

PUBLIC DISCLOSURE

September 6, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

**Simmons Bank
RSSD #663245**

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

Federal Reserve Bank of St. Louis

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

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

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INSTITUTION'S CRA RATING

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

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

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

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

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

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

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INSTITUTION

DESCRIPTION OF INSTITUTION

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

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

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

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

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

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purposes in instances where contiguous MSA or nonMSA assessment areas shared similar economic and demographic characteristics. The composition of each assessment area, including assessment areas that were combined, is detailed in the *General Demographics* section for each separate assessment area.

For this review period, no legal impediments or financial constraints were identified that would have hindered the bank from serving the credit needs of its customers, and the bank is considered capable of meeting the credit needs of its assessment areas based on its available resources and financial products. As of June 30, 2022, the bank reported total assets of \$27.2 billion. As of the same date, loans and leases outstanding were \$15.1 billion (55.8 percent of total assets), and deposits totaled \$22.2 billion. The bank's loan portfolio composition by credit category is displayed in the following table.

| Distribution of Total Loans as of June 30, 2022 | | |
|--|-------------------------|----------------------------------|
| Credit Category | Amount \$ (000s) | Percentage of Total Loans |
| Construction and Development | \$2,064,871 | 13.6% |
| Commercial Real Estate | \$6,132,151 | 40.5% |
| Multifamily Residential | \$530,194 | 3.5% |
| 1–4 Family Residential | \$2,354,198 | 15.5% |
| Farmland | \$470,210 | 3.1% |
| Farm Loans | \$219,157 | 1.5% |
| Commercial and Industrial | \$2,592,034 | 17.1% |
| Loans to Individuals | \$295,375 | 2.0% |
| Total Other Loans | \$490,602 | 3.2% |
| TOTAL | \$15,148,792 | 100% |

As indicated by the above table, a significant portion of the bank's lending resources is directed to commercial real estate loans, commercial and industrial loans, and loans secured by 1–4 family residential properties. The bank also originates and subsequently sells a significant volume of loans related to residential real estate. As these loans are sold on the secondary market shortly after origination, this activity would not be captured in the table. The bank originated and sold 5,428 loans in 2020; 4,303 in 2021; and 2,167 from January 1, 2022 through September 5, 2022.

While farmland and farm loans do not represent a significant portion of the bank's loan portfolio by dollar volume, these products are nevertheless an important product line in several of the bank's assessment areas and are thus included for review where applicable.

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

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SCOPE OF EXAMINATION

The bank's CRA performance was reviewed using the Federal Financial Institutions Examination Council's (FFIEC's) Interagency Large Institution CRA Examination Procedures. The large bank performance standards consist of three tests: Lending, Investment, and Service. The bank's performance under these tests is rated at the institution, multistate MSA, and state levels. The bank maintains operations in six states and one multistate MSA and received a rating for each of these areas as well as an overall institution rating. The following table details the number of branch offices, breakdown of deposits, and the CRA review procedures applicable to each rated area completed as part of this evaluation. Deposit information in the following table, as well as deposit information throughout this evaluation, is taken from the Federal Deposit Insurance Corporation (FDIC) Deposit Market Share Report data as of June 30, 2021, except where otherwise noted.

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

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

The bank's overall institution rating is a composite of these seven rated areas, which are weighted based on the significance of the bank's operations in each area. Based on the bank's branch structure and loan and deposit activity, primary emphasis (in order of significance) was placed on performance in Arkansas, Tennessee, and Missouri, with the other rated areas receiving less weight toward the overall institution rating. As shown in the table above, Arkansas, Tennessee, and Missouri account for a combined 65.7 percent of the bank's total branches and 73.0 percent of total deposits.

To augment this evaluation, 38 community contact interviews were utilized. These interviews helped to ascertain certain economic and demographic conditions, as well as credit needs and opportunities, in the bank's assessment areas and provided context with which to evaluate the bank's responsiveness to these credit needs. Key details from these community contact interviews are included in the *Description of Assessment Area* section applicable to the assessment area for which they were utilized.

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Lending Test

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

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

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

As detailed in the preceding table, HMDA, small business, and small farm loans (in some markets) were used to evaluate the bank's lending performance, as these loans are considered the bank's core business lines based on lending volume and the bank's business strategy. The weighting given to each product when evaluating the bank's lending performance varied based on loan demand, credit needs, and the bank's business strategy and is discussed at the rated area and assessment area level. In assessment areas in which the Lending Test analysis includes lending activity from both 2019 and 2020, equal emphasis is placed on performance in each year.

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

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

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

² This criterion is applicable at the institution level only.

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Lending Test analyses often entail comparisons of bank performance to assessment area demographics and the performance of other lenders based on HMDA and CRA aggregate lending data. Unless otherwise noted, assessment area demographics are based on 2015 American Community Survey (ACS) data; certain business and farm demographics are based on Dun & Bradstreet data applicable to the year of bank lending activity being considered. When analyzing bank performance by comparing lending activity to both demographic data and aggregate lending data, greater emphasis is generally placed on the aggregate lending data, because it is expected to describe many factors impacting lenders within an assessment area. Aggregate lending datasets are also updated annually and are, therefore, expected to predict more relevant comparisons.

Investment Test

All community development investments made since the bank's previous CRA evaluation through June 30, 2022, were reviewed, including grants and donations. In addition, investments made prior to the date of the previous CRA evaluation, but still outstanding as of June 30, 2022, were also considered. Qualified investments and grants were evaluated to determine the bank's overall level of activity, use of innovative and/or complex investments, and responsiveness to the credit and community development needs of the bank's assessment areas.

Service Test

The review period for retail and community development services includes activity from the date of the bank's previous CRA evaluation through June 30, 2022. The Service Test considers the following criteria:

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

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

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

| Rated Area | Lending Test Rating |
|----------------------------|-------------------------|
| Arkansas | High Satisfactory |
| Tennessee | Low Satisfactory |
| Missouri | High Satisfactory |
| Oklahoma | Low Satisfactory |
| Texas | Low Satisfactory |
| Kansas | Low Satisfactory |
| Kansas City Multistate MSA | Low Satisfactory |
| OVERALL | LOW SATISFACTORY |

Lending Activity

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

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

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Assessment Area Concentration

For the loan activity reviewed as part of this evaluation, the following table displays the number and dollar volume of loans originated inside and outside the bank's assessment areas for 2019 and 2020, combined.

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

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

Geographic and Borrower Distribution

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

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

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

| Rated Area | Loan Distribution by Borrower's Profile |
|----------------------------|---|
| Arkansas | Good |
| Tennessee | Good |
| Missouri | Good |
| Oklahoma | Adequate |
| Texas | Adequate |
| Kansas | Adequate |
| Kansas City Multistate MSA | Adequate |
| OVERALL | GOOD |

Community Development Lending Activities

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

| Rated Area | Community Development Lending |
|----------------------------|-------------------------------|
| Arkansas | Leader in Making |
| Tennessee | Adequate Level |
| Missouri | Relatively High Level |
| Oklahoma | Adequate Level |
| Texas | Relatively High Level |
| Kansas | Adequate Level |
| Kansas City Multistate MSA | Low Level |
| OVERALL | ADEQUATE LEVEL |

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

As the bank met the community development lending needs of its own assessment areas, consideration was also given to community development loans made outside of the bank's rated areas.³ As a result, the bank also received credit for two community development loans totaling

³ Community development loans made outside of the bank's assessment areas but within one of the bank's rated areas are discussed under the *Community Development Lending* write-up for each applicable rated area.

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

Product Innovation

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

Consumer Real Estate

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

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

Consumer Non-Real Estate

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

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

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

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

Small Business

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

PPP Lending

PPP loans are available to businesses with fewer than 500 employees or businesses that meet SBA industry size standards. The program provides funds for payroll costs and other operational costs to businesses impacted by the pandemic and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. The bank took quick, extensive measures to put new systems and processes in place to offer these loans. From 2020 through 2021, the bank originated 7,453 PPP loans totaling over \$970.0 million across the nation, with a significant majority of these loans originated in its assessment areas. As previously discussed in the *Community Development Lending Activities* section, a portion of these loans also received credit as qualified community development loans.

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INVESTMENT TEST

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

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

During the review period, the bank made total investment and grants of \$321.1 million and total donations of \$1.9 million. Of the bank's total qualified investments, \$207.0 million were made during the current review period, while \$114.1 million were made prior to this review period but were still outstanding as of the start date of this evaluation. The bank's investment and grant activity consisted primarily of mortgage-backed securities (MBS), which are investments in pools of loans made up of affordable housing loans to LMI borrowers, and municipal bonds, which benefitted schools or infrastructure projects in LMI areas in the bank's assessment areas.

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

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

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SERVICE TEST

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

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

The bank's delivery systems are accessible to geographies and individuals of different income levels throughout the combined assessment areas. In addition, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies or individuals. Furthermore, services do not vary in a way that inconveniences the needs of its assessment area, particularly LMI geographies or individuals. Lastly, the bank provides a relatively high level of community development services within the combined assessment areas.

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

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

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

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KANSAS CITY, MISSOURI-KANSAS MULTISTATE MSA

CRA RATING FOR THE KANSAS CITY MULTISTATE MSA: SATISFACTORY⁴

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

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

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

SCOPE OF EXAMINATION

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

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

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

The Kansas City assessment area was reviewed under full-scope examination procedures and included information obtained from one community contact. This interview was used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from the community contact interview is included in the next section.

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

Bank Structure

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

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

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

General Demographics

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

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

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

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

Income and Wealth Demographics

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

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

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

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

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

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

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

Housing Demographics

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

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

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

LENDING TEST

The bank's Lending Test performance in the Kansas City assessment area is rated low satisfactory. The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. The bank makes a low level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|------------|---------------|---------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 0 | 0.0% | 0 | 0.0% |
| Home Purchase | 28 | 13.2% | 6,771 | 18.5% |
| Multifamily Housing | 1 | 0.5% | 448 | 1.2% |
| Refinancing | 28 | 13.2% | 4,259 | 11.6% |
| Other Purpose Line of Credit (LOC) | 7 | 3.3% | 371 | 1.0% |
| Other Purpose Closed/Exempt | 1 | 0.5% | 120 | 0.3% |
| Total HMDA | 65 | 30.7% | 11,969 | 32.7% |
| Small Business | 145 | 68.4% | 24,519 | 67.0% |
| Small Farm | 2 | 0.9% | 129 | 0.4% |
| TOTAL LOANS | 212 | 100.0% | 36,617 | 100.0% |

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

Geographic Distribution of Loans

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

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HMDA Lending

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

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

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

Small Business Lending

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

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

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

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

Loan Distribution by Borrower's Profile

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

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HMDA Lending

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

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

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

Small Business Lending

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

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

Community Development Lending Activities

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

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INVESTMENT TEST

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

The bank operates two full-service branches in the Kansas City assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|------------------------|-----------|---------|--------|----------|-------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 1 | 0 | 1 | 0 | 2 |
| | 0.0% | 50.0% | 0.0% | 50.0% | 0.0% | 100% |
| Census Tracts | 15.5% | 20.1% | 29.2% | 32.2% | 3.0% | 100% |
| Household Population | 10.2% | 20.5% | 33.4% | 35.5% | 0.4% | 100% |

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

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Kansas City Multistate MSA

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Changes in Branch Locations

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

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

Community Development Services

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

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Arkansas

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ARKANSAS

CRA RATING FOR ARKANSAS: SATISFACTORY

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

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

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

SCOPE OF EXAMINATION

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

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Arkansas

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

To augment the evaluation of the four full-scope assessment areas, 13 community contact interviews were referenced. These interviews were used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from the interviews are included in the *Description of Institution's Operations* sections applicable to the assessment areas in which the community contacts were made.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ARKANSAS

The bank operates 64 branches throughout the seven CRA assessment areas in Arkansas. The following table gives additional detail regarding the bank's Arkansas operations.

| Review Area | Branches # | Branches % | Deposits \$ 000s (as of 6/30/21) | Deposits % | CRA Review Procedures |
|--|------------|-------------|-------------------------------------|-------------|--------------------------|
| Little Rock-North Little Rock-Conway MSA | 19 | 29.7% | \$2,285,224 | 33.5% | Full-Scope |
| Arkansas nonMSA Statewide Area | 17 | 26.6% | \$1,051,264 | 15.4% | Full-Scope |
| Pine Bluff MSA | 8 | 12.5% | \$2,062,214 | 30.2% | Full-Scope |
| Fayetteville-Springdale Rogers MSA | 8 | 12.5% | \$452,534 | 6.6% | Full-Scope |
| Fort Smith MSA | 5 | 7.8% | \$256,529 | 3.7% | Limited-Scope |
| Hot Springs MSA | 3 | 4.7% | \$257,710 | 3.8% | Limited-Scope |
| Jonesboro Combined Statistical Area (CSA) | 4 | 6.3% | \$461,636 | 6.8% | Limited-Scope |
| OVERALL | 64 | 100% | \$6,827,111 | 100% | 4 Full-Scope |

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

Simmons Bank
Pine Bluff, Arkansas

Arkansas

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ARKANSAS

LENDING TEST

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

Lending Activity

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

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

The bank's Arkansas lending levels reflect excellent responsiveness to assessment area credit needs based on loan activity analyzed under the Lending Test. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each area. Performance in the limited scope assessment areas was below those in the full scope areas but still was not considered less than satisfactory.

Geographic and Borrower Distribution

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

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

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

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

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

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

Community Development Lending Activities

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

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

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

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

INVESTMENT TEST

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

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

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

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

SERVICE TEST

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

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Accessibility of Delivery Systems

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

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

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

Changes in Branch Locations

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

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

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

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the Arkansas assessment areas, particularly LMI geographies and individuals, as displayed in the following tables.

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

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

Community Development Services

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

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

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

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

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Pine Bluff, Arkansas

Fayetteville MSA

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FAYETTEVILLE-SPRINGDALE-ROGERS, ARKANSAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FAYETTEVILLE ASSESSMENT AREA

Bank Structure

The bank operates eight branches in the Fayetteville assessment area, representing 3.5 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Locations by Census Tract Income Level | | | |
|--|------------------------|----------------------|---------------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| 0 | 0 | 5 | 3 |

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

General Demographics

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

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

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

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Fayetteville MSA

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Income and Wealth Demographics

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

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

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

Based on 2015 ACS data, the median family income for the assessment area is \$61,497, which exceeds the median family income for the state of Arkansas as a whole (\$51,782). More recently, the FFIEC estimated the median family income for the Fayetteville MSA to be \$66,400 in 2019 and \$69,000 in 2020. The following table compares the population of assessment area families by income level to the state of Arkansas.

| Family Population by Income Level | | | | |
|--|------------------------|-------------|-----------------|-------------|
| | Assessment Area | | Arkansas | |
| Low | 22,813 | 19.9% | 164,346 | 21.6% |
| Moderate | 21,158 | 18.5% | 134,818 | 17.7% |
| Middle | 23,272 | 20.3% | 149,580 | 19.7% |
| Upper | 47,177 | 41.2% | 311,180 | 41.0% |
| TOTAL | 114,420 | 100% | 759,924 | 100% |

When compared to the previous table, the information in the table above shows that a much larger percentage of families in the assessment area are LMI (38.4 percent) than reside in LMI geographies (21.0 percent). While the percentage of low-income families in the assessment area is slightly lower than state levels, the percentage of moderate-income families is slightly higher. Overall, the poverty level in the Fayetteville assessment area (10.9 percent) is below the statewide figure (14.3 percent). However, poverty levels are much higher in Washington County (13.4 percent) than Benton County (8.9 percent). Overall, when considering income and poverty levels, the Fayetteville assessment area is slightly more affluent than the state of Arkansas as a whole.

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Housing Demographics

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

| Housing Demographics | | | |
|-----------------------------|-----------------------------|----------------------------|------------------------------------|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) |
| Assessment Area | \$151,265 | 33.2% | \$746 |
| Arkansas | \$111,400 | 37.1% | \$677 |

Housing costs in the assessment area are higher than the state of Arkansas when adjusting for income levels. While median family income levels in the assessment area are higher than statewide levels, median housing values are also higher in the assessment area. There is also considerable difference between the two counties that comprise the Fayetteville assessment area. While median housing values are similar in each county, relative to incomes, Benton County has a much higher affordability ratio (37.3 percent) than Washington County (28.7 percent). Additionally, median gross rents for both counties (\$796 for Benton County and \$704 for Washington County) exceed the median gross rent for Arkansas. Thus, housing is less affordable in the assessment area than the state overall.

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect good responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank makes an adequate level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 31 | 1.8% | 2,183 | 0.8% |
| Home Purchase | 408 | 23.1% | 91,991 | 34.1% |
| Multifamily Housing | 4 | 0.2% | 5,633 | 2.1% |
| Refinancing | 204 | 11.6% | 42,498 | 15.8% |
| Other Purpose LOC | 19 | 1.1% | 826 | 0.3% |
| Other Purpose Closed/Exempt | 12 | 0.7% | 1,579 | 0.6% |
| Total HMDA | 678 | 38.4% | 144,710 | 53.7% |
| Small Business | 1,019 | 57.7% | 118,854 | 44.1% |
| Small Farm | 69 | 3.9% | 5,872 | 2.2% |
| TOTAL LOANS | 1,766 | 100.0% | 269,436 | 100.0% |

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

Geographic Distribution of Loans

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

HMDA Lending

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

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

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

Small Business Lending

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

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

Small Farm Lending

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

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

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

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

Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

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

Small Business Lending

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

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Pine Bluff, Arkansas

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Small Farm Lending

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

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

Community Development Lending Activities

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

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

INVESTMENT TEST

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

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

SERVICE TEST

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

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Pine Bluff, Arkansas

Fayetteville MSA

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Accessibility of Delivery Systems

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

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

The bank does not operate any branches in low- or moderate-income geographies in the assessment area. However, five of its branches are located less than one mile from the nearest LMI census tract. Based on its branch structure and other service delivery systems, such as online and mobile banking, the bank's service delivery systems are reasonably accessible to geographies and individuals of different income levels.

Changes in Branch Locations

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

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

Community Development Services

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

Simmons Bank
Pine Bluff, Arkansas

Little Rock MSA

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LITTLE ROCK-NORTH LITTLE ROCK-CONWAY, ARKANSAS MSA

(Full-Scope Review)

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

Bank Structure

The bank operates 19 branches in the Little Rock assessment area, representing 8.3 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Locations by Census Tract Income Level | | | |
|---|-----------------|---------------|--------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| 1 | 2 | 6 | 10 |

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

General Demographics

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

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

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

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Income and Wealth Demographics

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

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

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

Based on 2015 ACS data, the median family income for the assessment area is \$60,806, which exceeds the median family income for the state of Arkansas as a whole (\$51,782). More recently, the FFIEC estimates the median family income for the Little Rock MSA to be \$69,800 in 2019 and \$72,300 in 2020. The following table compares the population of assessment area families by income level to the state of Arkansas.

| Family Population by Income Level | | | | |
|--|------------------------|-------------|-----------------|-------------|
| | Assessment Area | | Arkansas | |
| Low | 40,082 | 20.9% | 164,346 | 21.6% |
| Moderate | 32,687 | 17.0% | 134,818 | 17.7% |
| Middle | 37,760 | 19.7% | 149,580 | 19.7% |
| Upper | 81,595 | 42.5% | 311,180 | 41.0% |
| TOTAL | 191,647 | 100% | 759,924 | 100% |

When compared to the previous table, the information in the table above shows that a much larger percentage of families in the assessment area are LMI (37.9 percent) than reside in LMI geographies (20.0 percent). As shown in the preceding table, the distribution of families by income level in the assessment area is closely aligned with the state of Arkansas. Overall, the poverty level in the Little Rock assessment area (10.9 percent) was below the statewide figure (14.3 percent). However, poverty levels are higher in White County, at 14.8 percent. When considering income and poverty levels, the Little Rock assessment area is slightly more affluent than the state of Arkansas as a whole.

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Housing Demographics

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

| Housing Demographics | | | |
|-----------------------------|-----------------------------|----------------------------|------------------------------------|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) |
| Assessment Area | \$137,950 | 35.2% | \$759 |
| Arkansas | \$111,400 | 37.1% | \$677 |

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

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

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

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank is a leader in making community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity | | | | |
|--|--------------|---------------|------------------|---------------|
| January 1, 2019 through December 31, 2020 | | | | |
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 86 | 1.7% | 5,278 | 0.6% |
| Home Purchase | 1,365 | 26.2% | 281,964 | 33.2% |
| Multifamily Housing | 2 | 0.0% | 1,163 | 0.1% |
| Refinancing | 875 | 16.8% | 194,520 | 22.9% |
| Other Purpose LOC | 48 | 0.9% | 2,429 | 0.3% |
| Other Purpose Closed/Exempt | 46 | 0.9% | 7,775 | 0.9% |
| Total HMDA | 2,422 | 46.5% | 493,129 | 58.0% |
| Small Business | 2,624 | 50.4% | 342,810 | 40.3% |
| Small Farm | 158 | 3.0% | 14,268 | 1.7% |
| TOTAL LOANS | 5,204 | 100.0% | 850,207 | 100.0% |

The bank's lending activity in the assessment area represents 15.1 percent of total 2019 and 2020 HMDA and CRA loans made in the bank's combined assessment areas. By comparison, the bank operates 8.3 percent of its total branches and, as of June 30, 2020, holds 11.1 percent of total bank deposits in the assessment area. Considering the level of loans originated in the assessment area relative to the percentage of deposits held, and the level of lending compared to other banks operating in the market, the bank's lending activity reflects excellent responsiveness to assessment area credit needs.

Geographic Distribution of Loans

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

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HMDA Lending

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

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

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

Small Business Lending

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

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

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

Small Farm Lending

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

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

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

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

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

Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

Small Business Lending

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

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Small Farm Lending

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

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

Community Development Lending Activities

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

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

INVESTMENT TEST

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

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

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SERVICE TEST

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

Accessibility of Delivery Systems

The bank operates 19 branches in the Little Rock assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 1 | 2 | 6 | 10 | 0 | 19 |
| | 5.3% | 10.5% | 31.6% | 52.6% | 0.0% | 100% |
| Census Tracts | 6.5% | 22.4% | 37.7% | 32.4% | 1.2% | 100% |
| Household Population | 3.3% | 16.7% | 40.9% | 38.8% | 0.4% | 100% |

The bank operates three, or 15.8 percent, of its branches in the Little Rock assessment area in LMI geographies. By comparison, 28.9 percent of geographies in the assessment area are LMI, and 20.0 percent of households reside in LMI geographies. Of the bank's branches in middle- and upper-income census tracts, eight are within one mile of LMI geographies and are accessible to residents of those census tracts. Based on its branch structure and additional delivery systems such as online and mobile banking, the bank's service delivery systems are accessible to geographies and individuals of different income levels throughout the assessment area.

Changes in Branch Locations

As mentioned previously, the bank closed three branches in middle-income census tracts and four branches in upper-income census tracts during the review period. However, several branches remain throughout the assessment area, with many located in or within close proximity to LMI geographies. Therefore, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to LMI geographies and individuals.

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Saturday hours are offered at 14 locations, while 18 locations offer extended Friday hours, including all three of the branches in LMI census tracts.

Community Development Services

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

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PINE BLUFF, ARKANSAS MSA

(Full-Scope Review)

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

Bank Structure

The bank operates eight branches in the Pine Bluff assessment area, representing 3.5 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Locations by Census Tract Income Level | | | |
|--|------------------------|----------------------|---------------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income |
| 0 | 2 | 4 | 2 |

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

General Demographics

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

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

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

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Income and Wealth Demographics

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

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

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

Based on 2015 ACS data, the median family income for the assessment area is \$47,412, which is below the median family income for the state of Arkansas as a whole (\$51,782). More recently, the FFIEC estimates the median family income for the Pine Bluff MSA to be \$51,000 in 2019 and \$52,600 in 2020. The following table compares the population of assessment area families by income level to the state of Arkansas.

| Family Population by Income Level | | | | |
|--|------------------------|-------------|-----------------|-------------|
| | Assessment Area | | Arkansas | |
| Low | 5,091 | 25.1% | 164,346 | 21.6% |
| Moderate | 3,076 | 15.2% | 134,818 | 17.7% |
| Middle | 3,635 | 17.9% | 149,580 | 19.7% |
| Upper | 8,498 | 41.9% | 311,180 | 41.0% |
| TOTAL | 20,300 | 100% | 759,924 | 100% |

When compared to the previous table, the information in the table above shows that a much larger percentage of families in the assessment area are LMI (40.3 percent) than reside in LMI geographies (21.7 percent). As shown in the table, the percentage of low-income families in the assessment area (25.1 percent) is greater than that of the state of Arkansas (21.6 percent). Additionally, the poverty level in the Pine Bluff assessment area (19.9 percent) is much higher than the statewide figure (14.3 percent). As indicated by a community contact, chronic disinvestment in the area has led to declining job opportunities and wages. Therefore, when considering income and poverty levels, the Pine Bluff assessment area is less affluent than the state of Arkansas as a whole.

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Housing Demographics

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

| Housing Demographics | | | |
|-----------------------------|-----------------------------|----------------------------|------------------------------------|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) |
| Assessment Area | \$79,148 | 45.6% | \$663 |
| Arkansas | \$111,400 | 37.1% | \$677 |

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

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

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

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income or revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank makes a relatively high level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 13 | 1.0% | 861 | 0.7% |
| Home Purchase | 152 | 11.9% | 16,270 | 13.5% |
| Refinancing | 72 | 5.6% | 13,854 | 11.5% |
| Other Purpose LOC | 5 | 0.4% | 320 | 0.3% |
| Other Purpose Closed/Exempt | 10 | 0.8% | 1,306 | 1.1% |
| Total HMDA | 252 | 19.7% | 32,611 | 27.1% |
| Small Business | 764 | 59.8% | 58,301 | 48.4% |
| Small Farm | 261 | 20.4% | 29,487 | 24.5% |
| TOTAL LOANS | 1,277 | 100.0% | 120,399 | 100.0% |

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

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Geographic Distribution of Loans

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

HMDA Lending

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

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

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

Small Business Lending

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

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

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

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Small Farm Lending

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

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

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

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

Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

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

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Small Business Lending

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

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

Small Farm Lending

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

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

Community Development Lending Activities

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

INVESTMENT TEST

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

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

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SERVICE TEST

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

Accessibility of Delivery Systems

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

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

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

Changes in Branch Locations

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

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

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Community Development Services

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

Simmons Bank
Pine Bluff, Arkansas

Fort Smith MSA

CRA Performance Evaluation
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FORT SMITH, ARKANSAS-OKLAHOMA MSA

(Limited-Scope Review)

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

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

| Assessment Area Demographics by Geography Income Level | | | | | | |
|--|------------------------|-----------|---------|--------|----------|---------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Census Tracts | 0 | 11 | 19 | 10 | 0 | 40 |
| | 0.0% | 27.5% | 47.5% | 25.0% | 0.0% | 100% |
| Family Population | 0 | 11,045 | 29,731 | 14,182 | 0 | 54,958 |
| | 0.0% | 20.1% | 54.1% | 25.8% | 0.0% | 100% |
| Household Population | 0 | 18,347 | 41,258 | 20,407 | 0 | 80,012 |
| | 0.0% | 22.9% | 51.6% | 25.5% | 0.0% | 100% |
| Business Institutions | 0 | 1,961 | 3,134 | 1,980 | 0 | 7,075 |
| | 0.0% | 27.7% | 44.3% | 28.0% | 0.0% | 100% |
| Agricultural Institutions | 0 | 8 | 81 | 38 | 0 | 127 |
| | 0.0% | 6.3% | 63.8% | 29.9% | 0.0% | 100% |

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

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Pine Bluff, Arkansas

Fort Smith MSA

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

LENDING TEST

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

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

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

INVESTMENT TEST

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

SERVICE TEST

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

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

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

Simmons Bank
Pine Bluff, Arkansas

Fort Smith MSA

CRA Performance Evaluation
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HOT SPRINGS, ARKANSAS MSA

(Limited-Scope Review)

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

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

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

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

Simmons Bank
Pine Bluff, Arkansas

Hot Springs MSA

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

LENDING TEST

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

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

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

INVESTMENT TEST

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

SERVICE TEST

The bank's performance in this assessment area is below the service test performance in the state of Arkansas, as detailed in the following table.

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

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

Simmons Bank
Pine Bluff, Arkansas

Jonesboro CSA

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JONESBORO, ARKANSAS CSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JONESBORO ASSESSMENT AREA

The Jonesboro assessment area is composed of the entirety of the Jonesboro-Paragould, Arkansas CSA, which includes Craighead, Poinsett, and Greene counties. The bank operates four full-service branches in the assessment area. The bank did not open or close any branches in the assessment area during the review period. The tables below detail key demographics relating to the Jonesboro CSA.

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

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

Simmons Bank
Pine Bluff, Arkansas

Jonesboro CSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JONESBORO ASSESSMENT AREA

LENDING TEST

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

| Lending Test Criteria | Performance |
|---|--------------|
| Lending Activity | Below |
| Geographic Distribution of Loans | Consistent |
| Distribution of Loans by Borrower's Profile | Consistent |
| Community Development Lending Activities | Below |
| OVERALL | BELOW |

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

INVESTMENT TEST

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

SERVICE TEST

The bank's performance in this assessment area is consistent the service test performance in the state of Arkansas, as detailed in the following table.

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

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

Simmons Bank
Pine Bluff, Arkansas

NonMSA Arkansas

CRA Performance Evaluation
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ARKANSAS NONMETROPOLITAN STATEWIDE AREA

(Full-Scope Review)

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

Bank Structure

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

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

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

General Demographics

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

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

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

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NonMSA Arkansas

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

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

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

Income and Wealth Demographics

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

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

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

Simmons Bank
Pine Bluff, Arkansas

NonMSA Arkansas

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

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

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

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

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

Housing Demographics

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

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

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

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

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

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

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income and revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank is a leader in making community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 45 | 1.4% | 1,544 | 0.6% |
| Home Purchase | 325 | 10.0% | 38,571 | 13.8% |
| Multifamily Housing | 2 | 0.1% | 1,157 | 0.4% |
| Refinancing | 211 | 6.5% | 25,602 | 9.2% |
| Other Purpose LOC | 30 | 0.9% | 1,295 | 0.5% |
| Other Purpose Closed/Exempt | 20 | 0.6% | 1,567 | 0.6% |
| Total HMDA | 633 | 19.5% | 69,736 | 25.0% |
| Small Business | 1,851 | 57.1% | 141,604 | 50.7% |
| Small Farm | 758 | 23.4% | 67,838 | 24.3% |
| TOTAL LOANS | 3,242 | 100.0% | 279,178 | 100.0% |

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

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Geographic Distribution of Loans

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

HMDA Lending

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

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

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

Small Business Lending

The geographic distribution of small business loans is good.

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

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

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Small Farm Lending

Small farm lending in LMI geographies is good.

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

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

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

Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

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

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

Small Business Lending

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

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

Small Farm Lending

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

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

Community Development Lending Activities

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

INVESTMENT TEST

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

The bank operates 17 branches in nonMSA Arkansas. The following table details the distribution of assessment area branches, census tracts, and families by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 2 | 12 | 3 | 0 | 17 |
| | 0.0% | 11.8% | 70.6% | 17.6% | 0.0% | 100% |
| Census Tracts | 3.1% | 18.5% | 61.2% | 15.4% | 0.0% | 100% |
| Family Population | 1.7% | 16.4% | 62.0% | 19.9% | 0.0% | 100% |

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

Changes in Branch Locations

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

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. While neither branch in a moderate-income census tract offers extended Friday or Saturday hours, eight of the branches located within one mile of LMI geographies do offer these options.

Community Development Services

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

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KANSAS

CRA RATING FOR KANSAS: SATISFACTORY

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

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

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

SCOPE OF EXAMINATION

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

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

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KANSAS

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

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

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

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KANSAS

LENDING TEST

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

Lending Activity

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

| Limited-Scope Review Areas | Lending Activity |
|----------------------------|------------------|
| NonMSA Kansas | Consistent |

The bank's Kansas lending levels reflect adequate responsiveness to assessment area credit needs based on loan activity analyzed under the Lending Test. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to the assessment area.

Geographic and Borrower Distribution

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

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

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

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

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

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

Community Development Lending Activities

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

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

| Limited-Scope Review Areas | Community Development Lending |
|----------------------------|-------------------------------|
| NonMSA Kansas | Below |

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

INVESTMENT TEST

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

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

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

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

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SERVICE TEST

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

Accessibility of Delivery Systems

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

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

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|-----------------------------------|--|
| NonMSA Kansas | Consistent |

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems in Kansas.

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

| Limited-Scope Review Areas | Changes in Branch Locations |
|-----------------------------------|------------------------------------|
| NonMSA Kansas | Consistent |

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of Kansas assessment areas, particularly LMI geographies and individuals.

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

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

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Community Development Services

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

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

| Limited-Scope Review Areas | Community Development Services |
|-----------------------------------|---------------------------------------|
| NonMSA Kansas | Below |

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

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Wichita MSA

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WICHITA, KANSAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WICHITA ASSESSMENT AREA

Bank Structure

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

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

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

General Demographics

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

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

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Wichita MSA

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Income and Wealth Demographics

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

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

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

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

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

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

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Housing Demographics

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

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WICHITA ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes an adequate level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|------------|---------------|---------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 3 | 0.7% | 133 | 0.1% |
| Home Purchase | 73 | 18.2% | 17,382 | 19.0% |
| Refinancing | 52 | 13.0% | 12,586 | 13.8% |
| Total HMDA | 128 | 31.9% | 30,101 | 33.0% |
| Small Business | 265 | 66.1% | 59,215 | 64.9% |
| Small Farm | 8 | 2.0% | 1,994 | 2.2% |
| TOTAL LOANS | 401 | 100.0% | 91,310 | 100.0% |

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

Geographic Distribution of Loans

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

HMDA Lending

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

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

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

Small Business Lending

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

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

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

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

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Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

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

Small Business Lending

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

Community Development Lending Activities

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

INVESTMENT TEST

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

The bank operates three full-service branches and one stand-alone ATM in the Wichita assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 1 | 0 | 2 | 0 | 3 |
| | 0.0% | 33.3% | 0.0% | 66.7% | 0.0% | 100% |
| Census Tracts | 12.1% | 29.0% | 27.4% | 31.5% | 0.0% | 100% |
| Household Population | 8.2 | 22.5% | 28.0% | 41.3% | 0.0% | 100% |

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

Changes in Branch Locations

During the review period, the bank did not open or close any branches in the assessment area. Therefore, the bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems.

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Hours are generally the same for all branches, with one branch in an upper-income census tract offering Saturday drive-through hours.

Community Development Services

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

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NonMSA Kansas

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KANSAS NONMETROPOLITAN STATEWIDE AREA

(Limited-Scope Review)

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

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

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

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

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

LENDING TEST

The bank's lending performance in this assessment area is below the overall Lending Test performance in Kansas largely due to the low level of community development loans in the assessment area, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

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

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

INVESTMENT TEST

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

SERVICE TEST

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

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

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

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MISSOURI

CRA RATING FOR MISSOURI: **SATISFACTORY**

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

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

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

SCOPE OF EXAMINATION

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

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

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

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN MISSOURI

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

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

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

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSOURI

LENDING TEST

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

Lending Activity

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

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

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

Geographic and Borrower Distribution

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

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

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

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

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

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

Community Development Lending Activities

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

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

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

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

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

INVESTMENT TEST

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

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

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

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

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

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| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|----------------------------|-----------------------------------|
| Columbia MSA | Exceeds |
| Joplin MSA | Consistent |
| Springfield MSA | Consistent |

Changes in Branch Locations

The bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems in Missouri.

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

| Limited-Scope Review Areas | Changes in Branch Locations |
|----------------------------|-----------------------------|
| Columbia MSA | Consistent |
| Joplin MSA | Consistent |
| Springfield MSA | Consistent |

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of Missouri assessment areas, particularly LMI geographies and individuals.

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

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

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Community Development Services

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

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

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

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

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ST. LOUIS, MISSOURI-ILLINOIS MULTISTATE MSA

(Full-Scope Review)

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

Bank Structure

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

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

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

General Demographics

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

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

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

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

Income and Wealth Demographics

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

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

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

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

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

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

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Housing Demographics

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

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

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

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

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

LENDING TEST

The bank's lending levels reflect poor responsiveness to assessment area credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. The bank makes an adequate level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 50 | 4.1% | 3,105 | 1.3% |
| Home Purchase | 188 | 15.6% | 35,327 | 15.1% |
| Multifamily Housing | 7 | 0.6% | 17,405 | 7.4% |
| Refinancing | 142 | 11.7% | 32,605 | 13.9% |
| Other Purpose LOC | 14 | 1.2% | 1,063 | 0.5% |
| Other Purpose Closed/Exempt | 5 | 0.4% | 483 | 0.2% |
| Total HMDA | 406 | 33.6% | 89,988 | 38.5% |
| Small Business | 802 | 66.3% | 143,774 | 61.5% |
| Small Farm | 1 | 0.1% | 52 | 0.0% |
| TOTAL LOANS | 1,209 | 100.0% | 233,814 | 100.0% |

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

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Geographic Distribution of Loans

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

HMDA Lending

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

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

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

Small Business Lending

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

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

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

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

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

Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

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

Small Business Lending

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

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

Community Development Lending Activities

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

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

INVESTMENT TEST

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

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

| Branch Distribution by Geography Income Level | | | | | | |
|---|------------------------|-----------|---------|--------|----------|-------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 1 | 4 | 4 | 8 | 0 | 17 |
| | 5.9% | 23.5% | 23.5% | 47.1% | 0.0% | 100% |
| Census Tracts | 14.8% | 20.1% | 28.1% | 35.9% | 1.0% | 100% |
| Family Population | 8.7% | 17.6% | 29.7% | 43.7% | 0.3% | 100% |

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

Changes in Branch Locations

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

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. Branch hours are generally the same, with 15 branches offering Saturday hours, including four branches located in LMI geographies.

Community Development Services

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

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Columbia MSA

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COLUMBIA, MISSOURI MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA ASSESSMENT AREA

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

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

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

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Columbia MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COLUMBIA ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the overall Lending Test performance in Missouri, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

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

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

INVESTMENT TEST

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

SERVICE TEST

The bank's performance in this assessment area exceeds the service test performance in the state of Missouri, as detailed in the following table.

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

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

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Joplin MSA

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JOPLIN, MISSOURI MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JOPLIN ASSESSMENT AREA

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

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

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

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Pine Bluff, Arkansas

Joplin MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JOPLIN ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in Missouri, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

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

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

INVESTMENT TEST

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

SERVICE TEST

The bank's performance in this assessment area is consistent the service test performance in the state of Missouri, as detailed in the following table.

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

During the review period, six bank employees provided 43 community development services to six different organizations.

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Springfield MSA

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SPRINGFIELD, MISSOURI MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SPRINGFIELD ASSESSMENT AREA

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

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

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

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Pine Bluff, Arkansas

Springfield MSA

CRA Performance Evaluation
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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SPRINGFIELD ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in Missouri, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

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

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

INVESTMENT TEST

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

SERVICE TEST

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

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

During the review period, 16 bank employees provided 87 community development services to 11 different organizations.

Simmons Bank
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NonMSA Missouri

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MISSOURI NONMETROPOLITAN STATEWIDE AREA

(Full-Scope Review)

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

Bank Structure

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

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

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

General Demographics

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

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

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

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

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

Income and Wealth Demographics

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

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

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

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

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

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

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

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

Housing Demographics

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

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

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

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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

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

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

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

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. The bank is a leader in making community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 56 | 1.8% | 2,645 | 0.9% |
| Home Purchase | 434 | 13.9% | 56,963 | 20.2% |
| Multifamily Housing | 5 | 0.2% | 2,596 | 0.9% |
| Refinancing | 291 | 9.3% | 39,879 | 14.1% |
| Other Purpose LOC | 28 | 0.9% | 1,105 | 0.4% |
| Other Purpose Closed/Exempt | 14 | 0.4% | 1,992 | 0.7% |
| Total HMDA | 828 | 26.4% | 105,180 | 37.3% |
| Small Business | 1,358 | 43.4% | 107,360 | 38.0% |
| Small Farm | 946 | 30.2% | 69,705 | 24.7% |
| TOTAL LOANS | 3,132 | 100.0% | 282,245 | 100.0% |

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

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Geographic Distribution of Loans

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

HMDA Lending

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

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

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

Small Business Lending

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

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

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

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

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

Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

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

Small Business Lending

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

Community Development Lending Activities

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

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INVESTMENT TEST

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

The bank operates 13 branches in the nonMSA Missouri assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|---|------------------------|-----------|---------|--------|----------|-------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 3 | 9 | 1 | 0 | 13 |
| | 0.0% | 23.1% | 69.2% | 7.7% | 0.0% | 100% |
| Census Tracts | 1.8% | 12.5% | 80.4% | 5.4% | 0.0% | 100% |
| Household Population | 0.7% | 12.2% | 80.5% | 6.6% | 0.0% | 100% |

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

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Changes in Branch Locations

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

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area. Eight branches offer extended Friday hours, including one in a moderate-income census tract. Ten branches offer Saturday hours, including two in moderate-income census tracts.

Community Development Services

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

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OKLAHOMA

CRA RATING FOR OKLAHOMA: SATISFACTORY

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

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

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

SCOPE OF EXAMINATION

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

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

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

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN OKLAHOMA

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

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

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

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OKLAHOMA

LENDING TEST

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

Lending Activity

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

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

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

Geographic and Borrower Distribution

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

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

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

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

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

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

Community Development Lending Activities

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

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

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

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

INVESTMENT TEST

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

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

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

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

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

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

Changes in Branch Locations

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

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

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

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

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

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

Community Development Services

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

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

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

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

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OKLAHOMA CITY, OKLAHOMA MSA

(Full-Scope Review)

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

Bank Structure

The bank operates six branches in the Oklahoma City assessment area, representing 2.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

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

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

General Demographics

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

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

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

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Income and Wealth Demographics

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

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

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

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

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

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

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Housing Demographics

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

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

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

Industry and Employment Demographics

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

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

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

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

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

Community Contact Information

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

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

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes a low level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 17 | 1.4% | 1,881 | 0.8% |
| Home Purchase | 201 | 16.1% | 54,245 | 23.3% |
| Multifamily Housing | 1 | 0.1% | 400 | 0.2% |
| Refinancing | 132 | 10.6% | 36,262 | 15.6% |
| Other Purpose LOC | 10 | 0.8% | 618 | 0.3% |
| Other Purpose Closed/Exempt | 7 | 0.6% | 1,136 | 0.5% |
| Total HMDA | 368 | 29.6% | 94,542 | 40.6% |
| Small Business | 871 | 70.0% | 138,280 | 59.3% |
| Small Farm | 6 | 0.5% | 210 | 0.1% |
| TOTAL LOANS | 1,245 | 100.0% | 233,032 | 100.0% |

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

Geographic Distribution of Loans

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

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HMDA Lending

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

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

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

Small Business Lending

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

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

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

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

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Loan Distribution by Borrower's Profile

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

HMDA Lending

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

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

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

Small Business Lending

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

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

Community Development Lending Activities

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

INVESTMENT TEST

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

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

The bank operates six full-service branches in the Oklahoma City assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 2 | 1 | 2 | 1 | 0 | 6 |
| | 33.3% | 16.7% | 33.3% | 16.7% | 0.0% | 100% |
| Census Tracts | 8.3% | 29.0% | 36.8% | 23.3% | 2.6% | 100% |
| Household Population | 5.7% | 21.7% | 40.8% | 31.7% | 0.1% | 100% |

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

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Changes in Branch Locations

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

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

Community Development Services

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

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Tulsa MSA

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TULSA, OKLAHOMA MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE TULSA ASSESSMENT AREA

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

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

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

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE TULSA ASSESSMENT AREA

LENDING TEST

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

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

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

INVESTMENT TEST

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

SERVICE TEST

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

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

During the review period, eight bank employees conducted 24 community development services for five different organizations.

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NonMSA Oklahoma

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OKLAHOMA NONMETROPOLITAN STATEWIDE AREA

(Full-Scope Review)⁵

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

Bank Structure

The bank operates eight branches in the Southern Oklahoma assessment area, representing 3.5 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Locations by Census Tract Income Level | | | | |
|---|-----------------|---------------|--------------|----------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 0 | 2 | 4 | 2 | 0 |

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

General Demographics

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

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

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

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

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NonMSA Oklahoma

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Income and Wealth Demographics

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

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

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

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

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

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

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Housing Demographics

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

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

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

Industry and Employment Demographics

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

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

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

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

Community Contact Information

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

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

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Pine Bluff, Arkansas

NonMSA Oklahoma

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

LENDING TEST

As noted above, the bank did not enter the Southern Oklahoma market until 2020, thus the lending test only included loans originated in 2020. The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects excellent penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes a low level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity | | | | |
|--|------------|---------------|------------------|---------------|
| January 1, 2020 through December 31, 2020 | | | | |
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 8 | 1.2% | 395 | 0.7% |
| Home Purchase | 29 | 4.3% | 2,956 | 5.0% |
| Refinancing | 37 | 5.5% | 4,150 | 7.0% |
| Other Purpose Closed/Exempt | 1 | 0.1% | 50 | 0.1% |
| Total HMDA | 75 | 11.2% | 7,551 | 12.7% |
| Small Business | 443 | 66.2% | 42,858 | 71.8% |
| Small Farm | 151 | 22.6% | 9,276 | 15.5% |
| TOTAL LOANS | 669 | 100.0% | 59,685 | 100.0% |

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

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Geographic Distribution of Loans

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

HMDA Lending

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

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

Small Business Lending

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

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

Small Farm Lending

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

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

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

Loan Distribution by Borrower's Profile

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

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HMDA Lending

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

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

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

Small Business Lending

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

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

Small Farm Lending

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

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

Community Development Lending Activities

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

INVESTMENT TEST

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

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

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

SERVICE TEST

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

Accessibility of Delivery Systems

The bank operates eight full-service branches in the Southern nonMSA Oklahoma assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 2 | 4 | 2 | 0 | 8 |
| | 0.0% | 25.0% | 50.0% | 25.0% | 0.0% | 100% |
| Census Tracts | 0.0% | 15.7% | 64.7% | 19.6% | 0.0% | 100% |
| Household Population | 0.0% | 10.5% | 66.2% | 23.3% | 0.0% | 100% |

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

Changes in Branch Locations

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

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

Community Development Services

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

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

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

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

| Assessment Area Demographics by Population Income Level | | | | | |
|---|-------------------------|-----------|---------|--------|--------|
| Demographic Type | Population Income Level | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | |
| Family Population | 3,275 | 2,905 | 3,106 | 7,282 | 16,568 |
| | 19.8% | 17.5% | 18.8% | 44.0% | 100% |
| Household Population | 9,153 | 4,339 | 4,995 | 11,677 | 30,164 |
| | 30.3% | 14.4% | 16.6% | 38.7% | 100% |

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

LENDING TEST

The bank's lending performance in this assessment area is consistent with performance in the full-scope review, southern Oklahoma nonMSA assessment area, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

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

The bank made one community development loan totaling \$1.1 million during the review period.

INVESTMENT TEST

The bank's performance in this assessment area is below the investment test performance in the full-scope review, southern Oklahoma nonMSA assessment area. The bank made two new investments totaling \$318,000 in addition to \$258,003 in investments made prior to this review period but still outstanding. The bank also made 15 donations and grants totaling \$37,500 during the review period.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test performance in the full-scope review, southern Oklahoma nonMSA assessment area, as detailed in the following table.

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

During the review period, five employees provided 108 services to four different organizations.

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TENNESSEE

CRA RATING FOR TENNESSEE: SATISFACTORY

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

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

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

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Tennessee assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. However, small farm lending was only analyzed in the Western nonMSA Tennessee assessment area. Small farm lending was not analyzed and did not play a role in assessing the lending performance in the remaining Tennessee assessment areas, as the bank's primary focus in these assessment areas is HMDA and small business lending, and demand for small farm loans is limited. In the Western nonMSA Tennessee assessment area, small farm lending received less weight in the analysis relative to HMDA and small business lending, given the lower volume of small farm loans and loan demand in the assessment area.

