	Agg	%
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	2	22.2%	350	20.9%	14.4%	2	22.2%	9.1%	350	20.9%	20.6%
	Moderate	1	11.1%	25	1.5%	28.4%	1	11.1%	21.0%	25	1.5%	21.6%
	Middle	4	44.4%	703	41.9%	40.7%	4	44.4%	49.1%	703	41.9%	41.7%
	Upper	2	22.2%	600	35.8%	16.5%	2	22.2%	20.2%	600	35.8%	15.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.6%	0	0.0%	0.2%
	<i>Total</i>	<i>9</i>	<i>100%</i>	<i>1,678</i>	<i>100%</i>	<i>100.0%</i>	<i>9</i>	<i>100%</i>	<i>100%</i>	<i>1,678</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	4.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	8.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	1	100.0%	14	100.0%	75.0%	1	100.0%	88.9%	14	100.0%	87.3%
	Upper	0	0.0%	0	0.0%	12.5%	0	0.0%	11.1%	0	0.0%	12.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>1</i>	<i>100%</i>	<i>14</i>	<i>100%</i>	<i>100.0%</i>	<i>1</i>	<i>100%</i>	<i>100%</i>	<i>14</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Newport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	50.0%	266	35.7%	39.4%	2	50.0%	45.0%	266	35.7%	38.0%
	Middle	2	50.0%	480	64.3%	60.6%	2	50.0%	55.0%	480	64.3%	62.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	4	100%	746	100%	100.0%	4	100%	100%	746	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	1	50.0%	54	60.0%	39.4%	1	50.0%	39.7%	54	60.0%	38.7%
	Middle	1	50.0%	36	40.0%	60.6%	1	50.0%	60.3%	36	40.0%	61.3%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	2	100%	90	100%	100.0%	2	100%	100%	90	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	39.4%	0	0.0%	41.4%	0	0.0%	38.5%
	Middle	0	0.0%	0	0.0%	60.6%	0	0.0%	58.6%	0	0.0%	61.5%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	86.2%	0	0.0%	66.7%	0	0.0%	89.6%
	Middle	0	0.0%	0	0.0%	13.8%	0	0.0%	33.3%	0	0.0%	10.4%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	39.4%	0	0.0%	12.5%	0	0.0%	14.4%
	Middle	0	0.0%	0	0.0%	60.6%	0	0.0%	87.5%	0	0.0%	85.6%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Newport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	50.0%	115	69.7%	39.4%	2	50.0%	41.7%	115	69.7%	38.5%
	Middle	2	50.0%	50	30.3%	60.6%	2	50.0%	58.3%	50	30.3%	61.5%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	4	100%	165	100%	100.0%	4	100%	100%	165	100%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	39.4%	0	0.0%	100.0%	0	0.0%	100.0%
	Middle	0	0.0%	0	0.0%	60.6%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	5	50.0%	435	43.5%	39.4%	5	50.0%	42.7%	435	43.5%	38.8%
	Middle	5	50.0%	566	56.5%	60.6%	5	50.0%	57.3%	566	56.5%	61.2%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	10	100%	1,001	100%	100.0%	10	100%	100%	1,001	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Newport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			Bank	Agg %	Bank		Agg \$ %	
#	%	\$ (000s)	\$ %	#	%	\$ (000s)			\$ %			
HOME PURCHASE	Low	0	0.0%	0	0.0%	25.5%	0	0.0%	2.5%	0	0.0%	1.1%
	Moderate	0	0.0%	0	0.0%	24.1%	0	0.0%	13.6%	0	0.0%	9.8%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	24.9%	0	0.0%	20.3%
	Upper	4	100.0%	746	100.0%	30.3%	4	100.0%	40.5%	746	100.0%	49.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	18.4%	0	0.0%	19.4%
	Total	4	100%	746	100%	100.0%	4	100%	100%	746	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	25.5%	0	0.0%	5.0%	0	0.0%	3.0%
	Moderate	1	50.0%	54	60.0%	24.1%	1	50.0%	20.6%	54	60.0%	16.7%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	27.7%	0	0.0%	26.4%
	Upper	1	50.0%	36	40.0%	30.3%	1	50.0%	22.0%	36	40.0%	20.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	24.8%	0	0.0%	33.2%
	Total	2	100%	90	100%	100.0%	2	100%	100%	90	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	25.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	24.1%	0	0.0%	20.7%	0	0.0%	13.0%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	17.2%	0	0.0%	14.4%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	55.2%	0	0.0%	69.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	6.9%	0	0.0%	3.4%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	25.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	24.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	25.5%	0	0.0%	12.5%	0	0.0%	5.7%
	Moderate	0	0.0%	0	0.0%	24.1%	0	0.0%	6.3%	0	0.0%	3.0%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	37.5%	0	0.0%	23.7%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	25.0%	0	0.0%	42.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	18.8%	0	0.0%	25.1%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Newport