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The bank operates six assessment areas throughout Tennessee located in four MSAs and two noncontiguous nonMSA portions of the state. Two of the bank's Tennessee assessment areas were reviewed under full-scope examination procedures, including one of the two nonMSA assessment areas. Based on the bank's branch structure and loan and deposit activity, CRA performance in the Western nonMSA Tennessee assessment area received slightly more consideration when determining statewide performance conclusions, followed by the Nashville assessment area.

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

The bank operates 43 offices throughout its assessment areas in Tennessee. The following table gives additional detail regarding the bank's operations in Tennessee.

| Review Area | Branches # | Branches % | Deposits \$ 000s (as of 6/30/21) | Deposits % | CRA Review Procedures |
|--------------------------|------------|-------------|-------------------------------------|-------------|--------------------------|
| Western Tennessee nonMSA | 11 | 25.6% | \$909,280 | 32.9% | Full-Scope |
| Nashville MSA | 11 | 25.6% | \$695,459 | 25.1% | Full-Scope |
| Memphis MSA | 10 | 23.3% | \$206,689 | 7.5% | Limited-Scope |
| Eastern Tennessee nonMSA | 5 | 11.6% | \$472,838 | 17.1% | Limited-Scope |
| Jackson MSA | 4 | 9.3% | \$357,708 | 12.9% | Limited-Scope |
| Knoxville MSA | 2 | 4.7% | \$123,292 | 4.5% | Limited-Scope |
| OVERALL | 43 | 100% | \$2,765,266 | 100% | 2 Full-Scope |

Deposits held in the state of Tennessee total approximately \$2.8 billion, which represents 14.9 percent of total bank deposits. The bank acquired 10 branches in Tennessee, four in the Nashville MSA and six in the Memphis MSA, and closed 11 branches throughout its Tennessee assessment areas, primarily due to consolidation of branches added through mergers and acquisitions.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

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

Lending Activity

| Full-Scope Review Areas | Lending Activity |
|--------------------------|------------------|
| Nashville MSA | Adequate |
| Western NonMSA Tennessee | Excellent |
| OVERALL | GOOD |

| Limited-Scope Review Areas | Lending Activity |
|----------------------------|------------------|
| Jackson MSA | Consistent |
| Knoxville MSA | Consistent |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Below |

The bank's Tennessee lending levels reflect good responsiveness to assessment area credit needs based on loan activity analyzed under the Lending Test. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors and the bank's overall importance to each assessment area.

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Geographic and Borrower Distribution

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

| Full-Scope Review Areas | Geographic Distribution of Loans |
|--------------------------------|---|
| Nashville MSA | Adequate |
| Western NonMSA Tennessee | Adequate |
| OVERALL | ADEQUATE |

| Limited-Scope Review Areas | Geographic Distribution of Loans |
|-----------------------------------|---|
| Jackson MSA | Consistent |
| Knoxville MSA | Consistent |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Consistent |

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

| Full-Scope Review Areas | Loan Distribution By Borrower's Profile |
|--------------------------------|--|
| Nashville MSA | Good |
| Western NonMSA Tennessee | Good |
| OVERALL | GOOD |

| Limited-Scope Review Areas | Loan Distribution By Borrower's Profile |
|-----------------------------------|--|
| Jackson MSA | Exceeds |
| Knoxville MSA | Consistent |
| Memphis MSA | Exceeds |
| Eastern NonMSA Tennessee | Consistent |

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Community Development Lending Activities

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

| Full-Scope Review Areas | Community Development Lending |
|--------------------------------|--------------------------------------|
| Nashville MSA | Adequate |
| Western NonMSA Tennessee | Low |
| OVERALL | ADEQUATE |

| Limited-Scope Review Areas | Community Development Lending |
|-----------------------------------|--------------------------------------|
| Jackson MSA | Consistent |
| Knoxville MSA | Below |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Consistent |

During the review period, the bank made 15 community development loans totaling \$29.3 million in its Tennessee assessment areas.

INVESTMENT TEST

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

| Full-Scope Review Areas | Investment and Grant Activity |
|--------------------------------|--------------------------------------|
| Nashville MSA | Significant |
| Western NonMSA Tennessee | Adequate |
| OVERALL | HIGH SATISFACTORY |

| Limited-Scope Review Areas | Investment and Grant Activity |
|-----------------------------------|--------------------------------------|
| Jackson MSA | Consistent |
| Knoxville MSA | Exceeds |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Consistent |

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The bank made a total of \$40.2 million in qualified community development investments and \$302,813 in donations and grants in the Tennessee assessment areas. Of the total statewide investments, \$21.1 million were made in the current review period, while \$19.0 million were made prior to the review period but were still outstanding.

SERVICE TEST

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

Accessibility of Delivery Systems

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

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|--------------------------------|--|
| Nashville MSA | Reasonably Accessible |
| Western NonMSA Tennessee | Accessible |
| OVERALL | REASONABLY ACCESSIBLE |

| Limited-Scope Review Areas | Accessibility of Delivery Systems |
|-----------------------------------|--|
| Jackson MSA | Consistent |
| Knoxville MSA | Consistent |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Exceeds |

Changes in Branch Locations

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

| Full-Scope Review Areas | Changes in Branch Locations |
|--------------------------------|---|
| Nashville MSA | Not Adversely Affected |
| Western NonMSA Tennessee | Generally Not Adversely Affected |
| OVERALL | GENERALLY NOT ADVERSELY AFFECTED |

| Limited-Scope Review Areas | Changes in Branch Locations |
|-----------------------------------|------------------------------------|
| Jackson MSA | Consistent |
| Knoxville MSA | Consistent |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Consistent |

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

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

| Full-Scope Review Areas | Reasonableness of Business Hours and Services |
|--------------------------------|--|
| Nashville MSA | Do Not Vary/Inconvenience |
| Western NonMSA Tennessee | Do Not Vary/Inconvenience |
| OVERALL | DO NOT VARY/INCONVENIENCE |

| Limited-Scope Review Areas | Reasonableness of Business Hours and Services |
|-----------------------------------|--|
| Jackson MSA | Consistent |
| Knoxville MSA | Consistent |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Consistent |

Community Development Services

The bank is a leader in providing community development services throughout the Tennessee assessment areas, as shown in the tables below.

| Full-Scope Review Areas | Community Development Services |
|--------------------------------|---------------------------------------|
| Nashville MSA | Relatively High Level |
| Western NonMSA Tennessee | Leader |
| OVERALL | LEADER |

| Limited-Scope Review Areas | Community Development Services |
|-----------------------------------|---------------------------------------|
| Jackson MSA | Consistent |
| Knoxville MSA | Consistent |
| Memphis MSA | Consistent |
| Eastern NonMSA Tennessee | Below |

During the review period, 78 bank employees provided 718 community development services to 55 different organizations.

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Nashville MSA

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NASHVILLE-DAVIDSON-MURFREESBORO- FRANKLIN, TENNESSEE MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NASHVILLE ASSESSMENT AREA

Bank Structure

The bank operates 11 of its 230 branches (4.8 percent) in the Nashville assessment area, which are distributed as follows.

| Branch Locations by Census Tract Income Level | | | | |
|---|-----------------|---------------|--------------|----------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 0 | 0 | 5 | 6 | 0 |

During the review period, the bank acquired four branches (one in a middle-income census tract and three in upper-income census tracts) and closed three branches located in upper-income census tracts. Based on the bank's branch network and other service delivery systems, such as online and mobile banking, the bank is likely able to deliver financial services to all of the Nashville assessment area.

General Demographics

The bank has designated the Nashville assessment area to include 5 of the 13 counties in the full Nashville MSA: Davidson, Maury, Robertson, Sumner, and Williamson. The table below details population demographics for each of the counties in the assessment area and the assessment area as a whole.

| County | Population |
|------------------------|------------------|
| Davidson | 658,506 |
| Maury | 84,089 |
| Robertson | 67,426 |
| Sumner | 169,623 |
| Williamson | 199,456 |
| ASSESSMENT AREA | 1,179,100 |

The majority of the assessment area population resides in Davidson County, which encompasses the city of Nashville, as well as Vanderbilt University and Belmont University, two major private universities. Nashville is an extremely competitive banking market, with 51 FDIC-insured depository institutions operating 400 branches in the assessment area. Of these institutions, Simmons Bank ranks 18th in deposit market share, with 0.9 percent of all assessment area deposit dollars. Competition for HMDA and CRA loans is similarly high. An analysis of 2020 HMDA-

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reportable loans shows that 832 institutions had loan activity in the assessment area, of which Simmons Bank ranked 69th, with less than 1.0 percent of total HMDA loans. Simmons Bank ranked 20th out of 244 institutions with CRA loan activity in the assessment area, accounting for 1.0 percent of total CRA loan activity.

The Nashville assessment area covers a wide metropolitan area with a diverse demographic composition. Credit needs include a standard blend of commercial and consumer loan products. Specifically, as noted by a community contact, there is a need for more affordable housing and flexible home loans tailored to the needs of LMI residents. Finally, the contact noted that numerous opportunities exist for banks to work with local community development organizations and government assistance programs.

Income and Wealth Demographics

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

| Assessment Area Demographics by Geography Income Level | | | | |
|---|----------------------|-------------|--------------------------|-------------|
| | Census Tracts | | Family Population | |
| Low | 31 | 11.4% | 22,061 | 7.6% |
| Moderate | 58 | 21.4% | 57,788 | 20.0% |
| Middle | 98 | 36.2% | 107,892 | 37.4% |
| Upper | 80 | 29.5% | 100,730 | 34.9% |
| Unknown | 4 | 1.5% | 319 | 0.1% |
| TOTAL | 271 | 100% | 288,790 | 100% |

As shown in the table above, 32.8 percent of census tracts in the assessment area are LMI, but only 27.6 percent of the family population resides in those tracts. The vast majority of these LMI geographies are located in Davidson County in the downtown Nashville area.

Based on 2015 ACS data, the median family income for the assessment area was \$68,115, which exceeds the figure for the state of Tennessee (\$56,110). More recently, the FFIEC estimates the median family income for the Nashville MSA to be \$73,100 in 2019 and \$76,500 in 2020.

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The following table displays the distribution of assessment area families by income level compared to the entire Nashville MSA and the state of Tennessee as a whole.

| Family Population by Income Level | | | | | |
|-----------------------------------|---------|-----------|---------|---------|------------------|
| Dataset | Low- | Moderate- | Middle- | Upper- | TOTAL |
| Assessment Area | 60,439 | 48,484 | 56,693 | 123,174 | 288,790 |
| | 20.9% | 16.8% | 19.6% | 42.7% | 100% |
| Nashville MSA | 89,844 | 76,574 | 88,452 | 177,876 | 432,746 |
| | 20.8% | 17.7% | 20.4% | 41.1% | 100% |
| State of Tennessee | 363,187 | 288,774 | 326,437 | 687,047 | 1,665,445 |
| | 21.8% | 17.3% | 19.6% | 41.3% | 100% |

When compared with the data in the first table in this section, a higher percentage of families in the assessment area are LMI (37.7 percent) than reside in LMI geographies (27.6 percent). The percentage of families in the assessment area that are LMI is slightly lower than the entire Nashville MSA (38.5 percent) and the state of Tennessee as a whole (39.1 percent). Furthermore, poverty levels in the assessment area (10.4 percent) are in line with the entire Nashville MSA (10.0) and below statewide levels (13.2 percent). Altogether, this points to the assessment area being roughly as affluent as the entire Nashville MSA and more affluent than the state of Tennessee as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area, the entire Nashville MSA, and the state of Tennessee.

| Housing Demographics | | | |
|----------------------|----------------------|---------------------|-----------------------------|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) |
| Assessment Area | \$188,966 | 29.0% | \$880 |
| Nashville MSA | \$176,076 | 30.9% | \$870 |
| Tennessee | \$142,100 | 31.8% | \$764 |

Housing is slightly less affordable in the assessment area than the Nashville MSA in its entirety and in the state of Tennessee. This holds true even when accounting for income levels, as evidenced by a lower affordability ratio in the assessment area. Affordability varied slightly between counties in the assessment area, with Robertson County being the most affordable (34.1 percent) and Williamson County being the least affordable (27.7 percent).

Industry and Employment Demographics

The assessment area economy is extremely diverse and buoyed by the tourism industry, major medical research facilities, universities, and several large national corporations. Major

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corporations with headquarters in Nashville include Amazon, iHeartMedia, Mitsubishi Motors, and Nissan North America. County business patterns indicate that there are 766,165 paid employees in the assessment area, with the three largest job categories being healthcare and social assistance (13.9 percent), government (10.3 percent), and accommodation and food services (9.7 percent). The assessment area also supports a strong small business sector, with demographic data indicating that 90.8 percent of businesses in the assessment area have annual revenues of \$1 million or less.

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

| Unemployment Levels for the Assessment Area | | | |
|--|------------------------|----------------------|------------------|
| Time Period (Annual Average) | Assessment Area | Nashville MSA | Tennessee |
| 2019 | 2.6% | 2.6% | 3.4% |
| 2020 | 7.2% | 7.0% | 7.4% |
| 2021 | 3.8% | 3.6% | 4.3% |

Unemployment levels in the assessment area were comparable to the entire Nashville MSA and remained lower than the state of Tennessee throughout the review period, and all were similarly impacted by the global pandemic.

Community Contact Information

A community contact interview conducted with an individual knowledgeable of the Nashville assessment area's economic conditions and credit needs was referenced for this examination. The contact noted that while unemployment has returned to pre-pandemic levels, the lower middle class is suffering. The contact characterized Davidson County as being very unaffordable and surrounding rural areas as experiencing social challenges. Hospitality jobs are widespread but offer low pay. Overall, there is a workforce shortage in most local industries. Nonetheless, industries continue to move to the area, including Amazon and Oracle. The contact describes the availability of banking services as sufficient, though some of the most rural areas lack bank branches.

The contact notes that many older homes are being torn down and replaced with luxury apartments and that affordable housing stock does not meet current demand. Barriers to homeownership include high sales prices and interest rates coupled with low wages. Additionally, agriculture in the area has diminished, and many small family farms have sold their land to real estate developers. Finally, the contact indicated that opportunities for bank involvement in community development activities are numerous, but banks need to be more proactive in these efforts.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NASHVILLE ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes an adequate level of community development loans in the assessment area.

Lending Activity

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

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 55 | 5.2% | 4,785 | 2.5% |
| Home Purchase | 168 | 16.0% | 50,885 | 26.8% |
| Multifamily Housing | 1 | 0.1% | 230 | 0.1% |
| Refinancing | 228 | 21.7% | 55,119 | 29.1% |
| Other Purpose LOC | 45 | 4.3% | 4,384 | 2.3% |
| Other Purpose Closed/Exempt | 4 | 0.4% | 1,073 | 0.6% |
| Total HMDA | 501 | 47.8% | 116,476 | 61.4% |
| Small Business | 544 | 51.9% | 72,637 | 38.3% |
| Small Farm | 4 | 0.4% | 529 | 0.3% |
| TOTAL LOANS | 1,049 | 100.0% | 189,642 | 100.0% |

Loans made in the Nashville assessment area represent 3.0 percent of total 2019 and 2020 HMDA and CRA loans made within the bank's combined assessment areas. This level of lending is slightly below the percentage of total bank branches in the assessment area (4.8 percent) and in line with the percentage of total bank deposits as of June 30, 2020 held in the assessment area (2.8 percent). Therefore, the bank's lending activity reflects adequate responsiveness to the credit needs of the Nashville assessment area.

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Geographic Distribution of Loans

Based on both products reviewed, the overall geographic distribution of loans is adequate.

HMDA Lending

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

The bank originated 6.8 percent of its HMDA loans in low-income geographies in 2019, which is excellent when compared to the performance of peer institutions in the assessment area (6.1 percent) and demographic levels (4.7 percent). The percentage of bank HMDA loans in low-income geographies in 2020 was lower (3.4 percent), which trailed both aggregate performance (5.8 percent) and the demographic figure (4.7 percent), reflecting poor performance.

The bank's level of lending in moderate-income geographies in 2019 (11.4 percent) is generally in line with aggregate lenders in the assessment area (14.4 percent) and below the demographic figure of 16.0 percent, reflecting adequate performance. In 2020, the bank's level of lending in moderate-income geographies (10.9 percent) was comparable to aggregate lending levels (12.6 percent) and below demographic levels (16.0 percent) and is considered adequate.

Small Business Lending

The bank's distribution of small business loans by geography income level is adequate.

The bank made 8.0 percent of its small business loans in low-income geographies in 2019, compared to 9.0 percent for aggregate lenders and a demographic level of 8.8 percent, reflecting adequate performance. The bank's small business lending in low-income geographies in 2020 (6.7 percent) was generally in line with aggregate lending levels (8.8 percent) and demographic levels (8.8 percent) and is also considered adequate.

Lending in moderate-income geographies was adequate in 2019, as the bank's performance (16.1 percent), aggregate performance (17.3 percent), and the demographic level (18.4 percent) were closely aligned. Similarly, the bank's level of small business lending in moderate-income tracts in 2020 (15.3 percent) was in line with aggregate levels (17.0 percent) and the demographic (18.3 percent), reflecting adequate performance.

Lastly, no conspicuous lending gaps were identified in the dispersion of the bank's HMDA and CRA loans, particularly in LMI geographies. In 2019, the bank had loan activity in 56.5 percent of all assessment area census tracts and 47.2 percent of all LMI census tracts. In 2020, the bank's loan dispersion improved, with loan activity in 66.4 percent of all assessment area census tracts and 53.9 percent of all LMI census tracts. The dispersion of the bank's loans was consistent with its branch structure in the assessment area. The bank's loan dispersion supports the conclusion that the bank's distribution of loans by geography income level is adequate overall.

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Loan Distribution by Borrower's Profile

Overall, the bank's distribution of loans by income or revenue profile is good. Small business lending received primary weight in determining overall performance.

HMDA Lending

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

In 2019, the bank originated 3.4 percent of HMDA loans to low-income borrowers, which aligned with aggregate performance (4.6 percent) and trailed the demographic figure of low-income families in the assessment area (20.9 percent). Considering the lack of affordable housing in the assessment area, as noted by a community contact, this performance is considered adequate. The bank's performance in 2020 was similar (3.8 percent) and again in line with aggregate lenders in the assessment area (4.2 percent) and the demographic figure (20.9 percent) and is also considered adequate.

The bank's level of HMDA lending to moderate-income borrowers (19.1 percent) in 2019 exceeded both aggregate lenders (15.4 percent) and the demographic level (16.8 percent), reflecting excellent performance. The bank's percentage of lending to moderate-income borrowers decreased in 2020 (14.0 percent) but remained in line with aggregate lenders (14.5 percent) and the demographic comparator (16.8 percent), and is therefore considered adequate.

Small Business Lending

The borrower distribution of small business loans is good.

The percentage of bank loans to businesses with annual revenues of \$1 million or less in 2019 (55.4 percent) and 2020 (53.0 percent) exceeded aggregate lending levels (48.6 percent in 2019 and 41.5 percent in 2020) and trailed the demographic figure (90.3 percent in 2019 and 90.8 percent in 2020), reflecting good performance.

Community Development Lending Activities

The bank makes an adequate level of community development loans in the Nashville assessment area. During the review period, the bank made one community development loan for \$9.7 million for a retail/office space development in a moderate-income census tract.

INVESTMENT TEST

The bank makes a significant level of community development investments and grants in the assessment area. The bank made qualified investments totaling \$11.3 million, \$5.8 million of which were investments made during the review period and \$5.4 million of which were made prior to the current review period but still outstanding. Investments made during the current review

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period were composed entirely of MBS supporting affordable housing for LMI borrowers, which is responsive to a need stated by a community contact in the assessment area.

In addition to these investments, the bank made 40 donations totaling \$62,563 to various community service and affordable housing organizations throughout the assessment area

SERVICE TEST

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

Accessibility of Delivery Systems

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

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 0 | 5 | 6 | 0 | 11 |
| | 0.0% | 0.0% | 45.5% | 54.5% | 0.0% | 100% |
| Census Tracts | 11.4% | 21.4% | 36.2% | 29.5% | 1.5% | 100% |
| Household Population | 7.6% | 20.0% | 37.4% | 34.9% | 0.1% | 100% |

The bank does not operate any branches in LMI geographies, while 32.8 percent of geographies are LMI and 27.6 percent of assessment area households are in LMI geographies. Despite not operating a branch in an LMI census tract, the bank's service delivery systems are reasonably accessible in the assessment area, as three branches are within one mile of LMI census tracts and one is within two miles.

Changes in Branch Locations

As mentioned previously, the bank acquired one branch in a middle-income census tract and three branches in upper-income census tracts during the review period; three branches in upper-income census tracts were subsequently closed. As such, this record of opening and closing branches has not adversely affected the accessibility of the bank's service delivery systems in the Nashville assessment area, particularly in LMI geographies.

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Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and services are generally uniform throughout the assessment area. Therefore, business hours and services do not vary in a way that inconveniences portions of the assessment area, particularly LMI geographies and individuals.

Community Development Services

The bank provides a relatively high level of community development services in the Nashville assessment area. During the review period, 21 bank employees provided 74 community development services to eight different organizations. Many of these community development services consisted of financial literacy education to children and adults.

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Jackson MSA

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JACKSON, TENNESSEE MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE JACKSON ASSESSMENT AREA

The bank's Jackson assessment area consists of Madison and Gibson counties, which represents two of the four counties in the Jackson, Tennessee MSA. The bank operates four full-service branches in the assessment area and did not open or close any branches during the review period. The tables below detail key demographics relating to the Tulsa assessment area.

| Assessment Area Demographics by Geography Income Level | | | | | | |
|--|------------------------|-----------|---------|--------|----------|---------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Census Tracts | 3 | 10 | 16 | 10 | 2 | 41 |
| | 7.3% | 24.4% | 39.0% | 24.4% | 4.9% | 100% |
| Family Population | 1,533 | 9,411 | 14,375 | 12,483 | 128 | 37,930 |
| | 4.0% | 24.8% | 37.9% | 32.9% | 0.3% | 100% |
| Household Population | 2,602 | 14,999 | 21,023 | 17,046 | 545 | 56,215 |
| | 4.6% | 26.7% | 37.4% | 30.3% | 1.0% | 100% |
| Business Institutions | 104 | 1,562 | 1,780 | 1,419 | 309 | 5,174 |
| | 2.0% | 30.2% | 34.4% | 27.4% | 6.0% | 100% |
| Agricultural Institutions | 1 | 21 | 111 | 45 | 0 | 178 |
| | 0.6% | 11.8% | 62.4% | 25.3% | 0.0% | 100% |

| Assessment Area Demographics by Population Income Level | | | | | |
|---|-------------------------|-----------|---------|--------|---------------|
| Demographic Type | Population Income Level | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | |
| Family Population | 8,055 | 6,706 | 7,118 | 16,051 | 37,930 |
| | 21.2% | 17.7% | 18.8% | 42.3% | 100% |
| Household Population | 13,392 | 8,767 | 9,936 | 24,120 | 56,215 |
| | 23.8% | 15.6% | 17.7% | 42.9% | 100% |

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE JACKSON ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance for the state of Tennessee, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| Lending Test Criteria | Performance |
|---|-------------------|
| Lending Activity | Consistent |
| Geographic Distribution of Loans | Consistent |
| Distribution of Loans by Borrower's Profile | Exceeds |
| Community Development Lending Activities | Consistent |
| OVERALL | CONSISTENT |

The bank made six community development loans totaling \$4.4 million in the assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance for the state of Oklahoma. During the review period, the bank had qualified community development investments totaling \$2.8 million, of which \$1.7 million were made during the current period and \$1.1 million were made in prior-period investments and are still outstanding. In addition to these investments, the bank made 19 donations and grants totaling \$39,125.

SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance for the state of Oklahoma area, as detailed in the following table.

| Service Test Criteria | Performance |
|---|-------------------|
| Accessibility of Delivery Systems | Consistent |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Consistent |
| OVERALL | CONSISTENT |

During the review period, 14 bank employees conducted 118 community development services for 11 different organizations.

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Knoxville MSA

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KNOXVILLE, TENNESSEE MSA

(Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE KNOXVILLE ASSESSMENT AREA

The bank's Knoxville assessment area consists of Anderson, Blount, Knox, Loudon, and Roane counties, which represents five of the eight counties in the Knoxville, Tennessee MSA. The bank operates two full-service branches throughout the assessment area and closed two branches in the assessment area during the review period, one in a moderate-income census tract and one in a middle-income census tract. The tables below detail key demographics relating to the Knoxville assessment area.

| Assessment Area Demographics by Geography Income Level | | | | | | |
|--|------------------------|-----------|---------|--------|----------|----------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Census Tracts | 11 | 32 | 81 | 49 | 6 | 179 |
| | 6.1% | 17.9% | 45.2% | 27.4% | 3.4% | 100% |
| Family Population | 8,359 | 27,442 | 99,570 | 57,865 | 14 | 193,250 |
| | 4.3% | 14.2% | 51.5% | 29.9% | 0.0% | 100% |
| Household Population | 15,654 | 51,493 | 151,467 | 83,554 | 102 | 302,270 |
| | 5.2% | 17.0% | 50.1% | 27.6% | 0.0% | 100% |
| Business Institutions | 1,299 | 4,419 | 13,550 | 11,459 | 202 | 30,929 |
| | 4.2% | 14.3% | 43.8% | 37.0% | 0.7% | 100% |
| Agricultural Institutions | 3 | 51 | 203 | 117 | 1 | 375 |
| | 0.8% | 13.6% | 54.1% | 31.2% | 0.3% | 100% |

| Assessment Area Demographics by Population Income Level | | | | | |
|---|-------------------------|-----------|---------|---------|----------------|
| Demographic Type | Population Income Level | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | |
| Family Population | 41,487 | 31,576 | 38,713 | 81,474 | 193,250 |
| | 21.5% | 16.3% | 20.0% | 42.2% | 100% |
| Household Population | 71,854 | 48,232 | 49,589 | 132,595 | 302,270 |
| | 23.8% | 16.0% | 16.4% | 43.9% | 100% |

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE KNOXVILLE ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance in the state of Tennessee, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| Lending Test Criteria | Performance |
|---|-------------------|
| Lending Activity | Consistent |
| Geographic Distribution of Loans | Consistent |
| Distribution of Loans by Borrower's Profile | Consistent |
| Community Development Lending Activities | Below |
| OVERALL | CONSISTENT |

The bank did not make any community development loans in the Knoxville assessment area during the review period.

INVESTMENT TEST

The bank's investment performance in the Knoxville assessment area exceeds the investment performance in the state of Tennessee. The bank made \$8.4 million in total qualified investments, \$2.8 million of which was made during the current review period and \$5.6 million of which was made in a prior review period but is still outstanding. The bank also made 17 donations totaling \$43,000 during the review period.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test performance in the Tennessee full-scope review assessment areas, as detailed in the following table.

| Service Test Criteria | Performance |
|---|-------------------|
| Accessibility of Delivery Systems | Consistent |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Consistent |
| OVERALL | CONSISTENT |

During the review period, four bank employees provided 87 community development services to six different organizations.

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Memphis MSA

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MEMPHIS, TENNESSEE-MISSISSIPPI-ARKANSAS MSA (Limited-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MEMPHIS ASSESSMENT AREA

The bank has designated the entireties of Shelby and Tipton counties as the Memphis assessment area, which represents two of the three counties in the Tennessee portion of the Memphis, Tennessee-Mississippi-Arkansas multistate MSA. The bank operates ten branches in the assessment area; six branches were acquired during the review period and one was closed. The acquired and closed branches were all located in upper-income census tracts. The tables below detail key demographics relating to the Memphis assessment area.

| Assessment Area Demographics by Geography Income Level | | | | | | |
|--|------------------------|-----------|---------|---------|----------|----------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Census Tracts | 66 | 49 | 40 | 73 | 6 | 234 |
| | 28.2% | 20.9% | 17.1% | 31.2% | 2.6% | 100% |
| Family Population | 45,546 | 47,068 | 41,874 | 101,923 | 404 | 236,815 |
| | 19.2% | 19.9% | 17.7% | 43.0% | 0.2% | 100% |
| Household Population | 78,048 | 74,106 | 65,069 | 150,768 | 808 | 368,799 |
| | 21.2% | 20.1% | 17.6% | 40.9% | 0.2% | 100% |
| Business Institutions | 5,798 | 6,383 | 6,547 | 19,160 | 397 | 38,285 |
| | 15.1% | 16.7% | 17.1% | 50.0% | 1.0% | 100% |
| Agricultural Institutions | 17 | 20 | 60 | 185 | 4 | 286 |
| | 5.9% | 7.0% | 21.0% | 64.7% | 1.4% | 100% |

| Assessment Area Demographics by Population Income Level | | | | | |
|---|-------------------------|-----------|---------|---------|----------------|
| Demographic Type | Population Income Level | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | |
| Family Population | 61,327 | 36,409 | 38,939 | 100,140 | 236,815 |
| | 25.9% | 15.4% | 16.4% | 42.3% | 100% |
| Household Population | 98,598 | 57,578 | 58,572 | 154,051 | 368,799 |
| | 26.7% | 15.6% | 15.9% | 41.8% | 100% |

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Pine Bluff, Arkansas

Memphis MSA

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MEMPHIS ASSESSMENT AREA

LENDING TEST

The bank's lending performance in this assessment area is consistent with the Lending Test performance for the state of Tennessee, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| Lending Test Criteria | Performance |
|---|-------------------|
| Lending Activity | Consistent |
| Geographic Distribution of Loans | Consistent |
| Distribution of Loans by Borrower's Profile | Exceeds |
| Community Development Lending Activities | Consistent |
| OVERALL | CONSISTENT |

The bank made four community development loans totaling \$10.7 million during the review period.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance in the full-scope review Tennessee assessment areas. The bank made qualified community development investments totaling \$11.1 million, of which \$6.3 million were made in the current review period and \$4.8 million were made prior to the current review period but are still outstanding. In addition to these investments, the bank made 27 donations and grants totaling \$78,375 to various organizations throughout the assessment area.

SERVICE TEST

The bank's service performance in this assessment area is consistent with the service performance in the full-scope review Tennessee assessment areas, as detailed in the following table.

| Service Test Criteria | Performance |
|---|-------------------|
| Accessibility of Delivery Systems | Consistent |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Consistent |
| OVERALL | CONSISTENT |

During the review period, 12 bank employees provided 91 community development services to seven different organizations in the Memphis assessment area.

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Pine Bluff, Arkansas

NonMSA Tennessee

CRA Performance Evaluation
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TENNESSEE NONMETROPOLITAN STATEWIDE AREA

(Full-Scope Review)⁶

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WESTERN TENNESSEE ASSESSMENT AREA

Bank Structure

The bank operates 11 branches in the Western nonMSA Tennessee assessment area, which represents 4.8 percent of total bank branches. The table below displays the bank's branch distribution by geography income level.

| Branch Locations by Census Tract Income Level | | | | |
|---|-----------------|---------------|--------------|----------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 0 | 1 | 9 | 1 | 0 |

The bank closed five branches during the review period: one in a moderate-income census tract and four in middle-income census tracts. Based on its branch and ATM network and other service delivery systems such as online and mobile banking, the bank is positioned to deliver financial services to substantially all of the assessment area.

General Demographics

The assessment area consists of six Tennessee nonMSA counties in their entirety: Dyer, Hardeman, Haywood, Henderson, Obion, and Weakley. Gibson County was part of the assessment area at the last examination but has been moved to the Jackson, Tennessee, assessment area, as it abuts the MSA. The assessment area has a total population of 176,112 and is largely rural. Additionally, the University of Tennessee at Martin, a public university with a total enrollment of approximately 7,300 students, is located in Weakley County in the city of Martin.

The assessment area is served by 20 FDIC-insured depository institutions operating 70 branches throughout the assessment area. Of these institutions, Simmons Bank ranked first in deposit market share, with 24.1 percent of all assessment area deposit dollars. Moreover, the bank operates the most branches of any institution operating in the assessment area.

While only 20 institutions have a branch presence in the assessment area, a much higher number of financial institutions reported loan activity in the assessment area, pointing to a competitive banking market. An analysis of 2020 HMDA-reportable loans shows that there were 223 financial institutions with HMDA loan activity, of which Simmons Bank ranked second, with 8.0 percent of total loan activity. Of the 80 financial institutions with CRA loan activity in the assessment area, Simmons Bank again ranked second, with 21.5 percent of total CRA loan activity.

⁶ There are two assessment areas in the nonMSA Tennessee review area: the western Tennessee assessment area (full-scope review) and the eastern Tennessee assessment area (limited-scope review).

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Credit needs in the Western nonMSA Tennessee assessment area include a standard blend of consumer, business, and farm credit products. Other particular credit needs in the assessment area pointed out by community contacts include small dollar home improvement loans to address needed repairs to aging housing stock and flexible small business loan products including government guaranteed products. Opportunities exist for bank participation in local community development efforts, and there is a specific need for financial education in local schools as well as workforce development and financial education programs to LMI adults.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|----------------------|-------------|--------------------------|-------------|
| | Census Tracts | | Family Population | |
| Low | 0 | 0.0% | 0 | 0.0% |
| Moderate | 4 | 8.5% | 4,117 | 8.9% |
| Middle | 33 | 70.2% | 32,300 | 70.0% |
| Upper | 9 | 19.2% | 9,711 | 21.0% |
| Unknown | 1 | 2.1% | 42 | 0.1% |
| TOTAL | 47 | 100% | 46,170 | 100% |

There are no low-income census tracts in the assessment area and only four moderate-income census tracts, representing 8.5 percent of total census tracts. Three of these moderate-income census tracts are located in Hardeman County, with the remaining moderate-income census tract located in Obion County. Most census tracts are middle income, with 70.2 percent of assessment area families residing in those tracts. Despite the low number of LMI geographies in the assessment area, poverty remains an issue, as evidenced by the fact that 9 out of 33 middle-income census tracts in the assessment area were designated as distressed due to poverty in 2020. Three of these tracts are in Hardeman County and six are in Haywood County.

Based on 2015 ACS data, the median family income for the assessment area was \$48,692, which is above the median family income for nonMSA Tennessee as a whole (\$46,066). More recently, the FFIEC estimates the median family income for nonMSA Tennessee to be \$50,100 in 2019 and \$52,200 in 2020. The following table displays the percentages of assessment area families by income level compared to nonMSA Tennessee as a whole.

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| Family Population by Income Level | | | | |
|-----------------------------------|-----------------|-------------|------------------|-------------|
| | Assessment Area | | NonMSA Tennessee | |
| Low | 9,073 | 19.7% | 81,163 | 20.9% |
| Moderate | 7,959 | 17.2% | 70,532 | 18.1% |
| Middle | 8,974 | 19.4% | 77,971 | 20.0% |
| Upper | 20,164 | 43.7% | 159,460 | 41.0% |
| TOTAL | 46,170 | 100% | 389,126 | 100% |

While the data in the first table revealed that only 8.9 percent of families in the assessment area reside in LMI census tracts, the table above shows that a much higher percentage of assessment area families are LMI (36.9 percent). This figure is slightly lower than the percentage of families that are LMI in nonMSA Tennessee as a whole (39.0 percent). The percentage of families below the poverty level in the assessment area (15.3 percent) is in line with levels in the entire nonMSA (15.4 percent). Based on these demographics, the assessment area is slightly more affluent than nonMSA Tennessee as a whole.

Housing Demographics

The following table displays housing demographics for the assessment area and nonMSA Tennessee as a whole.

| Housing Demographics | | | |
|----------------------|----------------------|---------------------|-----------------------------|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) |
| Assessment Area | \$92,394 | 41.0% | \$590 |
| NonMSA Tennessee | \$106,819 | 34.0% | \$601 |

Housing is more affordable in the assessment area than in nonMSA Tennessee as a whole, as evidenced by lower median housing values and gross rents and a higher affordability ratio. Within the assessment area, affordability levels varied slightly, with Obion County having the highest affordability ratio (45.9 percent) and Haywood County having the lowest affordability ratio (34.5 percent).

Industry and Employment Demographics

The assessment area supports a moderately diverse business community, including a strong small business sector. According to assessment area demographics, 89.5 percent of businesses and 97.2 percent of farms have annual revenues of \$1 million or less. County business patterns indicate that there are 55,725 paid employees in the assessment area and that the three largest job categories by number of paid employees are manufacturing (25.4 percent), government (20.6 percent), and retail trade (12.0 percent). Major employers in the area include Tyson Foods, Thyssenkrupp Elevator Manufacturing, and General Electric.

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The table below details unemployment statistics from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area and the state of Tennessee.

| Unemployment Levels for the Assessment Area | | |
|---|-----------------|-----------|
| Time Period (Annual Average) | Assessment Area | Tennessee |
| 2019 | 4.6% | 3.4% |
| 2020 | 7.3% | 7.4% |
| 2021 | 4.7% | 4.3% |

Unemployment levels in the assessment area were higher than in the state of Tennessee in 2019 and 2021 but were comparable in 2020 during the pandemic. Hardest hit by the pandemic were Haywood County (8.6% in 2020) and Henderson County (8.0 percent), while Weakley County (5.7 percent) and Obion County (6.7 percent) were less affected.

Community Contact Information

Six community contact interviews were referenced for this evaluation. The contacts include individuals knowledgeable regarding the economic conditions of the assessment area, with expertise in the following areas:

- Small business (three)
- Affordable housing (two)
- Economic development

Contacts noted that food production is the biggest industry in the area, including two Tyson poultry processing plants. Contacts from Haywood, Hardeman, and Henderson counties describe the economy as lagging behind other areas of the state. Haywood County has witnessed an outflow of population for better opportunities in other areas of the state, according to one contact. While Haywood, Hardeman, and Henderson are rural, Obion, Weakley, and Dyer counties have higher concentrations of population and benefit from more industry and low unemployment; however, contacts noted that several manufacturers have left the area in recent years, and many of the remaining jobs are low-paying service-related positions.

One contact described the small business environment as generally friendly but cautious, particularly toward entrepreneurs without a history of successful operations. Area banks serve existing businesses well, according to the contact, but many new business owners cannot meet banks' underwriting requirements. The contact noted that banks could offer guaranteed loans through the SBA and the USDA but that many choose not to as they are more work and more costly. The contact did note that Simmons Bank has worked well with local small businesses in the area to offer flexible small business loans. Another contact noted that some parts of the assessment area are not attractive to businesses due to the high crime rate and lack of skilled workforce. Additionally, many businesses suffer from a lack of collateral and poor or no credit histories. Thus, small business credit needs

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include flexible loan products with low interest rates. Non-credit needs include financial education and outreach to local schools.

Affordable housing is a need throughout the assessment area according to contacts. Much of the housing stock is older and in need of repair. Thus, small dollar home-improvement loans are a stated need. However, several barriers to homeownership exist in the assessment area, including lack of sufficient income, low property values, and poor credit histories. Banks can meet the needs of the community by offering low-down-payment guaranteed mortgage loans through the USDA, streamlining the application process, and conducting outreach to the LMI population through workforce development and financial literacy programs.

Agriculture remains an important part of the assessment area, with many small family farms in operations for several generations. Access to credit at local banks is good, according to one contact, and sufficient infrastructure exists for farmers to get their products to market.

According to the contacts, bank branches are accessible to all of the assessment area and are sufficient to meet basic banking needs but are often conservative in their available loan products. Despite the prevalence of available banks, much of the LMI community relies on alternative lenders with high interest rates and onerous repayment terms. Simmons Bank was noted by several contacts as being particularly responsive in the assessment area.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WESTERN TENNESSEE ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect excellent responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses and farms of different sizes. Finally, the bank makes a low level of community development loans in the assessment area.

Lending Activity

The following table displays the summary of the bank's lending activity analyzed under the Lending Test for this assessment area.

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 55 | 2.8% | 2,300 | 1.3% |
| Home Purchase | 263 | 13.4% | 32,547 | 17.7% |
| Multifamily Housing | 2 | 0.1% | 592 | 0.3% |
| Refinancing | 302 | 15.4% | 30,761 | 16.8% |
| Other Purpose LOC | 69 | 3.5% | 3,281 | 1.8% |
| Other Purpose Closed/Exempt | 11 | 0.6% | 635 | 0.3% |
| Total HMDA | 702 | 35.7% | 70,116 | 38.2% |
| Small Business | 998 | 50.8% | 83,478 | 45.5% |
| Small Farm | 266 | 13.5% | 29,871 | 16.3% |
| TOTAL LOANS | 1,966 | 100.0% | 183,465 | 100.0% |

Lending activity in this assessment area represents 5.7 percent of total HMDA and CRA loans made within the bank's combined assessment areas. In comparison, the share of total bank branches inside this assessment area is 4.8 percent, and the percentage of total bank deposits held in the assessment area as of June 30, 2020 is 5.1 percent. Moreover, the bank ranked first in 2019 in percentage of total HMDA loans compared to all lenders with HMDA loans in the assessment area and second in 2020. The bank ranked second in small business and small farm loans in the assessment area for both 2019 and 2020. Considering these factors, the bank's lending activity in the assessment area reflects excellent responsiveness to assessment area credit needs.

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Geographic Distribution of Loans

Considering all three loan products reviewed, the bank's overall geographic distribution of loans in the assessment area is adequate, with primary emphasis placed on HMDA and small business lending. As noted in the *Income and Wealth Demographics* section, there are no low-income census tracts in the assessment area, so performance is based on activity in moderate-income census tracts only.

HMDA Lending

The geographic distribution of HMDA loans is poor.

The bank's percentage of HMDA loans made in moderate-income census tracts in 2019 (2.3 percent) was below aggregate lending performance (7.1 percent) and demographic levels (8.3 percent) and is considered poor. While the bank's performance in 2020 improved slightly (3.7 percent), it is nevertheless still poor when considering aggregate lending performance (6.5 percent) and the percentage of owner-occupied housing in moderate-income census tracts (8.3 percent).

Small Business Lending

The bank's geographic distribution of small business loans is adequate.

In 2019, the bank made 3.0 percent of its small business loans in moderate-income geographies, which trailed aggregate lenders (5.1 percent) and the demographic level (6.8 percent), reflecting poor performance. In 2020, the bank's performance improved with 3.5 percent of its small business loans being made in moderate-income census tracts, which was in line with aggregate lenders (4.1 percent) and considered adequate.

Small Farm Lending

The bank's geographic distribution of small farm loans is adequate.

In 2019, the bank originated 1.4 percent of its small farm loans in moderate-income census tracts, which was below aggregate lenders (3.1 percent) and the demographic level (4.4 percent), reflecting poor performance. In 2020, small farm lending in moderate-income geographies improved to 2.4 percent, which was in line with aggregate lenders (2.7 percent) and considered adequate.

Lastly, the bank made loans in 95.7 percent of all assessment area census tracts in 2019 and 97.9 percent of all assessment area census tracts in 2020. In both years, the bank made loans in 75 percent of all moderate-income census tracts in the assessment area. Thus, no conspicuous lending gaps were identified.

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Loan Distribution by Borrower's Profile

The bank's borrower distribution in the Western nonMSA Tennessee assessment area is good.

HMDA Lending

The bank's borrower distribution of HMDA loans is good.

The distribution of HMDA loans to low-income borrowers is good in both 2019 and 2020. The bank originated 8.1 percent of HMDA loans to low-income borrowers in 2019 and 5.6 percent in 2020, which exceeded aggregate performance (5.5 percent in 2019 and 4.4 percent in 2020) but was below demographic levels (19.7 percent) for both years of data reviewed. While not reaching demographic levels, the bank's performance is good considering the barriers to credit noted by community contacts.

The bank's HMDA lending to moderate-income borrowers is also good for both 2019 and 2020. The bank originated 15.9 percent of its HMDA loans to moderate-income borrowers in 2019, which exceeded aggregate lenders (14.4 percent) and approached demographic levels (17.2 percent). Similarly, in 2020, the bank originated 15.4 percent of its HMDA loans to moderate-income borrowers, again exceeding aggregate levels (13.6 percent) and just below the demographic level (17.2 percent).

Small Business Lending

The bank's distribution of small business loans by revenue profile is good.

The bank made 70.1 percent of small business loans to businesses with annual revenues of \$1 million or less in 2019. While below the percentage of total assessment area businesses with annual revenues of \$1 million or less (89.5 percent), this level of lending exceeded peer institutions in the assessment area (51.9 percent) and is considered good. Performance in 2020 is likewise considered good, as the bank originated a higher percentage of small business loans to businesses with annual revenues of \$1 million or less (61.4 percent) than did peer institutions (54.3 percent).

Small Farm Lending

Lastly, the bank's distribution of farm loans by farm revenue size is good.

In both 2019 and 2020, the bank's percentage of small farm loans to farms with annual revenues of \$1 million or less (79.6 percent and 79.0 percent, respectively) exceeded aggregate levels (68.8 percent in 2019 and 67.4 percent in 2020). While the bank's level of lending was below the percentage of assessment area farms with annual revenues of \$1 million or less (97.1 percent in 2019 and 97.2 percent in 2020), this performance is nevertheless considered good when considering the bank's performance relative to aggregate lending levels.

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Community Development Lending Activities

The bank makes a low level of community development loans in the Western nonMSA Tennessee assessment area. During the review period, the bank made two community development loans totaling \$1.3 million in the assessment area. One loan was made to a small farm and one to a small business, both of which provide jobs to LMI workers in the assessment area.

INVESTMENT TEST

The bank makes an adequate level of qualified community development investments and grants in the assessment area. New investments totaled \$2.6 million, while the bank also received credit for \$788,495 in investments made prior to the current review period but still outstanding. Current- and prior-period investments consisted entirely of MBS providing affordable housing for LMI borrowers, which is responsive to assessment area needs noted by community contacts.

In addition to these investments, the bank made 31 donations totaling \$42,000 during the review period. These donations benefitted various community service and affordable housing organizations operating in the Western nonMSA Tennessee assessment area. Additionally, a Simmons First Foundation grant of \$25,000 was made to an organization serving LMI children in the assessment area.

SERVICE TEST

The bank's service delivery systems are accessible in the assessment area, and the bank's record of opening and closing branches has generally not adversely affected the accessibility of those service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank is a leader in providing community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 11 branches in the Western nonMSA Tennessee assessment area. The following table details the distribution of assessment area branches, census tracts, and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 1 | 9 | 1 | 0 | 11 |
| | 0.0% | 9.1% | 81.8% | 9.1% | 0.0% | 100% |
| Census Tracts | 0.0% | 8.5% | 70.2% | 19.2% | 2.1% | 100% |
| Household Population | 0.0% | 8.9% | 70.0% | 21.0% | 0.1% | 100% |

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The bank operates one, or 9.1 percent, of its assessment area branches in moderate-income census tracts, as shown in the preceding table. This is in line with the percentage of assessment area census tracts that are moderate income (8.5 percent) and the household population in those census tracts (8.9 percent). Based on this information, the bank's service delivery systems are accessible to geographies and individuals of different income levels.

Changes in Branch Locations

The bank's record of opening and closing branches within the assessment area has generally not adversely affected the accessibility of its service delivery systems. As previously described, the bank closed five branches during the review period, one of which was in a moderate-income census tract. Two remaining locations in middle-income census tracts are less than a mile from moderate tracts and are accessible to consumers in those geographies.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Four branches offer extended Friday hours, including the branch located in a moderate-income census tract.

Community Development Services

Simmons Bank is a leader in providing community development services in the assessment area. During the review period, 21 bank employees provided 287 community development services to 17 different organizations. Many of these services consisted of youth and adult financial literacy education, as well as serving on the boards of directors of local community development organizations.

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DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE EASTERN TENNESSEE ASSESSMENT AREA

The bank has designated the entireties of McMinn and Monroe counties as the Eastern nonMSA Tennessee assessment area. The bank operates five full-service branches in the assessment area; during the review period, the bank did not open or close any branches in the assessment area. The tables below detail key demographics relating to the Eastern nonMSA Tennessee assessment area.

| Assessment Area Demographics by Geography Income Level | | | | | | |
|--|------------------------|-----------|---------|--------|----------|--------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Census Tracts | 0 | 1 | 15 | 1 | 0 | 17 |
| | 0.0% | 5.9% | 88.2% | 5.9% | 0.0% | 100% |
| Family Population | 0 | 1,346 | 23,269 | 1,476 | 0 | 26,091 |
| | 0.0% | 5.2% | 89.2% | 5.7% | 0.0% | 100% |
| Household Population | 0 | 2,388 | 32,553 | 2,230 | 0 | 37,171 |
| | 0.0% | 6.4% | 87.6% | 6.0% | 0.0% | 100% |
| Business Institutions | 0 | 401 | 2,465 | 205 | 0 | 3,071 |
| | 0.0% | 13.1% | 80.3% | 6.7% | 0.0% | 100% |
| Agricultural Institutions | 0 | 1 | 95 | 2 | 0 | 98 |
| | 0.0% | 1.0% | 96.9% | 2.0% | 0.0% | 100% |

| Assessment Area Demographics by Population Income Level | | | | | |
|---|-------------------------|-----------|---------|--------|--------|
| Demographic Type | Population Income Level | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | |
| Family Population | 5,405 | 4,811 | 5,102 | 10,773 | 26,091 |
| | 20.7% | 18.4% | 19.6% | 41.3% | 100% |
| Household Population | 8,944 | 6,119 | 6,145 | 15,963 | 37,171 |
| | 24.1% | 16.5% | 16.5% | 43.0% | 100% |

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE EASTERN TENNESSEE ASSESSMENT AREA

LENDING TEST

The bank's performance in this assessment area is consistent with the Lending Test performance in the full-scope review, Western Tennessee nonMSA assessment area, as displayed in the following table. For more detailed information relating to the bank's Lending Test performance in this assessment area, see the tables in Appendix C.

| Lending Test Criteria | Performance |
|---|-------------------|
| Lending Activity | Below |
| Geographic Distribution of Loans | Consistent |
| Distribution of Loans by Borrower's Profile | Consistent |
| Community Development Lending Activities | Consistent |
| OVERALL | CONSISTENT |

During the review period, the bank made two community development loans \$3.2 million in the assessment area.

INVESTMENT TEST

The bank's investment performance in this assessment area is consistent with the investment performance in the full-scope review, Western Tennessee nonMSA assessment area. During the review period, the bank made qualified investments totaling \$3.1 million, of which \$1.8 million were made during the current period and \$1.4 million were made during a prior period but were still outstanding. In addition to these investments, the bank made 11 donations totaling \$12,750.

SERVICE TEST

The bank's performance in this assessment area is consistent with the service test performance in the full-scope review, Western Tennessee nonMSA assessment area, as detailed in the following table.

| Service Test Criteria | Performance |
|---|-------------------|
| Accessibility of Delivery Systems | Exceeds |
| Changes in Branch Locations | Consistent |
| Reasonableness of Business Hours and Services | Consistent |
| Community Development Services | Below |
| OVERALL | CONSISTENT |

During the review period, six bank employees provided 61 community development services to six different organizations in the assessment area.

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TEXAS

CRA RATING FOR TEXAS: SATISFACTORY

The Lending Test is rated: **Low Satisfactory**
 The Investment Test is rated: **High Satisfactory**
 The Service Test is rated: **High Satisfactory**

Factors supporting the institution's ratings for the state of Texas include:

- The bank's lending levels reflect adequate responsiveness to the credit needs of the Texas assessment areas.
- The geographic distribution of loans reflects adequate penetration throughout the Texas assessment areas.
- The distribution of loans by borrower's income or revenue profile reflects adequate penetration among customers of different income levels and businesses of different sizes.
- The bank makes a relatively high level of community development loans throughout the Texas assessment areas.
- The bank makes a significant level of qualified community development investments and grants and is occasionally in a leadership position in Texas.
- Delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the Texas assessment areas. Changes in branch locations have not adversely affected the accessibility of the bank's delivery systems, and business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly in LMI geographies.
- The bank provides a relatively high level of community development services.

SCOPE OF EXAMINATION

Scoping considerations applicable to the review of the Texas assessment areas are consistent with the overall CRA examination scope presented in the *Institution, Scope of Examination* section. However, small farm lending was not analyzed and did not play a role in assessing the lending performance in the Texas assessment areas, as the bank had minimal farm lending activity and is primarily focused on HMDA and small business lending. Given loan demand and the bank's lending activity, small business lending performance carried more weight toward the bank's lending performance conclusions throughout the state.

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The bank operates in ten assessment areas in Texas, located in nine MSAs and one nonMSA portion of the state. At the time of the last evaluation as of January 2020, the bank was operating in four assessment areas in Texas. During the current review period, the bank exited the San Antonio and Austin assessment areas through sale of its branches. In February 2020, the bank acquired branches in the Sherman-Denison, Texas MSA and added this as an additional assessment area. In April 2022, the bank re-entered the San Antonio and Austin markets through acquisition activity. At the same time, it expanded its footprint in Texas to include the additional MSA assessment areas of Fort Worth, Tyler, College Station, Corpus Christi, and Houston. Since the 2022 acquisition activity occurred shortly before the start of this evaluation, these assessment areas were not included in this evaluation. The Dallas and Sherman-Denison assessment areas were reviewed under full-scope examination procedures, with primary consideration given to performance in the Dallas assessment area when determining overall state ratings. Lending tests in the Sherman-Denison assessment area included only lending activity in 2020 when it became a new designated assessment area for the bank.

To augment the evaluation of the two full-scope assessment areas, three community contact interviews were referenced. These interviews were used to ascertain specific credit and community development needs and provided context with which to evaluate the bank's responsiveness to these needs. Key details from the interviews are included in the *Description of Institution's Operations* sections applicable to the assessment areas for which the community contacts interviews were conducted.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TEXAS

The bank operates 33 offices throughout its Dallas and Sherman-Denison assessment areas in Texas, including branches acquired in April 2022. The following table gives additional detail regarding the bank's operations in Texas.

| Review Area | Branches # | Branches % | Deposits \$ 000s (as of 6/30/21) | Deposits % | CRA Review Procedures |
|----------------|------------|-------------|-------------------------------------|-------------|--------------------------|
| Dallas CSA | 27 | 81.8% | \$1,638,314 | 74.1% | Full-Scope |
| Sherman MSA | 6 | 18.2% | \$573,931 | 25.9% | Full-Scope |
| OVERALL | 33 | 100% | \$2,212,245 | 100% | 2 Full-Scope |

The vast majority of the bank's operations in Texas are concentrated in the Dallas assessment area. Deposits held in the state of Texas total approximately \$2.2 billion, which represents 11.9 percent of total bank deposits. The bank added 23 branches in Texas during the review period through acquisition activity. The bank closed eight branches during the review period.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

LENDING TEST

Bank's performance under the Lending Test is rated low satisfactory. The test considers the bank's performance under the following criteria.

Lending Activity

| Full-Scope Review Areas | Lending Activity |
|-------------------------|------------------|
| Dallas MSA | Adequate |
| Sherman MSA | Adequate |
| OVERALL | ADEQUATE |

The bank's Texas lending levels reflect adequate responsiveness to assessment area credit needs based on loan activity analyzed under the Lending Test. The total number and dollar volume of loans were considered in arriving at lending activity conclusions, as well as competitive factors within the Texas assessment areas.

Geographic and Borrower Distribution

As displayed in the following tables, the bank's geographic distribution of loans reflects adequate penetration throughout the Texas assessment areas.

| Full-Scope Review Areas | Geographic Distribution of Loans |
|-------------------------|----------------------------------|
| Dallas MSA | Adequate |
| Sherman MSA | Good |
| OVERALL | ADEQUATE |

Performance by borrower's income or revenue profile is adequate in the state of Texas, as shown in the following tables.

| Full-Scope Review Areas | Loan Distribution By Borrower's Profile |
|-------------------------|---|
| Dallas MSA | Poor |
| Sherman MSA | Good |
| OVERALL | ADEQUATE |

Community Development Lending Activities

Overall, the bank makes a relatively high level of community development loans in the state of Texas, as displayed below.

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| Full-Scope Review Areas | Community Development Lending |
|-------------------------|-------------------------------|
| Dallas MSA | Relatively High |
| Sherman MSA | Adequate |
| OVERALL | RELATIVELY HIGH |

During the review period, the bank made 19 community development loans totaling \$43.9 million throughout the Texas assessment areas. An additional two PPP loans with a community development purpose were made in the greater statewide area totaling \$3.3 million.

INVESTMENT TEST

The bank is rated high satisfactory under the Investment Test. The following tables display investment and grant activity performance for the Texas assessment areas.

| Full-Scope Review Areas | Investment and Grant Activity |
|-------------------------|-------------------------------|
| Dallas MSA | Excellent |
| Sherman MSA | Adequate |
| OVERALL | SIGNIFICANT |

The bank made a total of \$51.0 million in qualified community development investments and \$197,875 in donations and grants in the Texas assessment areas. Of the total statewide investments, \$37.6 million were made in the current review period, while \$13.4 million were made prior to the review period but were still outstanding.

SERVICE TEST

The bank's performance in Texas is rated high satisfactory under the Service Test.

Accessibility of Delivery Systems

As displayed in the following table, the bank's service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in Texas assessment areas.

| Full-Scope Review Areas | Accessibility of Delivery Systems |
|-------------------------|-----------------------------------|
| Dallas MSA | Reasonably Accessible |
| Sherman MSA | Reasonably Accessible |
| OVERALL | REASONABLY ACCESSIBLE |

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Changes in Branch Locations

The bank's record of opening and closing branches in the Texas assessment areas has not adversely affected the accessibility of its service delivery systems, as shown in the table below.

| Full-Scope Review Areas | Changes in Branch Locations |
|--------------------------------|------------------------------------|
| Dallas MSA | Not Adversely Affected |
| Sherman MSA | Not Adversely Affected |
| OVERALL | NOT ADVERSELY AFFECTED |

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the Texas assessment areas, particularly LMI geographies and individuals. The bank's performance under this criteria is displayed by assessment area in the following table.

| Full-Scope Review Areas | Reasonableness of Business Hours and Services |
|--------------------------------|--|
| Dallas MSA | Do Not Vary/Inconvenience |
| Sherman MSA | Do Not Vary/Inconvenience |
| OVERALL | DO NOT VARY/INCONVENIENCE |

Community Development Services

Throughout the Texas assessment areas, the bank provided a relatively high level of community development services.

| Full-Scope Review Areas | Community Development Services |
|--------------------------------|---------------------------------------|
| Dallas MSA | Relatively High |
| Sherman MSA | Limited |
| OVERALL | RELATIVELY HIGH |

During the review period, 39 bank employees provided 198 community development services to 25 different organizations.

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Dallas MSA

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DALLAS-FORT WORTH-ARLINGTON, TEXAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DALLAS ASSESSMENT AREA

Bank Structure

The bank operates 27 branches in the Dallas assessment area, representing 11.7 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Locations by Census Tract Income Level | | | | |
|--|------------------------|----------------------|---------------------|-----------------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 0 | 6 | 10 | 10 | 1 |

During the review period, the bank acquired three branches in moderate-income census tracts, seven branches in middle-income census tracts, and six branches in upper-income census tracts. The bank also closed two branches in middle-income census tracts and four branches in upper-income census tracts. Based on its branch locations and other service delivery systems, such as online and mobile banking, and considering its reduced presence in the assessment area since the last examination, the bank may have to more heavily rely on digital delivery channels and outreach to deliver financial services to certain parts of the assessment area, particularly in southern Johnson County and northern Denton County.

General Demographics

The Dallas assessment area is composed of nine counties in the Dallas-Fort Worth-Arlington, Texas-Oklahoma CSA; including four of seven counties in the Dallas-Plano-Irving, Texas metropolitan division (Collin, Dallas, Denton, and Kaufman), three of four counties in the Fort-Worth-Arlington-Grapevine, Texas metropolitan division (Johnson, Parker, and Tarrant), and Palo Pinto and Henderson Counties located in micropolitan divisions in the CSA. While the bank has designated these as separate assessment areas, they are combined as the Dallas assessment area for the purposes of this evaluation and represent an expanded assessment area delineation since the last examination, when only Dallas, Johnson, and Tarrant counties comprised the Dallas assessment area.

The banking market in the assessment area is highly competitive, with 155 FDIC-insured depository institutions operating 1,587 branches. Of these institutions, Simmons Bank ranks 26th in deposit market share, with 0.2 percent of all assessment area deposit dollars.

Competition for HMDA and CRA loans is similarly high. An analysis of 2020 HMDA-reportable loans shows that 1,060 institutions had loan activity in the assessment area, of which Simmons Bank ranked 116th, with less than 1.0 percent of total HMDA loans. Simmons Bank ranked 29th out of 377 institutions with CRA loan activity in the assessment area, accounting for less than 1.0 percent of total CRA loan activity.

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Dallas MSA

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The assessment area covers a large metropolitan area with a diverse population and demographic composition. As such, credit needs in the assessment area are varied and include a blend of consumer and commercial loan and deposit products. Particular credit needs noted by community contacts include micro loans for small business with flexible underwriting requirements and financial literacy and business management training for new small businesses. Finally, as a large metropolitan area with a diverse population, there are numerous opportunities for banks to participate in community development efforts.

Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|----------------------|-------------|--------------------------|-------------|
| | Census Tracts | | Family Population | |
| Low | 163 | 12.9% | 147,943 | 9.4% |
| Moderate | 331 | 26.2% | 368,416 | 23.3% |
| Middle | 353 | 27.9% | 476,831 | 30.2% |
| Upper | 412 | 32.5% | 586,322 | 37.1% |
| Unknown | 7 | 0.6% | 1,488 | 0.1% |
| TOTAL | 1,266 | 100% | 1,581,100 | 100% |

As displayed in the preceding table, 39.1 percent of census tracts in the assessment area are designated as low- or moderate-income tracts, with 32.7 percent of all assessment area families residing in those census tracts. The majority of LMI census tracts are concentrated in southern Dallas County and central Tarrant County.

According to 2015 ACS data, the median family income for the Dallas assessment area was \$69,711, while the same figure for the state of Texas as a whole was \$62,717. More recently, the FFIEC estimates the median family income for the Dallas metropolitan division (MD) to be \$83,100 in 2019 and \$86,200 in 2020. The estimated median family income levels for the Fort Worth MD was \$75,300 in 2019 and \$81,100 in 2020. The following table displays the distribution of assessment area families by income level compared to all Texas families.

| Family Population by Income Level | | | | | | | | |
|--|------------------------|-------------|------------------|-------------|--|-------------|---|-------------|
| | Assessment Area | | Texas | | Dallas-Plano-Irving, Texas (MD) | | Fort Worth-Arlington, Texas (MD) | |
| Low | 369,736 | 23.4% | 1,474,125 | 23.2% | 260,862 | 23.7% | 124,263 | 22.4% |
| Moderate | 261,587 | 16.6% | 1,068,177 | 16.8% | 181,196 | 16.5% | 92,202 | 16.6% |
| Middle | 286,144 | 18.1% | 1,162,520 | 18.3% | 193,268 | 17.6% | 108,109 | 19.5% |
| Upper | 663,533 | 42.0% | 2,659,282 | 41.8% | 463,554 | 42.2% | 231,139 | 41.6% |
| TOTAL | 1,581,000 | 100% | 6,364,104 | 100% | 1,098,880 | 100% | 555,713 | 100% |

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Based on the information in the preceding table, 40.0 percent of families in the assessment area are LMI; this figure equals the percentage of families who are in LMI in the state of Texas as a whole (40.0 percent) and is comparable to the LMI family percentage in the Dallas and Fort Worth MDs individually. While not shown in the table above, poverty levels in the assessment area (11.5 percent) are below that of the state of Texas as a whole (13.5 percent) and comparable to poverty levels in the Dallas MD (11.5 percent) and Fort Worth MD (11.0 percent). Overall, this data points to the assessment area being slightly more affluent than the state of Texas as a whole but comparable to the full Dallas and Fort Worth MDs.

Housing Demographics

The following table displays key housing demographics for the assessment area and state of Texas.

| Housing Demographics | | | |
|-----------------------------|-----------------------------|----------------------------|------------------------------------|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) |
| Assessment Area | \$156,286 | 38.0% | \$938 |
| Texas | \$136,000 | 39.1% | \$882 |

Overall, housing costs in the assessment area are slightly less affordable than the state of Texas as a whole. Affordability within the assessment area varies, with Johnson County being the most affordable, with a ratio of 48.8 percent, and Dallas County being the least affordable at 37.9 percent.

Industry and Employment Demographics

The assessment area economy is large and well diversified. The assessment area is highly urban and has a total population of 6,486,689, the overwhelming majority of which is split between Dallas County (2,485,003) and Tarrant County (1,914,526). The assessment area hosts strong technology, financial and banking, and manufacturing sectors, and serves as the headquarters for numerous large national and multinational corporations such as AT&T, ExxonMobil, McKesson, and American Airlines. The assessment area also includes several universities and colleges, most notably Texas Christian University, Southern Methodist University, and the University of Texas at Dallas.

County business patterns data indicate that there are 3,501,863 paid employees in the assessment area, with the largest industries by number of paid employees being healthcare and social assistance (10.7 percent), retail trade (10.2 percent), and government (10.0 percent). Furthermore, professional, scientific, and technical services are a key industry in the assessment area, accounting for 16.0 percent of all private business establishments. The assessment area also supports a strong small business sector, with assessment area demographics indicating that 92.3 percent of businesses have annual revenues of \$1 million or less.

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The table below details unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for the assessment area compared to the state of Texas.

| Unemployment Levels for the Assessment Area | | |
|--|------------------------|--------------|
| Time Period (Annual Average) | Assessment Area | Texas |
| 2019 | 3.3% | 3.5% |
| 2020 | 7.2% | 7.7% |
| 2021 | 5.1% | 5.7% |

Unemployment levels in the assessment area remained lower than statewide levels throughout the review period, including during the pandemic. Counties within the assessment area showed relatively similar unemployment levels over the period, with Parker County consistently having the lowest unemployment rate.

Community Contact Information

For the Dallas assessment area, two community contact interviews with individuals knowledgeable of the area's economic conditions and credit needs were utilized.

Contacts describe Dallas overall as a thriving area, with strong business growth and opportunities. To this end, Dallas is home to nine Fortune 500 corporate headquarters, is a major transit hub, and the city continues to experience an influx of employers from other states. Nonetheless, the city can be divided into areas with varying economic conditions in each. West Dallas contains mixed-use developments, multifamily housing, and warehouses. It is also experiencing gentrification. East Dallas is characterized by smaller industries, such as tool and die companies. North Dallas and the downtown area are predominantly office and service-oriented jobs. South Dallas continues to have its challenges in achieving parity with the rest of Dallas, according to the contacts. Geographies south of Interstate 30 have less access to financial resources than those north of the interstate, and most census tracts in this area are LMI.

Housing barriers include rising costs due to high demand for both owner-occupied and rental housing. Affordable housing, particularly for first-time homebuyers, fails to meet area demand. Zoning and land use laws can also prevent redevelopment efforts, according to one contact.

Small business needs, according to one contact, include financial literacy and business management training. The contact noted that many new small businesses use nontraditional payment services, such as PayPal and Cash App, and do not establish deposit accounts with local banks. As a result, when credit needs arise, they lack the established relationships needed with many banks to procure financing. The contact noted the need for small dollar business loans and more flexible lending products for small business owners with minimal business history and/or low personal credit scores. The contact noted that most of the businesses in South Dallas fall into this category and thus struggle to obtain needed financing for their businesses.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE DALLAS ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects adequate penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects poor penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes a relatively high level of community development loans in the assessment area.

Lending Activity

The following table displays the summary of the bank's lending activity analyzed under the Lending Test for this assessment area.

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|--------------|---------------|----------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 6 | 0.2% | 544 | 0.1% |
| Home Purchase | 371 | 13.1% | 114,413 | 17.7% |
| Multifamily Housing | 9 | 0.3% | 7,718 | 1.2% |
| Refinancing | 534 | 18.9% | 160,528 | 24.9% |
| Other Purpose LOC | 6 | 0.2% | 579 | 0.1% |
| Other Purpose Closed/Exempt | 12 | 0.4% | 4,033 | 0.6% |
| Total HMDA | 938 | 33.2% | 287,815 | 44.6% |
| Small Business | 1,871 | 66.2% | 354,861 | 55.0% |
| Small Farm | 17 | 0.6% | 2,451 | 0.4% |
| TOTAL LOANS | 2,826 | 100.0% | 645,127 | 100.0% |

As a percentage of the 2019 and 2020 loans made inside the bank's combined assessment areas, the bank originated 8.2 percent of its HMDA and CRA loans in the Dallas assessment area. At the same time, the bank operates 11.7 percent of its total branches and, as of June 30, 2020, holds 8.9 percent of its total deposits in the assessment area. Considering this comparison data, the bank's level of lending represents adequate responsiveness to the credit needs of the Dallas assessment area.

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Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is adequate.

HMDA Lending

The bank's geographic distribution of HMDA loans is adequate.

The bank's level of HMDA lending in low-income geographies in 2019 (3.8 percent) is in line with the aggregate lending level (3.0 percent) and slightly below demographic levels (5.0 percent), reflecting adequate performance. In 2020, both bank (1.7 percent) and aggregate (2.5 percent) declined but remain comparable; this is considered adequate.

The bank originated 11.1 percent of its HMDA loans in moderate-income census tracts in 2019, compared to 13.1 percent for aggregate lenders and a demographic of 19.7 percent; this is considered adequate. The bank's percentage of HMDA loans in moderate-income census tracts in 2020 declined to 4.3 percent, which trailed aggregate (10.9 percent) and was again below demographic (19.7 percent), reflecting poor performance.

Small Business Lending

Overall, the bank's geographic distribution of small business loans is considered adequate.

The bank originated 6.5 percent of its small business loans in low-income census tracts in 2019, which was in line with aggregate performance (6.7 percent) and the demographic figure (7.3 percent) and is considered adequate. Similarly, in 2020, the bank originated 6.8 percent of its small business loans in low-income census tracts, which was again in line with aggregate lenders (7.1 percent) and the demographic (7.3 percent) and reflects adequate performance.

The bank's lending in moderate-income census tracts was also adequate for both 2019 and 2020. The bank originated 17.1 percent of its small business loans in moderate-income geographies in 2019 and 2020, compared to aggregate levels of 18.9 percent in 2019 and 19.0 percent in 2020 and a demographic level of 19.8 percent in 2019 and 19.7 percent in 2020.

The bank's loan dispersion supports the conclusion that the bank's distribution of loans by geography income level is adequate. In 2019, the bank had loan activity in 33.6 percent of all assessment area census tracts and 20.4 percent of all LMI census tracts. In 2020, the bank's loan dispersion improved, with loan activity in 47.9 percent of all assessment area census tracts and 33.6 percent of all LMI census tracts. While some lending gaps were identified in the dispersion of the bank's HMDA and CRA loans, including in LMI geographies, the dispersion of the bank's loans was consistent with its branch structure in the assessment area. Additionally, as noted above, the assessment area is a highly competitive banking market, with over 1,000 HMDA lenders and over 350 small business lenders in 2020, of which the bank originated less than 1.0 percent for both loan products.

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Loan Distribution by Borrower's Profile

The bank's distribution of loans by income or revenue profile is poor.

HMDA Lending

The bank's borrower distribution of HMDA loans is poor.

The bank originated 1.4 percent of its 2019 HMDA loans to low-income borrowers, which trails the level of lending to low-income borrowers by peer institutions in the assessment area (3.6 percent) and is well below the demographic figure (23.4 percent), reflecting poor performance. The bank's level of HMDA lending to low-income borrowers dropped to 0.5 percent in 2020, again trailing aggregate lenders (3.1 percent) and the demographic and reflects poor performance.

The bank's HMDA lending to moderate-income borrowers was also poor for both 2019 (8.3 percent) and 2020 (6.6 percent). This performance again trailed peers (13.9 percent in 2019 and 12.7 percent in 2020) and was below demographic levels (16.5 percent).

Small Business Lending

The bank's borrower distribution of small business loans is poor.

In 2019, the bank made 44.9 percent of its loans to businesses with annual revenues of \$1 million or less. This was in line with aggregate lending levels (47.0 percent) but below the demographic level (92.0 percent), reflecting adequate performance. In 2020, the bank originated 27.4 percent of its loans to businesses with annual revenues of \$1 million or less, which was below aggregate lenders (37.7 percent) and the demographic (92.3 percent) and is considered poor.

Community Development Lending Activities

The bank makes a relatively high level of community development loans in the Dallas assessment area. During the review period, the bank made 16 community development loans totaling \$39.6 million, which supported community development purposes of economic development (two), revitalization and stabilization of a moderate-income geography (ten), and affordable housing (four). These loans include ten PPP loans with a community development purpose totaling \$16.3 million, a \$13.7 million loan to construct a senior living apartment building to serve LMI residents, and a \$3.0 million participation loan to build affordable single-family loans. The PPP loans are responsive to the needs of small businesses during the pandemic, while the affordable housing loans address a need stated by community contacts.

INVESTMENT TEST

The bank made an excellent level of qualified community development investments and grants in the assessment area. Qualified community development investments held during the review period totaled \$35.6 million. Of this total, \$22.2 million was invested in school bonds, while the

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remaining \$13.4 million was made in MBS providing affordable housing loans to LMI individuals in the assessment area. The bank also received credit for \$13.4 million in investments in MBS that were made prior to the review period but are still outstanding.

In addition to these investments, the bank made 75 donations totaling \$175,875, including two Simmons First Foundation grants totaling \$26,000.

SERVICE TEST

Service delivery systems are accessible to portions of the assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a relatively high level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates 27 branches in the Dallas assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 6 | 10 | 10 | 1 | 27 |
| | 0.0% | 22.2% | 37.0% | 37.0% | 3.7% | 100% |
| Census Tracts | 12.9% | 26.2% | 27.9% | 32.5% | 0.6% | 100% |
| Household Population | 9.4% | 23.3% | 30.2% | 37.1% | 0.1% | 100% |

The bank operates six, or 22.2 percent, of its assessment area branches in LMI census tracts. This branch distribution is below the percentage of assessment area census tracts that are LMI (39.1 percent) and the household population in LMI census tracts (32.7 percent). Of the bank's locations in middle- and upper-income geographies, 11 are within one mile of LMI census tracts and four are within two miles of these geographies. Therefore, the bank's service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank closed two branches in middle-income census tracts and four in upper-income census tracts. Nonetheless, as noted above, the bank maintains a significant presence throughout the assessment area. Therefore, the bank's record of opening and closing

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branches in this assessment area has not adversely impacted the accessibility of its service delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. All branches have generally similar operating hours and services, and the same products are offered at each location.

Community Development Services

Simmons Bank employees provided a relatively high level of community development services in the assessment area. During the review period, 38 bank employees provided 188 community development services to 24 different organizations throughout the assessment area. Many of the bank's service efforts consisted of financial literacy training at various schools across the assessment area. Employees also served on the boards of directors of various community development organizations in the assessment area.

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SHERMAN-DENISON, TEXAS MSA

(Full-Scope Review)

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SHERMAN-DENISON ASSESSMENT AREA

Bank Structure

The bank operates six branches in the Sherman-Denison assessment area, representing 2.6 percent of all bank branches. The table below displays the distribution of these branches by census tract income level.

| Branch Locations by Census Tract Income Level | | | | |
|--|------------------------|----------------------|---------------------|-----------------------|
| Low-Income | Moderate-Income | Middle-Income | Upper-Income | Unknown-Income |
| 0 | 0 | 3 | 2 | 1 |

This is a new assessment area for the bank. The bank gained five branches through the acquisition of Landmark Bank in February 2020, in addition to a branch it acquired in 2018; two branches were subsequently closed. Based on its branch locations and other service delivery systems, such as online and mobile banking, the bank may have to more heavily rely on digital delivery channels and outreach to deliver financial services to certain parts of the assessment area, particularly in Cooke County.

General Demographics

The assessment area is composed of the two contiguous Texas counties of Cooke and Grayson. Grayson County comprises the entirety of the Sherman-Denison MSA, while Cooke County is part of the Gainesville, Texas, micropolitan statistical area and lies directly west of Grayson County. The assessment area has a total population of 161,541, with most of the population residing in Grayson County (122,780). While the assessment area sits just north of the Dallas assessment area, it is much more rural and less populated.

The Sherman-Denison assessment area's banking market consists of 16 institutions operating 50 branches. Of these institutions, the bank ranks third in deposit market share, with 13.0 percent of all assessment area deposit dollars. Bank deposits held in branches in the assessment area represent 3.8 percent of the bank's total deposits. While there are only 16 institutions with branches in the assessment area, competition for HMDA and CRA loans is much higher. An analysis of 2020 HMDA-reportable loans shows that 405 institutions had loan activity in the assessment area, of which Simmons Bank ranked 23rd, with 1.1 percent of total HMDA loans. Out of 106 institutions with CRA loan activity, Simmons Bank ranked fifth, with 6.7 percent of total CRA loan activity.

Credit needs of the assessment area are varied and include a blend of consumer, business, and agricultural credit products. A community contact indicated a need for small business loans and affordable housing programs.

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Income and Wealth Demographics

The following table reflects the number of census tracts by income level and the family population within those tracts.

| Assessment Area Demographics by Geography Income Level | | | | |
|---|----------------------|---------------|--------------------------|---------------|
| | Census Tracts | | Family Population | |
| Low | 0 | 0.0% | 0 | 0.0% |
| Moderate | 10 | 29.4% | 8,109 | 19.0% |
| Middle | 15 | 44.1% | 20,477 | 47.9% |
| Upper | 9 | 26.5% | 14,128 | 33.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% |
| TOTAL | 34 | 100.0% | 42,714 | 100.0% |

There are no low-income census tracts in the assessment area, and 29.4 percent of the census tracts in the assessment area are moderate income, with 19.0 percent of the family population in the assessment area residing in those tracts.

Based on 2015 ACS data, the median family income for the assessment area is \$60,947, which is below the median family income for the state of Texas as a whole (\$62,717). More recently, the FFIEC estimated the median family income for the Sherman-Denison MSA to be \$67,500 in 2019 and \$76,000 in 2020. The following table compares the population of assessment area families by income level to the state of Texas.

| Family Population by Income Level | | | | |
|--|------------------------|-------------|------------------|-------------|
| | Assessment Area | | Texas | |
| Low | 9,007 | 21.1% | 1,474,125 | 23.2% |
| Moderate | 7,246 | 17.0% | 1,068,177 | 16.8% |
| Middle | 8,154 | 19.1% | 1,162,520 | 18.3% |
| Upper | 18,307 | 42.9% | 2,659,282 | 41.8% |
| TOTAL | 42,714 | 100% | 6,364,104 | 100% |

When compared to the previous table, the information in the table above shows that a much larger percentage of families in the assessment area are LMI (38.1 percent) than reside in LMI geographies (19.0 percent). The percentage of LMI families in the assessment area is slightly below statewide levels (40.0 percent). Additionally, the poverty level in the assessment area (12.1 percent) is slightly below the statewide figure (13.5 percent). Overall, when considering income and poverty levels, the assessment area is slightly more affluent than the state of Texas as a whole.

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Housing Demographics

The following table displays key housing demographics for the assessment area and state of Texas.

| Housing Demographics | | | |
|-----------------------------|-----------------------------|----------------------------|------------------------------------|
| Dataset | Median Housing Value | Affordability Ratio | Median Gross Rent (monthly) |
| Assessment Area | \$110,842 | 44.4% | \$766 |
| Texas | \$136,000 | 39.1% | \$882 |

Housing costs in the assessment area are lower than the state of Texas and when adjusting for income levels render the assessment area more affordable. Additionally, the percentage of renters with rental costs in excess of 30 percent of their income in the assessment area (41.1 percent) is lower than statewide (44.7 percent). Thus, both homeownership and renting are more affordable in the assessment than statewide.

Industry and Employment Demographics

County business patterns indicate that there are 62,330 paid employees in the assessment area. By number of paid employees, the three largest industries are healthcare and social assistance (17.0 percent), government (16.1 percent), and manufacturing (13.2 percent). Of all businesses operating in the assessment area, 91.7 percent reported annual revenues of \$1 million or less, indicating that small businesses play an important role in the assessment area economy.

The following table displays unemployment data from the U.S. Department of Labor, Bureau of Labor Statistics (not seasonally adjusted) for each county in the assessment area, the assessment area as a whole, and the state of Texas.

| Unemployment Levels for the Assessment Area | | |
|--|------------------------|--------------|
| Time Period (Annual Average) | Assessment Area | Texas |
| 2019 | 3.0% | 3.5% |
| 2020 | 6.2% | 7.7% |
| 2021 | 4.7% | 5.7% |

The unemployment level for the assessment area overall is lower than statewide unemployment levels over the period, and both counties in the assessment area are closely aligned. Cooke County appears to have been more heavily impacted by the pandemic, with an unemployment rate of 7.1 percent in 2020 compared to 5.9 percent for Grayson County, though both were still below statewide levels.

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Community Contact Information

A community contact interview was conducted with an individual familiar with economic development in the Sherman assessment area. The contact noted that the local economy is stable, with low unemployment. Local industry includes manufacturing and technology, along with a number of restaurants and small businesses. The contact further noted that infrastructure improvements are needed in some area to support the growth of larger industries. Restaurants and small businesses were most heavily impacted by the pandemic, but most recovered and been able to reopen. One residual effect includes a diminished workforce, as some individuals who could not work during the pandemic have chosen not to return to the workforce.

The contact noted that new home construction is strong in the assessment area but that these properties are not affordable. Additionally, many available rental units are also expensive. Affordable housing is scarce and does not meet demand. Barriers to homeownership, besides a lack of housing stock, include insufficient incomes, poor credit histories, and lack of financial education.

Small business opportunities exist, according to the contact, but are hampered by a lack of start-up capital, persistent supply chain issues, and lack of affordable rental space. Opportunities exist for banks to support small businesses by developing relationships and offering start-up and low interest loans.

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CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE SHERMAN ASSESSMENT AREA

LENDING TEST

The bank's lending levels reflect adequate responsiveness to assessment area credit needs. The geographic distribution of loans reflects good penetration throughout the assessment area. The distribution of borrower's income/revenue profile reflects good penetration among customers of different income levels and businesses of different sizes. Finally, the bank makes an adequate level of community development loans in the assessment area.

As the bank entered the market in 2020, loan activity in 2019 was not included in the review. Finally, small business lending was given more weight in determining overall performance conclusions due to its relatively higher volume of loans in the assessment area.

Lending Activity

The following table displays the summary of the bank's lending activity analyzed under the Lending Test for this assessment area.

| Summary of Lending Activity January 1, 2019 through December 31, 2020 | | | | |
|--|------------|---------------|---------------|---------------|
| Loan Type | # | % | \$ (000s) | % |
| Home Improvement | 4 | 1.0% | 272 | 0.5% |
| Home Purchase | 52 | 13.2% | 12,596 | 23.3% |
| Multifamily Housing | 0 | 0.0% | 0 | 0.0% |
| Refinancing | 40 | 10.2% | 10,502 | 19.4% |
| Other Purpose Closed/Exempt | 1 | 0.3% | 63 | 0.1% |
| Total HMDA | 97 | 24.7% | 23,433 | 43.3% |
| Small Business | 275 | 70.0% | 28,536 | 52.7% |
| Small Farm | 21 | 5.3% | 2,158 | 4.0% |
| TOTAL LOANS | 393 | 100.0% | 54,127 | 100.0% |

As a percentage of the 2020 loans made inside the bank's combined assessment areas, the bank originated 1.1 percent of its HMDA and CRA loans in the Sherman assessment area. At the same time, the bank operates 2.6 percent of its total branches and as of June 30, 2020, holds 3.8 percent of its total deposits in the assessment area. Considering this comparison data and the bank's recent entry in this market, the bank's level of lending represents adequate responsiveness to the credit needs of the Sherman assessment area.

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Geographic Distribution of Loans

The bank's overall geographic distribution of loans in the assessment area is good. As noted in the *Income and Wealth Demographics* section, there are no low-income census tracts in the assessment area, so performance is based on activity in moderate-income census tracts only.

HMDA Lending

The geographic distribution of HMDA loans is poor. The bank's percentage of HMDA loans made in moderate-income census tracts in 2020 (7.2 percent) is below aggregate lending performance (11.5 percent) and demographic levels (17.2 percent).

Small Business Lending

The bank's geographic distribution of small business loans is excellent. In 2020, the bank made 29.2 percent of its small business loans in moderate-income geographies, which exceeds aggregate lenders (22.9 percent) and the demographic level (22.8 percent).

Lastly, the bank made loans in all assessment area census tracts. Thus, no conspicuous lending gaps were identified.

Loan Distribution by Borrower's Profile

The bank's borrower distribution in the Sherman-Denison assessment area is good.

HMDA Lending

The bank's borrower distribution of HMDA loans is good.

The bank originated 4.1 percent of its HMDA loans to low-income borrowers in 2020, which is in line with aggregate lenders (3.7 percent) and below demographic levels (21.1 percent), reflecting adequate performance.

The bank originated 17.5 percent of its HMDA loans to moderate-income borrowers in 2020, which exceeds aggregate lenders (13.6 percent) and the demographic (17.0 percent), reflecting excellent performance.

Small Business Lending

The bank's distribution of small business loans by revenue profile is adequate.

In 2020, the bank made 33.6 percent of small business loans to businesses with annual revenues of \$1 million or less. While below the percentage of total assessment area businesses with annual revenues of \$1 million or less (91.7 percent), this level of lending was in line with peer institutions in the assessment area (29.7 percent) and is considered adequate.

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Community Development Lending Activities

The bank makes an adequate level of community development loans in the Sherman assessment area. During the review period, the bank made three community development loans totaling \$4.3 million, all of which were PPP loans with a community development purpose.

INVESTMENT TEST

The bank made an adequate level of qualified community development investments and grants in the assessment area. Qualified community development investments made during the review period totaled \$2.0 million, all of which consisted of MBS providing affordable housing loans to LMI individuals in the assessment area.

In addition to these investments, the bank made eight donations totaling \$22,000 to organizations serving the community service and affordable housing needs of the assessment area.

SERVICE TEST

Service delivery systems are reasonably accessible to the bank's geographies and individuals of different income levels in the assessment area. The bank's record of opening and closing branches has not adversely affected the accessibility of its service delivery systems, particularly to LMI geographies and individuals. Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. Finally, the bank provides a limited level of community development services in the assessment area.

Accessibility of Delivery Systems

The bank operates six branches in the Sherman assessment area. The following table displays the location of the bank's branches by geography income level compared to the distribution of assessment area census tracts and households by geography income level.

| Branch Distribution by Geography Income Level | | | | | | |
|--|-------------------------------|------------------|----------------|---------------|-----------------|--------------|
| Dataset | Geography Income Level | | | | | TOTAL |
| | Low- | Moderate- | Middle- | Upper- | Unknown- | |
| Branches | 0 | 0 | 3 | 2 | 1 | 6 |
| | 0.0% | 0.0% | 50.0% | 33.3% | 16.7% | 100% |
| Census Tracts | 0.0% | 29.4% | 44.1% | 26.5% | 0.0% | 100% |
| Household Population | 0.0% | 19.0% | 47.9% | 33.1% | 0.0% | 100% |

The bank does not operate any branches in LMI geographies, while the percentage of assessment area census tracts that are LMI is 29.4 percent and the household population in LMI census tracts is 19.0 percent. Of the bank's locations in middle- and upper-income geographies, two are within one mile of LMI census tracts. Therefore, the bank's service delivery systems are reasonably

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accessible to the bank's geographies and individuals of different income levels in the assessment area.

Changes in Branch Locations

During the review period, the bank acquired two branches in middle-income census tracts, four branches in upper-income census tracts, and one branch in an unknown-income census tract. The bank also closed two branches in upper-income census tracts during the review period. Nonetheless, as noted earlier, the bank's remaining branches are reasonably accessible to assessment area consumers. Therefore, the bank's record of opening and closing branches in this assessment area has not adversely impacted the accessibility of its service delivery systems.

Reasonableness of Business Hours and Services in Meeting Assessment Area Needs

Business hours and banking services do not vary in a way that inconveniences certain portions of the assessment area, particularly LMI geographies and individuals. All branches have generally similar operating hours and services, and the same products are offered at each location.

Community Development Services

Simmons Bank provides a limited level of community development services in the assessment area. During the review period, one bank employee provided ten community development services to an organization that provides services to LMI residents in the assessment area.

SCOPE OF EXAMINATION TABLES

| Scope of Examination | | |
|--------------------------------------|---|--------------------------|
| TIME PERIOD REVIEWED | January 1, 2019 to December 31, 2020 for HMDA, small business, and small farm lending January 6, 2020 to June 30, 2022 for community development loans, investment, and service activities | |
| FINANCIAL INSTITUTION | PRODUCTS REVIEWED | |
| Simmons Bank Pine Bluff, Arkansas | Small Business HMDA Small Farm | |
| AFFILIATES | AFFILIATE RELATIONSHIP | PRODUCTS REVIEWED |
| N/A | N/A | N/A |

Appendix A (continued)

| Assessment Area – Examination Scope Details | | | | | |
|---|-------------|--------------|--|------------------|-----------------------|
| Assessment Area | Rated Area | # of Offices | Deposits (\$ 000s) (as of June 30, 2021) | Branches Visited | CRA Review Procedures |
| Kansas City Multistate MSA | Kansas City | 2 | \$197,865 | - | Full-Scope |
| Fayetteville MSA | Arkansas | 8 | \$452,534 | - | Full-Scope |
| Little Rock MSA | Arkansas | 19 | \$2,285,224 | - | Full-Scope |
| Pine Bluff MSA | Arkansas | 8 | \$2,062,214 | - | Full-Scope |
| Fort Smith MSA | Arkansas | 5 | \$256,529 | - | Limited-Scope |
| Hot Springs MSA | Arkansas | 3 | \$257,710 | - | Limited-Scope |
| Jonesboro MSA | Arkansas | 4 | \$461,636 | - | Limited-Scope |
| Arkansas NonMSA | Arkansas | 17 | \$1,051,264 | - | Full-Scope |
| Wichita MSA | Kansas | 3 | \$183,079 | - | Full-Scope |
| Kansas NonMSA | Kansas | 1 | \$92,092 | - | Limited-Scope |
| St. Louis MSA | Missouri | 17 | \$1,618,113 | - | Full-Scope |
| Columbia MSA | Missouri | 6 | \$912,203 | - | Limited-Scope |
| Joplin MSA | Missouri | 1 | \$140,042 | - | Limited-Scope |
| Springfield MSA | Missouri | 7 | \$443,616 | - | Limited-Scope |
| Missouri NonMSA | Missouri | 13 | \$824,808 | - | Full-Scope |
| Oklahoma City MSA | Oklahoma | 6 | \$577,430 | - | Full-Scope |
| Tulsa MSA | Oklahoma | 1 | \$220,745 | - | Limited-Scope |
| Southern Oklahoma NonMSA | Oklahoma | 8 | \$967,750 | - | Full-Scope |
| Payne County NonMSA | Oklahoma | 4 | \$546,458 | - | Limited-Scope |
| Nashville MSA | Tennessee | 11 | \$695,459 | - | Full-Scope |
| Jackson MSA | Tennessee | 4 | \$357,708 | - | Limited-Scope |
| Knoxville MSA | Tennessee | 2 | \$123,292 | - | Limited-Scope |
| Memphis MSA | Tennessee | 10 | \$206,689 | - | Limited-Scope |
| Western Tennessee NonMSA | Tennessee | 11 | \$909,280 | - | Full-Scope |
| Eastern Tennessee NonMSA | Tennessee | 5 | \$472,838 | - | Limited-Scope |
| Dallas MSA | Texas | 27 | \$1,638,314 | - | Full-Scope |
| Sherman MSA | Texas | 6 | \$573,931 | - | Full-Scope |
| OVERALL | | 230 | \$18,528.823 | - | 14 Full-Scope |

Appendix B

SUMMARY OF STATE AND MULTISTATE METROPOLITAN RATINGS

| State or Multistate MSA | Lending Test Rating | Investment Test Rating | Service Test Rating | Overall Rating |
|--------------------------------|----------------------------|-------------------------------|----------------------------|-----------------------|
| Kansas City MSA | Low Satisfactory | High Satisfactory | High Satisfactory | Satisfactory |
| Arkansas | High Satisfactory | High Satisfactory | High Satisfactory | Satisfactory |
| Kansas | Low Satisfactory | Outstanding | Outstanding | Satisfactory |
| Missouri | High Satisfactory | Outstanding | High Satisfactory | Satisfactory |
| Oklahoma | Low Satisfactory | Low Satisfactory | High Satisfactory | Satisfactory |
| Tennessee | Low Satisfactory | High Satisfactory | Outstanding | Satisfactory |
| Texas | Low Satisfactory | High Satisfactory | High Satisfactory | Satisfactory |

The following table depicts the previous ratings table in numerical form, which is used in determining the overall rating for each rated area for large banks. Summing the points from the Lending, Investment, and Service Tests, each rated area is given a total point value, which equates to an overall rating in accordance with the FFIEC's Interagency Large Institution CRA Examination Procedures.

| State or Multistate MSA | Lending Test Rating | Investment Test Rating | Service Test Rating | Total Points | Overall Rating |
|--------------------------------|----------------------------|-------------------------------|----------------------------|---------------------|-----------------------|
| Kansas City MSA | 6 | 4 | 4 | 14 | Satisfactory |
| Arkansas | 9 | 4 | 4 | 17 | Satisfactory |
| Kansas | 6 | 6 | 6 | 18 | Satisfactory |
| Missouri | 9 | 6 | 4 | 19 | Satisfactory |
| Oklahoma | 6 | 3 | 4 | 13 | Satisfactory |
| Tennessee | 6 | 4 | 6 | 16 | Satisfactory |
| Texas | 6 | 4 | 4 | 14 | Satisfactory |