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Families by Family Income			Count		Agg	Dollar		Agg
		Count	Dollar				Bank			Bank		
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	2	50.0%	57	34.5%	25.5%	2	50.0%	25.0%	57	34.5%	14.9%
	Moderate	0	0.0%	0	0.0%	24.1%	0	0.0%	8.3%	0	0.0%	11.7%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	33.3%	0	0.0%	47.4%
	Upper	2	50.0%	108	65.5%	30.3%	2	50.0%	33.3%	108	65.5%	26.1%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>4</i>	<i>100%</i>	<i>165</i>	<i>100%</i>	<i>100.0%</i>	<i>4</i>	<i>100%</i>	<i>100%</i>	<i>165</i>	<i>100%</i>	<i>100%</i>
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	25.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	24.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	30.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>
HMDA TOTALS	Low	2	20.0%	57	5.7%	25.5%	2	20.0%	3.8%	57	5.7%	1.6%
	Moderate	1	10.0%	54	5.4%	24.1%	1	10.0%	15.3%	54	5.4%	11.1%
	Middle	0	0.0%	0	0.0%	20.1%	0	0.0%	25.6%	0	0.0%	21.5%
	Upper	7	70.0%	890	88.9%	30.3%	7	70.0%	35.7%	890	88.9%	42.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	19.6%	0	0.0%	23.5%
	<i>Total</i>	<i>10</i>	<i>100%</i>	<i>1,001</i>	<i>100%</i>	<i>100.0%</i>	<i>10</i>	<i>100%</i>	<i>100%</i>	<i>1,001</i>	<i>100%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Newport

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count			Dollar		
		Count	Dollar	Count	Dollar		Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	2	100.0%	318	100.0%	60.1%	2	100.0%	50.2%	318	100.0%	71.0%
	Middle	0	0.0%	0	0.0%	39.5%	0	0.0%	49.8%	0	0.0%	29.0%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.4%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>318</i>	<i>100%</i>	<i>100.0%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>318</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	24.3%	0	0.0%	16.7%	0	0.0%	4.8%
	Middle	0	0.0%	0	0.0%	73.0%	0	0.0%	83.3%	0	0.0%	95.2%
	Upper	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Newport

PRODUCT TYPE			Bank Lending & Demographic Data						Bank & Aggregate Lending					
			2024						2024					
			Bank				Total Businesses	Count			Dollar			
			Count		Dollar			Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%	%			\$ 000s	\$ %		\$ %	
SMALL BUSINESS	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	92.1%	0	0.0%	66.0%	0	0.0%	41.1%	
		Over \$1 Million	2	100.0%	318	100.0%	5.8%	2	100.0%		318	100.0%		
		Total Rev. available	2	100.0%	318	100.0%	97.9%	2	100.0%		318	100.0%		
		Rev. Not Known	0	0.0%	0	0.0%	2.1%	0	0.0%		0	0.0%		
		Total	2	100%	318	100%	100%	2	100%		318	100%		
	Loan Size	\$100,000 or Less	1	50.0%	68	21.4%		1	50.0%	94.0%	68	21.4%	38.1%	
		\$100,001 - \$250,000	1	50.0%	250	78.6%		1	50.0%	3.3%	250	78.6%	20.5%	
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%	2.7%	0	0.0%	41.4%	
		Total	2	100%	318	100%		2	100%	100%	318	100%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$250,001 - \$1 Million	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		Total	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms 94.6%	0	0.0%	66.7%	0	0.0%	79.7%	
		Over \$1 Million	0	0.0%	0	0.0%	5.4%	0	0.0%		0	0.0%		
		Total Rev. available	0	0.0%	0	0.0%	100.0%	0	0.0%		0	0.0%		
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		
		Total	0	0.0%	0	0.0%	100%	0	0.0%		0	0.0%		
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	100.0%	0	0.0%	100.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%	
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		Total	0	0.0%	0	0.0%		0	0.0%		0	0.0%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Williamson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			#	%	%	Bank		Agg \$ %
#	%	\$ (000s)	\$ %	\$ (000s)	\$ %							
HOME PURCHASE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.7%	0	0.0%	2.2%	0	0.0%	1.8%
	Middle	1	100.0%	580	100.0%	13.3%	1	100.0%	11.8%	580	100.0%	8.6%
	Upper	0	0.0%	0	0.0%	85.0%	0	0.0%	86.0%	0	0.0%	89.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	580	100%	100.0%	1	100%	100%	580	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.7%	0	0.0%	1.1%	0	0.0%	0.9%
	Middle	0	0.0%	0	0.0%	13.3%	0	0.0%	13.0%	0	0.0%	10.2%
	Upper	0	0.0%	0	0.0%	85.0%	0	0.0%	85.9%	0	0.0%	89.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.7%	0	0.0%	0.9%	0	0.0%	0.8%
	Middle	0	0.0%	0	0.0%	13.3%	0	0.0%	10.5%	0	0.0%	8.9%
	Upper	0	0.0%	0	0.0%	85.0%	0	0.0%	88.6%	0	0.0%	90.4%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY		Multi-Family Units										
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.4%	0	0.0%	14.3%	0	0.0%	12.5%
	Middle	0	0.0%	0	0.0%	22.0%	0	0.0%	28.6%	0	0.0%	50.2%
	Upper	0	0.0%	0	0.0%	76.7%	0	0.0%	57.1%	0	0.0%	37.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.7%	0	0.0%	0.9%	0	0.0%	0.6%
	Middle	0	0.0%	0	0.0%	13.3%	0	0.0%	11.4%	0	0.0%	7.1%
	Upper	0	0.0%	0	0.0%	85.0%	0	0.0%	87.6%	0	0.0%	92.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Williamson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	13.3%	0	0.0%	15.3%	0	0.0%	4.2%
	Upper	0	0.0%	0	0.0%	85.0%	0	0.0%	84.7%	0	0.0%	95.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	13.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	85.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.7%	0	0.0%	1.7%	0	0.0%	1.7%
	Middle	1	100.0%	580	100.0%	13.3%	1	100.0%	12.0%	580	100.0%	9.5%
	Upper	0	0.0%	0	0.0%	85.0%	0	0.0%	86.3%	0	0.0%	88.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	1	100%	580	100%	100.0%	1	100%	100%	580	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Williamson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Families by Family Income			Count		Dollar			
		Count	Dollar				Bank	Agg	Bank	Agg		
		#	%	\$ (000s)	\$ %	%	#	%	\$ (000s)	\$ %	\$ %	
HOME PURCHASE	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	0.6%	0	0.0%	0.2%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	3.8%	0	0.0%	1.6%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	9.6%	0	0.0%	5.3%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	63.0%	0	0.0%	71.8%
	Unknown	1	100.0%	580	100.0%	0.0%	1	100.0%	23.0%	580	100.0%	21.2%
	Total	1	100%	580	100%	100.0%	1	100%	100%	580	100%	100%
REFINANCE	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	2.7%	0	0.0%	1.0%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	7.7%	0	0.0%	3.2%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	12.7%	0	0.0%	7.2%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	61.0%	0	0.0%	67.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	15.9%	0	0.0%	20.9%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	2.3%	0	0.0%	0.7%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	6.5%	0	0.0%	2.5%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	11.5%	0	0.0%	5.7%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	75.9%	0	0.0%	79.7%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.8%	0	0.0%	11.4%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	2.4%	0	0.0%	1.1%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	4.8%	0	0.0%	1.9%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	11.8%	0	0.0%	5.3%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	77.1%	0	0.0%	88.3%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	3.9%	0	0.0%	3.4%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Williamson