Appendix C

LENDING PERFORMANCE TABLES BY FULL-SCOPE ASSESSMENT AREA

KANSAS CITY

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 11.1% | 317 | 7.4% | 6.2% | 4.0% | 1.9% |
| Moderate | 2 | 11.1% | 148 | 3.4% | 16.1% | 15.8% | 9.1% |
| Middle | 7 | 38.9% | 1,244 | 29.0% | 33.3% | 34.7% | 28.9% |
| Upper | 7 | 38.9% | 2,584 | 60.2% | 44.2% | 45.3% | 59.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| TOTAL | 18 | 100.0% | 4,293 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 18.2% | 30 | 2.0% | 6.2% | 2.1% | 1.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.1% | 10.3% | 5.9% |
| Middle | 1 | 9.1% | 191 | 12.9% | 33.3% | 31.2% | 24.6% |
| Upper | 8 | 72.7% | 1,254 | 85.0% | 44.2% | 56.2% | 68.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.3% |
| TOTAL | 11 | 100.0% | 1,475 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6.2% | 1.6% | 1.3% |
| Moderate | 1 | 20.0% | 20 | 11.0% | 16.1% | 9.2% | 5.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 33.3% | 26.7% | 19.9% |
| Upper | 4 | 80.0% | 162 | 89.0% | 44.2% | 62.5% | 73.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% |
| TOTAL | 5 | 100.0% | 182 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6.2% | 3.6% | 2.4% |
| Moderate | 1 | 100.0% | 120 | 100.0% | 16.1% | 13.9% | 7.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 33.3% | 33.3% | 24.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 44.2% | 49.2% | 65.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 120 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 4 | 11.4% | 347 | 5.7% | | 6.2% | 3.2% |
| Moderate | 4 | 11.4% | 288 | 4.7% | 16.1% | 13.4% | 8.6% |
| Middle | 8 | 22.9% | 1,435 | 23.6% | 33.3% | 33.0% | 28.4% |
| Upper | 19 | 54.3% | 4,000 | 65.9% | 44.2% | 50.2% | 60.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| TOTAL | 35 | 100.0% | 6,070 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 10.0% | 30 | 1.2% | 6.2% | 4.4% | 2.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.1% | 15.8% | 9.3% |
| Middle | 2 | 20.0% | 406 | 16.4% | 33.3% | 33.9% | 28.6% |
| Upper | 7 | 70.0% | 2,042 | 82.4% | 44.2% | 45.7% | 59.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.3% |
| TOTAL | 10 | 100.0% | 2,478 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6.2% | 1.4% | 0.8% |
| Moderate | 2 | 11.8% | 270 | 9.7% | 16.1% | 7.9% | 4.5% |
| Middle | 5 | 29.4% | 735 | 26.4% | 33.3% | 29.1% | 22.8% |
| Upper | 10 | 58.8% | 1,779 | 63.9% | 44.2% | 61.5% | 71.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| TOTAL | 17 | 100.0% | 2,784 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 13.6% | 20.2% | 15.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 23.2% | 30.3% | 11.4% |
| Middle | 1 | 100.0% | 448 | 100.0% | 36.0% | 29.8% | 48.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 25.2% | 19.3% | 24.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2.0% | 0.5% | 0.1% |
| TOTAL | 1 | 100.0% | 448 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 6.2% | 1.5% | 0.7% |
| Moderate | 1 | 50.0% | 40 | 21.2% | 16.1% | 9.4% | 5.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 33.3% | 26.1% | 19.0% |
| Upper | 1 | 50.0% | 149 | 78.8% | 44.2% | 62.7% | 75.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.4% |
| TOTAL | 2 | 100.0% | 189 | 100.0% | 100.0% | 0.0% | 0.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 1 | 3.3% | 30 | 0.5% | 6.2% | 2.6% | 2.0% |
| Moderate | 3 | 10.0% | 310 | 5.3% | 16.1% | 11.1% | 6.7% |
| Middle | 8 | 26.7% | 1,589 | 26.9% | 33.3% | 30.9% | 26.2% |
| Upper | 18 | 60.0% | 3,970 | 67.3% | 44.2% | 55.2% | 64.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| TOTAL | 30 | 100.0% | 5,899 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 3 | 7.9% | \$1,836 | 18.2% | 7.4% | 6.5% | 8.8% |
| Moderate | 2 | 5.3% | \$140 | 1.4% | 16.9% | 14.6% | 14.6% |
| Middle | 8 | 21.1% | \$589 | 5.8% | 31.3% | 28.0% | 26.6% |
| Upper | 23 | 60.5% | \$7,307 | 72.3% | 42.4% | 47.5% | 44.4% |
| Unknown | 2 | 5.3% | \$230 | 2.3% | 2.0% | 3.4% | 5.6% |
| TOTAL | 38 | 100.0% | \$10,102 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 15 | 14.0% | \$2,652 | 18.4% | 7.5% | 6.6% | 8.5% |
| Moderate | 7 | 6.5% | \$645 | 4.5% | 17.1% | 15.3% | 15.2% |
| Middle | 26 | 24.3% | \$1,457 | 10.1% | 31.2% | 28.5% | 28.4% |
| Upper | 54 | 50.5% | \$8,947 | 62.1% | 42.2% | 47.0% | 42.6% |
| Unknown | 5 | 4.7% | \$716 | 5.0% | 2.0% | 2.7% | 5.4% |
| TOTAL | 107 | 100.0% | \$14,417 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 11.1% | 245 | 5.7% | 20.4% | 8.6% | 4.3% |
| Moderate | 4 | 22.2% | 696 | 16.2% | 16.6% | 20.5% | 14.8% |
| Middle | 4 | 22.2% | 406 | 9.5% | 19.5% | 22.3% | 20.3% |
| Upper | 6 | 33.3% | 2,502 | 58.3% | 43.4% | 37.1% | 50.0% |
| Unknown | 2 | 11.1% | 444 | 10.3% | 0.0% | 11.4% | 10.6% |
| TOTAL | 18 | 100.0% | 4,293 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 18.2% | 202 | 13.7% | 20.4% | 6.2% | 3.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.6% | 14.6% | 9.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.5% | 20.5% | 17.3% |
| Upper | 6 | 54.5% | 1,193 | 80.9% | 43.4% | 41.6% | 53.3% |
| Unknown | 3 | 27.3% | 80 | 5.4% | 0.0% | 17.1% | 16.7% |
| TOTAL | 11 | 100.0% | 1,475 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 20.0% | 28 | 15.4% | 20.4% | 4.7% | 2.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.6% | 12.8% | 8.1% |
| Middle | 3 | 60.0% | 75 | 41.2% | 19.5% | 21.7% | 14.9% |
| Upper | 1 | 20.0% | 79 | 43.4% | 43.4% | 57.8% | 70.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.0% | 3.5% |
| TOTAL | 5 | 100.0% | 182 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 100.0% | 120 | 100.0% | 20.4% | 9.2% | 6.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.6% | 15.7% | 9.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.5% | 20.7% | 14.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.4% | 48.6% | 60.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.7% | 8.2% |
| TOTAL | 1 | 100.0% | 120 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 6 | 17.1% | 595 | 9.8% | 20.4% | 7.3% | 3.4% |
| Moderate | 4 | 11.4% | 696 | 11.5% | 16.6% | 17.2% | 11.4% |
| Middle | 7 | 20.0% | 481 | 7.9% | 19.5% | 21.1% | 17.2% |
| Upper | 13 | 37.1% | 3,774 | 62.2% | 43.4% | 40.0% | 47.3% |
| Unknown | 5 | 14.3% | 524 | 8.6% | 0.0% | 14.3% | 20.7% |
| TOTAL | 35 | 100.0% | 6,070 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 10.0% | 30 | 1.2% | 20.4% | 8.8% | 4.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.6% | 21.8% | 15.9% |
| Middle | 2 | 20.0% | 578 | 23.3% | 19.5% | 21.9% | 20.7% |
| Upper | 7 | 70.0% | 1,870 | 75.5% | 43.4% | 35.7% | 47.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 11.8% | 11.0% |
| TOTAL | 10 | 100.0% | 2,478 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 5.9% | 100 | 3.6% | 20.4% | 3.9% | 1.9% |
| Moderate | 3 | 17.6% | 427 | 15.3% | 16.6% | 13.9% | 9.3% |
| Middle | 6 | 35.3% | 1,035 | 37.2% | 19.5% | 21.3% | 18.2% |
| Upper | 7 | 41.2% | 1,222 | 43.9% | 43.4% | 44.1% | 53.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 16.8% | 16.8% |
| TOTAL | 17 | 100.0% | 2,784 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.4% | 0.5% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.6% | 1.4% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.5% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.4% | 4.6% | 0.4% |
| Unknown | 1 | 100.0% | 448 | 100.0% | 0.0% | 93.6% | 99.5% |
| TOTAL | 1 | 100.0% | 448 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.4% | 3.8% | 1.8% |
| Moderate | 1 | 50.0% | 40 | 21.2% | 16.6% | 13.1% | 7.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.5% | 19.9% | 14.4% |
| Upper | 1 | 50.0% | 149 | 78.8% | 43.4% | 60.5% | 74.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.8% | 2.3% |
| TOTAL | 2 | 100.0% | 189 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 2 | 6.7% | 130 | 2.2% | 20.4% | 5.6% | 2.7% |
| Moderate | 4 | 13.3% | 467 | 7.9% | 16.6% | 16.3% | 11.1% |
| Middle | 8 | 26.7% | 1,613 | 27.3% | 19.5% | 21.0% | 18.0% |
| Upper | 15 | 50.0% | 3,241 | 54.9% | 43.4% | 40.9% | 48.9% |
| Unknown | 1 | 3.3% | 448 | 7.6% | 0.0% | 16.2% | 19.2% |
| TOTAL | 30 | 100.0% | 5,899 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 22 | 57.9% | 46.3% | \$7,134 | 70.6% | 31.2% | 89.9% |
| | Over \$1 Million/ Unknown | 16 | 42.1% | 53.7% | \$2,968 | 29.4% | 68.8% | 10.1% |
| | TOTAL | 38 | 100.0% | 100.0% | \$10,102 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 19 | 50.0% | 91.1% | \$955 | 9.5% | 27.8% | |
| | \$100,001– \$250,000 | 7 | 18.4% | 3.9% | \$1,175 | 11.6% | 14.5% | |
| | \$250,001– \$1 Million | 12 | 31.6% | 5.0% | \$7,972 | 78.9% | 57.8% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 38 | 100.0% | 100.0% | \$10,102 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 10 | 45.5% | | \$540 | 7.6% | | |
| | \$100,001– \$250,000 | 3 | 13.6% | | \$458 | 6.4% | | |
| | \$250,001– \$1 Million | 9 | 40.9% | | \$6,136 | 86.0% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 22 | 100.0% | | \$7,134 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 44 | 41.1% | 37.7% | \$7,233 | 50.2% | 21.2% | 90.1% |
| | Over \$1 Million/ Unknown | 63 | 58.9% | 62.3% | \$7,184 | 49.8% | 78.8% | 9.9% |
| | TOTAL | 107 | 100.0% | 100.0% | \$14,417 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 70 | 65.4% | 83.3% | \$2,583 | 17.9% | 23.6% | |
| | \$100,001– \$250,000 | 23 | 21.5% | 8.6% | \$3,444 | 23.9% | 19.1% | |
| | \$250,001– \$1 Million | 14 | 13.1% | 8.1% | \$8,390 | 58.2% | 57.3% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 107 | 100.0% | 100.0% | \$14,417 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 32 | 72.7% | | \$1,011 | 14.0% | | |
| | \$100,001– \$250,000 | 4 | 9.1% | | \$557 | 7.7% | | |
| | \$250,001– \$1 Million | 8 | 18.2% | | \$5,665 | 78.3% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 44 | 100.0% | | \$7,233 | 100.0% | | |

Appendix C (continued)

ARKANSAS

Fayetteville

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 1.9% | 813 | 1.7% | 0.7% | 0.7% | 0.5% |
| Moderate | 20 | 9.7% | 3,869 | 8.0% | 15.4% | 10.6% | 8.5% |
| Middle | 90 | 43.5% | 20,021 | 41.6% | 46.2% | 42.4% | 39.0% |
| Upper | 93 | 44.9% | 23,377 | 48.6% | 37.7% | 46.3% | 52.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 207 | 100.0% | 48,080 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.6% | 0.3% |
| Moderate | 9 | 13.2% | 1,069 | 9.1% | 15.4% | 11.3% | 8.3% |
| Middle | 24 | 35.3% | 4,057 | 34.7% | 46.2% | 41.6% | 38.1% |
| Upper | 35 | 51.5% | 6,570 | 56.2% | 37.7% | 46.5% | 53.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 68 | 100.0% | 11,696 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.9% | 1.4% |
| Moderate | 3 | 15.8% | 278 | 19.5% | 15.4% | 12.2% | 10.3% |
| Middle | 11 | 57.9% | 697 | 48.9% | 46.2% | 41.0% | 34.9% |
| Upper | 5 | 26.3% | 450 | 31.6% | 37.7% | 45.9% | 53.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 19 | 100.0% | 1,425 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 1 | 33.3% | 2,635 | 55.2% | | 11.4% | 7.4% |
| Moderate | 1 | 33.3% | 350 | 7.3% | 28.5% | 34.2% | 25.5% |
| Middle | 1 | 33.3% | 1,789 | 37.5% | 30.4% | 35.6% | 48.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 29.8% | 22.8% | 18.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 4,774 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 12.7% | 11.8% |
| Middle | 11 | 68.8% | 456 | 68.2% | 46.2% | 41.7% | 38.8% |
| Upper | 5 | 31.3% | 213 | 31.8% | 37.7% | 45.6% | 49.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 16 | 100.0% | 669 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.3% | 0.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 13.2% | 10.1% |
| Middle | 1 | 20.0% | 103 | 13.6% | 46.2% | 41.1% | 37.6% |
| Upper | 4 | 80.0% | 653 | 86.4% | 37.7% | 45.4% | 51.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 5 | 100.0% | 756 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 5 | 1.6% | 3,448 | 5.1% | 0.7% | 0.7% | 1.2% |
| Moderate | 33 | 10.4% | 5,566 | 8.3% | 15.4% | 11.2% | 10.3% |
| Middle | 138 | 43.4% | 27,123 | 40.2% | 46.2% | 42.1% | 39.7% |
| Upper | 142 | 44.7% | 31,263 | 46.4% | 37.7% | 46.1% | 48.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 318 | 100.0% | 67,400 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.5% | 0.3% |
| Moderate | 17 | 8.5% | 3,091 | 7.0% | 15.4% | 10.7% | 8.4% |
| Middle | 106 | 52.7% | 20,810 | 47.4% | 46.2% | 41.9% | 38.9% |
| Upper | 78 | 38.8% | 20,010 | 45.6% | 37.7% | 47.0% | 52.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 201 | 100.0% | 43,911 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.3% | 0.2% |
| Moderate | 11 | 8.1% | 3,454 | 11.2% | 15.4% | 9.3% | 7.1% |
| Middle | 54 | 39.7% | 10,591 | 34.4% | 46.2% | 37.8% | 35.0% |
| Upper | 71 | 52.2% | 16,757 | 54.4% | 37.7% | 52.5% | 57.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 136 | 100.0% | 30,802 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.3% | 0.1% |
| Moderate | 2 | 16.7% | 140 | 18.5% | 15.4% | 9.2% | 8.0% |
| Middle | 4 | 33.3% | 198 | 26.1% | 46.2% | 41.7% | 41.3% |
| Upper | 6 | 50.0% | 420 | 55.4% | 37.7% | 48.8% | 50.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 12 | 100.0% | 758 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 11.4% | 11.7% | 10.2% |
| Moderate | 1 | 100.0% | 859 | 100.0% | 28.5% | 27.7% | 19.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 30.4% | 41.3% | 40.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 29.8% | 19.4% | 30.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 859 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.0% | 0.0% |
| Moderate | 1 | 33.3% | 60 | 38.2% | 15.4% | 8.6% | 6.1% |
| Middle | 2 | 66.7% | 97 | 61.8% | 46.2% | 35.4% | 31.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.7% | 55.9% | 62.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 157 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.0% | 0.0% |
| Moderate | 1 | 14.3% | 302 | 36.7% | 15.4% | 12.5% | 7.9% |
| Middle | 2 | 28.6% | 100 | 12.2% | 46.2% | 43.1% | 38.1% |
| Upper | 4 | 57.1% | 421 | 51.2% | 37.7% | 44.4% | 54.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 7 | 100.0% | 823 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.7% | 0.4% | 0.7% |
| Moderate | 33 | 9.2% | 7,906 | 10.2% | 15.4% | 10.2% | 8.3% |
| Middle | 168 | 46.7% | 31,796 | 41.1% | 46.2% | 39.8% | 37.0% |
| Upper | 159 | 44.2% | 37,608 | 48.6% | 37.7% | 49.5% | 54.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 360 | 100.0% | 77,310 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 1.9% | 1.5% | 2.8% |
| Moderate | 42 | 13.4% | \$4,926 | 13.2% | 17.0% | 15.0% | 16.3% |
| Middle | 156 | 49.8% | \$16,634 | 44.4% | 46.1% | 44.4% | 45.7% |
| Upper | 115 | 36.7% | \$15,889 | 42.4% | 34.9% | 37.4% | 34.5% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 1.7% | 0.6% |
| TOTAL | 313 | 100.0% | \$37,449 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 9 | 1.3% | \$1,635 | 2.0% | 1.9% | 1.9% | 2.7% |
| Moderate | 98 | 13.9% | \$11,012 | 13.5% | 16.9% | 15.4% | 16.3% |
| Middle | 330 | 46.7% | \$39,283 | 48.3% | 45.8% | 45.0% | 43.9% |
| Upper | 269 | 38.1% | \$29,475 | 36.2% | 35.4% | 37.5% | 37.0% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.2% | 0.1% |
| TOTAL | 706 | 100.0% | \$81,405 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 1.0% | 0.0% | 0.0% |
| Moderate | 2 | 5.6% | \$46 | 1.5% | 11.0% | 7.9% | 8.0% |
| Middle | 26 | 72.2% | \$1,776 | 56.1% | 60.3% | 73.4% | 70.6% |
| Upper | 8 | 22.2% | \$1,345 | 42.5% | 27.7% | 18.3% | 21.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.4% | 0.1% |
| TOTAL | 36 | 100.0% | \$3,167 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.8% | 0.0% | 0.0% |
| Moderate | 3 | 9.1% | \$291 | 10.8% | 10.9% | 7.1% | 8.4% |
| Middle | 20 | 60.6% | \$1,520 | 56.2% | 59.4% | 75.7% | 69.8% |
| Upper | 10 | 30.3% | \$894 | 33.0% | 28.9% | 17.2% | 21.8% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 33 | 100.0% | \$2,705 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 12 | 5.8% | 1,353 | 2.8% | 19.9% | 5.2% | 2.9% |
| Moderate | 27 | 13.0% | 4,334 | 9.0% | 18.5% | 17.0% | 12.2% |
| Middle | 27 | 13.0% | 5,215 | 10.8% | 20.3% | 19.0% | 16.4% |
| Upper | 101 | 48.8% | 27,640 | 57.5% | 41.2% | 43.2% | 53.7% |
| Unknown | 40 | 19.3% | 9,538 | 19.8% | 0.0% | 15.5% | 14.8% |
| TOTAL | 207 | 100.0% | 48,080 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 2.9% | 159 | 1.4% | 19.9% | 6.8% | 3.3% |
| Moderate | 13 | 19.1% | 1,393 | 11.9% | 18.5% | 13.5% | 8.5% |
| Middle | 9 | 13.2% | 1,154 | 9.9% | 20.3% | 15.4% | 11.9% |
| Upper | 34 | 50.0% | 6,920 | 59.2% | 41.2% | 44.5% | 55.2% |
| Unknown | 10 | 14.7% | 2,070 | 17.7% | 0.0% | 19.8% | 21.2% |
| TOTAL | 68 | 100.0% | 11,696 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 2 | 10.5% | 80 | 5.6% | 19.9% | 5.2% | 3.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.5% | 13.4% | 9.8% |
| Middle | 1 | 5.3% | 28 | 2.0% | 20.3% | 18.0% | 14.4% |
| Upper | 11 | 57.9% | 729 | 51.2% | 41.2% | 52.8% | 56.5% |
| Unknown | 5 | 26.3% | 588 | 41.3% | 0.0% | 10.6% | 15.8% |
| TOTAL | 19 | 100.0% | 1,425 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.7% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.5% | 0.7% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.7% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.2% | 8.1% | 1.8% |
| Unknown | 3 | 100.0% | 4,774 | 100.0% | 0.0% | 89.9% | 97.9% |
| TOTAL | 3 | 100.0% | 4,774 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 6.3% | 16 | 2.4% | 19.9% | 3.9% | 2.0% |
| Moderate | 4 | 25.0% | 150 | 22.4% | 18.5% | 12.2% | 8.6% |
| Middle | 2 | 12.5% | 38 | 5.7% | 20.3% | 17.8% | 12.6% |
| Upper | 6 | 37.5% | 353 | 52.8% | 41.2% | 57.1% | 63.2% |
| Unknown | 3 | 18.8% | 112 | 16.7% | 0.0% | 8.9% | 13.6% |
| TOTAL | 16 | 100.0% | 669 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 6.4% | 2.9% |
| Moderate | 3 | 60.0% | 453 | 59.9% | 18.5% | 17.2% | 10.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 19.6% | 16.1% |
| Upper | 2 | 40.0% | 303 | 40.1% | 41.2% | 47.5% | 58.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 9.2% | 12.4% |
| TOTAL | 5 | 100.0% | 756 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 17 | 5.3% | 1,608 | 2.4% | 19.9% | 5.6% | 2.7% |
| Moderate | 47 | 14.8% | 6,330 | 9.4% | 18.5% | 15.5% | 9.8% |
| Middle | 39 | 12.3% | 6,435 | 9.5% | 20.3% | 17.6% | 13.4% |
| Upper | 154 | 48.4% | 35,945 | 53.3% | 41.2% | 43.6% | 48.6% |
| Unknown | 61 | 19.2% | 17,082 | 25.3% | 0.0% | 17.7% | 25.5% |
| TOTAL | 318 | 100.0% | 67,400 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | Income % | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 8 | 4.0% | 1,166 | 2.7% | 19.9% | 5.9% | 3.4% |
| Moderate | 25 | 12.4% | 4,160 | 9.5% | 18.5% | 17.4% | 12.8% |
| Middle | 44 | 21.9% | 8,751 | 19.9% | 20.3% | 20.3% | 18.0% |
| Upper | 87 | 43.3% | 22,469 | 51.2% | 41.2% | 42.6% | 52.5% |
| Unknown | 37 | 18.4% | 7,365 | 16.8% | 0.0% | 13.8% | 13.3% |
| TOTAL | 201 | 100.0% | 43,911 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 1.5% | 156 | 0.5% | 19.9% | 4.1% | 1.9% |
| Moderate | 15 | 11.0% | 1,772 | 5.8% | 18.5% | 10.3% | 6.4% |
| Middle | 28 | 20.6% | 4,837 | 15.7% | 20.3% | 14.9% | 11.3% |
| Upper | 80 | 58.8% | 19,493 | 63.3% | 41.2% | 51.3% | 60.7% |
| Unknown | 11 | 8.1% | 4,544 | 14.8% | 0.0% | 19.5% | 19.7% |
| TOTAL | 136 | 100.0% | 30,802 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 8.3% | 30 | 4.0% | 19.9% | 3.7% | 2.3% |
| Moderate | 2 | 16.7% | 120 | 15.8% | 18.5% | 9.5% | 5.7% |
| Middle | 1 | 8.3% | 18 | 2.4% | 20.3% | 15.9% | 11.7% |
| Upper | 6 | 50.0% | 430 | 56.7% | 41.2% | 56.2% | 63.6% |
| Unknown | 2 | 16.7% | 160 | 21.1% | 0.0% | 14.8% | 16.7% |
| TOTAL | 12 | 100.0% | 758 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.5% | 1.0% | 0.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.3% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.2% | 6.3% | 2.5% |
| Unknown | 1 | 100.0% | 859 | 100.0% | 0.0% | 92.7% | 97.2% |
| TOTAL | 1 | 100.0% | 859 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 2.1% | 1.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.5% | 10.0% | 4.5% |
| Middle | 1 | 33.3% | 44 | 28.0% | 20.3% | 13.5% | 8.3% |
| Upper | 2 | 66.7% | 113 | 72.0% | 41.2% | 61.1% | 66.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 13.3% | 19.3% |
| TOTAL | 3 | 100.0% | 157 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 1 | 14.3% | 35 | 4.3% | 19.9% | 8.3% | 4.0% |
| Moderate | 1 | 14.3% | 65 | 7.9% | 18.5% | 16.3% | 9.9% |
| Middle | 1 | 14.3% | 86 | 10.4% | 20.3% | 14.9% | 9.2% |
| Upper | 4 | 57.1% | 637 | 77.4% | 41.2% | 52.4% | 67.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.0% | 9.2% |
| TOTAL | 7 | 100.0% | 823 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 12 | 3.3% | 1,387 | 1.8% | 19.9% | 4.8% | 2.5% |
| Moderate | 43 | 11.9% | 6,117 | 7.9% | 18.5% | 13.3% | 8.9% |
| Middle | 75 | 20.8% | 13,736 | 17.8% | 20.3% | 17.0% | 13.7% |
| Upper | 179 | 49.7% | 43,142 | 55.8% | 41.2% | 46.7% | 54.0% |
| Unknown | 51 | 14.2% | 12,928 | 16.7% | 0.0% | 18.1% | 20.8% |
| TOTAL | 360 | 100.0% | 77,310 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|-----------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 191 | 61.0% | 43.5% | \$17,706 | 47.3% | 40.1% | 91.5% |
| | Over \$1 Million/ Unknown | 122 | 39.0% | 56.5% | \$19,743 | 52.7% | 59.9% | 8.5% |
| | TOTAL | 313 | 100.0% | 100.0% | \$37,449 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 222 | 70.9% | 89.0% | \$8,417 | 22.5% | 32.0% | |
| | \$100,001–\$250,000 | 45 | 14.4% | 6.1% | \$7,961 | 21.3% | 20.7% | |
| | \$250,001– \$1 Million | 46 | 14.7% | 4.9% | \$21,071 | 56.3% | 47.3% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 313 | 100.0% | 100.0% | \$37,449 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 152 | 79.6% | | \$5,477 | 30.9% | |
| | | \$100,001–\$250,000 | 21 | 11.0% | | \$3,585 | 20.2% | |
| | | \$250,001– \$1 Million | 18 | 9.4% | | \$8,644 | 48.8% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 191 | 100.0% | | \$17,706 | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 394 | 55.8% | 31.8% | \$36,776 | 45.2% | 29.7% | 91.7% |
| | Over \$1 Million/ Unknown | 312 | 44.2% | 68.2% | \$44,629 | 54.8% | 70.3% | 8.3% |
| | TOTAL | 706 | 100.0% | 100.0% | \$81,405 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 507 | 71.8% | 84.6% | \$15,406 | 18.9% | 27.5% | |
| | \$100,001– \$250,000 | 103 | 14.6% | 8.8% | \$16,942 | 20.8% | 22.6% | |
| | \$250,001– \$1 Million | 96 | 13.6% | 6.5% | \$49,057 | 60.3% | 49.9% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 706 | 100.0% | 100.0% | \$81,405 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 309 | 78.4% | | \$9,548 | 26.0% | |
| | | \$100,001– \$250,000 | 48 | 12.2% | | \$8,062 | 21.9% | |
| | | \$250,001– \$1 Million | 37 | 9.4% | | \$19,166 | 52.1% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 394 | 100.0% | | \$36,776 | 100.0% | |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|-----------------------------------|---------------------------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 32 | 88.9% | 72.0% | 3,050 | 96.3% | 83.1% | 96.9% |
| | Over \$1 Million/ Unknown | 4 | 11.1% | 28.0% | 117 | 3.7% | 16.9% | 3.1% |
| | TOTAL | 36 | 100.0% | 100.0% | 3,167 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 26 | 72.2% | 84.9% | 931 | 29.4% | 41.4% | |
| | \$100,001–\$250,000 | 7 | 19.4% | 10.5% | 1,110 | 35.0% | 28.8% | |
| | \$250,001–\$500,000 | 3 | 8.3% | 4.6% | 1,126 | 35.6% | 29.8% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 36 | 100.0% | 100.0% | 3,167 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 22 | 68.8% | | 814 | 26.7% | |
| | | \$100,001–\$250,000 | 7 | 21.9% | | 1,110 | 36.4% | |
| | | \$250,001– \$1 Million | 3 | 9.4% | | 1,126 | 36.9% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 32 | 100.0% | | 3,050 | 100.0% | |

| Distribution of 2020 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|-----------------------------------|-----------------------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 30 | 90.9% | 73.1% | 2,668 | 98.6% | 80.7% | 97.2% |
| | Over \$1 Million/ Unknown | 3 | 9.1% | 26.9% | 37 | 1.4% | 19.3% | 2.8% |
| | TOTAL | 33 | 100.0% | 100.0% | 2,705 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 22 | 66.7% | 83.8% | 755 | 27.9% | 42.8% | |
| | \$100,001–\$250,000 | 10 | 30.3% | 12.5% | 1,677 | 62.0% | 34.4% | |
| | \$250,001–\$500,000 | 1 | 3.0% | 3.7% | 273 | 10.1% | 22.8% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 33 | 100.0% | 100.0% | 2,705 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 19 | 63.3% | | 718 | 26.9% | |
| | | \$100,001–\$250,000 | 10 | 33.3% | | 1,677 | 62.9% | |
| | | \$250,001–\$1 Million | 1 | 3.3% | | 273 | 10.2% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 30 | 100.0% | | 2,668 | 100.0% | |

Appendix C (continued)

Little Rock

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|----------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 6 | 0.9% | 470 | 0.4% | 2.3% | 1.2% | 0.8% |
| Moderate | 31 | 4.7% | 3,831 | 3.0% | 15.0% | 10.0% | 6.7% |
| Middle | 233 | 35.4% | 37,896 | 29.6% | 41.6% | 42.1% | 37.4% |
| Upper | 389 | 59.0% | 85,670 | 67.0% | 40.9% | 46.6% | 55.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.2% |
| TOTAL | 659 | 100.0% | 127,867 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 1.0% | 150 | 0.4% | 2.3% | 0.8% | 0.4% |
| Moderate | 14 | 7.1% | 952 | 2.4% | 15.0% | 8.6% | 5.6% |
| Middle | 56 | 28.3% | 9,082 | 23.3% | 41.6% | 38.1% | 33.4% |
| Upper | 126 | 63.6% | 28,827 | 73.9% | 40.9% | 52.5% | 60.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% |
| TOTAL | 198 | 100.0% | 39,011 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.3% | 2.0% | 0.8% |
| Moderate | 4 | 7.4% | 217 | 6.2% | 15.0% | 12.5% | 9.1% |
| Middle | 14 | 25.9% | 592 | 17.0% | 41.6% | 34.9% | 30.3% |
| Upper | 36 | 66.7% | 2,678 | 76.8% | 40.9% | 50.4% | 59.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.3% | 0.1% |
| TOTAL | 54 | 100.0% | 3,487 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 1 | 100.0% | 1,020 | 100.0% | 8.3% | 13.0% | 6.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 23.0% | 28.8% | 23.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 29.5% | 27.2% | 23.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 31.0% | 47.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 1,020 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 3.2% | 57 | 3.5% | 2.3% | 0.5% | 0.3% |
| Moderate | 2 | 6.5% | 68 | 4.1% | 15.0% | 5.9% | 4.0% |
| Middle | 12 | 38.7% | 733 | 44.6% | 41.6% | 35.7% | 28.5% |
| Upper | 16 | 51.6% | 787 | 47.8% | 40.9% | 57.9% | 67.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 31 | 100.0% | 1,645 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|----------------|---------------|---------------------------|---------------|---------------|
| Low | 1 | 5.3% | 77 | 2.2% | 2.3% | 1.6% | 0.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.0% | 9.7% | 5.8% |
| Middle | 3 | 15.8% | 223 | 6.5% | 41.6% | 39.4% | 27.0% |
| Upper | 15 | 78.9% | 3,143 | 91.3% | 40.9% | 49.4% | 66.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 19 | 100.0% | 3,443 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 11 | 1.1% | 1,774 | 1.0% | 2.3% | 1.2% | 1.2% |
| Moderate | 51 | 5.3% | 5,068 | 2.9% | 15.0% | 10.1% | 8.3% |
| Middle | 318 | 33.1% | 48,526 | 27.5% | 41.6% | 40.8% | 34.8% |
| Upper | 582 | 60.5% | 121,105 | 68.6% | 40.9% | 47.8% | 55.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% |
| TOTAL | 962 | 100.0% | 176,473 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|----------------|---------------|---------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 7 | 1.0% | 537 | 0.3% | 2.3% | 1.1% | 0.7% |
| Moderate | 37 | 5.2% | 4,510 | 2.9% | 15.0% | 10.1% | 6.8% |
| Middle | 222 | 31.4% | 45,793 | 29.7% | 41.6% | 40.3% | 36.4% |
| Upper | 440 | 62.3% | 103,257 | 67.0% | 40.9% | 48.5% | 56.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% |
| TOTAL | 706 | 100.0% | 154,097 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 0.1% | 100 | 0.1% | 2.3% | 0.6% | 0.4% |
| Moderate | 31 | 4.6% | 4,680 | 3.0% | 15.0% | 6.2% | 4.3% |
| Middle | 161 | 23.8% | 29,900 | 19.2% | 41.6% | 34.8% | 30.3% |
| Upper | 484 | 71.5% | 120,829 | 77.7% | 40.9% | 58.4% | 64.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% |
| TOTAL | 677 | 100.0% | 155,509 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.3% | 1.3% | 0.9% |
| Moderate | 3 | 9.4% | 135 | 7.5% | 15.0% | 10.5% | 8.1% |
| Middle | 10 | 31.3% | 561 | 31.3% | 41.6% | 38.6% | 33.5% |
| Upper | 19 | 59.4% | 1,095 | 61.1% | 40.9% | 49.5% | 57.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.0% |
| TOTAL | 32 | 100.0% | 1,791 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | % of Multifamily Units | | | |
|-----------------------------|--------------|---------------|----------------|---------------|---------------------------|---------------|---------------|--|
| Low | 0 | 0.0% | 0 | 0.0% | 8.3% | 10.1% | 4.5% | |
| Moderate | 0 | 0.0% | 0 | 0.0% | 23.0% | 35.4% | 29.3% | |
| Middle | 0 | 0.0% | 0 | 0.0% | 29.5% | 25.4% | 31.8% | |
| Upper | 1 | 100.0% | 143 | 100.0% | 39.0% | 28.6% | 34.1% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.5% | 0.2% | |
| TOTAL | 1 | 100.0% | 143 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Other Purpose LOC | | | | | | | | |
| Low | 1 | 5.9% | 15 | 1.9% | 2.3% | 1.0% | 0.5% | |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.0% | 7.2% | 5.1% | |
| Middle | 4 | 23.5% | 75 | 9.6% | 41.6% | 35.9% | 29.1% | |
| Upper | 12 | 70.6% | 694 | 88.5% | 40.9% | 55.9% | 65.3% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% | |
| TOTAL | 17 | 100.0% | 784 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Other Purpose Closed/Exempt | | | | | | | | |
| Low | 1 | 3.7% | 87 | 2.0% | 2.3% | 1.3% | 0.4% | |
| Moderate | 3 | 11.1% | 328 | 7.6% | 15.0% | 12.6% | 10.1% | |
| Middle | 5 | 18.5% | 506 | 11.7% | 41.6% | 30.2% | 21.7% | |
| Upper | 18 | 66.7% | 3,411 | 78.7% | 40.9% | 55.8% | 67.9% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% | |
| TOTAL | 27 | 100.0% | 4,332 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | | |
| Low | 10 | 0.7% | 739 | 0.2% | 2.3% | 1.0% | 0.7% | |
| Moderate | 74 | 5.1% | 9,653 | 3.0% | 15.0% | 8.8% | 6.8% | |
| Middle | 402 | 27.5% | 76,835 | 24.3% | 41.6% | 38.0% | 33.5% | |
| Upper | 974 | 66.7% | 229,429 | 72.5% | 40.9% | 52.1% | 58.9% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% | |
| TOTAL | 1,460 | 100.0% | 316,656 | 100.0% | 100.0% | 100.0% | 100.0% | |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|------------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 34 | 4.8% | \$11,823 | 10.8% | 4.5% | 4.5% | 7.8% |
| Moderate | 117 | 16.4% | \$18,408 | 16.7% | 19.3% | 16.4% | 18.4% |
| Middle | 204 | 28.5% | \$25,661 | 23.3% | 32.8% | 32.8% | 29.5% |
| Upper | 360 | 50.3% | \$54,066 | 49.2% | 43.3% | 44.4% | 43.6% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.1% | 2.0% | 0.6% |
| TOTAL | 715 | 100.0% | \$109,958 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|------------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 60 | 3.1% | \$9,302 | 4.0% | 4.5% | 4.3% | 6.3% |
| Moderate | 268 | 14.0% | \$35,788 | 15.4% | 19.4% | 16.7% | 19.5% |
| Middle | 562 | 29.4% | \$55,854 | 24.0% | 32.7% | 33.5% | 29.7% |
| Upper | 1,019 | 53.4% | \$131,908 | 56.6% | 43.1% | 44.8% | 44.2% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.2% | 0.7% | 0.3% |
| TOTAL | 1,909 | 100.0% | \$232,852 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 2 | 2.3% | \$244 | 2.9% | 0.9% | 0.5% | 1.0% |
| Moderate | 17 | 19.3% | \$2,284 | 27.0% | 13.7% | 7.8% | 9.8% |
| Middle | 34 | 38.6% | \$3,506 | 41.4% | 47.0% | 52.1% | 52.5% |
| Upper | 35 | 39.8% | \$2,425 | 28.7% | 38.5% | 38.1% | 36.5% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 1.4% | 0.2% |
| TOTAL | 88 | 100.0% | \$8,459 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 1 | 1.4% | \$14 | 0.2% | 0.9% | 0.4% | 0.2% |
| Moderate | 14 | 20.0% | \$1,026 | 17.7% | 13.9% | 10.7% | 8.7% |
| Middle | 24 | 34.3% | \$2,645 | 45.5% | 46.9% | 52.5% | 56.4% |
| Upper | 31 | 44.3% | \$2,124 | 36.6% | 38.3% | 36.4% | 34.8% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 70 | 100.0% | \$5,809 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|----------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 46 | 7.0% | 4,640 | 3.6% | 20.9% | 6.3% | 3.4% |
| Moderate | 118 | 17.9% | 16,605 | 13.0% | 17.0% | 20.1% | 15.1% |
| Middle | 143 | 21.7% | 23,417 | 18.3% | 19.7% | 20.9% | 19.3% |
| Upper | 312 | 47.3% | 74,292 | 58.1% | 42.5% | 34.5% | 45.6% |
| Unknown | 40 | 6.1% | 8,913 | 7.0% | 0.0% | 18.2% | 16.7% |
| TOTAL | 659 | 100.0% | 127,867 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 10 | 5.1% | 731 | 1.9% | 20.9% | 5.4% | 2.6% |
| Moderate | 21 | 10.6% | 2,205 | 5.7% | 17.0% | 11.5% | 6.7% |
| Middle | 32 | 16.2% | 4,530 | 11.6% | 19.7% | 18.3% | 14.7% |
| Upper | 110 | 55.6% | 26,612 | 68.2% | 42.5% | 41.8% | 52.2% |
| Unknown | 25 | 12.6% | 4,933 | 12.6% | 0.0% | 23.1% | 23.8% |
| TOTAL | 198 | 100.0% | 39,011 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 3.7% | 51 | 1.5% | 20.9% | 7.3% | 4.2% |
| Moderate | 6 | 11.1% | 281 | 8.1% | 17.0% | 15.5% | 11.4% |
| Middle | 9 | 16.7% | 578 | 16.6% | 19.7% | 20.3% | 15.8% |
| Upper | 34 | 63.0% | 2,457 | 70.5% | 42.5% | 47.1% | 56.8% |
| Unknown | 3 | 5.6% | 120 | 3.4% | 0.0% | 9.8% | 11.9% |
| TOTAL | 54 | 100.0% | 3,487 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.0% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.7% | 1.1% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.5% | 2.2% | 0.2% |
| Unknown | 1 | 100.0% | 1,020 | 100.0% | 0.0% | 96.7% | 99.7% |
| TOTAL | 1 | 100.0% | 1,020 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 5 | 16.1% | 202 | 12.3% | 20.9% | 4.8% | 2.3% |
| Moderate | 1 | 3.2% | 27 | 1.6% | 17.0% | 15.3% | 7.6% |
| Middle | 6 | 19.4% | 334 | 20.3% | 19.7% | 19.0% | 15.7% |
| Upper | 17 | 54.8% | 988 | 60.1% | 42.5% | 57.1% | 67.7% |
| Unknown | 2 | 6.5% | 94 | 5.7% | 0.0% | 3.8% | 6.7% |
| TOTAL | 31 | 100.0% | 1,645 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low | 1 | 5.3% | 60 | 1.7% | 20.9% | 8.4% | 4.8% |
| Moderate | 3 | 15.8% | 306 | 8.9% | 17.0% | 16.8% | 10.8% |
| Middle | 4 | 21.1% | 651 | 18.9% | 19.7% | 24.2% | 22.2% |
| Upper | 11 | 57.9% | 2,426 | 70.5% | 42.5% | 43.5% | 55.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.1% | 7.2% |
| TOTAL | 19 | 100.0% | 3,443 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 64 | 6.7% | 5,684 | 3.2% | 20.9% | 5.9% | 2.8% |
| Moderate | 149 | 15.5% | 19,424 | 11.0% | 17.0% | 16.9% | 11.0% |
| Middle | 194 | 20.2% | 29,510 | 16.7% | 19.7% | 19.5% | 15.8% |
| Upper | 484 | 50.3% | 106,775 | 60.5% | 42.5% | 36.0% | 42.3% |
| Unknown | 71 | 7.4% | 15,080 | 8.5% | 0.0% | 21.8% | 28.1% |
| TOTAL | 962 | 100.0% | 176,473 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|----------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 53 | 7.5% | 6,232 | 4.0% | 20.9% | 8.0% | 4.7% |
| Moderate | 136 | 19.3% | 19,176 | 12.4% | 17.0% | 20.6% | 16.0% |
| Middle | 143 | 20.3% | 26,807 | 17.4% | 19.7% | 21.4% | 20.3% |
| Upper | 330 | 46.7% | 88,197 | 57.2% | 42.5% | 33.1% | 43.3% |
| Unknown | 44 | 6.2% | 13,685 | 8.9% | 0.0% | 16.9% | 15.6% |
| TOTAL | 706 | 100.0% | 154,097 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 17 | 2.5% | 1,475 | 0.9% | 20.9% | 3.0% | 1.5% |
| Moderate | 52 | 7.7% | 6,501 | 4.2% | 17.0% | 9.5% | 6.1% |
| Middle | 116 | 17.1% | 20,187 | 13.0% | 19.7% | 16.5% | 13.2% |
| Upper | 432 | 63.8% | 109,816 | 70.6% | 42.5% | 43.2% | 52.0% |
| Unknown | 60 | 8.9% | 17,530 | 11.3% | 0.0% | 27.7% | 27.3% |
| TOTAL | 677 | 100.0% | 155,509 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 5.9% | 3.4% |
| Moderate | 4 | 12.5% | 141 | 7.9% | 17.0% | 13.1% | 8.6% |
| Middle | 5 | 15.6% | 232 | 13.0% | 19.7% | 18.9% | 13.1% |
| Upper | 20 | 62.5% | 1,019 | 56.9% | 42.5% | 52.1% | 58.6% |
| Unknown | 3 | 9.4% | 399 | 22.3% | 0.0% | 10.0% | 16.2% |
| TOTAL | 32 | 100.0% | 1,791 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | | | |
|-----------------------------|--------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.0% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.7% | 1.1% | 0.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.5% | 3.2% | 0.7% |
| Unknown | 1 | 100.0% | 143 | 100.0% | 0.0% | 95.8% | 99.1% |
| TOTAL | 1 | 100.0% | 143 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 3.7% | 2.3% |
| Moderate | 1 | 5.9% | 140 | 17.9% | 17.0% | 11.5% | 8.1% |
| Middle | 5 | 29.4% | 211 | 26.9% | 19.7% | 20.1% | 13.1% |
| Upper | 8 | 47.1% | 378 | 48.2% | 42.5% | 61.0% | 72.7% |
| Unknown | 3 | 17.6% | 55 | 7.0% | 0.0% | 3.7% | 3.7% |
| TOTAL | 17 | 100.0% | 784 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 3.7% | 50 | 1.2% | 20.9% | 7.0% | 3.1% |
| Moderate | 4 | 14.8% | 436 | 10.1% | 17.0% | 15.3% | 9.6% |
| Middle | 5 | 18.5% | 441 | 10.2% | 19.7% | 23.9% | 14.0% |
| Upper | 17 | 63.0% | 3,405 | 78.6% | 42.5% | 47.8% | 60.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.0% | 12.9% |
| TOTAL | 27 | 100.0% | 4,332 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 71 | 4.9% | 7,757 | 2.4% | 20.9% | 5.3% | 2.8% |
| Moderate | 197 | 13.5% | 26,394 | 8.3% | 17.0% | 14.4% | 10.2% |
| Middle | 274 | 18.8% | 47,878 | 15.1% | 19.7% | 18.2% | 15.5% |
| Upper | 807 | 55.3% | 202,815 | 64.0% | 42.5% | 36.9% | 44.7% |
| Unknown | 111 | 7.6% | 31,812 | 10.0% | 0.0% | 25.2% | 26.8% |
| TOTAL | 1,460 | 100.0% | 316,656 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|---------------------------|---------------|---------------|------------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 362 | 50.6% | 42.4% | \$44,629 | 40.6% | 37.7% | 90.4% |
| | Over \$1 Million/ Unknown | 353 | 49.4% | 57.6% | \$65,329 | 59.4% | 62.3% | 9.6% |
| | TOTAL | 715 | 100.0% | 100.0% | \$109,958 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 456 | 63.8% | 90.7% | \$17,603 | 16.0% | 33.3% | |
| | \$100,001– \$250,000 | 125 | 17.5% | 5.0% | \$21,718 | 19.8% | 18.3% | |
| | \$250,001– \$1 Million | 134 | 18.7% | 4.3% | \$70,637 | 64.2% | 48.4% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 715 | 100.0% | 100.0% | \$109,958 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 254 | 70.2% | | \$8,813 | 19.7% | |
| | | \$100,001– \$250,000 | 50 | 13.8% | | \$7,748 | 17.4% | |
| | | \$250,001– \$1 Million | 58 | 16.0% | | \$28,068 | 62.9% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 362 | 100.0% | | \$44,629 | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|-------------|---------------|---------------|------------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 802 | 42.0% | 34.7% | \$73,893 | 31.7% | 30.9% | 90.7% |
| | Over \$1 Million/ Unknown | 1107 | 58.0% | 65.3% | \$158,959 | 68.3% | 69.1% | 9.3% |
| | TOTAL | 1909 | 100.0% | 100.0% | \$232,852 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 1338 | 70.1% | 85.7% | \$43,183 | 18.5% | 28.8% | |
| | \$100,001– \$250,000 | 293 | 15.3% | 8.0% | \$48,011 | 20.6% | 21.0% | |
| | \$250,001– \$1 Million | 278 | 14.6% | 6.3% | \$141,658 | 60.8% | 50.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 1909 | 100.0% | 100.0% | \$232,852 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 642 | 80.0% | | \$18,988 | 25.7% | | |
| | \$100,001– \$250,000 | 80 | 10.0% | | \$13,666 | 18.5% | | |
| | \$250,001– \$1 Million | 80 | 10.0% | | \$41,239 | 55.8% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 802 | 100.0% | | \$73,893 | 100.0% | | |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|-----------------------------------|---------------------------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 75 | 85.2% | 64.4% | 7,472 | 88.3% | 70.2% | 98.0% |
| | Over \$1 Million/ Unknown | 13 | 14.8% | 35.6% | 987 | 11.7% | 29.8% | 2.0% |
| | TOTAL | 88 | 100.0% | 100.0% | 8,459 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 63 | 71.6% | 82.8% | 2,579 | 30.5% | 35.5% | |
| | \$100,001–\$250,000 | 16 | 18.2% | 11.3% | 2,750 | 32.5% | 31.8% | |
| | \$250,001–\$500,000 | 9 | 10.2% | 5.9% | 3,130 | 37.0% | 32.8% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 88 | 100.0% | 100.0% | 8,459 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 54 | 72.0% | | 2,193 | 29.3% | |
| | | \$100,001–\$250,000 | 12 | 16.0% | | 2,149 | 28.8% | |
| | | \$250,001– \$1 Million | 9 | 12.0% | | 3,130 | 41.9% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 75 | 100.0% | | 7,472 | 100.0% | |

| Distribution of 2020 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|-----------------------------------|-----------------------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 64 | 91.4% | 62.1% | 4,811 | 82.8% | 73.1% | 98.0% |
| | Over \$1 Million/ Unknown | 6 | 8.6% | 37.9% | 998 | 17.2% | 26.9% | 2.0% |
| | TOTAL | 70 | 100.0% | 100.0% | 5,809 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 54 | 77.1% | 82.9% | 1,995 | 34.3% | 38.4% | |
| | \$100,001–\$250,000 | 10 | 14.3% | 11.9% | 1,766 | 30.4% | 30.6% | |
| | \$250,001–\$500,000 | 6 | 8.6% | 5.3% | 2,048 | 35.3% | 31.0% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 70 | 100.0% | 100.0% | 5,809 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 52 | 81.3% | | 1,910 | 39.7% | |
| | | \$100,001–\$250,000 | 8 | 12.5% | | 1,549 | 32.2% | |
| | | \$250,001–\$1 Million | 4 | 6.3% | | 1,352 | 28.1% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 64 | 100.0% | | 4,811 | 100.0% | |