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank		Agg	
#	%	\$ (000s)	\$ %	%	#	%			%	\$ (000s)		\$ %
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	2.3%	0	0.0%	0.7%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	10.2%	0	0.0%	2.2%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	15.7%	0	0.0%	3.6%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	62.0%	0	0.0%	76.6%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	9.7%	0	0.0%	16.8%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	9.7%	0	0.0%	1.4%	0	0.0%	0.4%
	Moderate	0	0.0%	0	0.0%	9.7%	0	0.0%	5.2%	0	0.0%	1.9%
	Middle	0	0.0%	0	0.0%	15.0%	0	0.0%	10.9%	0	0.0%	5.5%
	Upper	0	0.0%	0	0.0%	65.6%	0	0.0%	64.9%	0	0.0%	70.6%
	Unknown	1	100.0%	580	100.0%	0.0%	1	100.0%	17.6%	580	100.0%	21.6%
	Total	1	100%	580	100%	100.0%	1	100%	100%	580	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: TN Williamson

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count			Dollar		
		Count	Dollar	Count	Dollar		Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	1.5%	0	0.0%	1.2%	0	0.0%	1.0%
	Middle	0	0.0%	0	0.0%	15.2%	0	0.0%	11.9%	0	0.0%	13.4%
	Upper	2	100.0%	575	100.0%	83.4%	2	100.0%	86.6%	575	100.0%	85.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.3%	0	0.0%	0.1%
	<i>Total</i>	<i>2</i>	<i>100%</i>	<i>575</i>	<i>100%</i>	<i>100.0%</i>	<i>2</i>	<i>100%</i>	<i>100%</i>	<i>575</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	2.2%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	12.4%	0	0.0%	9.3%	0	0.0%	9.2%
	Upper	0	0.0%	0	0.0%	85.5%	0	0.0%	90.7%	0	0.0%	90.8%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: TN Williamson

PRODUCT TYPE			Bank Lending & Demographic Data						Bank & Aggregate Lending					
			2024						2024					
			Bank				Total Businesses	Count			Dollar			
			Count		Dollar			Bank	Agg	Bank		Agg		
#	%	\$ (000s)	\$ %	%	#	%	%			\$ 000s	\$ %		\$ %	
SMALL BUSINESS	Revenue	\$1 Million or Less	1	50.0%	500	87.0%	90.6%	1	50.0%	52.0%	500	87.0%	35.2%	
		Over \$1 Million	1	50.0%	75	13.0%	8.6%	1	50.0%		75	13.0%		
		Total Rev. available	2	100.0%	575	100.0%	99.2%	2	100.0%		575	100.0%		
		Rev. Not Known	0	0.0%	0	0.0%	0.8%	0	0.0%		0	0.0%		
		Total	2	100%	575	100%	100%	2	100%		575	100%		
	Loan Size	\$100,000 or Less	1	50.0%	75	13.0%		1	50.0%	93.5%	75	13.0%	40.7%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	3.7%	0	0.0%	17.3%	
		\$250,001 - \$1 Million	1	50.0%	500	87.0%		1	50.0%	2.8%	500	87.0%	42.0%	
		Total	2	100%	575	100%		2	100%	100%	575	100%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$250,001 - \$1 Million	1	100.0%	500	100.0%		1	100.0%		500	100.0%		
		Total	1	100%	500	100%		1	100%		500	100%		
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms 99.5%	0	0.0%	54.7%	0	0.0%	44.7%	
		Over \$1 Million	0	0.0%	0	0.0%	0.5%	0	0.0%		0	0.0%		
		Total Rev. available	0	0.0%	0	0.0%	100.0%	0	0.0%		0	0.0%		
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%		
		Total	0	0.0%	0	0.0%	100%	0	0.0%		0	0.0%		
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	94.7%	0	0.0%	52.4%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	2.7%	0	0.0%	16.6%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	2.7%	0	0.0%	30.9%	
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%	
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%		
		Total	0	0.0%	0	0.0%		0	0.0%		0	0.0%		