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Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.0% | 0.0% |
| Moderate | 9 | 12.3% | 487 | 6.2% | 15.2% | 6.7% | 3.2% |
| Middle | 31 | 42.5% | 3,055 | 38.6% | 59.0% | 57.9% | 53.9% |
| Upper | 33 | 45.2% | 4,368 | 55.2% | 23.6% | 35.2% | 42.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.2% | 0.1% |
| TOTAL | 73 | 100.0% | 7,910 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.6% | 0.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 4.0% | 1.8% |
| Middle | 9 | 39.1% | 1,089 | 16.3% | 59.0% | 51.2% | 42.4% |
| Upper | 14 | 60.9% | 5,591 | 83.7% | 23.6% | 44.2% | 55.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 23 | 100.0% | 6,680 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 4.5% | 2.6% |
| Moderate | 3 | 27.3% | 52 | 6.9% | 15.2% | 25.0% | 12.4% |
| Middle | 6 | 54.5% | 575 | 76.6% | 59.0% | 52.3% | 58.5% |
| Upper | 2 | 18.2% | 124 | 16.5% | 23.6% | 18.2% | 26.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 11 | 100.0% | 751 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 14.3% | 9.3% |
| Middle | 1 | 100.0% | 22 | 100.0% | 59.0% | 57.1% | 53.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 23.6% | 28.6% | 37.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 22 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 11.1% | 4.6% |
| Middle | 3 | 37.5% | 504 | 42.7% | 59.0% | 48.1% | 41.7% |
| Upper | 5 | 62.5% | 677 | 57.3% | 23.6% | 40.7% | 53.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | 1,181 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |

Appendix C (continued)

| | | | | | | | |
|--------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.5% | 0.2% |
| Moderate | 12 | 10.3% | 539 | 3.3% | 15.2% | 7.3% | 3.0% |
| Middle | 50 | 43.1% | 5,245 | 31.7% | 59.0% | 56.2% | 49.6% |
| Upper | 54 | 46.6% | 10,760 | 65.0% | 23.6% | 35.9% | 47.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.0% |
| TOTAL | 116 | 100.0% | 16,544 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 1.3% | 21 | 0.3% | 2.2% | 0.1% | 0.0% |
| Moderate | 12 | 15.2% | 467 | 5.6% | 15.2% | 6.0% | 3.3% |
| Middle | 39 | 49.4% | 3,904 | 46.7% | 59.0% | 55.3% | 52.1% |
| Upper | 27 | 34.2% | 3,968 | 47.5% | 23.6% | 38.6% | 44.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 79 | 100.0% | 8,360 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.0% | 0.0% |
| Moderate | 2 | 4.1% | 344 | 4.8% | 15.2% | 2.7% | 2.0% |
| Middle | 23 | 46.9% | 3,306 | 46.1% | 59.0% | 53.4% | 51.4% |
| Upper | 24 | 49.0% | 3,524 | 49.1% | 23.6% | 43.9% | 46.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 49 | 100.0% | 7,174 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 8.0% | 3.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 8.0% | 6.4% |
| Middle | 1 | 50.0% | 75 | 68.2% | 59.0% | 32.0% | 35.5% |
| Upper | 1 | 50.0% | 35 | 31.8% | 23.6% | 52.0% | 54.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 110 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 12.5% | 2.3% |
| Middle | 1 | 25.0% | 123 | 41.3% | 59.0% | 12.5% | 28.7% |
| Upper | 3 | 75.0% | 175 | 58.7% | 23.6% | 75.0% | 68.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 298 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.2% | 0.0% | 0.0% |

Appendix C (continued)

| | | | | | | | |
|----------------------------------|------------|---------------|---------------|---------------|----------------------------------|---------------|---------------|
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 14.3% | 6.4% |
| Middle | 1 | 50.0% | 70 | 56.0% | 59.0% | 57.1% | 50.8% |
| Upper | 1 | 50.0% | 55 | 44.0% | 23.6% | 28.6% | 42.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 125 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 1 | 0.7% | 21 | 0.1% | 2.2% | 0.4% | 0.5% |
| Moderate | 14 | 10.3% | 811 | 5.0% | 15.2% | 5.5% | 3.1% |
| Middle | 65 | 47.8% | 7,478 | 46.5% | 59.0% | 54.7% | 51.3% |
| Upper | 56 | 41.2% | 7,757 | 48.3% | 23.6% | 39.4% | 45.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 136 | 100.0% | 16,067 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 9 | 3.8% | \$252 | 1.3% | 5.2% | 2.7% | 1.3% |
| Moderate | 47 | 19.7% | \$2,388 | 12.0% | 22.2% | 18.5% | 17.6% |
| Middle | 130 | 54.6% | \$12,883 | 64.9% | 53.0% | 56.7% | 62.4% |
| Upper | 52 | 21.8% | \$4,326 | 21.8% | 19.6% | 20.3% | 17.7% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 1.7% | 1.0% |
| TOTAL | 238 | 100.0% | \$19,849 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 15 | 2.9% | \$744 | 1.9% | 5.2% | 3.2% | 2.6% |
| Moderate | 99 | 18.8% | \$7,205 | 18.7% | 21.9% | 18.9% | 18.5% |
| Middle | 290 | 55.1% | \$22,755 | 59.2% | 53.3% | 55.9% | 59.7% |
| Upper | 122 | 23.2% | \$7,748 | 20.1% | 19.5% | 21.1% | 18.6% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.8% | 0.5% |
| TOTAL | 526 | 100.0% | \$38,452 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 1.1% | 0.5% | 0.0% |
| Moderate | 41 | 28.9% | \$5,082 | 33.6% | 25.0% | 28.2% | 32.3% |
| Middle | 85 | 59.9% | \$7,984 | 52.8% | 66.0% | 61.5% | 54.6% |
| Upper | 16 | 11.3% | \$2,056 | 13.6% | 8.0% | 9.7% | 13.1% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 142 | 100.0% | \$15,122 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 1.1% | 0.0% | 0.0% |
| Moderate | 26 | 21.8% | \$3,673 | 25.6% | 24.4% | 23.2% | 23.7% |
| Middle | 83 | 69.7% | \$9,655 | 67.2% | 66.7% | 69.0% | 69.0% |
| Upper | 10 | 8.4% | \$1,037 | 7.2% | 7.8% | 7.7% | 7.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 119 | 100.0% | \$14,365 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 4.1% | 143 | 1.8% | 25.1% | 4.0% | 2.2% |
| Moderate | 7 | 9.6% | 575 | 7.3% | 15.2% | 13.3% | 9.5% |
| Middle | 20 | 27.4% | 1,982 | 25.1% | 17.9% | 23.1% | 22.8% |
| Upper | 34 | 46.6% | 4,348 | 55.0% | 41.9% | 34.8% | 42.3% |
| Unknown | 9 | 12.3% | 862 | 10.9% | 0.0% | 24.8% | 23.2% |
| TOTAL | 73 | 100.0% | 7,910 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.1% | 3.4% | 1.8% |
| Moderate | 4 | 17.4% | 196 | 2.9% | 15.2% | 7.9% | 4.4% |
| Middle | 6 | 26.1% | 454 | 6.8% | 17.9% | 21.6% | 14.4% |
| Upper | 10 | 43.5% | 1,679 | 25.1% | 41.9% | 41.5% | 40.5% |
| Unknown | 3 | 13.0% | 4,351 | 65.1% | 0.0% | 25.6% | 38.9% |
| TOTAL | 23 | 100.0% | 6,680 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 18.2% | 68 | 9.1% | 25.1% | 11.4% | 9.4% |
| Moderate | 1 | 9.1% | 20 | 2.7% | 15.2% | 11.4% | 9.3% |
| Middle | 3 | 27.3% | 154 | 20.5% | 17.9% | 29.5% | 23.2% |
| Upper | 4 | 36.4% | 109 | 14.5% | 41.9% | 40.9% | 32.8% |
| Unknown | 1 | 9.1% | 400 | 53.3% | 0.0% | 6.8% | 25.3% |
| TOTAL | 11 | 100.0% | 751 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.1% | 14.3% | 8.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 0.0% | 0.0% |
| Middle | 1 | 100.0% | 22 | 100.0% | 17.9% | 28.6% | 26.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.9% | 57.1% | 65.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 22 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.1% | 7.4% | 1.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 0.0% | 0.0% |
| Middle | 1 | 12.5% | 42 | 3.6% | 17.9% | 14.8% | 5.2% |
| Upper | 7 | 87.5% | 1,139 | 96.4% | 41.9% | 63.0% | 76.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 14.8% | 16.3% |
| TOTAL | 8 | 100.0% | 1,181 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | | | |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 5 | 4.3% | 211 | 1.3% | 25.1% | 3.9% | 1.9% |
| Moderate | 12 | 10.3% | 791 | 4.8% | 15.2% | 10.7% | 6.8% |
| Middle | 31 | 26.7% | 2,654 | 16.0% | 17.9% | 21.1% | 17.4% |
| Upper | 55 | 47.4% | 7,275 | 44.0% | 41.9% | 34.8% | 37.3% |
| Unknown | 13 | 11.2% | 5,613 | 33.9% | 0.0% | 29.5% | 36.6% |
| TOTAL | 116 | 100.0% | 16,544 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 5 | 6.3% | 457 | 5.5% | 25.1% | 6.3% | 3.7% |
| Moderate | 11 | 13.9% | 1,076 | 12.9% | 15.2% | 18.4% | 13.5% |
| Middle | 23 | 29.1% | 1,884 | 22.5% | 17.9% | 22.1% | 20.9% |
| Upper | 32 | 40.5% | 4,382 | 52.4% | 41.9% | 28.6% | 37.1% |
| Unknown | 8 | 10.1% | 561 | 6.7% | 0.0% | 24.5% | 24.8% |
| TOTAL | 79 | 100.0% | 8,360 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.1% | 1.1% | 0.8% |
| Moderate | 9 | 18.4% | 1,061 | 14.8% | 15.2% | 9.4% | 5.9% |
| Middle | 7 | 14.3% | 1,000 | 13.9% | 17.9% | 11.7% | 10.3% |
| Upper | 23 | 46.9% | 3,746 | 52.2% | 41.9% | 43.3% | 45.9% |
| Unknown | 10 | 20.4% | 1,367 | 19.1% | 0.0% | 34.5% | 37.2% |
| TOTAL | 49 | 100.0% | 7,174 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.1% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 8.0% | 4.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 17.9% | 12.0% | 7.7% |
| Upper | 2 | 100.0% | 110 | 100.0% | 41.9% | 68.0% | 76.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 12.0% | 11.2% |
| TOTAL | 2 | 100.0% | 110 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.1% | 0.0% | 0.0% |
| Moderate | 1 | 25.0% | 123 | 41.3% | 15.2% | 12.5% | 28.7% |
| Middle | 1 | 25.0% | 30 | 10.1% | 17.9% | 37.5% | 28.0% |
| Upper | 2 | 50.0% | 145 | 48.7% | 41.9% | 50.0% | 43.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 298 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 25.1% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.2% | 28.6% | 39.6% |
| Middle | 1 | 50.0% | 70 | 56.0% | 17.9% | 14.3% | 5.9% |
| Upper | 1 | 50.0% | 55 | 44.0% | 41.9% | 35.7% | 43.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 21.4% | 10.6% |
| TOTAL | 2 | 100.0% | 125 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 5 | 3.7% | 457 | 2.8% | 25.1% | 3.7% | 2.1% |
| Moderate | 21 | 15.4% | 2,260 | 14.1% | 15.2% | 13.2% | 9.1% |
| Middle | 32 | 23.5% | 2,984 | 18.6% | 17.9% | 16.0% | 14.2% |
| Upper | 60 | 44.1% | 8,438 | 52.5% | 41.9% | 30.2% | 35.5% |
| Unknown | 18 | 13.2% | 1,928 | 12.0% | 0.0% | 36.9% | 39.0% |
| TOTAL | 136 | 100.0% | 16,067 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$(000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 132 | 55.5% | 34.0% | \$7,275 | 36.7% | 32.1% | 91.0% |
| | Over \$1 Million/ Unknown | 106 | 44.5% | 66.0% | \$12,574 | 63.3% | 67.9% | 9.0% |
| | TOTAL | 238 | 100.0% | 100.0% | \$19,849 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 187 | 78.6% | 92.7% | \$5,580 | 28.1% | 39.9% | |
| | \$100,001– \$250,000 | 29 | 12.2% | 4.2% | \$4,722 | 23.8% | 18.9% | |
| | \$250,001– \$1 Million | 22 | 9.2% | 3.1% | \$9,547 | 48.1% | 41.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 238 | 100.0% | 100.0% | \$19,849 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 116 | 87.9% | | \$3,423 | 47.1% | | |
| | \$100,001– \$250,000 | 11 | 8.3% | | \$1,609 | 22.1% | | |
| | \$250,001– \$1 Million | 5 | 3.8% | | \$2,243 | 30.8% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 132 | 100.0% | | \$7,275 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|--------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 257 | 48.9% | 34.3% | \$11,709 | 30.5% | 31.3% | 91.2% |
| | Over \$1 Million/ Unknown | 269 | 51.1% | 65.7% | \$26,743 | 69.5% | 68.7% | 8.8% |
| | TOTAL | 526 | 100.0% | 100.0% | \$38,452 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 432 | 82.1% | 88.9% | \$12,250 | 31.9% | 34.3% | |
| | \$100,001– \$250,000 | 63 | 12.0% | 6.7% | \$9,890 | 25.7% | 21.3% | |
| | \$250,001– \$1 Million | 31 | 5.9% | 4.3% | \$16,312 | 42.4% | 44.4% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 526 | 100.0% | 100.0% | \$38,452 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 231 | 89.9% | | \$6,132 | 52.4% | |
| | | \$100,001– \$250,000 | 22 | 8.6% | | \$3,419 | 29.2% | |
| | | \$250,001–\$1 Million | 4 | 1.6% | | \$2,158 | 18.4% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 257 | 100.0% | | \$11,709 | 100.0% | |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|-------|
| Farm Revenue and Loan Size | | 2019 | | | | | | | |
| | | Count | | | Dollars | | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % | |
| Farm Revenue | \$1 Million or Less | 104 | 73.2% | 59.0% | 11,054 | 73.1% | 69.2% | 97.9% | |
| | Over \$1 Million/ Unknown | 38 | 26.8% | 41.0% | 4,068 | 26.9% | 30.8% | 2.1% | |
| | TOTAL | 142 | 100.0% | 100.0% | 15,122 | 100.0% | 100.0% | 100.0% | |
| Loan Size | \$100,000 or Less | 92 | 64.8% | 73.3% | 3,191 | 21.1% | 23.9% | | |
| | \$100,001–\$250,000 | 32 | 22.5% | 17.4% | 5,301 | 35.1% | 35.0% | | |
| | \$250,001–\$500,000 | 18 | 12.7% | 9.2% | 6,630 | 43.8% | 41.1% | | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | | |
| | TOTAL | 142 | 100.0% | 100.0% | 15,122 | 100.0% | 100.0% | | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 70 | 67.3% | | 2,634 | 23.8% | | | |
| | \$100,001–\$250,000 | 21 | 20.2% | | 3,545 | 32.1% | | | |
| | \$250,001– \$1 Million | 13 | 12.5% | | 4,875 | 44.1% | | | |
| | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | | | |
| | TOTAL | 104 | 100.0% | | 11,054 | 100.0% | | | |

| Distribution of 2020 Small Farm Lending By Borrower Income Level | | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|-------|
| Farm Revenue and Loan Size | | 2020 | | | | | | | |
| | | Count | | | Dollars | | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % | |
| Farm Revenue | \$1 Million or Less | 86 | 72.3% | 60.0% | 9,244 | 64.4% | 59.4% | 97.8% | |
| | Over \$1 Million/ Unknown | 33 | 27.7% | 40.0% | 5,121 | 35.6% | 40.6% | 2.2% | |
| | TOTAL | 119 | 100.0% | 100.0% | 14,365 | 100.0% | 100.0% | 100.0% | |
| Loan Size | \$100,000 or Less | 72 | 60.5% | 66.5% | 2,925 | 20.4% | 20.5% | | |
| | \$100,001–\$250,000 | 30 | 25.2% | 21.3% | 5,056 | 35.2% | 34.3% | | |
| | \$250,001–\$500,000 | 17 | 14.3% | 12.3% | 6,384 | 44.4% | 45.2% | | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | | |
| | TOTAL | 119 | 100.0% | 100.0% | 14,365 | 100.0% | 100.0% | | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 56 | 65.1% | | 2,120 | 22.9% | | | |
| | \$100,001–\$250,000 | 20 | 23.3% | | 3,283 | 35.5% | | | |
| | \$250,001–\$1 Million | 10 | 11.6% | | 3,841 | 41.6% | | | |
| | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | | | |
| | TOTAL | 86 | 100.0% | | 9,244 | 100.0% | | | |

Appendix C (continued)

NonMSA Arkansas

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.6% | 24 | 0.1% | 1.2% | 0.3% | 0.1% |
| Moderate | 28 | 16.1% | 3,247 | 16.9% | 14.6% | 11.4% | 11.0% |
| Middle | 93 | 53.4% | 8,892 | 46.2% | 63.2% | 60.2% | 54.7% |
| Upper | 52 | 29.9% | 7,084 | 36.8% | 21.0% | 27.9% | 34.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.2% | 0.3% |
| TOTAL | 174 | 100.0% | 19,247 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.3% | 0.4% |
| Moderate | 17 | 19.5% | 942 | 10.9% | 14.6% | 12.9% | 11.3% |
| Middle | 57 | 65.5% | 5,492 | 63.8% | 63.2% | 57.4% | 51.8% |
| Upper | 13 | 14.9% | 2,171 | 25.2% | 21.0% | 28.9% | 35.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.6% | 0.7% |
| TOTAL | 87 | 100.0% | 8,605 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.5% | 0.3% |
| Moderate | 5 | 16.7% | 172 | 19.7% | 14.6% | 14.0% | 17.2% |
| Middle | 15 | 50.0% | 426 | 48.7% | 63.2% | 46.2% | 40.6% |
| Upper | 10 | 33.3% | 277 | 31.7% | 21.0% | 38.7% | 40.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.5% | 1.3% |
| TOTAL | 30 | 100.0% | 875 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.0% | 0.0% |
| Moderate | 3 | 13.6% | 300 | 29.1% | 14.6% | 7.5% | 9.4% |
| Middle | 15 | 68.2% | 555 | 53.8% | 63.2% | 57.5% | 50.5% |
| Upper | 4 | 18.2% | 176 | 17.1% | 21.0% | 34.9% | 40.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 22 | 100.0% | 1,031 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.0% | 0.0% |
| Moderate | 1 | 7.1% | 29 | 3.8% | 14.6% | 11.9% | 14.6% |
| Middle | 9 | 64.3% | 543 | 70.5% | 63.2% | 58.7% | 49.2% |
| Upper | 4 | 28.6% | 198 | 25.7% | 21.0% | 29.4% | 36.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 14 | 100.0% | 770 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
|---------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 1 | 0.3% | 24 | 0.1% | 1.2% | 0.3% | 0.4% |
| Moderate | 54 | 16.5% | 4,690 | 15.4% | 14.6% | 11.9% | 11.3% |
| Middle | 189 | 57.8% | 15,908 | 52.1% | 63.2% | 58.9% | 53.9% |
| Upper | 83 | 25.4% | 9,906 | 32.4% | 21.0% | 28.6% | 34.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.3% | 0.4% |
| TOTAL | 327 | 100.0% | 30,528 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 1.3% | 112 | 0.6% | 1.2% | 0.4% | 0.2% |
| Moderate | 21 | 13.9% | 2,296 | 11.9% | 14.6% | 13.1% | 11.9% |
| Middle | 84 | 55.6% | 9,610 | 49.7% | 63.2% | 60.2% | 55.7% |
| Upper | 44 | 29.1% | 7,306 | 37.8% | 21.0% | 26.2% | 32.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.2% |
| TOTAL | 151 | 100.0% | 19,324 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.4% | 0.5% |
| Moderate | 21 | 16.9% | 2,702 | 15.9% | 14.6% | 13.0% | 12.1% |
| Middle | 78 | 62.9% | 10,422 | 61.3% | 63.2% | 54.2% | 49.2% |
| Upper | 25 | 20.2% | 3,873 | 22.8% | 21.0% | 32.1% | 38.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.2% | 0.2% |
| TOTAL | 124 | 100.0% | 16,997 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.0% | 0.0% |
| Moderate | 1 | 6.7% | 19 | 2.8% | 14.6% | 12.7% | 14.2% |
| Middle | 7 | 46.7% | 262 | 39.2% | 63.2% | 60.2% | 61.8% |
| Upper | 7 | 46.7% | 388 | 58.0% | 21.0% | 25.9% | 22.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.2% | 2.0% |
| TOTAL | 15 | 100.0% | 669 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 25.5% | 25.8% | 16.3% |
| Middle | 1 | 50.0% | 448 | 38.7% | 56.5% | 61.3% | 68.6% |
| Upper | 1 | 50.0% | 709 | 61.3% | 14.6% | 12.9% | 15.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 1,157 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.6% | 11.3% | 8.0% |
| Middle | 7 | 87.5% | 254 | 96.2% | 63.2% | 60.4% | 65.1% |
| Upper | 1 | 12.5% | 10 | 3.8% | 21.0% | 28.3% | 26.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | 264 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.2% | 0.0% | 0.0% |
| Moderate | 1 | 16.7% | 275 | 34.5% | 14.6% | 9.2% | 14.9% |
| Middle | 4 | 66.7% | 365 | 45.8% | 63.2% | 62.1% | 55.5% |
| Upper | 1 | 16.7% | 157 | 19.7% | 21.0% | 28.7% | 29.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 6 | 100.0% | 797 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 2 | 0.7% | 112 | 0.3% | 1.2% | 0.4% | 0.3% |
| Moderate | 44 | 14.4% | 5,292 | 13.5% | 14.6% | 13.0% | 12.1% |
| Middle | 181 | 59.2% | 21,361 | 54.5% | 63.2% | 57.8% | 53.3% |
| Upper | 79 | 25.8% | 12,443 | 31.7% | 21.0% | 28.6% | 34.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.2% | 0.2% |
| TOTAL | 306 | 100.0% | 39,208 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 9 | 1.4% | \$1,212 | 2.4% | 1.3% | 1.5% | 1.4% |
| Moderate | 118 | 18.1% | \$8,502 | 16.5% | 21.6% | 16.0% | 14.8% |
| Middle | 389 | 59.7% | \$26,502 | 51.5% | 55.4% | 57.5% | 55.7% |
| Upper | 136 | 20.9% | \$15,276 | 29.7% | 21.7% | 22.4% | 27.4% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 2.6% | 0.7% |
| TOTAL | 652 | 100.0% | \$51,492 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 21 | 1.8% | \$965 | 1.1% | 1.4% | 1.2% | 0.7% |
| Moderate | 212 | 17.7% | \$14,786 | 16.4% | 21.9% | 18.3% | 18.6% |
| Middle | 707 | 59.0% | \$54,426 | 60.4% | 54.9% | 57.6% | 58.2% |
| Upper | 259 | 21.6% | \$19,935 | 22.1% | 21.9% | 22.3% | 22.4% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.6% | 0.1% |
| TOTAL | 1,199 | 100.0% | \$90,112 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 2 | 0.5% | \$718 | 2.2% | 4.2% | 1.2% | 1.6% |
| Moderate | 100 | 25.9% | \$7,608 | 23.2% | 10.1% | 15.5% | 17.0% |
| Middle | 270 | 69.9% | \$22,868 | 69.6% | 70.6% | 75.1% | 72.7% |
| Upper | 14 | 3.6% | \$1,665 | 5.1% | 15.1% | 7.8% | 8.6% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.5% | 0.1% |
| TOTAL | 386 | 100.0% | \$32,859 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 9 | 2.4% | \$1,341 | 3.8% | 4.6% | 2.5% | 2.6% |
| Moderate | 61 | 16.4% | \$5,945 | 17.0% | 9.3% | 12.2% | 14.1% |
| Middle | 286 | 76.9% | \$26,292 | 75.2% | 71.6% | 74.7% | 75.0% |
| Upper | 16 | 4.3% | \$1,401 | 4.0% | 14.5% | 10.3% | 8.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.2% | 0.1% |
| TOTAL | 372 | 100.0% | \$34,979 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 2.3% | 384 | 2.0% | 22.4% | 4.3% | 2.4% |
| Moderate | 32 | 18.4% | 2,418 | 12.6% | 18.0% | 16.4% | 11.0% |
| Middle | 33 | 19.0% | 3,335 | 17.3% | 18.8% | 20.2% | 17.3% |
| Upper | 95 | 54.6% | 12,431 | 64.6% | 40.8% | 44.5% | 55.1% |
| Unknown | 10 | 5.7% | 679 | 3.5% | 0.0% | 14.5% | 14.2% |
| TOTAL | 174 | 100.0% | 19,247 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 9 | 10.3% | 235 | 2.7% | 22.4% | 5.8% | 2.6% |
| Moderate | 9 | 10.3% | 468 | 5.4% | 18.0% | 12.5% | 7.5% |
| Middle | 18 | 20.7% | 1,393 | 16.2% | 18.8% | 17.3% | 13.4% |
| Upper | 47 | 54.0% | 5,952 | 69.2% | 40.8% | 48.0% | 56.6% |
| Unknown | 4 | 4.6% | 557 | 6.5% | 0.0% | 16.5% | 20.0% |
| TOTAL | 87 | 100.0% | 8,605 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 6.7% | 40 | 4.6% | 22.4% | 10.2% | 7.3% |
| Moderate | 4 | 13.3% | 104 | 11.9% | 18.0% | 14.5% | 12.4% |
| Middle | 5 | 16.7% | 104 | 11.9% | 18.8% | 19.9% | 20.0% |
| Upper | 18 | 60.0% | 597 | 68.2% | 40.8% | 50.0% | 54.6% |
| Unknown | 1 | 3.3% | 30 | 3.4% | 0.0% | 5.4% | 5.7% |
| TOTAL | 30 | 100.0% | 875 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 2 | 9.1% | 35 | 3.4% | 22.4% | 5.7% | 3.3% |
| Moderate | 3 | 13.6% | 111 | 10.8% | 18.0% | 11.3% | 8.2% |
| Middle | 4 | 18.2% | 118 | 11.4% | 18.8% | 15.1% | 8.5% |
| Upper | 10 | 45.5% | 477 | 46.3% | 40.8% | 62.3% | 72.5% |
| Unknown | 3 | 13.6% | 290 | 28.1% | 0.0% | 5.7% | 7.6% |
| TOTAL | 22 | 100.0% | 1,031 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 7.1% | 22 | 2.9% | 22.4% | 7.9% | 2.1% |
| Moderate | 3 | 21.4% | 123 | 16.0% | 18.0% | 23.8% | 16.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.8% | 14.3% | 12.0% |
| Upper | 10 | 71.4% | 625 | 81.2% | 40.8% | 46.8% | 62.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.1% | 7.6% |
| TOTAL | 14 | 100.0% | 770 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | | | |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 18 | 5.5% | 716 | 2.3% | 22.4% | 5.0% | 2.4% |
| Moderate | 51 | 15.6% | 3,224 | 10.6% | 18.0% | 14.9% | 9.7% |
| Middle | 60 | 18.3% | 4,950 | 16.2% | 18.8% | 18.7% | 15.5% |
| Upper | 180 | 55.0% | 20,082 | 65.8% | 40.8% | 45.1% | 54.1% |
| Unknown | 18 | 5.5% | 1,556 | 5.1% | 0.0% | 16.4% | 18.2% |
| TOTAL | 327 | 100.0% | 30,528 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 10 | 6.6% | 809 | 4.2% | 22.4% | 5.5% | 2.9% |
| Moderate | 25 | 16.6% | 2,883 | 14.9% | 18.0% | 16.1% | 11.1% |
| Middle | 29 | 19.2% | 3,289 | 17.0% | 18.8% | 19.5% | 16.8% |
| Upper | 72 | 47.7% | 10,835 | 56.1% | 40.8% | 44.2% | 55.2% |
| Unknown | 15 | 9.9% | 1,508 | 7.8% | 0.0% | 14.6% | 14.0% |
| TOTAL | 151 | 100.0% | 19,324 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 6 | 4.8% | 186 | 1.1% | 22.4% | 3.2% | 1.3% |
| Moderate | 18 | 14.5% | 1,387 | 8.2% | 18.0% | 8.9% | 5.3% |
| Middle | 14 | 11.3% | 1,198 | 7.0% | 18.8% | 14.6% | 10.9% |
| Upper | 77 | 62.1% | 11,801 | 69.4% | 40.8% | 52.5% | 60.1% |
| Unknown | 9 | 7.3% | 2,425 | 14.3% | 0.0% | 20.8% | 22.4% |
| TOTAL | 124 | 100.0% | 16,997 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 6.7% | 23 | 3.4% | 22.4% | 9.6% | 4.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.0% | 7.2% | 4.3% |
| Middle | 6 | 40.0% | 169 | 25.3% | 18.8% | 17.5% | 12.4% |
| Upper | 6 | 40.0% | 292 | 43.6% | 40.8% | 57.2% | 65.1% |
| Unknown | 2 | 13.3% | 185 | 27.7% | 0.0% | 8.4% | 13.2% |
| TOTAL | 15 | 100.0% | 669 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.0% | 0.0% | 0.0% |
| Middle | 1 | 50.0% | 448 | 38.7% | 18.8% | 3.2% | 1.6% |
| Upper | 1 | 50.0% | 709 | 61.3% | 40.8% | 19.4% | 6.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 77.4% | 92.4% |
| TOTAL | 2 | 100.0% | 1,157 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 22.4% | 5.7% | 2.9% |
| Moderate | 2 | 25.0% | 37 | 14.0% | 18.0% | 11.3% | 7.0% |
| Middle | 2 | 25.0% | 85 | 32.2% | 18.8% | 15.1% | 19.6% |
| Upper | 4 | 50.0% | 142 | 53.8% | 40.8% | 64.2% | 64.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.8% | 6.3% |
| TOTAL | 8 | 100.0% | 264 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.4% | 3.4% | 1.8% |
| Moderate | 1 | 16.7% | 110 | 13.8% | 18.0% | 13.8% | 9.2% |
| Middle | 2 | 33.3% | 159 | 19.9% | 18.8% | 24.1% | 19.8% |
| Upper | 3 | 50.0% | 528 | 66.2% | 40.8% | 58.6% | 69.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 6 | 100.0% | 797 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 17 | 5.6% | 1,018 | 2.6% | 22.4% | 4.5% | 2.1% |
| Moderate | 46 | 15.0% | 4,417 | 11.3% | 18.0% | 12.4% | 7.9% |
| Middle | 54 | 17.6% | 5,348 | 13.6% | 18.8% | 16.9% | 13.5% |
| Upper | 163 | 53.3% | 24,307 | 62.0% | 40.8% | 47.1% | 55.4% |
| Unknown | 26 | 8.5% | 4,118 | 10.5% | 0.0% | 19.2% | 21.2% |
| TOTAL | 306 | 100.0% | 39,208 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|--------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 457 | 70.1% | 40.2% | \$26,008 | 50.5% | 43.0% | 89.5% |
| | Over \$1 Million/ Unknown | 195 | 29.9% | 59.8% | \$25,484 | 49.5% | 57.0% | 10.5% |
| | TOTAL | 652 | 100.0% | 100.0% | \$51,492 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 530 | 81.3% | 91.3% | \$15,795 | 30.7% | 36.9% | |
| | \$100,001– \$250,000 | 71 | 10.9% | 5.5% | \$11,734 | 22.8% | 23.6% | |
| | \$250,001– \$1 Million | 51 | 7.8% | 3.2% | \$23,963 | 46.5% | 39.4% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 652 | 100.0% | 100.0% | \$51,492 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 397 | 86.9% | | \$9,972 | 38.3% | |
| | | \$100,001– \$250,000 | 35 | 7.7% | | \$5,902 | 22.7% | |
| | | \$250,001–\$1 Million | 25 | 5.5% | | \$10,134 | 39.0% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 457 | 100.0% | | \$26,008 | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 660 | 55.0% | 37.5% | \$32,081 | 35.6% | 33.9% | 89.6% |
| | Over \$1 Million/ Unknown | 539 | 45.0% | 62.5% | \$58,031 | 64.4% | 66.1% | 10.4% |
| | TOTAL | 1199 | 100.0% | 100.0% | \$90,112 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 963 | 80.3% | 87.5% | \$27,968 | 31.0% | 34.6% | |
| | \$100,001– \$250,000 | 150 | 12.5% | 8.3% | \$23,775 | 26.4% | 26.3% | |
| | \$250,001– \$1 Million | 86 | 7.2% | 4.2% | \$38,369 | 42.6% | 39.1% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 1199 | 100.0% | 100.0% | \$90,112 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 586 | 88.8% | | \$14,706 | 45.8% | |
| | | \$100,001– \$250,000 | 50 | 7.6% | | \$7,814 | 24.4% | |
| | | \$250,001– \$1 Million | 24 | 3.6% | | \$9,561 | 29.8% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 660 | 100.0% | | \$32,081 | 100.0% | |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 334 | 86.5% | 69.2% | 24,667 | 75.1% | 73.8% | 96.1% |
| | Over \$1 Million/ Unknown | 52 | 13.5% | 30.8% | 8,192 | 24.9% | 26.2% | 3.9% |
| | TOTAL | 386 | 100.0% | 100.0% | 32,859 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 294 | 76.2% | 84.1% | 8,779 | 26.7% | 36.5% | |
| | \$100,001–\$250,000 | 54 | 14.0% | 9.8% | 9,602 | 29.2% | 26.9% | |
| | \$250,001–\$500,000 | 38 | 9.8% | 6.1% | 14,478 | 44.1% | 36.6% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 386 | 100.0% | 100.0% | 32,859 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 267 | 79.9% | | 7,739 | 31.4% | |
| | | \$100,001–\$250,000 | 41 | 12.3% | | 7,271 | 29.5% | |
| | | \$250,001– \$1 Million | 26 | 7.8% | | 9,657 | 39.1% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 334 | 100.0% | | 24,667 | 100.0% | |

| Distribution of 2020 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|-----------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 293 | 78.8% | 67.5% | 23,882 | 68.3% | 70.1% | 95.9% |
| | Over \$1 Million/ Unknown | 79 | 21.2% | 32.5% | 11,097 | 31.7% | 29.9% | 4.1% |
| | TOTAL | 372 | 100.0% | 100.0% | 34,979 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 268 | 72.0% | 81.0% | 9,714 | 27.8% | 35.6% | |
| | \$100,001–\$250,000 | 65 | 17.5% | 12.8% | 10,628 | 30.4% | 31.0% | |
| | \$250,001–\$500,000 | 39 | 10.5% | 6.2% | 14,637 | 41.8% | 33.5% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 372 | 100.0% | 100.0% | 34,979 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 229 | 78.2% | | 7,979 | 33.4% | |
| | | \$100,001–\$250,000 | 39 | 13.3% | | 6,242 | 26.1% | |
| | | \$250,001–\$1 Million | 25 | 8.5% | | 9,661 | 40.5% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 293 | 100.0% | | 23,882 | 100.0% | |

Appendix C (continued)

KANSAS

Wichita

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|------------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.8% | 3.1% | 1.4% |
| Moderate | 4 | 10.0% | 494 | 4.9% | 19.6% | 17.1% | 9.4% |
| Middle | 12 | 30.0% | 2,562 | 25.3% | 29.0% | 28.9% | 24.0% |
| Upper | 24 | 60.0% | 7,087 | 69.9% | 45.6% | 50.9% | 65.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 40 | 100.0% | 10,143 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 6.7% | 39 | 1.0% | 5.8% | 2.2% | 1.0% |
| Moderate | 4 | 26.7% | 172 | 4.2% | 19.6% | 11.6% | 6.0% |
| Middle | 3 | 20.0% | 202 | 5.0% | 29.0% | 25.8% | 19.9% |
| Upper | 7 | 46.7% | 3,646 | 89.8% | 45.6% | 60.3% | 73.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 15 | 100.0% | 4,059 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.8% | 4.7% | 1.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.6% | 13.6% | 10.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 29.0% | 25.9% | 24.7% |
| Upper | 1 | 100.0% | 50 | 100.0% | 45.6% | 55.8% | 63.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 50 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 1 | 1.8% | 39 | 0.3% | | 5.8% | 3.2% |
| Moderate | 8 | 14.3% | 666 | 4.7% | 19.6% | 15.6% | 12.4% |
| Middle | 15 | 26.8% | 2,764 | 19.4% | 29.0% | 27.8% | 22.5% |
| Upper | 32 | 57.1% | 10,783 | 75.7% | 45.6% | 53.4% | 63.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 56 | 100.0% | 14,252 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 3.0% | 41 | 0.6% | 5.8% | 2.8% | 1.3% |
| Moderate | 4 | 12.1% | 372 | 5.1% | 19.6% | 18.2% | 9.9% |
| Middle | 7 | 21.2% | 880 | 12.2% | 29.0% | 28.5% | 23.1% |
| Upper | 21 | 63.6% | 5,946 | 82.1% | 45.6% | 50.4% | 65.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 33 | 100.0% | 7,239 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.8% | 1.3% | 0.5% |
| Moderate | 1 | 2.7% | 50 | 0.6% | 19.6% | 8.2% | 4.7% |
| Middle | 6 | 16.2% | 1,494 | 17.5% | 29.0% | 23.1% | 17.9% |
| Upper | 30 | 81.1% | 6,983 | 81.9% | 45.6% | 67.4% | 76.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 37 | 100.0% | 8,527 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.8% | 3.0% | 1.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.6% | 9.1% | 5.8% |
| Middle | 1 | 50.0% | 40 | 48.2% | 29.0% | 23.3% | 16.2% |
| Upper | 1 | 50.0% | 43 | 51.8% | 45.6% | 64.6% | 76.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 83 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 1 | 1.4% | 41 | 0.3% | 5.8% | 2.3% | 1.4% |
| Moderate | 5 | 6.9% | 422 | 2.7% | 19.6% | 13.7% | 9.7% |
| Middle | 14 | 19.4% | 2,414 | 15.2% | 29.0% | 25.8% | 20.8% |
| Upper | 52 | 72.2% | 12,972 | 81.8% | 45.6% | 58.2% | 68.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 72 | 100.0% | 15,849 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 4 | 4.0% | \$979 | 3.9% | 6.4% | 5.8% | 6.2% |
| Moderate | 39 | 39.4% | \$9,034 | 35.9% | 29.1% | 27.1% | 33.3% |
| Middle | 27 | 27.3% | \$6,197 | 24.6% | 27.4% | 25.5% | 24.3% |
| Upper | 29 | 29.3% | \$8,949 | 35.6% | 37.1% | 39.9% | 35.7% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 1.7% | 0.4% |
| TOTAL | 99 | 100.0% | \$25,159 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 6.4% | 6.3% | 7.1% |
| Moderate | 49 | 29.5% | \$14,004 | 41.1% | 29.3% | 28.0% | 34.3% |
| Middle | 29 | 17.5% | \$5,510 | 16.2% | 27.3% | 25.1% | 25.3% |
| Upper | 88 | 53.0% | \$14,542 | 42.7% | 37.0% | 40.4% | 33.2% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.2% | 0.0% |
| TOTAL | 166 | 100.0% | \$34,056 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 8.1% | 4.1% |
| Moderate | 8 | 20.0% | 1,467 | 14.5% | 17.6% | 20.7% | 15.4% |
| Middle | 5 | 12.5% | 643 | 6.3% | 20.8% | 22.0% | 21.1% |
| Upper | 25 | 62.5% | 7,793 | 76.8% | 40.2% | 30.6% | 42.9% |
| Unknown | 2 | 5.0% | 240 | 2.4% | 0.0% | 18.5% | 16.4% |
| TOTAL | 40 | 100.0% | 10,143 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 6.7% | 25 | 0.6% | 21.4% | 5.6% | 2.7% |
| Moderate | 1 | 6.7% | 49 | 1.2% | 17.6% | 15.6% | 10.0% |
| Middle | 1 | 6.7% | 24 | 0.6% | 20.8% | 20.6% | 16.3% |
| Upper | 7 | 46.7% | 3,646 | 89.8% | 40.2% | 39.1% | 49.6% |
| Unknown | 5 | 33.3% | 315 | 7.8% | 0.0% | 19.1% | 21.3% |
| TOTAL | 15 | 100.0% | 4,059 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 8.3% | 5.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 16.4% | 12.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.8% | 18.8% | 18.6% |
| Upper | 1 | 100.0% | 50 | 100.0% | 40.2% | 45.9% | 51.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.5% | 11.3% |
| TOTAL | 1 | 100.0% | 50 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 1 | 1.8% | 25 | 0.2% | 21.4% | 7.1% | 3.3% |
| Moderate | 9 | 16.1% | 1,516 | 10.6% | 17.6% | 18.1% | 12.0% |
| Middle | 6 | 10.7% | 667 | 4.7% | 20.8% | 21.1% | 17.4% |
| Upper | 33 | 58.9% | 11,489 | 80.6% | 40.2% | 33.5% | 40.2% |
| Unknown | 7 | 12.5% | 555 | 3.9% | 0.0% | 20.2% | 27.1% |
| TOTAL | 56 | 100.0% | 14,252 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 9.1% | 338 | 4.7% | 21.4% | 8.9% | 4.7% |
| Moderate | 5 | 15.2% | 985 | 13.6% | 17.6% | 22.6% | 17.5% |
| Middle | 6 | 18.2% | 1,111 | 15.3% | 20.8% | 21.0% | 21.3% |
| Upper | 16 | 48.5% | 4,636 | 64.0% | 40.2% | 28.9% | 41.6% |
| Unknown | 3 | 9.1% | 169 | 2.3% | 0.0% | 18.6% | 14.8% |
| TOTAL | 33 | 100.0% | 7,239 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 3.5% | 1.6% |
| Moderate | 7 | 18.9% | 1,118 | 13.1% | 17.6% | 13.5% | 8.8% |
| Middle | 7 | 18.9% | 1,269 | 14.9% | 20.8% | 19.8% | 16.1% |
| Upper | 22 | 59.5% | 6,090 | 71.4% | 40.2% | 40.2% | 50.2% |
| Unknown | 1 | 2.7% | 50 | 0.6% | 0.0% | 22.9% | 23.3% |
| TOTAL | 37 | 100.0% | 8,527 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 50.0% | 43 | 51.8% | 21.4% | 5.1% | 3.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 15.9% | 9.8% |
| Middle | 1 | 50.0% | 40 | 48.2% | 20.8% | 19.2% | 14.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.2% | 54.5% | 65.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.4% | 6.4% |
| TOTAL | 2 | 100.0% | 83 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 4 | 5.6% | 381 | 2.4% | 21.4% | 6.0% | 2.9% |
| Moderate | 12 | 16.7% | 2,103 | 13.3% | 17.6% | 17.2% | 11.9% |
| Middle | 14 | 19.4% | 2,420 | 15.3% | 20.8% | 19.7% | 17.1% |
| Upper | 38 | 52.8% | 10,726 | 67.7% | 40.2% | 34.1% | 42.6% |
| Unknown | 4 | 5.6% | 219 | 1.4% | 0.0% | 23.0% | 25.5% |
| TOTAL | 72 | 100.0% | 15,849 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|-----------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 44 | 44.4% | 40.5% | \$8,099 | 32.2% | 32.3% | 88.7% |
| | Over \$1 Million/ Unknown | 55 | 55.6% | 59.5% | \$17,060 | 67.8% | 67.7% | 11.3% |
| | TOTAL | 99 | 100.0% | 100.0% | \$25,159 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 49 | 49.5% | 88.0% | \$2,537 | 10.1% | 24.0% | |
| | \$100,001– \$250,000 | 20 | 20.2% | 5.3% | \$3,584 | 14.2% | 15.3% | |
| | \$250,001–\$1 Million | 30 | 30.3% | 6.7% | \$19,038 | 75.7% | 60.7% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 99 | 100.0% | 100.0% | \$25,159 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 26 | 59.1% | | \$1,228 | 15.2% | | |
| | \$100,001– \$250,000 | 10 | 22.7% | | \$1,852 | 22.9% | | |
| | \$250,001–\$1 Million | 8 | 18.2% | | \$5,019 | 62.0% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 44 | 100.0% | | \$8,099 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|---------------------------|---------------|---------------|-----------------|----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | Total Businesses |
| | | Count | | | Dollars | | | |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | |
| Business Revenue | \$1 Million or Less | 65 | 39.2% | 40.1% | \$9,530 | 28.0% | 25.6% | 89.0% |
| | Over \$1 Million/ Unknown | 101 | 60.8% | 59.9% | \$24,526 | 72.0% | 74.4% | 11.0% |
| | TOTAL | 166 | 100.0% | 100.0% | \$34,056 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 86 | 51.8% | 81.5% | \$3,766 | 11.1% | 22.0% | |
| | \$100,001– \$250,000 | 36 | 21.7% | 9.4% | \$5,786 | 17.0% | 19.1% | |
| | \$250,001– \$1 Million | 44 | 26.5% | 9.2% | \$24,504 | 72.0% | 58.8% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 166 | 100.0% | 100.0% | \$34,056 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 39 | 60.0% | | \$1,877 | 19.7% | |
| | | \$100,001– \$250,000 | 14 | 21.5% | | \$2,325 | 24.4% | |
| | | \$250,001– \$1 Million | 12 | 18.5% | | \$5,328 | 55.9% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 65 | 100.0% | | \$9,530 | 100.0% | |

Appendix C (continued)

MISSOURI

St. Louis

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 8 | 8.2% | 723 | 3.4% | 5.6% | 2.6% | 1.2% |
| Moderate | 20 | 20.6% | 2,237 | 10.7% | 16.2% | 13.7% | 7.8% |
| Middle | 34 | 35.1% | 5,562 | 26.5% | 31.5% | 34.3% | 28.4% |
| Upper | 35 | 36.1% | 12,446 | 59.4% | 46.6% | 49.2% | 62.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| TOTAL | 97 | 100.0% | 20,968 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 2.8% | 141 | 1.0% | 5.6% | 1.1% | 0.5% |
| Moderate | 20 | 28.2% | 1,556 | 10.6% | 16.2% | 7.1% | 3.8% |
| Middle | 15 | 21.1% | 3,087 | 21.0% | 31.5% | 29.3% | 22.5% |
| Upper | 34 | 47.9% | 9,892 | 67.4% | 46.6% | 62.4% | 73.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.2% |
| TOTAL | 71 | 100.0% | 14,676 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 4 | 12.5% | 96 | 4.9% | 5.6% | 1.8% | 1.2% |
| Moderate | 6 | 18.8% | 208 | 10.6% | 16.2% | 9.0% | 5.2% |
| Middle | 6 | 18.8% | 450 | 23.0% | 31.5% | 30.5% | 25.9% |
| Upper | 16 | 50.0% | 1,204 | 61.5% | 46.6% | 58.4% | 67.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.4% |
| TOTAL | 32 | 100.0% | 1,958 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 3 | 50.0% | 3,310 | 27.6% | 12.8% | 17.4% | 3.4% |
| Moderate | 1 | 16.7% | 1,238 | 10.3% | 19.8% | 35.3% | 22.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 33.0% | 28.0% | 41.1% |
| Upper | 2 | 33.3% | 7,427 | 62.0% | 33.3% | 19.0% | 30.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1.1% | 0.3% | 1.9% |
| TOTAL | 6 | 100.0% | 11,975 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 5.6% | 0.8% | 0.3% |
| Moderate | 2 | 25.0% | 48 | 8.7% | 16.2% | 5.8% | 2.9% |
| Middle | 2 | 25.0% | 213 | 38.5% | 31.5% | 27.8% | 20.8% |
| Upper | 4 | 50.0% | 292 | 52.8% | 46.6% | 65.5% | 75.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.2% |
| TOTAL | 8 | 100.0% | 553 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 33.3% | 30 | 14.0% | 5.6% | 1.8% | 0.9% |
| Moderate | 1 | 33.3% | 80 | 37.2% | 16.2% | 10.6% | 5.8% |
| Middle | 1 | 33.3% | 105 | 48.8% | 31.5% | 30.0% | 18.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 46.6% | 57.5% | 74.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.3% |
| TOTAL | 3 | 100.0% | 215 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 18 | 8.3% | 4,300 | 8.5% | 5.6% | 2.0% | 1.0% |
| Moderate | 50 | 23.0% | 5,367 | 10.7% | 16.2% | 10.8% | 6.8% |
| Middle | 58 | 26.7% | 9,417 | 18.7% | 31.5% | 31.8% | 26.2% |
| Upper | 91 | 41.9% | 31,261 | 62.1% | 46.6% | 55.3% | 65.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.3% |
| TOTAL | 217 | 100.0% | 50,345 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|---------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 19 | 20.9% | 1,681 | 11.7% | 5.6% | 2.7% | 1.3% |
| Moderate | 24 | 26.4% | 2,273 | 15.8% | 16.2% | 13.5% | 7.7% |
| Middle | 25 | 27.5% | 4,324 | 30.1% | 31.5% | 34.8% | 29.5% |
| Upper | 23 | 25.3% | 6,081 | 42.3% | 46.6% | 48.8% | 61.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.3% | 0.3% |
| TOTAL | 91 | 100.0% | 14,359 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 4.2% | 235 | 1.3% | 5.6% | 0.8% | 0.4% |
| Moderate | 6 | 8.5% | 907 | 5.1% | 16.2% | 6.0% | 3.5% |
| Middle | 9 | 12.7% | 1,686 | 9.4% | 31.5% | 29.0% | 23.1% |
| Upper | 53 | 74.6% | 15,101 | 84.2% | 46.6% | 64.1% | 72.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.2% |
| TOTAL | 71 | 100.0% | 17,929 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 3 | 16.7% | 50 | 4.4% | 5.6% | 1.6% | 1.1% |
| Moderate | 1 | 5.6% | 11 | 1.0% | 16.2% | 6.8% | 4.1% |
| Middle | 5 | 27.8% | 175 | 15.3% | 31.5% | 28.3% | 23.6% |
| Upper | 9 | 50.0% | 911 | 79.4% | 46.6% | 63.2% | 71.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.0% |
| TOTAL | 18 | 100.0% | 1,147 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 12.8% | 19.5% | 4.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.8% | 29.4% | 15.2% |
| Middle | 1 | 100.0% | 5,430 | 100.0% | 33.0% | 26.4% | 20.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 33.3% | 24.2% | 56.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1.1% | 0.5% | 3.4% |
| TOTAL | 1 | 100.0% | 5,430 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 16.7% | 16 | 3.1% | 5.6% | 0.5% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.2% | 5.6% | 3.3% |
| Middle | 2 | 33.3% | 295 | 57.8% | 31.5% | 26.2% | 18.3% |
| Upper | 3 | 50.0% | 199 | 39.0% | 46.6% | 67.7% | 78.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 6 | 100.0% | 510 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.6% | 2.2% | 0.7% |
| Moderate | 1 | 50.0% | 37 | 13.8% | 16.2% | 12.3% | 5.4% |
| Middle | 1 | 50.0% | 231 | 86.2% | 31.5% | 31.5% | 20.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 46.6% | 53.9% | 73.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.0% |
| TOTAL | 2 | 100.0% | 268 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 26 | 13.8% | 1,982 | 5.0% | 5.6% | 1.6% | 0.8% |
| Moderate | 32 | 16.9% | 3,228 | 8.1% | 16.2% | 8.8% | 5.2% |
| Middle | 43 | 22.8% | 12,141 | 30.6% | 31.5% | 30.9% | 25.1% |
| Upper | 88 | 46.6% | 22,292 | 56.2% | 46.6% | 58.6% | 68.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.3% |
| TOTAL | 189 | 100.0% | 39,643 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 18 | 9.3% | \$3,580 | 8.0% | 6.4% | 5.5% | 5.7% |
| Moderate | 36 | 18.7% | \$8,931 | 20.0% | 16.7% | 16.2% | 16.8% |
| Middle | 41 | 21.2% | \$8,011 | 18.0% | 28.1% | 27.6% | 26.2% |
| Upper | 96 | 49.7% | \$22,632 | 50.8% | 47.7% | 48.9% | 47.8% |
| Unknown | 2 | 1.0% | \$1,415 | 3.2% | 1.2% | 1.8% | 3.4% |
| TOTAL | 193 | 100.0% | \$44,569 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 45 | 7.4% | \$5,780 | 5.8% | 6.6% | 5.7% | 5.6% |
| Moderate | 102 | 16.7% | \$18,223 | 18.4% | 16.9% | 15.7% | 16.8% |
| Middle | 116 | 19.0% | \$18,733 | 18.9% | 28.1% | 27.3% | 26.7% |
| Upper | 342 | 56.2% | \$55,929 | 56.4% | 47.2% | 49.8% | 48.3% |
| Unknown | 4 | 0.7% | \$540 | 0.5% | 1.2% | 1.4% | 2.7% |
| TOTAL | 609 | 100.0% | \$99,205 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 24 | 24.7% | 2,336 | 11.1% | 20.9% | 9.6% | 4.6% |
| Moderate | 26 | 26.8% | 4,180 | 19.9% | 16.1% | 20.0% | 13.8% |
| Middle | 12 | 12.4% | 1,958 | 9.3% | 19.0% | 20.4% | 18.3% |
| Upper | 31 | 32.0% | 11,472 | 54.7% | 44.0% | 34.6% | 48.9% |
| Unknown | 4 | 4.1% | 1,022 | 4.9% | 0.0% | 15.4% | 14.4% |
| TOTAL | 97 | 100.0% | 20,968 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 4.2% | 333 | 2.3% | 20.9% | 5.4% | 2.7% |
| Moderate | 8 | 11.3% | 1,209 | 8.2% | 16.1% | 14.0% | 8.7% |
| Middle | 15 | 21.1% | 2,637 | 18.0% | 19.0% | 20.5% | 16.4% |
| Upper | 27 | 38.0% | 9,066 | 61.8% | 44.0% | 43.2% | 55.9% |
| Unknown | 18 | 25.4% | 1,431 | 9.8% | 0.0% | 16.9% | 16.4% |
| TOTAL | 71 | 100.0% | 14,676 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 4 | 12.5% | 86 | 4.4% | 20.9% | 7.6% | 4.3% |
| Moderate | 7 | 21.9% | 441 | 22.5% | 16.1% | 15.5% | 11.1% |
| Middle | 4 | 12.5% | 103 | 5.3% | 19.0% | 22.0% | 18.8% |
| Upper | 15 | 46.9% | 1,168 | 59.7% | 44.0% | 49.9% | 59.2% |
| Unknown | 2 | 6.3% | 160 | 8.2% | 0.0% | 5.0% | 6.6% |
| TOTAL | 32 | 100.0% | 1,958 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 1 | 16.7% | 110 | 0.9% | 20.9% | 0.6% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.1% | 0.3% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.0% | 0.3% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 44.0% | 2.5% | 0.6% |
| Unknown | 5 | 83.3% | 11,865 | 99.1% | 0.0% | 96.4% | 99.3% |
| TOTAL | 6 | 100.0% | 11,975 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 7.2% | 4.4% |
| Moderate | 1 | 12.5% | 100 | 18.1% | 16.1% | 15.6% | 10.2% |
| Middle | 3 | 37.5% | 223 | 40.3% | 19.0% | 21.4% | 15.7% |
| Upper | 4 | 50.0% | 230 | 41.6% | 44.0% | 52.8% | 66.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.1% | 3.0% |
| TOTAL | 8 | 100.0% | 553 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 33.3% | 30 | 14.0% | 20.9% | 9.5% | 4.8% |
| Moderate | 1 | 33.3% | 105 | 48.8% | 16.1% | 18.2% | 11.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.0% | 20.7% | 13.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 44.0% | 46.2% | 63.1% |
| Unknown | 1 | 33.3% | 80 | 37.2% | 0.0% | 5.4% | 7.6% |
| TOTAL | 3 | 100.0% | 215 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 33 | 15.2% | 2,895 | 5.8% | 20.9% | 7.5% | 3.5% |
| Moderate | 43 | 19.8% | 6,035 | 12.0% | 16.1% | 16.8% | 10.6% |
| Middle | 34 | 15.7% | 4,921 | 9.8% | 19.0% | 20.1% | 16.3% |
| Upper | 77 | 35.5% | 21,936 | 43.6% | 44.0% | 38.9% | 49.6% |
| Unknown | 30 | 13.8% | 14,558 | 28.9% | 0.0% | 16.7% | 20.0% |
| TOTAL | 217 | 100.0% | 50,345 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 29 | 31.9% | 2,836 | 19.8% | 20.9% | 9.7% | 4.8% |
| Moderate | 25 | 27.5% | 3,184 | 22.2% | 16.1% | 21.9% | 15.6% |
| Middle | 10 | 11.0% | 1,858 | 12.9% | 19.0% | 19.6% | 18.0% |
| Upper | 19 | 20.9% | 4,920 | 34.3% | 44.0% | 34.3% | 47.4% |
| Unknown | 8 | 8.8% | 1,561 | 10.9% | 0.0% | 14.6% | 14.2% |
| TOTAL | 91 | 100.0% | 14,359 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 2.8% | 148 | 0.8% | 20.9% | 3.9% | 1.9% |
| Moderate | 10 | 14.1% | 1,366 | 7.6% | 16.1% | 13.3% | 8.6% |
| Middle | 12 | 16.9% | 2,441 | 13.6% | 19.0% | 19.6% | 15.9% |
| Upper | 40 | 56.3% | 12,657 | 70.6% | 44.0% | 46.1% | 56.9% |
| Unknown | 7 | 9.9% | 1,317 | 7.3% | 0.0% | 17.1% | 16.7% |
| TOTAL | 71 | 100.0% | 17,929 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 11.1% | 74 | 6.5% | 20.9% | 6.9% | 3.8% |
| Moderate | 2 | 11.1% | 26 | 2.3% | 16.1% | 12.9% | 9.4% |
| Middle | 9 | 50.0% | 644 | 56.1% | 19.0% | 21.1% | 17.6% |
| Upper | 5 | 27.8% | 403 | 35.1% | 44.0% | 54.3% | 61.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 4.8% | 7.7% |
| TOTAL | 18 | 100.0% | 1,147 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.1% | 0.3% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.0% | 0.3% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 44.0% | 1.9% | 0.5% |
| Unknown | 1 | 100.0% | 5,430 | 100.0% | 0.0% | 97.5% | 99.4% |
| TOTAL | 1 | 100.0% | 5,430 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 2 | 33.3% | 60 | 11.8% | 20.9% | 7.1% | 3.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.1% | 14.4% | 9.6% |
| Middle | 3 | 50.0% | 350 | 68.6% | 19.0% | 19.1% | 15.0% |
| Upper | 1 | 16.7% | 100 | 19.6% | 44.0% | 56.1% | 68.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.3% | 3.3% |
| TOTAL | 6 | 100.0% | 510 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 9.8% | 4.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.1% | 18.2% | 9.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.0% | 18.5% | 11.3% |
| Upper | 2 | 100.0% | 268 | 100.0% | 44.0% | 47.5% | 66.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.1% | 8.4% |
| TOTAL | 2 | 100.0% | 268 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 35 | 18.5% | 3,118 | 7.9% | 20.9% | 5.7% | 2.7% |
| Moderate | 37 | 19.6% | 4,576 | 11.5% | 16.1% | 15.6% | 10.4% |
| Middle | 34 | 18.0% | 5,293 | 13.4% | 19.0% | 19.2% | 15.9% |
| Upper | 67 | 35.4% | 18,348 | 46.3% | 44.0% | 41.8% | 52.1% |
| Unknown | 16 | 8.5% | 8,308 | 21.0% | 0.0% | 17.7% | 18.8% |
| TOTAL | 189 | 100.0% | 39,643 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------|------------|---------------|---------------|-----------------|---------------|---------------|------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$(000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 80 | 41.5% | 47.1% | \$15,156 | 34.0% | 28.7% | 89.1% |
| | Over \$1 Million/Unknown | 113 | 58.5% | 52.9% | \$29,413 | 66.0% | 71.3% | 10.9% |
| | TOTAL | 193 | 100.0% | 100.0% | \$44,569 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 88 | 45.6% | 91.3% | \$3,715 | 8.3% | 28.3% | |
| | \$100,001–\$250,000 | 40 | 20.7% | 4.0% | \$6,621 | 14.9% | 15.5% | |
| | \$250,001–\$1 Million | 65 | 33.7% | 4.7% | \$34,233 | 76.8% | 56.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 193 | 100.0% | 100.0% | \$44,569 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 39 | 48.8% | | \$1,517 | 10.0% | | |
| | \$100,001–\$250,000 | 21 | 26.3% | | \$3,361 | 22.2% | | |
| | \$250,001–\$1 Million | 20 | 25.0% | | \$10,278 | 67.8% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 80 | 100.0% | | \$15,156 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 192 | 31.5% | 39.7% | \$33,413 | 33.7% | 22.8% | 89.4% |
| | Over \$1 Million/ Unknown | 417 | 68.5% | 60.3% | \$65,792 | 66.3% | 77.2% | 10.6% |
| | TOTAL | 609 | 100.0% | 100.0% | \$99,205 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 372 | 61.1% | 83.6% | \$13,794 | 13.9% | 23.7% | |
| | \$100,001– \$250,000 | 113 | 18.6% | 8.6% | \$17,807 | 17.9% | 19.8% | |
| | \$250,001– \$1 Million | 124 | 20.4% | 7.9% | \$67,604 | 68.1% | 56.5% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 609 | 100.0% | 100.0% | \$99,205 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 117 | 60.9% | | \$3,998 | 12.0% | |
| | | \$100,001– \$250,000 | 33 | 17.2% | | \$4,787 | 14.3% | |
| | | \$250,001– \$1 Million | 42 | 21.9% | | \$24,628 | 73.7% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 192 | 100.0% | | \$33,413 | 100.0% | |

Appendix C (continued)

NonMSA Missouri

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.5% | 32 | 0.1% | 0.5% | 0.4% | 0.3% |
| Moderate | 4 | 2.1% | 268 | 1.1% | 11.0% | 9.4% | 7.4% |
| Middle | 162 | 83.9% | 20,747 | 82.8% | 81.6% | 81.6% | 81.6% |
| Upper | 26 | 13.5% | 4,014 | 16.0% | 6.8% | 8.5% | 10.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 193 | 100.0% | 25,061 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.1% | 0.1% |
| Moderate | 5 | 5.4% | 648 | 4.8% | 11.0% | 7.7% | 5.8% |
| Middle | 76 | 82.6% | 10,603 | 77.8% | 81.6% | 82.4% | 83.2% |
| Upper | 11 | 12.0% | 2,369 | 17.4% | 6.8% | 9.7% | 10.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 92 | 100.0% | 13,620 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.5% | 0.4% |
| Moderate | 2 | 6.5% | 46 | 3.0% | 11.0% | 9.1% | 6.0% |
| Middle | 27 | 87.1% | 1,441 | 94.6% | 81.6% | 83.6% | 89.0% |
| Upper | 2 | 6.5% | 36 | 2.4% | 6.8% | 6.8% | 4.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 31 | 100.0% | 1,523 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | | 1.7% | 2.4% |
| Moderate | 1 | 25.0% | 826 | 39.4% | 10.7% | 21.4% | 13.5% |
| Middle | 3 | 75.0% | 1,270 | 60.6% | 80.6% | 59.5% | 66.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 7.0% | 16.7% | 15.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 2,096 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.8% | 0.1% |
| Moderate | 2 | 9.1% | 120 | 14.1% | 11.0% | 4.7% | 3.8% |
| Middle | 16 | 72.7% | 568 | 66.8% | 81.6% | 85.3% | 88.5% |
| Upper | 4 | 18.2% | 162 | 19.1% | 6.8% | 9.3% | 7.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 22 | 100.0% | 850 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.0% | 8.1% | 8.7% |
| Middle | 5 | 71.4% | 719 | 50.9% | 81.6% | 82.9% | 80.5% |
| Upper | 2 | 28.6% | 694 | 49.1% | 6.8% | 8.1% | 10.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.8% | 0.5% |
| TOTAL | 7 | 100.0% | 1,413 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 1 | 0.3% | 32 | 0.1% | 0.5% | 0.3% | 0.4% |
| Moderate | 14 | 4.0% | 1,908 | 4.3% | 11.0% | 8.9% | 7.1% |
| Middle | 289 | 82.8% | 35,348 | 79.3% | 81.6% | 81.8% | 81.6% |
| Upper | 45 | 12.9% | 7,275 | 16.3% | 6.8% | 8.9% | 10.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 349 | 100.0% | 44,563 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.3% | 0.2% |
| Moderate | 18 | 7.5% | 1,663 | 5.2% | 11.0% | 8.7% | 6.5% |
| Middle | 189 | 78.4% | 22,756 | 71.3% | 81.6% | 81.3% | 81.7% |
| Upper | 34 | 14.1% | 7,483 | 23.5% | 6.8% | 9.7% | 11.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 241 | 100.0% | 31,902 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.1% | 0.1% |
| Moderate | 20 | 10.1% | 2,064 | 7.9% | 11.0% | 6.5% | 5.0% |
| Middle | 168 | 84.4% | 22,271 | 84.8% | 81.6% | 83.0% | 83.1% |
| Upper | 11 | 5.5% | 1,924 | 7.3% | 6.8% | 10.4% | 11.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 199 | 100.0% | 26,259 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.0% | 0.0% |
| Moderate | 2 | 8.0% | 51 | 4.5% | 11.0% | 7.7% | 5.3% |
| Middle | 22 | 88.0% | 1,054 | 93.9% | 81.6% | 78.7% | 77.8% |
| Upper | 1 | 4.0% | 17 | 1.5% | 6.8% | 13.7% | 16.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 25 | 100.0% | 1,122 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | % of Multifamily Units | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|--|
| Low | 0 | 0.0% | 0 | 0.0% | 1.7% | 0.0% | 0.0% | |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 8.8% | 10.3% | |
| Middle | 1 | 100.0% | 500 | 100.0% | 80.6% | 73.5% | 82.2% | |
| Upper | 0 | 0.0% | 0 | 0.0% | 7.0% | 17.6% | 7.5% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | |
| TOTAL | 1 | 100.0% | 500 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Other Purpose LOC | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.0% | 0.0% | |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.0% | 6.2% | 3.7% | |
| Middle | 6 | 100.0% | 255 | 100.0% | 81.6% | 86.4% | 89.5% | |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.8% | 7.4% | 6.8% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | |
| TOTAL | 6 | 100.0% | 255 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Other Purpose Closed/Exempt | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.0% | 0.0% | |
| Moderate | 1 | 14.3% | 101 | 17.4% | 11.0% | 9.2% | 7.9% | |
| Middle | 6 | 85.7% | 478 | 82.6% | 81.6% | 84.0% | 86.0% | |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.8% | 6.7% | 6.0% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | |
| TOTAL | 7 | 100.0% | 579 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.5% | 0.2% | 0.1% | |
| Moderate | 41 | 8.6% | 3,879 | 6.4% | 11.0% | 7.8% | 6.0% | |
| Middle | 392 | 81.8% | 47,314 | 78.1% | 81.6% | 82.1% | 82.4% | |
| Upper | 46 | 9.6% | 9,424 | 15.5% | 6.8% | 10.0% | 11.5% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | |
| TOTAL | 479 | 100.0% | 60,617 | 100.0% | 100.0% | 100.0% | 100.0% | |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 1 | 0.4% | \$143 | 0.5% | 0.5% | 0.5% | 0.3% |
| Moderate | 15 | 5.5% | \$2,308 | 7.8% | 13.0% | 10.4% | 11.2% |
| Middle | 227 | 83.5% | \$21,615 | 72.6% | 79.1% | 77.9% | 78.3% |
| Upper | 29 | 10.7% | \$5,705 | 19.2% | 7.4% | 8.5% | 9.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 2.8% | 0.8% |
| TOTAL | 272 | 100.0% | \$29,771 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 4 | 0.4% | \$159 | 0.2% | 0.5% | 0.4% | 0.2% |
| Moderate | 186 | 17.1% | \$11,880 | 15.3% | 12.9% | 11.9% | 11.4% |
| Middle | 833 | 76.7% | \$60,050 | 77.4% | 79.3% | 80.0% | 80.1% |
| Upper | 63 | 5.8% | \$5,500 | 7.1% | 7.3% | 7.2% | 8.1% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.6% | 0.2% |
| TOTAL | 1,086 | 100.0% | \$77,589 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 10 | 5.2% | 569 | 2.3% | 21.4% | 4.9% | 2.5% |
| Moderate | 29 | 15.0% | 2,602 | 10.4% | 18.7% | 16.1% | 11.0% |
| Middle | 38 | 19.7% | 4,240 | 16.9% | 22.0% | 20.6% | 18.3% |
| Upper | 104 | 53.9% | 16,570 | 66.1% | 37.9% | 40.3% | 50.9% |
| Unknown | 12 | 6.2% | 1,080 | 4.3% | 0.0% | 18.1% | 17.3% |
| TOTAL | 193 | 100.0% | 25,061 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 11 | 12.0% | 516 | 3.8% | 21.4% | 6.4% | 3.0% |
| Moderate | 16 | 17.4% | 1,257 | 9.2% | 18.7% | 12.3% | 8.0% |
| Middle | 14 | 15.2% | 1,640 | 12.0% | 22.0% | 17.2% | 13.6% |
| Upper | 44 | 47.8% | 7,530 | 55.3% | 37.9% | 43.7% | 52.0% |
| Unknown | 7 | 7.6% | 2,677 | 19.7% | 0.0% | 20.5% | 23.4% |
| TOTAL | 92 | 100.0% | 13,620 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 3.2% | 15 | 1.0% | 21.4% | 10.5% | 7.1% |
| Moderate | 7 | 22.6% | 227 | 14.9% | 18.7% | 15.0% | 11.3% |
| Middle | 4 | 12.9% | 225 | 14.8% | 22.0% | 22.7% | 24.6% |
| Upper | 18 | 58.1% | 1,046 | 68.7% | 37.9% | 47.7% | 52.8% |
| Unknown | 1 | 3.2% | 10 | 0.7% | 0.0% | 4.1% | 4.2% |
| TOTAL | 31 | 100.0% | 1,523 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 1 | 25.0% | 990 | 47.2% | 21.4% | 2.4% | 2.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.0% | 2.4% | 0.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 37.9% | 11.9% | 8.1% |
| Unknown | 3 | 75.0% | 1,106 | 52.8% | 0.0% | 83.3% | 89.4% |
| TOTAL | 4 | 100.0% | 2,096 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 4 | 18.2% | 130 | 15.3% | 21.4% | 11.6% | 5.4% |
| Moderate | 3 | 13.6% | 74 | 8.7% | 18.7% | 10.1% | 4.3% |
| Middle | 4 | 18.2% | 121 | 14.2% | 22.0% | 21.7% | 18.5% |
| Upper | 8 | 36.4% | 352 | 41.4% | 37.9% | 50.4% | 66.7% |
| Unknown | 3 | 13.6% | 173 | 20.4% | 0.0% | 6.2% | 5.2% |
| TOTAL | 22 | 100.0% | 850 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 8.1% | 3.6% |
| Moderate | 1 | 14.3% | 67 | 4.7% | 18.7% | 12.2% | 7.2% |
| Middle | 2 | 28.6% | 147 | 10.4% | 22.0% | 26.0% | 22.2% |
| Upper | 4 | 57.1% | 1,199 | 84.9% | 37.9% | 48.0% | 59.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.7% | 7.9% |
| TOTAL | 7 | 100.0% | 1,413 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 27 | 7.7% | 2,220 | 5.0% | 21.4% | 5.6% | 2.7% |
| Moderate | 56 | 16.0% | 4,227 | 9.5% | 18.7% | 14.4% | 9.4% |
| Middle | 62 | 17.8% | 6,373 | 14.3% | 22.0% | 19.4% | 15.9% |
| Upper | 178 | 51.0% | 26,697 | 59.9% | 37.9% | 41.2% | 49.3% |
| Unknown | 26 | 7.4% | 5,046 | 11.3% | 0.0% | 19.4% | 22.6% |
| TOTAL | 349 | 100.0% | 44,563 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 14 | 5.8% | 849 | 2.7% | 21.4% | 5.9% | 3.0% |
| Moderate | 38 | 15.8% | 3,818 | 12.0% | 18.7% | 17.3% | 11.9% |
| Middle | 43 | 17.8% | 4,540 | 14.2% | 22.0% | 20.6% | 18.2% |
| Upper | 138 | 57.3% | 21,841 | 68.5% | 37.9% | 41.0% | 52.0% |
| Unknown | 8 | 3.3% | 854 | 2.7% | 0.0% | 15.2% | 14.9% |
| TOTAL | 241 | 100.0% | 31,902 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 23 | 11.6% | 1,087 | 4.1% | 21.4% | 3.5% | 1.5% |
| Moderate | 23 | 11.6% | 2,323 | 8.8% | 18.7% | 10.2% | 6.6% |
| Middle | 45 | 22.6% | 5,908 | 22.5% | 22.0% | 16.6% | 13.0% |
| Upper | 94 | 47.2% | 15,016 | 57.2% | 37.9% | 43.7% | 49.8% |
| Unknown | 14 | 7.0% | 1,925 | 7.3% | 0.0% | 26.0% | 29.1% |
| TOTAL | 199 | 100.0% | 26,259 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 8.0% | 31 | 2.8% | 21.4% | 4.9% | 2.3% |
| Moderate | 5 | 20.0% | 129 | 11.5% | 18.7% | 14.2% | 9.2% |
| Middle | 6 | 24.0% | 210 | 18.7% | 22.0% | 18.6% | 15.1% |
| Upper | 11 | 44.0% | 735 | 65.5% | 37.9% | 53.0% | 63.2% |
| Unknown | 1 | 4.0% | 17 | 1.5% | 0.0% | 9.3% | 10.2% |
| TOTAL | 25 | 100.0% | 1,122 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.0% | 0.0% | 0.0% |
| Upper | 1 | 100.0% | 500 | 100.0% | 37.9% | 5.9% | 1.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 94.1% | 98.3% |
| TOTAL | 1 | 100.0% | 500 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 3.7% | 1.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.7% | 7.4% | 4.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 22.0% | 17.3% | 14.8% |
| Upper | 5 | 83.3% | 240 | 94.1% | 37.9% | 59.3% | 64.2% |
| Unknown | 1 | 16.7% | 15 | 5.9% | 0.0% | 12.3% | 15.1% |
| TOTAL | 6 | 100.0% | 255 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 1 | 14.3% | 40 | 6.9% | 21.4% | 13.4% | 6.7% |
| Moderate | 2 | 28.6% | 146 | 25.2% | 18.7% | 16.0% | 10.3% |
| Middle | 3 | 42.9% | 298 | 51.5% | 22.0% | 26.1% | 19.1% |
| Upper | 1 | 14.3% | 95 | 16.4% | 37.9% | 38.7% | 57.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.9% | 6.0% |
| TOTAL | 7 | 100.0% | 579 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 40 | 8.4% | 2,007 | 3.3% | 21.4% | 4.7% | 2.2% |
| Moderate | 68 | 14.2% | 6,416 | 10.6% | 18.7% | 13.5% | 8.8% |
| Middle | 97 | 20.3% | 10,956 | 18.1% | 22.0% | 18.2% | 14.9% |
| Upper | 250 | 52.2% | 38,427 | 63.4% | 37.9% | 41.4% | 48.8% |
| Unknown | 24 | 5.0% | 2,811 | 4.6% | 0.0% | 22.1% | 25.3% |
| TOTAL | 479 | 100.0% | 60,617 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 196 | 72.1% | 51.8% | \$13,460 | 45.2% | 49.9% | 91.4% |
| | Over \$1 Million/ Unknown | 76 | 27.9% | 48.2% | \$16,311 | 54.8% | 50.1% | 8.6% |
| | TOTAL | 272 | 100.0% | 100.0% | \$29,771 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 204 | 75.0% | 92.9% | \$7,036 | 23.6% | 37.5% | |
| | \$100,001– \$250,000 | 40 | 14.7% | 4.0% | \$6,433 | 21.6% | 17.6% | |
| | \$250,001– \$1 Million | 28 | 10.3% | 3.1% | \$16,302 | 54.8% | 44.8% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 272 | 100.0% | 100.0% | \$29,771 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 162 | 82.7% | | \$4,930 | 36.6% | |
| | | \$100,001– \$250,000 | 24 | 12.2% | | \$3,711 | 27.6% | |
| | | \$250,001– \$1 Million | 10 | 5.1% | | \$4,819 | 35.8% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 196 | 100.0% | | \$13,460 | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 714 | 65.7% | 44.6% | \$40,294 | 51.9% | 41.1% | 91.5% |
| | Over \$1 Million/ Unknown | 372 | 34.3% | 55.4% | \$37,295 | 48.1% | 58.9% | 8.5% |
| | TOTAL | 1086 | 100.0% | 100.0% | \$77,589 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 902 | 83.1% | 88.7% | \$24,311 | 31.3% | 32.5% | |
| | \$100,001– \$250,000 | 108 | 9.9% | 6.4% | \$17,560 | 22.6% | 20.0% | |
| | \$250,001– \$1 Million | 76 | 7.0% | 4.9% | \$35,718 | 46.0% | 47.5% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 1086 | 100.0% | 100.0% | \$77,589 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 622 | 87.1% | | \$16,067 | 39.9% | |
| | | \$100,001– \$250,000 | 60 | 8.4% | | \$9,790 | 24.3% | |
| | | \$250,001– \$1 Million | 32 | 4.5% | | \$14,437 | 35.8% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 714 | 100.0% | | \$40,294 | 100.0% | |

Appendix C (continued)

OKLAHOMA

Oklahoma City

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 2.0% | 1.1% |
| Moderate | 14 | 11.8% | 2,637 | 8.3% | 18.2% | 13.1% | 8.3% |
| Middle | 28 | 23.5% | 4,889 | 15.4% | 43.2% | 39.0% | 34.0% |
| Upper | 77 | 64.7% | 24,171 | 76.3% | 34.9% | 45.7% | 56.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| TOTAL | 119 | 100.0% | 31,697 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 1.7% | 0.9% |
| Moderate | 5 | 14.7% | 1,240 | 13.7% | 18.2% | 12.1% | 6.8% |
| Middle | 5 | 14.7% | 480 | 5.3% | 43.2% | 38.9% | 31.8% |
| Upper | 23 | 67.6% | 6,880 | 75.9% | 34.9% | 47.2% | 60.3% |
| Unknown | 1 | 2.9% | 465 | 5.1% | 0.1% | 0.1% | 0.2% |
| TOTAL | 34 | 100.0% | 9,065 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 2.4% | 1.7% |
| Moderate | 5 | 41.7% | 262 | 25.5% | 18.2% | 13.8% | 9.8% |
| Middle | 3 | 25.0% | 358 | 34.8% | 43.2% | 37.1% | 32.1% |
| Upper | 4 | 33.3% | 409 | 39.7% | 34.9% | 46.5% | 56.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| TOTAL | 12 | 100.0% | 1,029 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 0.9% | 0.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.2% | 8.2% | 4.6% |
| Middle | 2 | 28.6% | 33 | 8.4% | 43.2% | 37.9% | 30.1% |
| Upper | 5 | 71.4% | 360 | 91.6% | 34.9% | 52.8% | 61.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.2% | 3.2% |
| TOTAL | 7 | 100.0% | 393 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 1.5% | 0.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.2% | 11.6% | 7.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 43.2% | 42.1% | 32.1% |
| Upper | 3 | 100.0% | 738 | 100.0% | 34.9% | 44.9% | 59.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 738 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
|---------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 2.0% | 1.4% |
| Moderate | 24 | 13.7% | 4,139 | 9.6% | 18.2% | 13.2% | 9.8% |
| Middle | 38 | 21.7% | 5,760 | 13.4% | 43.2% | 39.1% | 34.4% |
| Upper | 112 | 64.0% | 32,558 | 75.9% | 34.9% | 45.5% | 54.3% |
| Unknown | 1 | 0.6% | 465 | 1.1% | 0.1% | 0.1% | 0.2% |
| TOTAL | 175 | 100.0% | 42,922 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 1.9% | 1.1% |
| Moderate | 9 | 11.0% | 2,133 | 9.5% | 18.2% | 13.1% | 8.6% |
| Middle | 22 | 26.8% | 4,986 | 22.1% | 43.2% | 37.3% | 32.3% |
| Upper | 51 | 62.2% | 15,429 | 68.4% | 34.9% | 47.5% | 57.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| TOTAL | 82 | 100.0% | 22,548 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 1.0% | 60 | 0.2% | 3.6% | 1.0% | 0.5% |
| Moderate | 1 | 1.0% | 350 | 1.3% | 18.2% | 8.2% | 5.0% |
| Middle | 18 | 18.4% | 3,467 | 12.7% | 43.2% | 35.1% | 28.8% |
| Upper | 78 | 79.6% | 23,320 | 85.7% | 34.9% | 55.6% | 65.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.2% | 0.2% |
| TOTAL | 98 | 100.0% | 27,197 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 2.9% | 2.1% |
| Moderate | 1 | 20.0% | 70 | 8.2% | 18.2% | 11.0% | 7.9% |
| Middle | 1 | 20.0% | 150 | 17.6% | 43.2% | 41.8% | 35.1% |
| Upper | 3 | 60.0% | 632 | 74.2% | 34.9% | 44.2% | 54.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.4% |
| TOTAL | 5 | 100.0% | 852 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.6% | 9.7% | 4.3% |
| Moderate | 1 | 100.0% | 400 | 100.0% | 39.4% | 39.6% | 28.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 33.1% | 31.8% | 33.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 17.6% | 18.4% | 32.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 1.3% | 0.6% | 0.6% |
| TOTAL | 1 | 100.0% | 400 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 1.3% | 0.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.2% | 9.1% | 4.7% |
| Middle | 1 | 33.3% | 30 | 13.3% | 43.2% | 36.5% | 30.4% |
| Upper | 2 | 66.7% | 195 | 86.7% | 34.9% | 53.1% | 64.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 225 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.6% | 1.6% | 0.7% |
| Moderate | 2 | 50.0% | 182 | 45.7% | 18.2% | 11.1% | 6.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 43.2% | 39.6% | 30.6% |
| Upper | 2 | 50.0% | 216 | 54.3% | 34.9% | 47.7% | 62.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 398 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 1 | 0.5% | 60 | 0.1% | 3.6% | 1.6% | 1.0% |
| Moderate | 14 | 7.3% | 3,135 | 6.1% | 18.2% | 11.3% | 8.2% |
| Middle | 42 | 21.8% | 8,633 | 16.7% | 43.2% | 36.7% | 31.1% |
| Upper | 136 | 70.5% | 39,792 | 77.1% | 34.9% | 50.3% | 59.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.2% |
| TOTAL | 193 | 100.0% | 51,620 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 8 | 3.6% | \$851 | 1.7% | 4.6% | 4.4% | 6.1% |
| Moderate | 42 | 19.1% | \$8,297 | 16.6% | 22.2% | 18.4% | 20.5% |
| Middle | 78 | 35.5% | \$16,168 | 32.3% | 36.9% | 35.0% | 34.7% |
| Upper | 84 | 38.2% | \$21,420 | 42.8% | 33.1% | 37.0% | 33.6% |
| Unknown | 8 | 3.6% | \$3,295 | 6.6% | 3.1% | 5.2% | 5.1% |
| TOTAL | 220 | 100.0% | \$50,031 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 23 | 3.5% | \$2,010 | 2.3% | 4.7% | 4.4% | 5.7% |
| Moderate | 145 | 22.3% | \$17,339 | 19.6% | 22.3% | 19.7% | 22.9% |
| Middle | 213 | 32.7% | \$31,479 | 35.7% | 36.8% | 35.5% | 33.9% |
| Upper | 245 | 37.6% | \$30,441 | 34.5% | 33.0% | 37.4% | 32.7% |
| Unknown | 25 | 3.8% | \$6,980 | 7.9% | 3.2% | 3.0% | 4.9% |
| TOTAL | 651 | 100.0% | \$88,249 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 3.4% | 387 | 1.2% | 21.3% | 6.7% | 3.8% |
| Moderate | 11 | 9.2% | 1,460 | 4.6% | 17.3% | 19.9% | 15.3% |
| Middle | 11 | 9.2% | 2,058 | 6.5% | 20.5% | 20.6% | 19.7% |
| Upper | 84 | 70.6% | 26,808 | 84.6% | 40.9% | 32.7% | 43.6% |
| Unknown | 9 | 7.6% | 984 | 3.1% | 0.0% | 20.2% | 17.7% |
| TOTAL | 119 | 100.0% | 31,697 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 8.8% | 285 | 3.1% | 21.3% | 6.2% | 2.7% |
| Moderate | 3 | 8.8% | 375 | 4.1% | 17.3% | 12.9% | 8.0% |
| Middle | 1 | 2.9% | 114 | 1.3% | 20.5% | 17.0% | 13.2% |
| Upper | 22 | 64.7% | 6,669 | 73.6% | 40.9% | 36.8% | 45.7% |
| Unknown | 5 | 14.7% | 1,622 | 17.9% | 0.0% | 27.1% | 30.4% |
| TOTAL | 34 | 100.0% | 9,065 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 16.7% | 55 | 5.3% | 21.3% | 6.1% | 3.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.3% | 15.7% | 10.1% |
| Middle | 1 | 8.3% | 83 | 8.1% | 20.5% | 17.4% | 13.9% |
| Upper | 8 | 66.7% | 816 | 79.3% | 40.9% | 51.6% | 56.9% |
| Unknown | 1 | 8.3% | 75 | 7.3% | 0.0% | 9.2% | 15.7% |
| TOTAL | 12 | 100.0% | 1,029 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 5.1% | 2.5% |
| Moderate | 1 | 14.3% | 13 | 3.3% | 17.3% | 11.8% | 7.1% |
| Middle | 1 | 14.3% | 30 | 7.6% | 20.5% | 24.9% | 14.8% |
| Upper | 5 | 71.4% | 350 | 89.1% | 40.9% | 53.5% | 67.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 4.6% | 8.0% |
| TOTAL | 7 | 100.0% | 393 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 7.0% | 3.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.3% | 20.1% | 14.4% |
| Middle | 1 | 33.3% | 190 | 25.7% | 20.5% | 22.1% | 17.6% |
| Upper | 2 | 66.7% | 548 | 74.3% | 40.9% | 44.6% | 51.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.2% | 13.1% |
| TOTAL | 3 | 100.0% | 738 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 9 | 5.1% | 727 | 1.7% | 21.3% | 6.3% | 3.2% |
| Moderate | 15 | 8.6% | 1,848 | 4.3% | 17.3% | 17.2% | 12.0% |
| Middle | 15 | 8.6% | 2,475 | 5.8% | 20.5% | 18.9% | 16.3% |
| Upper | 121 | 69.1% | 35,191 | 82.0% | 40.9% | 33.6% | 40.5% |
| Unknown | 15 | 8.6% | 2,681 | 6.2% | 0.0% | 24.0% | 28.1% |
| TOTAL | 175 | 100.0% | 42,922 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 3.7% | 308 | 1.4% | 21.3% | 6.3% | 3.6% |
| Moderate | 11 | 13.4% | 1,809 | 8.0% | 17.3% | 20.0% | 15.6% |
| Middle | 11 | 13.4% | 1,925 | 8.5% | 20.5% | 20.3% | 19.5% |
| Upper | 53 | 64.6% | 17,895 | 79.4% | 40.9% | 32.1% | 42.4% |
| Unknown | 4 | 4.9% | 611 | 2.7% | 0.0% | 21.3% | 18.9% |
| TOTAL | 82 | 100.0% | 22,548 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 3.2% | 1.4% |
| Moderate | 7 | 7.1% | 1,100 | 4.0% | 17.3% | 10.6% | 6.5% |
| Middle | 9 | 9.2% | 1,775 | 6.5% | 20.5% | 15.9% | 12.6% |
| Upper | 80 | 81.6% | 23,505 | 86.4% | 40.9% | 40.8% | 49.3% |
| Unknown | 2 | 2.0% | 817 | 3.0% | 0.0% | 29.5% | 30.3% |
| TOTAL | 98 | 100.0% | 27,197 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 6.2% | 3.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.3% | 13.2% | 9.3% |
| Middle | 3 | 60.0% | 293 | 34.4% | 20.5% | 18.5% | 13.9% |
| Upper | 2 | 40.0% | 559 | 65.6% | 40.9% | 52.4% | 61.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 9.8% | 12.0% |
| TOTAL | 5 | 100.0% | 852 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.3% | 0.3% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.5% | 0.9% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.9% | 4.4% | 1.0% |
| Unknown | 1 | 100.0% | 400 | 100.0% | 0.0% | 94.4% | 98.9% |
| TOTAL | 1 | 100.0% | 400 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 33.3% | 30 | 13.3% | 21.3% | 5.5% | 2.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.3% | 13.1% | 8.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.5% | 18.6% | 10.4% |
| Upper | 2 | 66.7% | 195 | 86.7% | 40.9% | 58.6% | 70.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 4.2% | 8.2% |
| TOTAL | 3 | 100.0% | 225 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 21.3% | 6.5% | 3.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.3% | 16.1% | 11.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.5% | 18.8% | 16.2% |
| Upper | 4 | 100.0% | 398 | 100.0% | 40.9% | 48.0% | 58.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.6% | 10.9% |
| TOTAL | 4 | 100.0% | 398 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 4 | 2.1% | 338 | 0.7% | 21.3% | 4.7% | 2.4% |
| Moderate | 18 | 9.3% | 2,909 | 5.6% | 17.3% | 15.0% | 10.5% |
| Middle | 23 | 11.9% | 3,993 | 7.7% | 20.5% | 17.6% | 15.0% |
| Upper | 141 | 73.1% | 42,552 | 82.4% | 40.9% | 35.2% | 42.5% |
| Unknown | 7 | 3.6% | 1,828 | 3.5% | 0.0% | 27.5% | 29.6% |
| TOTAL | 193 | 100.0% | 51,620 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | (\$ (000s)) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 107 | 48.6% | 45.1% | \$20,355 | 40.7% | 40.3% | 91.4% |
| | Over \$1 Million/ Unknown | 113 | 51.4% | 54.9% | \$29,676 | 59.3% | 59.7% | 8.6% |
| | TOTAL | 220 | 100.0% | 100.0% | \$50,031 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 104 | 47.3% | 92.8% | \$5,323 | 10.6% | 35.5% | |
| | \$100,001– \$250,000 | 51 | 23.2% | 3.6% | \$9,388 | 18.8% | 15.4% | |
| | \$250,001– \$1 Million | 65 | 29.5% | 3.7% | \$35,320 | 70.6% | 49.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 220 | 100.0% | 100.0% | \$50,031 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 58 | 54.2% | | \$2,651 | 13.0% | | |
| | \$100,001– \$250,000 | 23 | 21.5% | | \$4,028 | 19.8% | | |
| | \$250,001– \$1 Million | 26 | 24.3% | | \$13,676 | 67.2% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 107 | 100.0% | | \$20,355 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total |
| | | Bank | | Aggregate | Bank | | Aggregate | Businesses |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 305 | 46.9% | 29.2% | \$33,390 | 37.8% | 25.5% | 91.5% |
| | Over \$1 Million/ Unknown | 346 | 53.1% | 70.8% | \$54,859 | 62.2% | 74.5% | 8.5% |
| | TOTAL | 651 | 100.0% | 100.0% | \$88,249 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 427 | 65.6% | 86.7% | \$17,422 | 19.7% | 29.9% | |
| | \$100,001– \$250,000 | 122 | 18.7% | 7.4% | \$20,348 | 23.1% | 20.1% | |
| | \$250,001– \$1 Million | 102 | 15.7% | 5.9% | \$50,479 | 57.2% | 50.0% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 651 | 100.0% | 100.0% | \$88,249 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 220 | 72.1% | | \$8,063 | 24.1% | |
| | | \$100,001– \$250,000 | 45 | 14.8% | | \$7,749 | 23.2% | |
| | | \$250,001– \$1 Million | 40 | 13.1% | | \$17,578 | 52.6% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 305 | 100.0% | | \$33,390 | 100.0% | |

Appendix C (continued)

Southern NonMSA Oklahoma

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 8 | 27.6% | 692 | 23.4% | 8.2% | 8.5% | 6.8% |
| Middle | 17 | 58.6% | 1,706 | 57.7% | 67.3% | 68.5% | 69.6% |
| Upper | 4 | 13.8% | 558 | 18.9% | 24.5% | 23.0% | 23.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 29 | 100.0% | 2,956 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 5 | 13.5% | 512 | 12.3% | 8.2% | 6.3% | 5.6% |
| Middle | 25 | 67.6% | 2,887 | 69.6% | 67.3% | 66.1% | 67.7% |
| Upper | 7 | 18.9% | 751 | 18.1% | 24.5% | 27.6% | 26.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 37 | 100.0% | 4,150 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 37.5% | 145 | 36.7% | 8.2% | 8.5% | 6.7% |
| Middle | 3 | 37.5% | 210 | 53.2% | 67.3% | 69.5% | 73.0% |
| Upper | 2 | 25.0% | 40 | 10.1% | 24.5% | 22.0% | 20.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | 395 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 8.2% | 8.8% | 5.6% |
| Middle | 1 | 100.0% | 50 | 100.0% | 67.3% | 66.2% | 64.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 24.5% | 25.0% | 29.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 50 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 16 | 21.3% | 1,349 | 17.9% | 8.2% | 7.7% | 7.0% |
| Middle | 46 | 61.3% | 4,853 | 64.3% | 67.3% | 67.2% | 67.8% |
| Upper | 13 | 17.3% | 1,349 | 17.9% | 24.5% | 25.1% | 25.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 75 | 100.0% | 7,551 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 94 | 21.2% | \$5,223 | 12.2% | 15.5% | 14.0% | 14.5% |
| Middle | 252 | 56.9% | \$27,533 | 64.2% | 61.9% | 66.2% | 64.4% |
| Upper | 97 | 21.9% | \$10,102 | 23.6% | 22.6% | 18.8% | 20.9% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.9% | 0.3% |
| TOTAL | 443 | 100.0% | \$42,858 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.0% | 3.5% | 1.8% |
| Moderate | 3 | 10.3% | 228 | 7.7% | 17.6% | 14.9% | 10.6% |
| Middle | 7 | 24.1% | 694 | 23.5% | 20.4% | 22.7% | 20.3% |
| Upper | 11 | 37.9% | 1,194 | 40.4% | 42.0% | 42.6% | 53.3% |
| Unknown | 8 | 27.6% | 840 | 28.4% | 0.0% | 16.3% | 14.1% |
| TOTAL | 29 | 100.0% | 2,956 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 8.1% | 107 | 2.6% | 20.0% | 2.3% | 1.0% |
| Moderate | 1 | 2.7% | 96 | 2.3% | 17.6% | 9.2% | 5.6% |
| Middle | 4 | 10.8% | 288 | 6.9% | 20.4% | 14.6% | 10.5% |
| Upper | 24 | 64.9% | 3,198 | 77.1% | 42.0% | 53.0% | 60.8% |
| Unknown | 5 | 13.5% | 461 | 11.1% | 0.0% | 21.0% | 22.1% |
| TOTAL | 37 | 100.0% | 4,150 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 25.0% | 40 | 10.1% | 20.0% | 8.5% | 4.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 10.2% | 7.8% |
| Middle | 2 | 25.0% | 120 | 30.4% | 20.4% | 21.2% | 21.0% |
| Upper | 4 | 50.0% | 235 | 59.5% | 42.0% | 47.5% | 52.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 12.7% | 14.2% |
| TOTAL | 8 | 100.0% | 395 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|-----------|---------------|--------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.0% | 7.4% | 3.6% |
| Moderate | 1 | 100.0% | 50 | 100.0% | 17.6% | 16.2% | 10.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.4% | 26.5% | 27.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.0% | 44.1% | 52.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.9% | 5.9% |
| TOTAL | 1 | 100.0% | 50 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 5 | 6.7% | 147 | 1.9% | 20.0% | 3.0% | 1.3% |
| Moderate | 5 | 6.7% | 374 | 5.0% | 17.6% | 11.7% | 7.6% |
| Middle | 13 | 17.3% | 1,102 | 14.6% | 20.4% | 18.3% | 14.6% |
| Upper | 39 | 52.0% | 4,627 | 61.3% | 42.0% | 46.0% | 53.6% |
| Unknown | 13 | 17.3% | 1,301 | 17.2% | 0.0% | 21.0% | 22.9% |
| TOTAL | 75 | 100.0% | 7,551 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 216 | 48.8% | 38.0% | \$20,233 | 47.2% | 35.1% | 89.6% |
| | Over \$1 Million/ Unknown | 227 | 51.2% | 62.0% | \$22,625 | 52.8% | 64.9% | 10.4% |
| | TOTAL | 443 | 100.0% | 100.0% | \$42,858 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 341 | 77.0% | 88.0% | \$9,040 | 21.1% | 35.7% | |
| | \$100,001–\$250,000 | 54 | 12.2% | 7.0% | \$8,891 | 20.7% | 20.2% | |
| | \$250,001–\$1 Million | 48 | 10.8% | 5.0% | \$24,927 | 58.2% | 44.1% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 443 | 100.0% | 100.0% | \$42,858 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 161 | 74.5% | | \$4,156 | 20.5% | | |
| | \$100,001–\$250,000 | 30 | 13.9% | | \$4,794 | 23.7% | | |
| | \$250,001–\$1 Million | 25 | 11.6% | | \$11,283 | 55.8% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 216 | 100.0% | | \$20,233 | 100.0% | | |