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2

Assessment Area: NC Gaston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units %	Count			Dollar		
		Count		Dollar			Bank	Agg	Bank	Agg		
#	%	\$ (000s)	\$ %	#	%	%					\$ (000s)	\$ %
HOME PURCHASE	Low	0	0.0%	0	0.0%	4.6%	0	0.0%	5.7%	0	0.0%	3.9%
	Moderate	0	0.0%	0	0.0%	37.0%	0	0.0%	39.0%	0	0.0%	33.4%
	Middle	0	0.0%	0	0.0%	38.3%	0	0.0%	35.8%	0	0.0%	36.5%
	Upper	0	0.0%	0	0.0%	19.1%	0	0.0%	18.6%	0	0.0%	25.4%
	Unknown	0	0.0%	0	0.0%	1.0%	0	0.0%	1.0%	0	0.0%	0.9%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
REFINANCE	Low	0	0.0%	0	0.0%	4.6%	0	0.0%	5.0%	0	0.0%	4.0%
	Moderate	0	0.0%	0	0.0%	37.0%	0	0.0%	37.1%	0	0.0%	33.6%
	Middle	1	100.0%	700	100.0%	38.3%	1	100.0%	38.4%	700	100.0%	38.2%
	Upper	0	0.0%	0	0.0%	19.1%	0	0.0%	18.0%	0	0.0%	22.8%
	Unknown	0	0.0%	0	0.0%	1.0%	0	0.0%	1.5%	0	0.0%	1.4%
	Total	1	100%	700	100%	100.0%	1	100%	100%	700	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	4.6%	0	0.0%	2.9%	0	0.0%	2.3%
	Moderate	0	0.0%	0	0.0%	37.0%	0	0.0%	28.4%	0	0.0%	23.4%
	Middle	0	0.0%	0	0.0%	38.3%	0	0.0%	39.4%	0	0.0%	37.6%
	Upper	0	0.0%	0	0.0%	19.1%	0	0.0%	27.6%	0	0.0%	34.5%
	Unknown	0	0.0%	0	0.0%	1.0%	0	0.0%	1.7%	0	0.0%	2.2%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	11.3%	0	0.0%	22.7%	0	0.0%	10.0%
	Moderate	0	0.0%	0	0.0%	41.5%	0	0.0%	45.5%	0	0.0%	42.5%
	Middle	0	0.0%	0	0.0%	35.3%	0	0.0%	22.7%	0	0.0%	22.8%
	Upper	0	0.0%	0	0.0%	9.1%	0	0.0%	9.1%	0	0.0%	24.7%
	Unknown	0	0.0%	0	0.0%	2.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	4.6%	0	0.0%	2.6%	0	0.0%	1.6%
	Moderate	0	0.0%	0	0.0%	37.0%	0	0.0%	23.5%	0	0.0%	21.6%
	Middle	0	0.0%	0	0.0%	38.3%	0	0.0%	42.0%	0	0.0%	38.2%
	Upper	0	0.0%	0	0.0%	19.1%	0	0.0%	30.4%	0	0.0%	37.7%
	Unknown	0	0.0%	0	0.0%	1.0%	0	0.0%	1.5%	0	0.0%	0.8%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: NC Gaston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Owner Occupied Units	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	4.6%	0	0.0%	7.1%	0	0.0%	5.8%
	Moderate	0	0.0%	0	0.0%	37.0%	0	0.0%	32.7%	0	0.0%	27.0%
	Middle	0	0.0%	0	0.0%	38.3%	0	0.0%	40.5%	0	0.0%	34.3%
	Upper	0	0.0%	0	0.0%	19.1%	0	0.0%	17.3%	0	0.0%	31.0%
	Unknown	0	0.0%	0	0.0%	1.0%	0	0.0%	2.4%	0	0.0%	1.9%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	4.6%	0	0.0%	6.7%	0	0.0%	3.4%
	Moderate	0	0.0%	0	0.0%	37.0%	0	0.0%	33.3%	0	0.0%	26.8%
	Middle	0	0.0%	0	0.0%	38.3%	0	0.0%	40.0%	0	0.0%	35.4%
	Upper	0	0.0%	0	0.0%	19.1%	0	0.0%	20.0%	0	0.0%	34.3%
	Unknown	0	0.0%	0	0.0%	1.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	4.6%	0	0.0%	5.2%	0	0.0%	4.1%
	Moderate	0	0.0%	0	0.0%	37.0%	0	0.0%	36.9%	0	0.0%	33.4%
	Middle	1	100.0%	700	100.0%	38.3%	1	100.0%	37.0%	700	100.0%	36.2%
	Upper	0	0.0%	0	0.0%	19.1%	0	0.0%	19.7%	0	0.0%	25.4%
	Unknown	0	0.0%	0	0.0%	1.0%	0	0.0%	1.2%	0	0.0%	1.0%
	Total	1	100%	700	100%	100.0%	1	100%	100%	700	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: NC Gaston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income %	Count			Dollar		
		Count		Dollar			#	%	%	Bank		Agg \$ %
#	%	\$ (000s)	\$ %	\$ (000s)	\$ %							
HOME PURCHASE	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	6.8%	0	0.0%	3.5%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	23.6%	0	0.0%	18.2%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	23.1%	0	0.0%	22.6%
	Upper	0	0.0%	0	0.0%	31.0%	0	0.0%	26.3%	0	0.0%	35.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	20.1%	0	0.0%	20.7%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
REFINANCE	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	13.2%	0	0.0%	7.2%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	20.8%	0	0.0%	16.6%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	19.9%	0	0.0%	19.1%
	Upper	1	100.0%	700	100.0%	31.0%	1	100.0%	19.1%	700	100.0%	23.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	27.0%	0	0.0%	33.2%
	Total	1	100%	700	100%	100.0%	1	100%	100%	700	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	9.4%	0	0.0%	6.7%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	23.0%	0	0.0%	15.8%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	26.4%	0	0.0%	21.6%
	Upper	0	0.0%	0	0.0%	31.0%	0	0.0%	35.8%	0	0.0%	49.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	5.5%	0	0.0%	6.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
MULTI FAMILY	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	0.0%	0	0.0%	0.0%
	Upper	0	0.0%	0	0.0%	31.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	100.0%	0	0.0%	100.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
OTHER PURPOSE LOC	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	9.5%	0	0.0%	5.2%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	16.2%	0	0.0%	10.5%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	29.4%	0	0.0%	22.7%
	Upper	0	0.0%	0	0.0%	31.0%	0	0.0%	38.1%	0	0.0%	55.5%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	6.7%	0	0.0%	6.1%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: NC Gaston