Appendix C (continued)

TENNESSEE

Nashville

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|-------------------------------|------------------------------|------------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 9 | 11.3% | 3,116 | 14.0% | 4.7% | 7.2% | 6.7% |
| Moderate | 10 | 12.5% | 2,320 | 10.5% | 16.0% | 15.6% | 11.3% |
| Middle | 27 | 33.8% | 6,286 | 28.3% | 39.7% | 37.6% | 30.2% |
| Upper | 34 | 42.5% | 10,469 | 47.2% | 39.5% | 39.6% | 51.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 80 | 100.0% | 22,191 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 6 | 6.7% | 1,234 | 6.3% | 4.7% | 5.1% | 4.3% |
| Moderate | 8 | 9.0% | 1,599 | 8.1% | 16.0% | 13.2% | 8.6% |
| Middle | 36 | 40.4% | 6,091 | 30.9% | 39.7% | 37.7% | 30.1% |
| Upper | 39 | 43.8% | 10,809 | 54.8% | 39.5% | 43.8% | 56.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 89 | 100.0% | 19,733 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.7% | 4.2% | 3.6% |
| Moderate | 6 | 17.6% | 664 | 22.0% | 16.0% | 13.4% | 9.7% |
| Middle | 13 | 38.2% | 1,013 | 33.5% | 39.7% | 33.8% | 28.7% |
| Upper | 15 | 44.1% | 1,347 | 44.5% | 39.5% | 48.5% | 58.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.1% |
| TOTAL | 34 | 100.0% | 3,024 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | % of Multifamily Units | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 14.3% | 23.0% | 18.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 32.0% | 31.5% | 19.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 29.0% | 31.5% | 42.5% |
| Upper | 1 | 100.0% | 230 | 100.0% | 24.7% | 13.9% | 20.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 230 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 3.3% | 20 | 0.7% | 4.7% | 0.0% | 0.0% |
| Moderate | 3 | 10.0% | 259 | 9.6% | 16.0% | 0.0% | 0.0% |
| Middle | 15 | 50.0% | 1,072 | 39.6% | 39.7% | 0.0% | 0.0% |
| Upper | 11 | 36.7% | 1,358 | 50.1% | 39.5% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 30 | 100.0% | 2,709 | 100.0% | 100.0% | 0.0% | 0.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 4.7% | 3.2% | 1.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 9.3% | 5.3% |
| Middle | 1 | 50.0% | 297 | 42.2% | 39.7% | 31.8% | 23.7% |
| Upper | 1 | 50.0% | 406 | 57.8% | 39.5% | 55.6% | 69.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 2 | 100.0% | 703 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 16 | 6.8% | 4,370 | 9.0% | 4.7% | 6.1% | 6.5% |
| Moderate | 27 | 11.4% | 4,842 | 10.0% | 16.0% | 14.4% | 10.8% |
| Middle | 92 | 39.0% | 14,759 | 30.4% | 39.7% | 37.3% | 30.8% |
| Upper | 101 | 42.8% | 24,619 | 50.7% | 39.5% | 42.1% | 51.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 236 | 100.0% | 48,590 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 4.5% | 1,016 | 3.5% | 4.7% | 7.4% | 6.8% |
| Moderate | 13 | 14.8% | 3,022 | 10.5% | 16.0% | 15.4% | 11.5% |
| Middle | 41 | 46.6% | 12,312 | 42.9% | 39.7% | 38.3% | 31.4% |
| Upper | 30 | 34.1% | 12,344 | 43.0% | 39.5% | 38.7% | 50.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.2% | 0.1% |
| TOTAL | 88 | 100.0% | 28,694 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 4 | 2.9% | 593 | 1.7% | 4.7% | 4.9% | 4.5% |
| Moderate | 13 | 9.4% | 2,815 | 8.0% | 16.0% | 10.9% | 7.8% |
| Middle | 55 | 39.6% | 10,594 | 29.9% | 39.7% | 34.0% | 27.0% |
| Upper | 67 | 48.2% | 21,384 | 60.4% | 39.5% | 50.1% | 60.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 139 | 100.0% | 35,386 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 4.8% | 150 | 8.5% | 4.7% | 3.4% | 3.3% |
| Moderate | 1 | 4.8% | 25 | 1.4% | 16.0% | 9.5% | 6.1% |
| Middle | 11 | 52.4% | 984 | 55.9% | 39.7% | 32.4% | 26.2% |
| Upper | 8 | 38.1% | 602 | 34.2% | 39.5% | 54.6% | 64.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 21 | 100.0% | 1,761 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.7% | 3.1% | 1.9% |
| Moderate | 2 | 13.3% | 149 | 8.9% | 16.0% | 7.4% | 4.1% |
| Middle | 8 | 53.3% | 1,026 | 61.3% | 39.7% | 28.3% | 20.7% |
| Upper | 5 | 33.3% | 500 | 29.9% | 39.5% | 61.1% | 73.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 15 | 100.0% | 1,675 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.7% | 5.3% | 3.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 14.2% | 6.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 39.7% | 31.0% | 16.3% |
| Upper | 2 | 100.0% | 370 | 100.0% | 39.5% | 49.5% | 73.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 370 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
|---------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 9 | 3.4% | 1,759 | 2.6% | 4.7% | 5.8% | 5.5% |
| Moderate | 29 | 10.9% | 6,011 | 8.9% | 16.0% | 12.6% | 9.2% |
| Middle | 115 | 43.4% | 24,916 | 36.7% | 39.7% | 35.5% | 30.0% |
| Upper | 112 | 42.3% | 35,200 | 51.9% | 39.5% | 46.0% | 55.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 265 | 100.0% | 67,886 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 9 | 8.0% | \$2,600 | 11.9% | 8.8% | 9.0% | 11.5% |
| Moderate | 18 | 16.1% | \$2,876 | 13.2% | 18.4% | 17.3% | 18.6% |
| Middle | 39 | 34.8% | \$5,698 | 26.1% | 27.0% | 24.9% | 20.3% |
| Upper | 46 | 41.1% | \$10,662 | 48.8% | 44.7% | 46.6% | 47.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 1.1% | 2.1% | 2.3% |
| TOTAL | 112 | 100.0% | \$21,836 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 29 | 6.7% | \$5,157 | 10.2% | 8.8% | 8.8% | 11.3% |
| Moderate | 66 | 15.3% | \$6,385 | 12.6% | 18.3% | 17.0% | 19.3% |
| Middle | 164 | 38.0% | \$15,791 | 31.1% | 26.9% | 24.9% | 19.5% |
| Upper | 169 | 39.1% | \$20,893 | 41.1% | 45.0% | 48.1% | 47.6% |
| Unknown | 4 | 0.9% | \$2,575 | 5.1% | 1.0% | 1.2% | 2.4% |
| TOTAL | 432 | 100.0% | \$50,801 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | Income % | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 2.5% | 257 | 1.2% | 20.9% | 3.8% | 1.9% |
| Moderate | 20 | 25.0% | 3,978 | 17.9% | 16.8% | 17.0% | 10.8% |
| Middle | 11 | 13.8% | 2,395 | 10.8% | 19.6% | 20.5% | 16.6% |
| Upper | 40 | 50.0% | 13,111 | 59.1% | 42.7% | 46.1% | 58.2% |
| Unknown | 7 | 8.8% | 2,450 | 11.0% | 0.0% | 12.6% | 12.5% |
| TOTAL | 80 | 100.0% | 22,191 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 2.2% | 200 | 1.0% | 20.9% | 5.7% | 2.5% |
| Moderate | 15 | 16.9% | 1,830 | 9.3% | 16.8% | 14.1% | 8.5% |
| Middle | 16 | 18.0% | 2,528 | 12.8% | 19.6% | 18.1% | 14.1% |
| Upper | 46 | 51.7% | 12,216 | 61.9% | 42.7% | 43.7% | 56.1% |
| Unknown | 10 | 11.2% | 2,959 | 15.0% | 0.0% | 18.4% | 18.8% |
| TOTAL | 89 | 100.0% | 19,733 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 5.9% | 30 | 1.0% | 20.9% | 4.9% | 2.6% |
| Moderate | 5 | 14.7% | 595 | 19.7% | 16.8% | 13.8% | 9.3% |
| Middle | 11 | 32.4% | 762 | 25.2% | 19.6% | 20.7% | 16.1% |
| Upper | 16 | 47.1% | 1,637 | 54.1% | 42.7% | 58.0% | 67.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.7% | 4.7% |
| TOTAL | 34 | 100.0% | 3,024 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 0.6% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.8% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 2.4% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.7% | 11.5% | 0.9% |
| Unknown | 1 | 100.0% | 230 | 100.0% | 0.0% | 85.5% | 99.0% |
| TOTAL | 1 | 100.0% | 230 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 2 | 6.7% | 80 | 3.0% | 20.9% | 4.7% | 2.1% |
| Moderate | 5 | 16.7% | 341 | 12.6% | 16.8% | 12.2% | 6.6% |
| Middle | 8 | 26.7% | 712 | 26.3% | 19.6% | 19.1% | 12.2% |
| Upper | 15 | 50.0% | 1,576 | 58.2% | 42.7% | 62.3% | 77.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.8% | 1.8% |
| TOTAL | 30 | 100.0% | 2,709 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 5.6% | 2.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.8% | 14.6% | 5.8% |
| Middle | 1 | 50.0% | 297 | 42.2% | 19.6% | 20.1% | 12.5% |
| Upper | 1 | 50.0% | 406 | 57.8% | 42.7% | 52.7% | 68.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.0% | 11.0% |
| TOTAL | 2 | 100.0% | 703 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 8 | 3.4% | 567 | 1.2% | 20.9% | 4.6% | 2.0% |
| Moderate | 45 | 19.1% | 6,744 | 13.9% | 16.8% | 15.4% | 9.1% |
| Middle | 47 | 19.9% | 6,694 | 13.8% | 19.6% | 19.3% | 14.4% |
| Upper | 118 | 50.0% | 28,946 | 59.6% | 42.7% | 46.1% | 53.8% |
| Unknown | 18 | 7.6% | 5,639 | 11.6% | 0.0% | 14.6% | 20.7% |
| TOTAL | 236 | 100.0% | 48,590 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 5 | 5.7% | 655 | 2.3% | 20.9% | 4.5% | 2.3% |
| Moderate | 11 | 12.5% | 2,796 | 9.7% | 16.8% | 18.6% | 12.4% |
| Middle | 16 | 18.2% | 4,624 | 16.1% | 19.6% | 20.9% | 17.6% |
| Upper | 46 | 52.3% | 16,861 | 58.8% | 42.7% | 44.7% | 56.6% |
| Unknown | 10 | 11.4% | 3,758 | 13.1% | 0.0% | 11.3% | 11.1% |
| TOTAL | 88 | 100.0% | 28,694 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 5 | 3.6% | 598 | 1.7% | 20.9% | 4.1% | 1.9% |
| Moderate | 21 | 15.1% | 2,623 | 7.4% | 16.8% | 12.6% | 7.9% |
| Middle | 27 | 19.4% | 5,290 | 14.9% | 19.6% | 18.2% | 14.7% |
| Upper | 84 | 60.4% | 26,389 | 74.6% | 42.7% | 47.6% | 57.9% |
| Unknown | 2 | 1.4% | 486 | 1.4% | 0.0% | 17.5% | 17.7% |
| TOTAL | 139 | 100.0% | 35,386 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 4.0% | 2.0% |
| Moderate | 2 | 9.5% | 106 | 6.0% | 16.8% | 12.8% | 8.0% |
| Middle | 4 | 19.0% | 474 | 26.9% | 19.6% | 17.5% | 14.0% |
| Upper | 15 | 71.4% | 1,181 | 67.1% | 42.7% | 59.5% | 66.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.2% | 9.3% |
| TOTAL | 21 | 100.0% | 1,761 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 3.9% | 1.8% |
| Moderate | 2 | 13.3% | 177 | 10.6% | 16.8% | 9.9% | 4.9% |
| Middle | 3 | 20.0% | 250 | 14.9% | 19.6% | 16.7% | 10.3% |
| Upper | 10 | 66.7% | 1,248 | 74.5% | 42.7% | 65.9% | 78.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.7% | 4.5% |
| TOTAL | 15 | 100.0% | 1,675 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.9% | 8.1% | 2.8% |
| Moderate | 1 | 50.0% | 100 | 27.0% | 16.8% | 12.9% | 4.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 14.2% | 7.1% |
| Upper | 1 | 50.0% | 270 | 73.0% | 42.7% | 49.2% | 70.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 15.6% | 15.2% |
| TOTAL | 2 | 100.0% | 370 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 10 | 3.8% | 1,253 | 1.8% | 20.9% | 4.2% | 2.0% |
| Moderate | 37 | 14.0% | 5,802 | 8.5% | 16.8% | 14.5% | 9.3% |
| Middle | 50 | 18.9% | 10,638 | 15.7% | 19.6% | 18.8% | 15.1% |
| Upper | 156 | 58.9% | 45,949 | 67.7% | 42.7% | 46.7% | 55.5% |
| Unknown | 12 | 4.5% | 4,244 | 6.3% | 0.0% | 15.7% | 18.3% |
| TOTAL | 265 | 100.0% | 67,886 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 62 | 55.4% | 48.6% | \$7,826 | 35.8% | 36.5% | 90.3% |
| | Over \$1 Million/ Unknown | 50 | 44.6% | 51.4% | \$14,010 | 64.2% | 63.5% | 9.7% |
| | TOTAL | 112 | 100.0% | 100.0% | \$21,836 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 68 | 60.7% | 91.1% | \$2,653 | 12.1% | 28.4% | |
| | \$100,001– \$250,000 | 17 | 15.2% | 4.1% | \$3,123 | 14.3% | 15.4% | |
| | \$250,001– \$1 Million | 27 | 24.1% | 4.7% | \$16,060 | 73.5% | 56.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 112 | 100.0% | 100.0% | \$21,836 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 48 | 77.4% | | \$1,750 | 22.4% | | |
| | \$100,001– \$250,000 | 4 | 6.5% | | \$588 | 7.5% | | |
| | \$250,001– \$1 Million | 10 | 16.1% | | \$5,488 | 70.1% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 62 | 100.0% | | \$7,826 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 229 | 53.0% | 41.5% | \$20,984 | 41.3% | 27.4% | 90.8% |
| | Over \$1 Million/ Unknown | 203 | 47.0% | 58.5% | \$29,817 | 58.7% | 72.6% | 9.2% |
| | TOTAL | 432 | 100.0% | 100.0% | \$50,801 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 307 | 71.1% | 84.9% | \$9,266 | 18.2% | 26.9% | |
| | \$100,001– \$250,000 | 72 | 16.7% | 8.3% | \$11,782 | 23.2% | 20.5% | |
| | \$250,001– \$1 Million | 53 | 12.3% | 6.8% | \$29,753 | 58.6% | 52.6% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 432 | 100.0% | 100.0% | \$50,801 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 182 | 79.5% | | \$4,557 | 21.7% | | |
| | \$100,001– \$250,000 | 23 | 10.0% | | \$3,852 | 18.4% | | |
| | \$250,001– \$1 Million | 24 | 10.5% | | \$12,575 | 59.9% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 229 | 100.0% | | \$20,984 | 100.0% | | |

Appendix C (continued)

Western NonMSA Tennessee

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 5 | 3.6% | 926 | 5.3% | 8.3% | 7.0% | 6.5% |
| Middle | 86 | 62.8% | 9,311 | 53.8% | 70.0% | 63.8% | 59.2% |
| Upper | 46 | 33.6% | 7,081 | 40.9% | 21.7% | 29.0% | 34.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 137 | 100.0% | 17,318 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 8.3% | 7.0% | 6.6% |
| Middle | 86 | 69.9% | 8,422 | 72.4% | 70.0% | 65.1% | 62.0% |
| Upper | 37 | 30.1% | 3,218 | 27.6% | 21.7% | 27.8% | 31.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 123 | 100.0% | 11,640 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 7.3% | 133 | 7.5% | 8.3% | 6.5% | 5.0% |
| Middle | 28 | 68.3% | 1,280 | 72.0% | 70.0% | 72.1% | 77.3% |
| Upper | 10 | 24.4% | 366 | 20.6% | 21.7% | 21.4% | 17.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 41 | 100.0% | 1,779 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 7.3% | 7.1% | 2.3% |
| Middle | 1 | 100.0% | 385 | 100.0% | 64.3% | 71.4% | 64.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 20.3% | 21.4% | 32.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 8.1% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 385 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 8.3% | 7.1% | 2.3% |
| Middle | 26 | 65.0% | 937 | 54.4% | 70.0% | 71.4% | 64.9% |
| Upper | 14 | 35.0% | 787 | 45.6% | 21.7% | 21.4% | 32.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 40 | 100.0% | 1,724 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 8.3% | 14.3% | 10.7% |
| Middle | 3 | 75.0% | 254 | 81.9% | 70.0% | 57.1% | 62.2% |
| Upper | 1 | 25.0% | 56 | 18.1% | 21.7% | 28.6% | 27.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 310 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 8 | 2.3% | 1,059 | 3.2% | 8.3% | 7.1% | 6.5% |
| Middle | 230 | 66.5% | 20,589 | 62.1% | 70.0% | 64.3% | 60.4% |
| Upper | 108 | 31.2% | 11,508 | 34.7% | 21.7% | 28.5% | 33.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 346 | 100.0% | 33,156 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 7 | 5.6% | 473 | 3.1% | 8.3% | 6.9% | 6.7% |
| Middle | 84 | 66.7% | 9,805 | 64.4% | 70.0% | 66.0% | 61.4% |
| Upper | 35 | 27.8% | 4,951 | 32.5% | 21.7% | 27.1% | 31.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 126 | 100.0% | 15,229 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 1.7% | 272 | 1.4% | 8.3% | 5.9% | 5.8% |
| Middle | 118 | 65.9% | 11,108 | 58.1% | 70.0% | 62.5% | 58.1% |
| Upper | 58 | 32.4% | 7,741 | 40.5% | 21.7% | 31.6% | 36.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 179 | 100.0% | 19,121 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 14.3% | 80 | 15.4% | 8.3% | 14.4% | 11.6% |
| Middle | 7 | 50.0% | 217 | 41.7% | 70.0% | 66.7% | 69.3% |
| Upper | 5 | 35.7% | 224 | 43.0% | 21.7% | 18.9% | 19.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 14 | 100.0% | 521 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | % of Multifamily Units | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 7.3% | 6.7% | 3.9% | |
| Middle | 1 | 100.0% | 207 | 100.0% | 64.3% | 86.7% | 87.7% | |
| Upper | 0 | 0.0% | 0 | 0.0% | 20.3% | 6.7% | 8.3% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 8.1% | 0.0% | 0.0% | |
| TOTAL | 1 | 100.0% | 207 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Other Purpose LOC | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 8.3% | 5.1% | 4.9% | |
| Middle | 18 | 62.1% | 704 | 45.2% | 70.0% | 56.6% | 48.3% | |
| Upper | 11 | 37.9% | 853 | 54.8% | 21.7% | 38.4% | 46.8% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | |
| TOTAL | 29 | 100.0% | 1,557 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Other Purpose Closed/Exempt | | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 14.3% | 34 | 10.5% | 8.3% | 6.4% | 2.8% | |
| Middle | 4 | 57.1% | 172 | 52.9% | 70.0% | 66.0% | 58.7% | |
| Upper | 2 | 28.6% | 119 | 36.6% | 21.7% | 27.7% | 38.5% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | |
| TOTAL | 7 | 100.0% | 325 | 100.0% | 100.0% | 100.0% | 100.0% | |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 13 | 3.7% | 859 | 2.3% | 8.3% | 6.5% | 6.2% | |
| Middle | 232 | 65.2% | 22,213 | 60.1% | 70.0% | 64.4% | 60.1% | |
| Upper | 111 | 31.2% | 13,888 | 37.6% | 21.7% | 29.1% | 33.7% | |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% | |
| TOTAL | 356 | 100.0% | 36,960 | 100.0% | 100.0% | 100.0% | 100.0% | |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | | |
| | # | # % | \$ 000s | \$ % | | % | \$ % | |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 10 | 3.0% | \$483 | 1.5% | 6.8% | 5.1% | 3.1% | |
| Middle | 231 | 69.0% | \$24,654 | 75.7% | 68.7% | 65.0% | 67.7% | |
| Upper | 94 | 28.1% | \$7,425 | 22.8% | 23.6% | 28.3% | 28.6% | |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 1.0% | 1.7% | 0.6% | |
| TOTAL | 335 | 100.0% | \$32,562 | 100.0% | 100.0% | 100.0% | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 23 | 3.5% | \$2,339 | 4.6% | 6.8% | 4.1% | 3.4% |
| Middle | 475 | 71.6% | \$36,540 | 71.8% | 68.4% | 66.5% | 69.0% |
| Upper | 161 | 24.3% | \$11,668 | 22.9% | 23.9% | 28.9% | 26.9% |
| Unknown | 4 | 0.6% | \$369 | 0.7% | 0.9% | 0.5% | 0.7% |
| TOTAL | 663 | 100.0% | \$50,916 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 1.4% | \$369 | 2.3% | 4.4% | 3.1% | 1.4% |
| Middle | 109 | 76.8% | \$12,899 | 81.1% | 68.4% | 62.2% | 65.1% |
| Upper | 31 | 21.8% | \$2,629 | 16.5% | 27.2% | 34.2% | 33.4% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.5% | 0.0% |
| TOTAL | 142 | 100.0% | \$15,897 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 2.4% | \$426 | 3.0% | 5.9% | 2.7% | 1.8% |
| Middle | 92 | 74.2% | \$11,336 | 81.1% | 68.1% | 64.7% | 64.6% |
| Upper | 29 | 23.4% | \$2,212 | 15.8% | 26.0% | 32.6% | 33.6% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 124 | 100.0% | \$13,974 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 9 | 6.6% | 651 | 3.8% | 19.7% | 4.6% | 2.6% |
| Moderate | 33 | 24.1% | 3,036 | 17.5% | 17.2% | 16.6% | 11.5% |
| Middle | 25 | 18.2% | 2,857 | 16.5% | 19.4% | 21.1% | 18.5% |
| Upper | 64 | 46.7% | 10,274 | 59.3% | 43.7% | 38.5% | 48.7% |
| Unknown | 6 | 4.4% | 500 | 2.9% | 0.0% | 19.1% | 18.7% |
| TOTAL | 137 | 100.0% | 17,318 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 9 | 7.3% | 421 | 3.6% | 19.7% | 6.4% | 2.6% |
| Moderate | 14 | 11.4% | 855 | 7.3% | 17.2% | 11.7% | 6.9% |
| Middle | 25 | 20.3% | 1,560 | 13.4% | 19.4% | 19.6% | 14.9% |
| Upper | 72 | 58.5% | 8,371 | 71.9% | 43.7% | 46.9% | 53.4% |
| Unknown | 3 | 2.4% | 433 | 3.7% | 0.0% | 15.4% | 22.3% |
| TOTAL | 123 | 100.0% | 11,640 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 4 | 9.8% | 98 | 5.5% | 19.7% | 7.1% | 4.9% |
| Moderate | 4 | 9.8% | 140 | 7.9% | 17.2% | 14.9% | 11.3% |
| Middle | 5 | 12.2% | 193 | 10.8% | 19.4% | 17.5% | 16.7% |
| Upper | 26 | 63.4% | 1,302 | 73.2% | 43.7% | 57.8% | 64.6% |
| Unknown | 2 | 4.9% | 46 | 2.6% | 0.0% | 2.6% | 2.5% |
| TOTAL | 41 | 100.0% | 1,779 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 7.1% | 0.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.2% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 0.0% | 0.0% |
| Upper | 1 | 100.0% | 385 | 100.0% | 43.7% | 42.9% | 28.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 50.0% | 70.6% |
| TOTAL | 1 | 100.0% | 385 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 6 | 15.0% | 160 | 9.3% | 19.7% | 10.7% | 6.6% |
| Moderate | 2 | 5.0% | 30 | 1.7% | 17.2% | 4.5% | 2.4% |
| Middle | 9 | 22.5% | 398 | 23.1% | 19.4% | 25.0% | 24.0% |
| Upper | 23 | 57.5% | 1,136 | 65.9% | 43.7% | 57.1% | 62.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.7% | 4.7% |
| TOTAL | 40 | 100.0% | 1,724 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 9.5% | 6.7% |
| Moderate | 2 | 50.0% | 139 | 44.8% | 17.2% | 17.5% | 15.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 23.8% | 23.6% |
| Upper | 2 | 50.0% | 171 | 55.2% | 43.7% | 46.0% | 47.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.2% | 7.0% |
| TOTAL | 4 | 100.0% | 310 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 28 | 8.1% | 1,330 | 4.0% | 19.7% | 5.5% | 2.6% |
| Moderate | 55 | 15.9% | 4,200 | 12.7% | 17.2% | 14.4% | 9.7% |
| Middle | 64 | 18.5% | 5,008 | 15.1% | 19.4% | 20.3% | 17.0% |
| Upper | 188 | 54.3% | 21,639 | 65.3% | 43.7% | 42.1% | 49.9% |
| Unknown | 11 | 3.2% | 979 | 3.0% | 0.0% | 17.7% | 20.7% |
| TOTAL | 346 | 100.0% | 33,156 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 8 | 6.3% | 706 | 4.6% | 19.7% | 5.5% | 2.9% |
| Moderate | 30 | 23.8% | 2,769 | 18.2% | 17.2% | 19.3% | 14.2% |
| Middle | 38 | 30.2% | 4,426 | 29.1% | 19.4% | 22.1% | 20.2% |
| Upper | 43 | 34.1% | 6,168 | 40.5% | 43.7% | 32.3% | 41.4% |
| Unknown | 7 | 5.6% | 1,160 | 7.6% | 0.0% | 20.8% | 21.1% |
| TOTAL | 126 | 100.0% | 15,229 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 5 | 2.8% | 336 | 1.8% | 19.7% | 2.9% | 1.2% |
| Moderate | 20 | 11.2% | 1,169 | 6.1% | 17.2% | 8.4% | 4.4% |
| Middle | 35 | 19.6% | 2,967 | 15.5% | 19.4% | 18.0% | 13.6% |
| Upper | 109 | 60.9% | 13,609 | 71.2% | 43.7% | 49.2% | 56.5% |
| Unknown | 10 | 5.6% | 1,040 | 5.4% | 0.0% | 21.5% | 24.4% |
| TOTAL | 179 | 100.0% | 19,121 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 6.7% | 4.3% |
| Moderate | 2 | 14.3% | 65 | 12.5% | 17.2% | 13.3% | 8.8% |
| Middle | 5 | 35.7% | 185 | 35.5% | 19.4% | 28.9% | 29.5% |
| Upper | 7 | 50.0% | 271 | 52.0% | 43.7% | 50.0% | 56.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.1% | 1.2% |
| TOTAL | 14 | 100.0% | 521 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.2% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.4% | 6.7% | 3.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.7% | 40.0% | 41.1% |
| Unknown | 1 | 100.0% | 207 | 100.0% | 0.0% | 53.3% | 54.9% |
| TOTAL | 1 | 100.0% | 207 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 5 | 17.2% | 216 | 13.9% | 19.7% | 10.1% | 8.0% |
| Moderate | 1 | 3.4% | 64 | 4.1% | 17.2% | 7.1% | 3.6% |
| Middle | 4 | 13.8% | 140 | 9.0% | 19.4% | 19.2% | 14.3% |
| Upper | 19 | 65.5% | 1,137 | 73.0% | 43.7% | 61.6% | 72.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.0% | 1.5% |
| TOTAL | 29 | 100.0% | 1,557 | 100.0% | 100.0% | 100.0% | 100.05 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 2 | 28.6% | 64 | 19.7% | 19.7% | 12.8% | 6.2% |
| Moderate | 2 | 28.6% | 74 | 22.8% | 17.2% | 21.3% | 15.2% |
| Middle | 1 | 14.3% | 68 | 20.9% | 19.4% | 10.6% | 8.4% |
| Upper | 2 | 28.6% | 119 | 36.6% | 43.7% | 48.9% | 61.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.4% | 8.4% |
| TOTAL | 7 | 100.0% | 325 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 20 | 5.6% | 1,322 | 3.6% | 19.7% | 4.4% | 2.1% |
| Moderate | 55 | 15.4% | 4,141 | 11.2% | 17.2% | 13.6% | 9.0% |
| Middle | 83 | 23.3% | 7,786 | 21.1% | 19.4% | 19.6% | 16.5% |
| Upper | 180 | 50.6% | 21,304 | 57.6% | 43.7% | 40.1% | 48.4% |
| Unknown | 18 | 5.1% | 2,407 | 6.5% | 0.0% | 22.3% | 24.0% |
| TOTAL | 356 | 100.0% | 36,960 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 235 | 70.1% | 51.9% | \$16,246 | 49.9% | 55.7% | 89.5% |
| | Over \$1 Million/ Unknown | 100 | 29.9% | 48.1% | \$16,316 | 50.1% | 44.3% | 10.5% |
| | TOTAL | 335 | 100.0% | 100.0% | \$32,562 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 264 | 78.8% | 88.7% | \$9,082 | 27.9% | 37.5% | |
| | \$100,001– \$250,000 | 46 | 13.7% | 8.4% | \$8,172 | 25.1% | 30.3% | |
| | \$250,001– \$1 Million | 25 | 7.5% | 3.0% | \$15,308 | 47.0% | 32.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 335 | 100.0% | 100.0% | \$32,562 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 204 | 86.8% | | \$6,048 | 37.2% | | |
| | \$100,001– \$250,000 | 18 | 7.7% | | \$3,136 | 19.3% | | |
| | \$250,001– \$1 Million | 13 | 5.5% | | \$7,062 | 43.5% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 235 | 100.0% | | \$16,246 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 407 | 61.4% | 54.3% | \$21,179 | 41.6% | 49.3% | 89.5% |
| | Over \$1 Million/ Unknown | 256 | 38.6% | 45.7% | \$29,737 | 58.4% | 50.7% | 10.5% |
| | TOTAL | 663 | 100.0% | 100.0% | \$50,916 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 547 | 82.5% | 84.9% | \$14,965 | 29.4% | 31.8% | |
| | \$100,001– \$250,000 | 78 | 11.8% | 10.5% | \$12,892 | 25.3% | 28.0% | |
| | \$250,001– \$1 Million | 38 | 5.7% | 4.6% | \$23,059 | 45.3% | 40.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 663 | 100.0% | 100.0% | \$50,916 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 369 | 90.7% | | \$8,745 | 41.3% | |
| | | \$100,001– \$250,000 | 25 | 6.1% | | \$4,059 | 19.2% | |
| | | \$250,001– \$1 Million | 13 | 3.2% | | \$8,375 | 39.5% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 407 | 100.0% | | \$21,179 | 100.0% | |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 113 | 79.6% | 68.8% | 10,972 | 69.0% | 73.7% | 97.1% |
| | Over \$1 Million/ Unknown | 29 | 20.4% | 31.2% | 4,925 | 31.0% | 26.3% | 2.9% |
| | TOTAL | 142 | 100.0% | 100.0% | 15,897 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 89 | 62.7% | 76.4% | 3,491 | 22.0% | 30.5% | |
| | \$100,001– \$250,000 | 38 | 26.8% | 17.1% | 6,406 | 40.3% | 36.7% | |
| | \$250,001– \$500,000 | 15 | 10.6% | 6.6% | 6,000 | 37.7% | 32.8% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 142 | 100.0% | 100.0% | 15,897 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 76 | 67.3% | | 2,736 | 24.9% | |
| | | \$100,001– \$250,000 | 28 | 24.8% | | 4,719 | 43.0% | |
| | | \$250,001– \$1 Million | 9 | 8.0% | | 3,517 | 32.1% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 113 | 100.0% | | 10,972 | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|-----------------------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 98 | 79.0% | 67.4% | 8626 | 61.7% | 73.2% | 97.2% |
| | Over \$1 Million/ Unknown | 26 | 21.0% | 32.6% | 5348 | 38.3% | 26.8% | 2.8% |
| | TOTAL | 124 | 100.0% | 100.0% | 13974 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 79 | 63.7% | 72.2% | 3095 | 22.1% | 24.2% | |
| | \$100,001–\$250,000 | 28 | 22.6% | 17.9% | 4463 | 31.9% | 34.2% | |
| | \$250,001–\$500,000 | 17 | 13.7% | 9.9% | 6416 | 45.9% | 41.6% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 124 | 100.0% | 100.0% | 13974 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 71 | 72.4% | | 2693 | 31.2% | |
| | | \$100,001–\$250,000 | 18 | 18.4% | | 2793 | 32.4% | |
| | | \$250,001–\$1 Million | 9 | 9.2% | | 3140 | 36.4% | |
| | | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | |
| | | TOTAL | 98 | 100.0% | | 8626 | 100.0% | |

Appendix C (continued)

TEXAS

Dallas

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 10 | 5.9% | 1,626 | 3.2% | 5.0% | 3.4% | 2.2% |
| Moderate | 27 | 15.9% | 3,778 | 7.5% | 19.7% | 13.6% | 9.5% |
| Middle | 49 | 28.8% | 13,206 | 26.1% | 31.4% | 33.4% | 28.0% |
| Upper | 83 | 48.8% | 31,920 | 63.1% | 43.8% | 49.4% | 60.1% |
| Unknown | 1 | 0.6% | 89 | 0.2% | 0.1% | 0.2% | 0.2% |
| TOTAL | 170 | 100.0% | 50,619 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 1.0% | 143 | 0.5% | 5.0% | 2.1% | 1.5% |
| Moderate | 4 | 3.8% | 421 | 1.3% | 19.7% | 11.4% | 7.1% |
| Middle | 24 | 22.9% | 4,529 | 14.5% | 31.4% | 30.0% | 23.5% |
| Upper | 76 | 72.4% | 26,198 | 83.7% | 43.8% | 56.4% | 67.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 105 | 100.0% | 31,291 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.0% | 2.7% | 2.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.7% | 11.6% | 9.0% |
| Middle | 1 | 33.3% | 49 | 25.3% | 31.4% | 27.7% | 23.6% |
| Upper | 2 | 66.7% | 145 | 74.7% | 43.8% | 57.9% | 65.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.1% |
| TOTAL | 3 | 100.0% | 194 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | | 22.3% | 21.7% |
| Moderate | 1 | 20.0% | 2,435 | 41.3% | 28.0% | 33.2% | 23.1% |
| Middle | 1 | 20.0% | 2,430 | 41.3% | 26.1% | 24.1% | 25.9% |
| Upper | 3 | 60.0% | 1,025 | 17.4% | 23.0% | 20.9% | 34.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| TOTAL | 5 | 100.0% | 5,890 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 5.0% | 1.8% | 0.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.7% | 10.6% | 6.7% |
| Middle | 1 | 25.0% | 50 | 11.3% | 31.4% | 25.0% | 17.7% |
| Upper | 3 | 75.0% | 392 | 88.7% | 43.8% | 62.4% | 74.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 4 | 100.0% | 442 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.0% | 3.1% | 1.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.7% | 13.1% | 7.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 31.4% | 31.4% | 21.5% |
| Upper | 1 | 100.0% | 484 | 100.0% | 43.8% | 52.3% | 69.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 484 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 11 | 3.8% | 1,769 | 2.0% | 5.0% | 3.0% | 3.3% |
| Moderate | 32 | 11.1% | 6,634 | 7.5% | 19.7% | 13.1% | 10.1% |
| Middle | 76 | 26.4% | 20,264 | 22.8% | 31.4% | 32.2% | 26.4% |
| Upper | 168 | 58.3% | 60,164 | 67.7% | 43.8% | 51.6% | 60.1% |
| Unknown | 1 | 0.3% | 89 | 0.1% | 0.1% | 0.1% | 0.1% |
| TOTAL | 288 | 100.0% | 88,920 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|----------------|---------------|---------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 2.0% | 1,448 | 2.3% | 5.0% | 3.3% | 2.3% |
| Moderate | 15 | 7.5% | 2,980 | 4.7% | 19.7% | 12.9% | 9.2% |
| Middle | 48 | 23.9% | 13,070 | 20.5% | 31.4% | 35.2% | 29.8% |
| Upper | 134 | 66.7% | 46,296 | 72.6% | 43.8% | 48.3% | 58.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.2% | 0.2% |
| TOTAL | 201 | 100.0% | 63,794 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 6 | 1.4% | 1,722 | 1.3% | 5.0% | 1.7% | 1.4% |
| Moderate | 11 | 2.6% | 1,859 | 1.4% | 19.7% | 8.4% | 5.7% |
| Middle | 80 | 18.6% | 20,100 | 15.6% | 31.4% | 27.1% | 21.9% |
| Upper | 330 | 76.9% | 104,817 | 81.1% | 43.8% | 62.6% | 70.8% |
| Unknown | 2 | 0.5% | 739 | 0.6% | 0.1% | 0.1% | 0.1% |
| TOTAL | 429 | 100.0% | 129,237 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|------------|---------------|----------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 5.0% | 1.8% | 1.3% |
| Moderate | 1 | 33.3% | 24 | 6.9% | 19.7% | 9.0% | 6.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 31.4% | 24.3% | 20.1% |
| Upper | 2 | 66.7% | 326 | 93.1% | 43.8% | 64.8% | 71.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.1% |
| TOTAL | 3 | 100.0% | 350 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 1 | 25.0% | 280 | 15.3% | 22.3% | 20.5% | 16.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 28.0% | 36.5% | 26.2% |
| Middle | 1 | 25.0% | 940 | 51.4% | 26.1% | 27.1% | 28.2% |
| Upper | 2 | 50.0% | 608 | 33.3% | 23.0% | 15.7% | 28.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.2% | 0.0% |
| TOTAL | 4 | 100.0% | 1,828 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.0% | 1.6% | 0.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 19.7% | 8.0% | 4.8% |
| Middle | 2 | 100.0% | 137 | 100.0% | 31.4% | 20.5% | 13.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 43.8% | 69.9% | 80.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.1% | 0.0% |
| TOTAL | 2 | 100.0% | 137 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 5.0% | 2.8% | 1.3% |
| Moderate | 1 | 9.1% | 100 | 2.8% | 19.7% | 13.6% | 7.4% |
| Middle | 3 | 27.3% | 765 | 21.6% | 31.4% | 28.7% | 17.1% |
| Upper | 7 | 63.6% | 2,684 | 75.6% | 43.8% | 54.7% | 71.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.1% | 0.2% | 3.0% |
| TOTAL | 11 | 100.0% | 3,549 | 100.0% | 100.0% | 0.0% | 0.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 11 | 1.7% | 3,450 | 1.7% | 5.0% | 2.5% | 2.5% |
| Moderate | 28 | 4.3% | 4,963 | 2.5% | 19.7% | 10.9% | 8.4% |
| Middle | 134 | 20.6% | 35,012 | 17.6% | 31.4% | 31.0% | 25.7% |
| Upper | 475 | 73.1% | 154,731 | 77.8% | 43.8% | 55.5% | 63.2% |
| Unknown | 2 | 0.3% | 739 | 0.4% | 0.1% | 0.1% | 0.2% |
| TOTAL | 650 | 100.0% | 198,895 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|------------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 37 | 6.5% | \$10,317 | 8.8% | 7.3% | 6.7% | 8.1% |
| Moderate | 97 | 17.1% | \$21,378 | 18.2% | 19.8% | 18.9% | 21.5% |
| Middle | 139 | 24.6% | \$24,920 | 21.2% | 27.5% | 25.2% | 23.6% |
| Upper | 284 | 50.2% | \$57,991 | 49.4% | 44.8% | 47.1% | 44.8% |
| Unknown | 9 | 1.6% | \$2,809 | 2.4% | 0.6% | 2.0% | 2.0% |
| TOTAL | 566 | 100.0% | \$117,415 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|------------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 89 | 6.8% | \$19,106 | 8.0% | 7.3% | 7.1% | 8.6% |
| Moderate | 223 | 17.1% | \$50,194 | 21.1% | 19.7% | 19.0% | 21.5% |
| Middle | 300 | 23.0% | \$47,139 | 19.9% | 27.4% | 25.9% | 24.7% |
| Upper | 675 | 51.7% | \$116,343 | 49.0% | 45.0% | 46.8% | 43.4% |
| Unknown | 18 | 1.4% | \$4,664 | 2.0% | 0.6% | 1.1% | 1.8% |
| TOTAL | 1,305 | 100.0% | \$237,446 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 1.2% | 95 | 0.2% | 23.4% | 3.2% | 1.5% |
| Moderate | 20 | 11.8% | 3,465 | 6.8% | 16.5% | 15.8% | 10.2% |
| Middle | 21 | 12.4% | 4,270 | 8.4% | 18.1% | 22.3% | 18.4% |
| Upper | 82 | 48.2% | 34,875 | 68.9% | 42.0% | 44.8% | 56.5% |
| Unknown | 45 | 26.5% | 7,914 | 15.6% | 0.0% | 13.8% | 13.3% |
| TOTAL | 170 | 100.0% | 50,619 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 1.0% | 49 | 0.2% | 23.4% | 4.4% | 2.0% |
| Moderate | 4 | 3.8% | 827 | 2.6% | 16.5% | 11.5% | 6.5% |
| Middle | 14 | 13.3% | 2,393 | 7.6% | 18.1% | 17.8% | 13.2% |
| Upper | 78 | 74.3% | 26,867 | 85.9% | 42.0% | 48.3% | 59.6% |
| Unknown | 8 | 7.6% | 1,155 | 3.7% | 0.0% | 18.0% | 18.7% |
| TOTAL | 105 | 100.0% | 31,291 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 1 | 33.3% | 50 | 25.8% | 23.4% | 5.0% | 3.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.5% | 11.8% | 8.6% |
| Middle | 1 | 33.3% | 49 | 25.3% | 18.1% | 17.7% | 14.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.0% | 61.0% | 68.1% |
| Unknown | 1 | 33.3% | 95 | 49.0% | 0.0% | 4.5% | 5.9% |
| TOTAL | 3 | 100.0% | 194 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.5% | 0.2% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.1% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.0% | 2.2% | 0.1% |
| Unknown | 5 | 100.0% | 5,890 | 100.0% | 0.0% | 97.6% | 99.9% |
| TOTAL | 5 | 100.0% | 5,890 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.4% | 5.8% | 3.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.5% | 11.1% | 6.9% |
| Middle | 1 | 25.0% | 50 | 11.3% | 18.1% | 17.5% | 11.5% |
| Upper | 3 | 75.0% | 392 | 88.7% | 42.0% | 62.0% | 74.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.7% | 3.6% |
| TOTAL | 4 | 100.0% | 442 | 100.0% | 100.0% | 100.0% | 100.05 |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.4% | 6.5% | 2.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.5% | 15.4% | 8.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.1% | 18.3% | 11.3% |
| Upper | 1 | 100.0% | 484 | 100.0% | 42.0% | 52.5% | 66.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.2% | 10.5% |
| TOTAL | 1 | 100.0% | 484 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 4 | 1.4% | 194 | 0.2% | 23.4% | 3.6% | 1.6% |
| Moderate | 24 | 8.3% | 4,292 | 4.8% | 16.5% | 13.9% | 8.1% |
| Middle | 37 | 12.8% | 6,762 | 7.6% | 18.1% | 20.2% | 15.0% |
| Upper | 164 | 56.9% | 62,618 | 70.4% | 42.0% | 45.7% | 52.1% |
| Unknown | 59 | 20.5% | 15,054 | 16.9% | 0.0% | 16.5% | 23.3% |
| TOTAL | 288 | 100.0% | 88,920 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|----------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.5% | 22 | 0.0% | 23.4% | 3.9% | 2.0% |
| Moderate | 16 | 8.0% | 3,928 | 6.2% | 16.5% | 18.3% | 12.4% |
| Middle | 28 | 13.9% | 7,654 | 12.0% | 18.1% | 23.9% | 20.8% |
| Upper | 130 | 64.7% | 47,497 | 74.5% | 42.0% | 44.0% | 54.6% |
| Unknown | 26 | 12.9% | 4,693 | 7.4% | 0.0% | 9.9% | 10.2% |
| TOTAL | 201 | 100.0% | 63,794 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 0.5% | 219 | 0.2% | 23.4% | 2.6% | 1.2% |
| Moderate | 26 | 6.1% | 4,280 | 3.3% | 16.5% | 9.0% | 5.5% |
| Middle | 85 | 19.8% | 19,754 | 15.3% | 18.1% | 17.0% | 13.2% |
| Upper | 299 | 69.7% | 100,157 | 77.5% | 42.0% | 52.0% | 60.9% |
| Unknown | 17 | 4.0% | 4,827 | 3.7% | 0.0% | 19.3% | 19.3% |
| TOTAL | 429 | 100.0% | 129,237 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.4% | 3.5% | 2.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.5% | 10.4% | 7.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.1% | 16.2% | 12.6% |
| Upper | 2 | 66.7% | 144 | 41.1% | 42.0% | 66.1% | 72.7% |
| Unknown | 1 | 33.3% | 206 | 58.9% | 0.0% | 3.9% | 5.1% |
| TOTAL | 3 | 100.0% | 350 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.5% | 0.2% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.1% | 0.4% | 0.0% |
| Upper | 2 | 50.0% | 608 | 33.3% | 42.0% | 4.6% | 0.3% |
| Unknown | 2 | 50.0% | 1,220 | 66.7% | 0.0% | 94.8% | 99.7% |
| TOTAL | 4 | 100.0% | 1,828 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.4% | 6.1% | 3.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.5% | 11.5% | 6.0% |
| Middle | 1 | 50.0% | 20 | 14.6% | 18.1% | 14.6% | 10.0% |
| Upper | 1 | 50.0% | 117 | 85.4% | 42.0% | 65.5% | 77.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.3% | 3.5% |
| TOTAL | 2 | 100.0% | 137 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|----------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 23.4% | 5.8% | 2.2% |
| Moderate | 1 | 9.1% | 152 | 4.3% | 16.5% | 10.7% | 5.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.1% | 16.6% | 9.5% |
| Upper | 10 | 90.9% | 3,397 | 95.7% | 42.0% | 56.6% | 69.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.3% | 14.1% |
| TOTAL | 11 | 100.0% | 3,549 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 3 | 0.5% | 241 | 0.1% | 23.4% | 3.1% | 1.5% |
| Moderate | 43 | 6.6% | 8,360 | 4.2% | 16.5% | 12.7% | 8.1% |
| Middle | 114 | 17.5% | 27,428 | 13.8% | 18.1% | 19.4% | 15.6% |
| Upper | 444 | 68.3% | 151,920 | 76.4% | 42.0% | 47.1% | 54.4% |
| Unknown | 46 | 7.1% | 10,946 | 5.5% | 0.0% | 17.7% | 20.5% |
| TOTAL | 650 | 100.0% | 198,895 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|-----------------------------------|---------------------------|---------------|---------------|------------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 254 | 44.9% | 47.0% | \$48,164 | 41.0% | 34.2% | 92.0% |
| | Over \$1 Million/ Unknown | 312 | 55.1% | 53.0% | \$69,251 | 59.0% | 65.8% | 8.0% |
| | TOTAL | 566 | 100.0% | 100.0% | \$117,415 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 319 | 56.4% | 93.6% | \$16,580 | 14.1% | 39.6% | |
| | \$100,001– \$250,000 | 106 | 18.7% | 3.2% | \$19,138 | 16.3% | 14.7% | |
| | \$250,001– \$1 Million | 141 | 24.9% | 3.2% | \$81,697 | 69.6% | 45.7% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 566 | 100.0% | 100.0% | \$117,415 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 152 | 59.8% | | \$8,488 | 17.6% | |
| | | \$100,001– \$250,000 | 47 | 18.5% | | \$8,409 | 17.5% | |
| | | \$250,001– \$1 Million | 55 | 21.7% | | \$31,267 | 64.9% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 254 | 100.0% | | \$48,164 | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|------------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 357 | 27.4% | 37.7% | \$78,425 | 33.0% | 24.6% | 92.3% |
| | Over \$1 Million/ Unknown | 948 | 72.6% | 62.3% | \$159,021 | 67.0% | 75.4% | 7.7% |
| | TOTAL | 1305 | 100.0% | 100.0% | \$237,446 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 712 | 54.6% | 87.6% | \$29,474 | 12.4% | 32.6% | |
| | \$100,001– \$250,000 | 283 | 21.7% | 7.1% | \$45,899 | 19.3% | 19.9% | |
| | \$250,001– \$1 Million | 310 | 23.8% | 5.4% | \$162,073 | 68.3% | 47.5% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 1305 | 100.0% | 100.0% | \$237,446 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 191 | 53.5% | | \$8,675 | 11.1% | |
| | | \$100,001– \$250,000 | 54 | 15.1% | | \$9,774 | 12.5% | |
| | | \$250,001– \$1 Million | 112 | 31.4% | | \$59,976 | 76.5% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 357 | 100.0% | | \$78,425 | 100.0% | |