PRODUCT TYPE	Borrower Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank				Families by Family Income	Count			Dollar		
		Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ (000s)	\$ %	\$ %		
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	16.1%	0	0.0%	10.3%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	20.8%	0	0.0%	12.3%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	22.0%	0	0.0%	20.2%
	Upper	0	0.0%	0	0.0%	31.0%	0	0.0%	23.8%	0	0.0%	34.2%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	17.3%	0	0.0%	23.0%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
PURPOSE NOT APPLICABLE	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	6.7%	0	0.0%	9.5%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	6.7%	0	0.0%	25.4%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	13.3%	0	0.0%	8.9%
	Upper	0	0.0%	0	0.0%	31.0%	0	0.0%	0.0%	0	0.0%	0.0%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	73.3%	0	0.0%	56.2%
	Total	0	0.0%	0	0.0%	100.0%	0	0.0%	100%	0	0.0%	100%
HMDA TOTALS	Low	0	0.0%	0	0.0%	27.5%	0	0.0%	8.8%	0	0.0%	4.2%
	Moderate	0	0.0%	0	0.0%	19.8%	0	0.0%	22.4%	0	0.0%	16.8%
	Middle	0	0.0%	0	0.0%	21.7%	0	0.0%	22.9%	0	0.0%	20.7%
	Upper	1	100.0%	700	100.0%	31.0%	1	100.0%	25.8%	700	100.0%	31.9%
	Unknown	0	0.0%	0	0.0%	0.0%	0	0.0%	20.1%	0	0.0%	26.5%
	Total	1	100%	700	100%	100.0%	1	100%	100%	700	100%	100%

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES
Geographic Distribution of Small Business & Small Farm Loans

Assessment Area: NC Gaston

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data					Bank & Aggregate Lending					
		2024					2024					
		Bank		Total		Businesses	Count			Dollar		
		Count	Dollar	Count	Dollar		Bank	Agg		Bank	Agg	
		#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %
SMALL BUSINESSES	Low	4	12.1%	575	10.4%	10.4%	4	12.1%	7.7%	575	10.4%	12.0%
	Moderate	17	51.5%	3,360	60.8%	36.3%	17	51.5%	32.5%	3,360	60.8%	33.9%
	Middle	5	15.2%	1,115	20.2%	32.2%	5	15.2%	35.5%	1,115	20.2%	29.8%
	Upper	3	9.1%	155	2.8%	15.7%	3	9.1%	20.1%	155	2.8%	18.3%
	Unknown	4	12.1%	323	5.8%	5.4%	4	12.1%	3.8%	323	5.8%	5.9%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.4%	0	0.0%	0.1%
	<i>Total</i>	<i>33</i>	<i>100%</i>	<i>5,528</i>	<i>100%</i>	<i>100.0%</i>	<i>33</i>	<i>100%</i>	<i>100%</i>	<i>5,528</i>	<i>100%</i>	<i>100%</i>
SMALL FARM		Total Farms										
	Low	0	0.0%	0	0.0%	5.3%	0	0.0%	0.0%	0	0.0%	0.0%
	Moderate	0	0.0%	0	0.0%	35.1%	0	0.0%	24.1%	0	0.0%	25.7%
	Middle	0	0.0%	0	0.0%	40.4%	0	0.0%	58.6%	0	0.0%	63.3%
	Upper	0	0.0%	0	0.0%	17.5%	0	0.0%	17.2%	0	0.0%	11.0%
	Unknown	0	0.0%	0	0.0%	1.8%	0	0.0%	0.0%	0	0.0%	0.0%
	Tr Unknown	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100.0%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX E: LIMITED SCOPE ASSESSMENT AREA LENDING ANALYSIS TABLES

Small Business & Small Farm Lending By Revenue & Loan Size

Assessment Area: NC Gaston

PRODUCT TYPE			Bank Lending & Demographic Data					Bank & Aggregate Lending					
			2024					2024					
			Bank				Total Businesses	Count			Dollar		
			Count		Dollar			Bank		Agg	Bank		Agg
#	%	\$ (000s)	\$ %	%	#	%	%	\$ 000s	\$ %	\$ %			
SMALL BUSINESS	Revenue	\$1 Million or Less	15	45.5%	2,654	48.0%	91.4%	15	45.5%	55.8%	2,654	48.0%	31.5%
		Over \$1 Million	18	54.5%	2,874	52.0%	7.6%	18	54.5%		2,874	52.0%	
		Total Rev. available	33	100.0%	5,528	100.0%	99.0%	33	100.0%		5,528	100.0%	
		Rev. Not Known	0	0.0%	0	0.0%	1.0%	0	0.0%		0	0.0%	
		Total	33	100%	5,528	100%	100%	33	100%		5,528	100%	
	Loan Size	\$100,000 or Less	15	45.5%	838	15.2%		15	45.5%	93.9%	838	15.2%	37.4%
		\$100,001 - \$250,000	13	39.4%	2,447	44.3%		13	39.4%	3.2%	2,447	44.3%	16.3%
		\$250,001 - \$1 Million	5	15.2%	2,243	40.6%		5	15.2%	2.9%	2,243	40.6%	46.4%
		Total	33	100%	5,528	100%		33	100%	100%	5,528	100%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	7	46.7%	339	12.8%		7	46.7%		339	12.8%	
		\$100,001 - \$250,000	5	33.3%	922	34.7%		5	33.3%		922	34.7%	
		\$250,001 - \$1 Million	3	20.0%	1,393	52.5%		3	20.0%		1,393	52.5%	
		Total	15	100%	2,654	100%		15	100%		2,654	100%	
SMALL FARM	Revenue	\$1 Million or Less	0	0.0%	0	0.0%	Total Farms 100.0%	0	0.0%	58.6%	0	0.0%	46.3%
		Over \$1 Million	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%	
		Total Rev. available	0	0.0%	0	0.0%	100.0%	0	0.0%		0	0.0%	
		Not Known	0	0.0%	0	0.0%	0.0%	0	0.0%		0	0.0%	
		Total	0	0.0%	0	0.0%	100%	0	0.0%		0	0.0%	
	Loan Size	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%	100.0%	0	0.0%	100.0%
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%	0.0%	0	0.0%	0.0%
		Total	0	0.0%	0	0.0%		0	0.0%	100%	0	0.0%	100%
	Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$100,001 - \$250,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		\$250,001 - \$500,000	0	0.0%	0	0.0%		0	0.0%		0	0.0%	
		Total	0	0.0%	0	0.0%		0	0.0%		0	0.0%	

Originations & Purchases

Aggregate data is unavailable for loans to businesses/farms with revenue over \$1 million or revenue unknown, and for loan size by revenue

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

APPENDIX F: DEFINITIONS AND GENERAL INFORMATION

Definitions

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

Rounding Convention

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

General Information

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

This document is an evaluation of the CRA performance of Commercial Bank prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of **October 6, 2025**. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX G: 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/AA.

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

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

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

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

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

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

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

APPENDIX G: GLOSSARY (Continued)

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

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

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

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

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

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

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

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

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

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

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

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

APPENDIX G: GLOSSARY (Continued)

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

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

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

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

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

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