Appendix C (continued)

Sherman-Denison

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 5 | 9.6% | 593 | 4.7% | 17.2% | 15.4% | 9.9% |
| Middle | 25 | 48.1% | 5,894 | 46.8% | 47.7% | 44.6% | 40.9% |
| Upper | 22 | 42.3% | 6,109 | 48.5% | 35.1% | 40.0% | 49.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 52 | 100.0% | 12,596 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 2.5% | 183 | 1.7% | 17.2% | 6.4% | 4.3% |
| Middle | 18 | 45.0% | 4,174 | 39.7% | 47.7% | 42.1% | 36.7% |
| Upper | 21 | 52.5% | 6,145 | 58.5% | 35.1% | 51.5% | 59.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 40 | 100.0% | 10,502 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.2% | 13.6% | 7.8% |
| Middle | 1 | 25.0% | 95 | 34.9% | 47.7% | 52.0% | 57.6% |
| Upper | 3 | 75.0% | 177 | 65.1% | 35.1% | 34.4% | 34.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 272 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.1% | 2.3% |
| Moderate | 1 | 100.0% | 63 | 100.0% | 17.2% | 19.9% | 13.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 47.7% | 24.2% | 22.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 35.1% | 52.8% | 62.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 63 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 7 | 7.2% | 839 | 3.6% | 17.2% | 11.5% | 8.7% |
| Middle | 44 | 45.4% | 10,163 | 43.4% | 47.7% | 43.8% | 40.0% |
| Upper | 46 | 47.4% | 12,431 | 53.0% | 35.1% | 44.7% | 51.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 97 | 100.0% | 23,433 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 80 | 29.2% | \$10,396 | 37.7% | 22.8% | 22.9% | 22.8% |
| Middle | 91 | 33.2% | \$6,461 | 23.4% | 44.3% | 40.0% | 37.9% |
| Upper | 103 | 37.6% | \$10,700 | 38.8% | 33.0% | 36.3% | 38.9% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.9% | 0.5% |
| TOTAL | 274 | 100.0% | \$27,557 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 5.8% | 284 | 2.3% | 21.1% | 4.6% | 2.3% |
| Moderate | 9 | 17.3% | 1,671 | 13.3% | 17.0% | 18.2% | 12.6% |
| Middle | 5 | 9.6% | 1,080 | 8.6% | 19.1% | 23.4% | 21.3% |
| Upper | 32 | 61.5% | 9,277 | 73.7% | 42.9% | 39.8% | 49.7% |
| Unknown | 3 | 5.8% | 284 | 2.3% | 0.0% | 14.1% | 14.1% |
| TOTAL | 52 | 100.0% | 12,596 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 2.5% | 165 | 1.6% | 21.1% | 2.7% | 1.2% |
| Moderate | 5 | 12.5% | 831 | 7.9% | 17.0% | 9.1% | 5.5% |
| Middle | 5 | 12.5% | 1,006 | 9.6% | 19.1% | 16.1% | 12.4% |
| Upper | 25 | 62.5% | 7,821 | 74.5% | 42.9% | 48.2% | 57.1% |
| Unknown | 4 | 10.0% | 679 | 6.5% | 0.0% | 24.0% | 23.8% |
| TOTAL | 40 | 100.0% | 10,502 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.1% | 8.0% | 4.8% |
| Moderate | 2 | 50.0% | 121 | 44.5% | 17.0% | 12.0% | 5.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.1% | 21.6% | 15.2% |
| Upper | 2 | 50.0% | 151 | 55.5% | 42.9% | 48.0% | 61.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.4% | 13.2% |
| TOTAL | 4 | 100.0% | 272 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 21.1% | 7.2% | 2.7% |
| Moderate | 1 | 100.0% | 63 | 100.0% | 17.0% | 11.6% | 7.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.1% | 24.9% | 17.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.9% | 54.7% | 69.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 4.2% | 2.5% |
| TOTAL | 1 | 100.0% | 63 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 4 | 4.1% | 449 | 1.9% | 21.1% | 3.7% | 1.7% |
| Moderate | 17 | 17.5% | 2,686 | 11.5% | 17.0% | 13.6% | 8.5% |
| Middle | 10 | 10.3% | 2,086 | 8.9% | 19.1% | 19.4% | 15.8% |
| Upper | 59 | 60.8% | 17,249 | 73.6% | 42.9% | 42.5% | 50.0% |
| Unknown | 7 | 7.2% | 963 | 4.1% | 0.0% | 20.8% | 23.9% |
| TOTAL | 97 | 100.0% | 23,433 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 92 | 33.6% | 29.7% | \$9,002 | 32.7% | 28.0% | 91.7% |
| | Over \$1 Million/ Unknown | 182 | 66.4% | 70.3% | \$18,555 | 67.3% | 72.0% | 8.3% |
| | TOTAL | 274 | 100.0% | 100.0% | \$27,557 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 202 | 73.7% | 87.8% | \$7,245 | 26.3% | 34.7% | |
| | \$100,001– \$250,000 | 40 | 14.6% | 7.7% | \$6,368 | 23.1% | 22.7% | |
| | \$250,001– \$1 Million | 32 | 11.7% | 4.5% | \$13,944 | 50.6% | 42.6% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 274 | 100.0% | 100.0% | \$27,557 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 70 | 76.1% | | \$2,443 | 27.1% | | |
| | \$100,001– \$250,000 | 11 | 12.0% | | \$1,765 | 19.6% | | |
| | \$250,001– \$1 Million | 11 | 12.0% | | \$4,794 | 53.3% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 92 | 100.0% | | \$9,002 | 100.0% | | |

Appendix C (continued)

LENDING PERFORMANCE TABLES BY LIMITED-SCOPE ASSESSMENT AREA

ARKANSAS

Fort Smith

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | #% | \$ | % | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 7 | 14.6% | 1,008 | 13.2% | 15.4% | 13.7% | 8.4% |
| Middle | 29 | 60.4% | 4,324 | 56.7% | 57.1% | 54.2% | 53.9% |
| Upper | 12 | 25.0% | 2,294 | 30.1% | 27.5% | 32.0% | 37.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.2% |
| TOTAL | 48 | 100.0% | 7,626 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 3.8% | 50 | 1.8% | 15.4% | 12.0% | 7.5% |
| Middle | 17 | 65.4% | 1,496 | 53.6% | 57.1% | 54.6% | 54.0% |
| Upper | 8 | 30.8% | 1,247 | 44.6% | 27.5% | 33.3% | 38.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 26 | 100.0% | 2,793 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 11.0% | 9.8% |
| Middle | 4 | 57.1% | 187 | 73.6% | 57.1% | 50.6% | 45.3% |
| Upper | 3 | 42.9% | 67 | 26.4% | 27.5% | 38.4% | 44.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 7 | 100.0% | 254 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | | 0.0% | 0.0% |
| Moderate | 1 | 33.3% | 3,234 | 32.9% | 37.6% | 45.9% | 32.2% |
| Middle | 1 | 33.3% | 2,990 | 30.4% | 32.5% | 41.9% | 47.9% |
| Upper | 1 | 33.3% | 3,597 | 36.6% | 29.9% | 12.2% | 19.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 9,821 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 8.1% | 8.2% |
| Middle | 5 | 62.5% | 238 | 72.1% | 57.1% | 59.7% | 55.1% |
| Upper | 3 | 37.5% | 92 | 27.9% | 27.5% | 32.2% | 36.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | 330 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 100.0% | 10 | 100.0% | 15.4% | 20.1% | 12.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 57.1% | 51.1% | 58.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 27.5% | 28.1% | 29.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.7% | 0.0% |
| TOTAL | 1 | 100.0% | 10 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 10 | 10.8% | 4,302 | 20.6% | 15.4% | 13.9% | 10.1% |
| Middle | 56 | 60.2% | 9,235 | 44.3% | 57.1% | 54.0% | 53.4% |
| Upper | 27 | 29.0% | 7,297 | 35.0% | 27.5% | 32.0% | 36.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 93 | 100.0% | 20,834 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | #% | \$ | \$% | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 7 | 14.9% | 888 | 12.7% | 15.4% | 13.7% | 8.8% |
| Middle | 33 | 70.2% | 4,800 | 68.5% | 57.1% | 56.1% | 56.3% |
| Upper | 7 | 14.9% | 1,317 | 18.8% | 27.5% | 30.0% | 34.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.2% | 0.2% |
| TOTAL | 47 | 100.0% | 7,005 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 8.5% | 5.1% |
| Middle | 18 | 60.0% | 2,888 | 51.8% | 57.1% | 55.0% | 54.5% |
| Upper | 12 | 40.0% | 2,692 | 48.2% | 27.5% | 36.5% | 40.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.1% | 0.1% |
| TOTAL | 30 | 100.0% | 5,580 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 16.7% | 12 | 5.0% | 15.4% | 9.8% | 8.8% |
| Middle | 3 | 50.0% | 173 | 72.7% | 57.1% | 50.0% | 43.2% |
| Upper | 2 | 33.3% | 53 | 22.3% | 27.5% | 39.2% | 46.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.0% | 1.4% |
| TOTAL | 6 | 100.0% | 238 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 14.3% | 75 | 18.5% | 15.4% | 8.6% | 6.3% |
| Middle | 6 | 85.7% | 330 | 81.5% | 57.1% | 53.3% | 48.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 27.5% | 38.1% | 44.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 7 | 100.0% | 405 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 50.0% | 56 | 18.9% | 15.4% | 11.3% | 5.4% |
| Middle | 1 | 50.0% | 240 | 81.1% | 57.1% | 53.8% | 50.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 27.5% | 35.0% | 44.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 296 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 10 | 10.9% | 1,031 | 7.6% | 15.4% | 12.1% | 9.1% |
| Middle | 61 | 66.3% | 8,431 | 62.3% | 57.1% | 55.1% | 54.7% |
| Upper | 21 | 22.8% | 4,062 | 30.0% | 27.5% | 32.6% | 36.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.2% | 0.2% |
| TOTAL | 92 | 100.0% | 13,524 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | #% | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 14 | 21.2% | \$2,099 | 15.6% | 27.9% | 25.3% | 27.1% |
| Middle | 34 | 51.5% | \$7,406 | 55.0% | 44.3% | 45.7% | 48.6% |
| Upper | 18 | 27.3% | \$3,960 | 29.4% | 27.8% | 26.7% | 23.6% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 2.3% | 0.7% |
| TOTAL | 66 | 100.0% | \$13,465 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | #% | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 36 | 18.5% | \$4,330 | 16.7% | 27.7% | 25.1% | 28.5% |
| Middle | 103 | 52.8% | \$11,781 | 45.6% | 44.3% | 46.9% | 45.4% |
| Upper | 56 | 28.7% | \$9,740 | 37.7% | 28.0% | 27.3% | 25.8% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.7% | 0.4% |
| TOTAL | 195 | 100.0% | \$25,851 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | #% | \$ | \$ % | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 4.2% | 163 | 2.1% | 21.4% | 5.0% | 2.5% |
| Moderate | 9 | 18.8% | 839 | 11.0% | 17.7% | 16.1% | 10.8% |
| Middle | 16 | 33.3% | 1,613 | 21.2% | 19.1% | 22.4% | 19.1% |
| Upper | 20 | 41.7% | 4,422 | 58.0% | 41.9% | 40.0% | 51.1% |
| Unknown | 1 | 2.1% | 589 | 7.7% | 0.0% | 16.5% | 16.5% |
| TOTAL | 48 | 100.0% | 7,626 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 3.8% | 42 | 1.5% | 21.4% | 4.7% | 2.0% |
| Moderate | 3 | 11.5% | 130 | 4.7% | 17.7% | 11.0% | 6.5% |
| Middle | 7 | 26.9% | 802 | 28.7% | 19.1% | 19.0% | 14.6% |
| Upper | 13 | 50.0% | 1,626 | 58.2% | 41.9% | 43.5% | 52.5% |
| Unknown | 2 | 7.7% | 193 | 6.9% | 0.0% | 21.7% | 24.5% |
| TOTAL | 26 | 100.0% | 2,793 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 2 | 28.6% | 54 | 21.3% | 21.4% | 4.6% | 2.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 11.4% | 8.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.1% | 19.8% | 17.6% |
| Upper | 5 | 71.4% | 200 | 78.7% | 41.9% | 55.7% | 61.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.4% | 9.7% |
| TOTAL | 7 | 100.0% | 254 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.1% | 2.7% | 0.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.9% | 5.4% | 2.2% |
| Unknown | 3 | 100.0% | 9,821 | 100.0% | 0.0% | 91.9% | 97.4% |
| TOTAL | 3 | 100.0% | 9,821 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 2 | 25.0% | 56 | 17.0% | 21.4% | 3.4% | 2.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 13.4% | 11.2% |
| Middle | 2 | 25.0% | 65 | 19.7% | 19.1% | 17.4% | 12.3% |
| Upper | 2 | 25.0% | 142 | 43.0% | 41.9% | 61.7% | 66.5% |
| Unknown | 2 | 25.0% | 67 | 20.3% | 0.0% | 4.0% | 7.4% |
| TOTAL | 8 | 100.0% | 330 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 7.9% | 3.4% |
| Moderate | 1 | 100.0% | 10 | 100.0% | 17.7% | 19.4% | 17.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.1% | 22.3% | 22.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.9% | 48.9% | 54.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.4% | 2.5% |
| TOTAL | 1 | 100.0% | 10 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
| Low | 7 | 7.5% | 315 | 1.5% | 21.4% | 4.7% | 2.1% |
| Moderate | 13 | 14.0% | 979 | 4.7% | 17.7% | 13.6% | 8.5% |
| Middle | 25 | 26.9% | 2,480 | 11.9% | 19.1% | 20.0% | 15.9% |
| Upper | 40 | 43.0% | 6,390 | 30.7% | 41.9% | 40.2% | 46.7% |
| Unknown | 8 | 8.6% | 10,670 | 51.2% | 0.0% | 21.5% | 26.8% |
| TOTAL | 93 | 100.0% | 20,834 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|------------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | #% | \$ | \$% | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 2.1% | 62 | 0.9% | 21.4% | 5.3% | 2.9% |
| Moderate | 10 | 21.3% | 881 | 12.6% | 17.7% | 17.6% | 12.4% |
| Middle | 9 | 19.1% | 790 | 11.3% | 19.1% | 21.6% | 19.0% |
| Upper | 21 | 44.7% | 3,540 | 50.5% | 41.9% | 38.0% | 48.5% |
| Unknown | 6 | 12.8% | 1,732 | 24.7% | 0.0% | 17.5% | 17.2% |
| TOTAL | 47 | 100.0% | 7,005 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 2.5% | 1.0% |
| Moderate | 3 | 10.0% | 146 | 2.6% | 17.7% | 8.3% | 4.6% |
| Middle | 5 | 16.7% | 718 | 12.9% | 19.1% | 16.5% | 12.0% |
| Upper | 16 | 53.3% | 3,351 | 60.1% | 41.9% | 46.6% | 55.0% |
| Unknown | 6 | 20.0% | 1,365 | 24.5% | 0.0% | 26.1% | 27.5% |
| TOTAL | 30 | 100.0% | 5,580 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 16.7% | 12 | 5.0% | 21.4% | 2.6% | 1.3% |
| Moderate | 1 | 16.7% | 10 | 4.2% | 17.7% | 12.9% | 8.8% |
| Middle | 2 | 33.3% | 53 | 22.3% | 19.1% | 13.4% | 7.8% |
| Upper | 2 | 33.3% | 163 | 68.5% | 41.9% | 59.3% | 66.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 11.9% | 16.1% |
| TOTAL | 6 | 100.0% | 238 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 1.1% | 0.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.1% | 2.1% | 0.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.9% | 8.5% | 2.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 88.3% | 96.7% |
| TOTAL | 0 | 0.0% | 0 | 0.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 14.3% | 20 | 4.9% | 21.4% | 5.7% | 3.7% |
| Moderate | 1 | 14.3% | 75 | 18.5% | 17.7% | 7.6% | 6.0% |
| Middle | 2 | 28.6% | 145 | 35.8% | 19.1% | 18.1% | 11.3% |
| Upper | 3 | 42.9% | 165 | 40.7% | 41.9% | 64.8% | 73.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.8% | 5.1% |
| TOTAL | 7 | 100.0% | 405 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|-----------|---------------|---------------|-----------------------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 21.4% | 10.0% | 5.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 15.0% | 11.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.1% | 21.3% | 11.3% |
| Upper | 2 | 100.0% | 296 | 100.0% | 41.9% | 46.3% | 59.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.5% | 12.0% |
| TOTAL | 2 | 100.0% | 296 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | Families By Family Income % | | | |
| Low | 3 | 3.3% | 94 | 0.7% | 21.4% | 3.9% | 1.8% |
| Moderate | 15 | 16.3% | 1,112 | 8.2% | 17.7% | 12.5% | 7.8% |
| Middle | 18 | 19.6% | 1,706 | 12.6% | 19.1% | 18.2% | 14.1% |
| Upper | 44 | 47.8% | 7,515 | 55.6% | 41.9% | 40.8% | 47.4% |
| Unknown | 12 | 13.0% | 3,097 | 22.9% | 0.0% | 24.7% | 28.9% |
| TOTAL | 92 | 100.0% | 13,524 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 38 | 57.6% | 39.5% | \$6,941 | 51.5% | 34.3% | 88.1% |
| | Over \$1 Million/ Unknown | 28 | 42.4% | 60.5% | \$6,524 | 48.5% | 65.7% | 11.9% |
| | TOTAL | 66 | 100.0% | 100.0% | \$13,465 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 40 | 60.6% | 89.7% | \$1,905 | 14.1% | 33.0% | |
| | \$100,001–\$250,000 | 11 | 16.7% | 5.6% | \$2,244 | 16.7% | 19.3% | |
| | \$250,001–\$1 Million | 15 | 22.7% | 4.7% | \$9,316 | 69.2% | 47.7% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 66 | 100.0% | 100.0% | \$13,465 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 25 | 65.8% | | \$1,054 | 15.2% | | |
| | \$100,001–\$250,000 | 7 | 18.4% | | \$1,394 | 20.1% | | |
| | \$250,001–\$1 Million | 6 | 15.8% | | \$4,493 | 64.7% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 38 | 100.0% | | \$6,941 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--|--------------------------|---------------|------------------|------------------|-----------------|------------------|-----------------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 94 | 48.2% | 31.1% | \$11,376 | 44.0% | 29.9% | 88.2% |
| | Over \$1 Million/ Unknown | 101 | 51.8% | 68.9% | \$14,475 | 56.0% | 70.1% | 11.8% |
| | TOTAL | 195 | 100.0% | 100.0% | \$25,851 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 145 | 74.4% | 84.7% | \$3,979 | 15.4% | 27.6% | |
| | \$100,001– \$250,000 | 17 | 8.7% | 8.2% | \$2,788 | 10.8% | 20.4% | |
| | \$250,001–\$1 Million | 33 | 16.9% | 7.1% | \$19,084 | 73.8% | 52.0% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 195 | 100.0% | 100.0% | \$25,851 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 73 | 77.7% | | \$1,733 | 15.2% | |
| | | \$100,001– \$250,000 | 8 | 8.5% | | \$1,325 | 11.6% | |
| | | \$250,001–\$1 Million | 13 | 13.8% | | \$8,318 | 73.1% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 94 | 100.0% | | \$11,376 | 100.0% | |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 20 | 100.0% | 69.6% | 1064 | 100.0% | 76.9% | 96.1% |
| | Over \$1 Million/ Unknown | 0 | 0.0% | 30.4% | 0 | 0.0% | 23.1% | 3.9% |
| | TOTAL | 20 | 100.0% | 100.0% | 1064 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 18 | 90.0% | 84.1% | 798 | 75.0% | 44.7% | |
| | \$100,001– \$250,000 | 2 | 10.0% | 12.3% | 266 | 25.0% | 32.8% | |
| | \$250,001– \$500,000 | 0 | 0.0% | 3.6% | 0 | 0.0% | 22.5% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 20 | 100.0% | 100.0% | 1064 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 18 | 90.0% | | 798 | 75.0% | | |
| | \$100,001– \$250,000 | 2 | 10.0% | | 266 | 25.0% | | |
| | \$250,001–\$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | TOTAL | 20 | 100.0% | | 1064 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|-------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 20 | 95.2% | 63.5% | 2309 | 88.2% | 82.6% | 96.1% |
| | Over \$1 Million/ Unknown | 1 | 4.8% | 36.5% | 310 | 11.8% | 17.4% | 3.9% |
| | TOTAL | 21 | 100.0% | 100.0% | 2619 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 14 | 66.7% | 79.1% | 678 | 25.9% | 33.0% | |
| | \$100,001– \$250,000 | 3 | 14.3% | 14.9% | 459 | 17.5% | 34.0% | |
| | \$250,001– \$500,000 | 4 | 19.0% | 6.1% | 1482 | 56.6% | 33.0% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 21 | 100.0% | 100.0% | 2619 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 14 | 70.0% | | 678 | 29.4% | | |
| | \$100,001– \$250,000 | 3 | 15.0% | | 459 | 19.9% | | |
| | \$250,001–\$1 Million | 3 | 15.0% | | 1172 | 50.8% | | |
| | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | TOTAL | 20 | 100.0% | | 2309 | 100.0% | | |

Appendix C (continued)

Hot Springs

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 7 | 6.1% | 353 | 2.2% | 3.4% | 3.8% | 1.7% |
| Moderate | 13 | 11.3% | 1,061 | 6.7% | 11.8% | 9.6% | 7.1% |
| Middle | 58 | 50.4% | 7,798 | 49.3% | 49.1% | 47.0% | 41.5% |
| Upper | 37 | 32.2% | 6,591 | 41.7% | 35.6% | 39.6% | 49.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 115 | 100.0% | 15,803 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 2.3% | 53 | 0.7% | 3.4% | 1.7% | 0.8% |
| Moderate | 10 | 22.7% | 3,171 | 39.8% | 11.8% | 10.5% | 8.7% |
| Middle | 20 | 45.5% | 2,984 | 37.5% | 49.1% | 40.8% | 32.8% |
| Upper | 13 | 29.5% | 1,755 | 22.0% | 35.6% | 47.0% | 57.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 44 | 100.0% | 7,963 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 6.3% | 25 | 4.0% | 3.4% | 8.2% | 3.6% |
| Moderate | 1 | 6.3% | 45 | 7.2% | 11.8% | 8.2% | 5.4% |
| Middle | 3 | 18.8% | 86 | 13.8% | 49.1% | 44.5% | 41.4% |
| Upper | 11 | 68.8% | 465 | 74.9% | 35.6% | 39.0% | 49.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 16 | 100.0% | 621 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 1.6% | 0.4% |
| Moderate | 1 | 20.0% | 15 | 4.8% | 11.8% | 4.8% | 3.5% |
| Middle | 2 | 40.0% | 235 | 75.3% | 49.1% | 38.1% | 30.7% |
| Upper | 2 | 40.0% | 62 | 19.9% | 35.6% | 55.6% | 65.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 5 | 100.0% | 312 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 3.5% | 3.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 5.3% | 3.2% |
| Middle | 3 | 100.0% | 399 | 100.0% | 49.1% | 61.4% | 46.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 35.6% | 29.8% | 46.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 399 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 9 | 4.9% | 431 | 1.7% | 3.4% | 3.5% | 1.6% |
| Moderate | 25 | 13.7% | 4,292 | 17.1% | 11.8% | 9.9% | 7.7% |
| Middle | 86 | 47.0% | 11,502 | 45.8% | 49.1% | 45.1% | 39.1% |
| Upper | 63 | 34.4% | 8,873 | 35.4% | 35.6% | 41.5% | 51.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 183 | 100.0% | 25,098 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 2.1% | 122 | 0.7% | 3.4% | 3.1% | 1.6% |
| Moderate | 9 | 9.3% | 1,817 | 9.7% | 11.8% | 8.6% | 7.3% |
| Middle | 55 | 56.7% | 8,704 | 46.5% | 49.1% | 48.3% | 42.3% |
| Upper | 31 | 32.0% | 8,093 | 43.2% | 35.6% | 40.1% | 48.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 97 | 100.0% | 18,736 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 1.6% | 0.7% |
| Moderate | 10 | 13.5% | 1,748 | 11.9% | 11.8% | 6.7% | 5.5% |
| Middle | 25 | 33.8% | 3,982 | 27.1% | 49.1% | 42.3% | 36.1% |
| Upper | 39 | 52.7% | 8,957 | 61.0% | 35.6% | 49.4% | 57.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 74 | 100.0% | 14,687 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 7.7% | 25 | 3.4% | 3.4% | 4.2% | 2.7% |
| Moderate | 3 | 23.1% | 318 | 43.4% | 11.8% | 10.9% | 10.2% |
| Middle | 2 | 15.4% | 81 | 11.1% | 49.1% | 41.2% | 35.1% |
| Upper | 7 | 53.8% | 309 | 42.2% | 35.6% | 43.7% | 52.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 13 | 100.0% | 733 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 3.4% | 4.0% | 0.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 10.0% | 4.3% |
| Middle | 3 | 100.0% | 407 | 100.0% | 49.1% | 52.0% | 38.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 35.6% | 34.0% | 56.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 407 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 3 | 1.6% | 147 | 0.4% | 3.4% | 2.6% | 1.7% |
| Moderate | 22 | 11.8% | 3,883 | 11.2% | 11.8% | 8.2% | 7.0% |
| Middle | 85 | 45.5% | 13,174 | 38.1% | 49.1% | 45.1% | 37.8% |
| Upper | 77 | 41.2% | 17,359 | 50.2% | 35.6% | 44.1% | 53.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 187 | 100.0% | 34,563 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 2 | 1.8% | \$21 | 0.1% | 6.8% | 4.9% | 3.0% |
| Moderate | 17 | 14.9% | \$1,787 | 9.5% | 19.1% | 20.8% | 19.8% |
| Middle | 40 | 35.1% | \$8,629 | 45.8% | 44.9% | 40.5% | 46.2% |
| Upper | 55 | 48.2% | \$8,395 | 44.6% | 29.2% | 32.2% | 30.4% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 1.5% | 0.6% |
| TOTAL | 114 | 100.0% | \$18,832 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 10 | 4.1% | \$444 | 1.6% | 6.9% | 5.0% | 4.0% |
| Moderate | 64 | 26.1% | \$7,122 | 26.0% | 18.8% | 22.2% | 26.7% |
| Middle | 89 | 36.3% | \$11,662 | 42.7% | 44.3% | 40.5% | 44.1% |
| Upper | 82 | 33.5% | \$8,113 | 29.7% | 29.9% | 31.9% | 25.1% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.4% | 0.1% |
| TOTAL | 245 | 100.0% | \$27,341 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 3.5% | 390 | 2.5% | 23.2% | 6.7% | 3.2% |
| Moderate | 22 | 19.1% | 2,531 | 16.0% | 16.7% | 17.1% | 11.6% |
| Middle | 23 | 20.0% | 2,999 | 19.0% | 19.6% | 19.7% | 17.3% |
| Upper | 56 | 48.7% | 8,834 | 55.9% | 40.4% | 40.8% | 52.7% |
| Unknown | 10 | 8.7% | 1,049 | 6.6% | 0.0% | 15.7% | 15.2% |
| TOTAL | 115 | 100.0% | 15,803 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 6.8% | 269 | 3.4% | 23.2% | 6.9% | 2.6% |
| Moderate | 1 | 2.3% | 50 | 0.6% | 16.7% | 11.8% | 6.1% |
| Middle | 5 | 11.4% | 279 | 3.5% | 19.6% | 17.6% | 12.7% |
| Upper | 14 | 31.8% | 3,386 | 42.5% | 40.4% | 44.2% | 55.7% |
| Unknown | 21 | 47.7% | 3,979 | 50.0% | 0.0% | 19.5% | 22.9% |
| TOTAL | 44 | 100.0% | 7,963 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 3 | 18.8% | 41 | 6.6% | 23.2% | 13.0% | 9.8% |
| Moderate | 2 | 12.5% | 60 | 9.7% | 16.7% | 17.8% | 11.7% |
| Middle | 5 | 31.3% | 146 | 23.5% | 19.6% | 21.9% | 16.0% |
| Upper | 4 | 25.0% | 216 | 34.8% | 40.4% | 38.4% | 50.7% |
| Unknown | 2 | 12.5% | 158 | 25.4% | 0.0% | 8.9% | 11.8% |
| TOTAL | 16 | 100.0% | 621 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 23.2% | 6.3% | 3.3% |
| Moderate | 1 | 20.0% | 15 | 4.8% | 16.7% | 14.3% | 12.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 27.0% | 24.2% |
| Upper | 3 | 60.0% | 162 | 51.9% | 40.4% | 46.0% | 54.5% |
| Unknown | 1 | 20.0% | 135 | 43.3% | 0.0% | 6.3% | 5.9% |
| TOTAL | 5 | 100.0% | 312 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 33.3% | 40 | 10.0% | 23.2% | 14.0% | 5.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.7% | 17.5% | 15.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 12.3% | 8.8% |
| Upper | 2 | 66.7% | 359 | 90.0% | 40.4% | 50.9% | 67.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.3% | 0.0% |
| TOTAL | 3 | 100.0% | 399 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | | | |
|----------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 11 | 6.0% | 740 | 2.9% | 23.2% | 7.0% | 3.0% |
| Moderate | 26 | 14.2% | 2,656 | 10.6% | 16.7% | 15.2% | 9.4% |
| Middle | 33 | 18.0% | 3,424 | 13.6% | 19.6% | 18.8% | 15.0% |
| Upper | 79 | 43.2% | 12,957 | 51.6% | 40.4% | 40.9% | 51.4% |
| Unknown | 34 | 18.6% | 5,321 | 21.2% | 0.0% | 18.1% | 21.2% |
| TOTAL | 183 | 100.0% | 25,098 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 4.1% | 586 | 3.1% | 23.2% | 6.5% | 3.4% |
| Moderate | 14 | 14.4% | 1,664 | 8.9% | 16.7% | 18.3% | 12.4% |
| Middle | 18 | 18.6% | 2,586 | 13.8% | 19.6% | 18.7% | 16.3% |
| Upper | 51 | 52.6% | 11,848 | 63.2% | 40.4% | 42.4% | 54.5% |
| Unknown | 10 | 10.3% | 2,052 | 11.0% | 0.0% | 14.2% | 13.4% |
| TOTAL | 97 | 100.0% | 18,736 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 7 | 9.5% | 723 | 4.9% | 23.2% | 5.3% | 2.4% |
| Moderate | 7 | 9.5% | 814 | 5.5% | 16.7% | 12.3% | 7.9% |
| Middle | 13 | 17.6% | 2,296 | 15.6% | 19.6% | 15.2% | 11.5% |
| Upper | 45 | 60.8% | 10,156 | 69.1% | 40.4% | 41.9% | 52.7% |
| Unknown | 2 | 2.7% | 698 | 4.8% | 0.0% | 25.2% | 25.5% |
| TOTAL | 74 | 100.0% | 14,687 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 15.4% | 40 | 5.5% | 23.2% | 10.1% | 3.0% |
| Moderate | 1 | 7.7% | 30 | 4.1% | 16.7% | 15.1% | 10.3% |
| Middle | 3 | 23.1% | 96 | 13.1% | 19.6% | 21.0% | 16.8% |
| Upper | 6 | 46.2% | 507 | 69.2% | 40.4% | 43.7% | 55.3% |
| Unknown | 1 | 7.7% | 60 | 8.2% | 0.0% | 10.1% | 14.5% |
| TOTAL | 13 | 100.0% | 733 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 33.3% | 164 | 40.3% | 23.2% | 6.0% | 2.5% |
| Moderate | 1 | 33.3% | 35 | 8.6% | 16.7% | 22.0% | 11.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 24.0% | 8.5% |
| Upper | 1 | 33.3% | 208 | 51.1% | 40.4% | 36.0% | 65.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 12.0% | 11.9% |
| TOTAL | 3 | 100.0% | 407 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 14 | 7.5% | 1,513 | 4.4% | 23.2% | 5.9% | 2.7% |
| Moderate | 23 | 12.3% | 2,543 | 7.4% | 16.7% | 15.0% | 9.5% |
| Middle | 34 | 18.2% | 4,978 | 14.4% | 19.6% | 16.5% | 13.0% |
| Upper | 103 | 55.1% | 22,719 | 65.7% | 40.4% | 40.7% | 50.4% |
| Unknown | 13 | 7.0% | 2,810 | 8.1% | 0.0% | 21.8% | 24.4% |
| TOTAL | 187 | 100.0% | 34,563 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|--------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 71 | 62.3% | 39.3% | \$12,632 | 67.1% | 48.9% | 92.4% |
| | Over \$1 Million/ Unknown | 43 | 37.7% | 60.7% | \$6,200 | 32.9% | 51.1% | 7.6% |
| | TOTAL | 114 | 100.0% | 100.0% | \$18,832 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 73 | 64.0% | 92.7% | \$2,817 | 15.0% | 36.5% | |
| | \$100,001– \$250,000 | 19 | 16.7% | 4.7% | \$3,591 | 19.1% | 23.9% | |
| | \$250,001–\$1 Million | 22 | 19.3% | 2.6% | \$12,424 | 66.0% | 39.5% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 114 | 100.0% | 100.0% | \$18,832 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 44 | 62.0% | | \$1,729 | 13.7% | |
| | | \$100,001– \$250,000 | 14 | 19.7% | | \$2,714 | 21.5% | |
| | | \$250,001–\$1 Million | 13 | 18.3% | | \$8,189 | 64.8% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 71 | 100.0% | | \$12,632 | 100.0% | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|--------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 123 | 50.2% | 32.5% | \$14,709 | 53.8% | 39.3% | 92.8% |
| | Over \$1 Million/ Unknown | 122 | 49.8% | 67.5% | \$12,632 | 46.2% | 60.7% | 7.2% |
| | TOTAL | 245 | 100.0% | 100.0% | \$27,341 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 176 | 71.8% | 86.0% | \$6,025 | 22.0% | 30.1% | |
| | \$100,001– \$250,000 | 41 | 16.7% | 9.0% | \$7,078 | 25.9% | 25.5% | |
| | \$250,001–\$1 Million | 28 | 11.4% | 5.0% | \$14,238 | 52.1% | 44.5% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 245 | 100.0% | 100.0% | \$27,341 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 91 | 74.0% | | \$2,952 | 20.1% | |
| | | \$100,001– \$250,000 | 16 | 13.0% | | \$2,927 | 19.9% | |
| | | \$250,001–\$1 Million | 16 | 13.0% | | \$8,830 | 60.0% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 123 | 100.0% | | \$14,709 | 100.0% | |

Appendix C (continued)

Jonesboro

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|------------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 2.2% | 374 | 1.3% | 1.7% | 2.4% | 1.9% |
| Moderate | 28 | 15.5% | 3,918 | 14.0% | 14.3% | 9.4% | 7.5% |
| Middle | 90 | 49.7% | 12,494 | 44.6% | 53.1% | 50.6% | 44.5% |
| Upper | 59 | 32.6% | 11,246 | 40.1% | 30.9% | 37.7% | 46.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 181 | 100.0% | 28,032 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 4 | 5.1% | 326 | 2.5% | 1.7% | 2.7% | 1.9% |
| Moderate | 5 | 6.3% | 400 | 3.0% | 14.3% | 9.2% | 7.3% |
| Middle | 39 | 49.4% | 7,236 | 55.0% | 53.1% | 51.7% | 48.2% |
| Upper | 31 | 39.2% | 5,184 | 39.4% | 30.9% | 36.4% | 42.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 79 | 100.0% | 13,146 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 5.6% | 50 | 5.7% | 1.7% | 3.8% | 5.2% |
| Moderate | 2 | 11.1% | 94 | 10.7% | 14.3% | 11.1% | 8.9% |
| Middle | 9 | 50.0% | 436 | 49.5% | 53.1% | 50.6% | 46.1% |
| Upper | 6 | 33.3% | 301 | 34.2% | 30.9% | 34.5% | 39.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 18 | 100.0% | 881 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 1 | 50.0% | 958 | 90.7% | 23.0% | 14.7% | 6.6% |
| Moderate | 1 | 50.0% | 98 | 9.3% | 34.7% | 11.8% | 4.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 27.2% | 49.0% | 50.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 15.1% | 24.5% | 38.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 1,056 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.7% | 0.0% | 0.0% |
| Moderate | 2 | 6.7% | 120 | 7.2% | 14.3% | 11.6% | 9.3% |
| Middle | 18 | 60.0% | 791 | 47.2% | 53.1% | 60.7% | 53.6% |
| Upper | 10 | 33.3% | 765 | 45.6% | 30.9% | 27.7% | 37.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 30 | 100.0% | 1,676 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 1.7% | 2.0% | 1.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.3% | 6.1% | 3.6% |
| Middle | 2 | 66.7% | 72 | 85.7% | 53.1% | 42.4% | 47.6% |
| Upper | 1 | 33.3% | 12 | 14.3% | 30.9% | 49.5% | 47.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 84 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 10 | 3.2% | 1,708 | 3.8% | 1.7% | 2.6% | 2.4% |
| Moderate | 38 | 12.1% | 4,630 | 10.3% | 14.3% | 9.5% | 7.2% |
| Middle | 158 | 50.5% | 21,029 | 46.9% | 53.1% | 51.2% | 46.4% |
| Upper | 107 | 34.2% | 17,508 | 39.0% | 30.9% | 36.7% | 44.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 313 | 100.0% | 44,875 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 9 | 5.4% | 1,114 | 3.3% | 1.7% | 1.8% | 1.4% |
| Moderate | 16 | 9.5% | 2,050 | 6.2% | 14.3% | 8.4% | 6.7% |
| Middle | 80 | 47.6% | 16,232 | 48.8% | 53.1% | 52.3% | 47.7% |
| Upper | 63 | 37.5% | 13,875 | 41.7% | 30.9% | 37.4% | 44.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 168 | 100.0% | 33,271 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 10 | 6.1% | 1,586 | 4.5% | 1.7% | 2.0% | 1.5% |
| Moderate | 13 | 7.9% | 2,523 | 7.2% | 14.3% | 8.2% | 6.5% |
| Middle | 67 | 40.6% | 13,553 | 38.6% | 53.1% | 45.0% | 41.1% |
| Upper | 75 | 45.5% | 17,427 | 49.7% | 30.9% | 44.8% | 50.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 165 | 100.0% | 35,089 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.7% | 5.6% | 4.4% |
| Moderate | 1 | 33.3% | 79 | 32.9% | 14.3% | 13.4% | 6.3% |
| Middle | 2 | 66.7% | 161 | 67.1% | 53.1% | 49.2% | 39.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 30.9% | 31.3% | 48.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.6% | 1.5% |
| TOTAL | 3 | 100.0% | 240 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | % of Multifamily Units | | |
|---------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 2 | 50.0% | 1,431 | 70.9% | 23.0% | 24.2% | 19.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 34.7% | 12.5% | 14.9% |
| Middle | 2 | 50.0% | 588 | 29.1% | 27.2% | 51.7% | 45.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 15.1% | 11.7% | 20.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 2,019 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 10.0% | 10 | 3.3% | 1.7% | 7.7% | 10.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 14.3% | 13.5% | 10.7% |
| Middle | 5 | 50.0% | 172 | 56.0% | 53.1% | 42.3% | 38.6% |
| Upper | 4 | 40.0% | 125 | 40.7% | 30.9% | 36.5% | 39.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 10 | 100.0% | 307 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 22 | 6.3% | 4,141 | 5.8% | 1.7% | 2.3% | 3.1% |
| Moderate | 30 | 8.6% | 4,652 | 6.6% | 14.3% | 8.7% | 7.4% |
| Middle | 156 | 44.6% | 30,706 | 43.3% | 53.1% | 49.3% | 44.9% |
| Upper | 142 | 40.6% | 31,427 | 44.3% | 30.9% | 39.8% | 44.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 350 | 100.0% | 70,926 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 22 | 4.9% | \$1,782 | 5.4% | 8.1% | 5.6% | 6.1% |
| Moderate | 47 | 10.5% | \$3,576 | 10.8% | 19.7% | 14.2% | 16.0% |
| Middle | 265 | 59.2% | \$19,969 | 60.4% | 50.2% | 52.5% | 53.6% |
| Upper | 114 | 25.4% | \$7,735 | 23.4% | 22.1% | 25.9% | 23.9% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 1.7% | 0.5% |
| TOTAL | 448 | 100.0% | \$33,062 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 35 | 4.9% | \$4,668 | 7.2% | 6.7% | 6.3% | 8.9% |
| Moderate | 90 | 12.7% | \$8,349 | 12.9% | 19.3% | 14.5% | 15.0% |
| Middle | 396 | 55.8% | \$34,408 | 53.0% | 51.3% | 52.3% | 51.9% |
| Upper | 189 | 26.6% | \$17,494 | 26.9% | 22.7% | 26.6% | 24.2% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.3% | 0.1% |
| TOTAL | 710 | 100.0% | \$64,919 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.6% | 0.5% | 0.1% |
| Moderate | 16 | 9.4% | \$2,811 | 11.0% | 18.8% | 9.4% | 6.5% |
| Middle | 98 | 57.3% | \$14,890 | 58.3% | 51.4% | 51.3% | 49.9% |
| Upper | 57 | 33.3% | \$7,838 | 30.7% | 29.2% | 38.0% | 43.4% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.8% | 0.1% |
| TOTAL | 171 | 100.0% | \$25,539 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Farm Lending By Income Level of Geography | | | | | | | |
|---|-----------------------|---------------|-----------------|---------------|---------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Farm Loans | | | | % of Farms | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | # % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.5% | 0.6% | 0.3% |
| Moderate | 23 | 14.3% | \$3,501 | 14.3% | 19.2% | 9.3% | 10.9% |
| Middle | 99 | 61.5% | \$14,598 | 59.7% | 51.6% | 50.7% | 47.7% |
| Upper | 39 | 24.2% | \$6,364 | 26.0% | 28.6% | 39.2% | 41.1% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.1% | 0.0% |
| TOTAL | 161 | 100.0% | \$24,463 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 1.7% | 210 | 0.7% | 20.7% | 2.6% | 1.4% |
| Moderate | 28 | 15.5% | 3,255 | 11.6% | 16.8% | 14.2% | 10.2% |
| Middle | 27 | 14.9% | 4,065 | 14.5% | 20.0% | 21.2% | 18.5% |
| Upper | 68 | 37.6% | 13,466 | 48.0% | 42.5% | 39.7% | 50.0% |
| Unknown | 55 | 30.4% | 7,036 | 25.1% | 0.0% | 22.3% | 19.9% |
| TOTAL | 181 | 100.0% | 28,032 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 2.8% | 1.3% |
| Moderate | 4 | 5.1% | 476 | 3.6% | 16.8% | 8.4% | 4.9% |
| Middle | 12 | 15.2% | 1,343 | 10.2% | 20.0% | 16.3% | 11.3% |
| Upper | 45 | 57.0% | 8,676 | 66.0% | 42.5% | 50.0% | 58.4% |
| Unknown | 18 | 22.8% | 2,651 | 20.2% | 0.0% | 22.4% | 24.0% |
| TOTAL | 79 | 100.0% | 13,146 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 4.3% | 2.9% |
| Moderate | 1 | 5.6% | 27 | 3.1% | 16.8% | 8.5% | 4.6% |
| Middle | 4 | 22.2% | 115 | 13.1% | 20.0% | 18.7% | 13.7% |
| Upper | 8 | 44.4% | 535 | 60.7% | 42.5% | 57.0% | 67.6% |
| Unknown | 5 | 27.8% | 204 | 23.2% | 0.0% | 11.5% | 11.2% |
| TOTAL | 18 | 100.0% | 881 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 1.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.8% | 2.9% | 0.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.0% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.5% | 9.8% | 1.8% |
| Unknown | 2 | 100.0% | 1,056 | 100.0% | 0.0% | 86.3% | 97.6% |
| TOTAL | 2 | 100.0% | 1,056 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 5.4% | 3.3% |
| Moderate | 4 | 13.3% | 125 | 7.5% | 16.8% | 8.9% | 4.3% |
| Middle | 2 | 6.7% | 30 | 1.8% | 20.0% | 8.0% | 3.5% |
| Upper | 23 | 76.7% | 1,441 | 86.0% | 42.5% | 74.1% | 86.5% |
| Unknown | 1 | 3.3% | 80 | 4.8% | 0.0% | 3.6% | 2.5% |
| TOTAL | 30 | 100.0% | 1,676 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 8.1% | 4.0% |
| Moderate | 1 | 33.3% | 12 | 14.3% | 16.8% | 19.2% | 12.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.0% | 18.2% | 17.3% |
| Upper | 2 | 66.7% | 72 | 85.7% | 42.5% | 52.5% | 64.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.0% | 1.2% |
| TOTAL | 3 | 100.0% | 84 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 3 | 1.0% | 210 | 0.5% | 20.7% | 2.8% | 1.3% |
| Moderate | 38 | 12.1% | 3,895 | 8.7% | 16.8% | 12.0% | 7.6% |
| Middle | 45 | 14.4% | 5,553 | 12.4% | 20.0% | 18.8% | 14.4% |
| Upper | 146 | 46.6% | 24,190 | 53.9% | 42.5% | 42.9% | 47.6% |
| Unknown | 81 | 25.9% | 11,027 | 24.6% | 0.0% | 23.6% | 29.1% |
| TOTAL | 313 | 100.0% | 44,875 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 6 | 3.6% | 514 | 1.5% | 20.7% | 4.8% | 2.8% |
| Moderate | 28 | 16.7% | 3,423 | 10.3% | 16.8% | 18.2% | 13.6% |
| Middle | 25 | 14.9% | 3,816 | 11.5% | 20.0% | 21.5% | 19.8% |
| Upper | 56 | 33.3% | 16,016 | 48.1% | 42.5% | 34.3% | 44.0% |
| Unknown | 53 | 31.5% | 9,502 | 28.6% | 0.0% | 21.2% | 19.7% |
| TOTAL | 168 | 100.0% | 33,271 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 1.8% | 266 | 0.8% | 20.7% | 2.8% | 1.2% |
| Moderate | 19 | 11.5% | 1,980 | 5.6% | 16.8% | 9.3% | 5.6% |
| Middle | 23 | 13.9% | 3,284 | 9.4% | 20.0% | 15.2% | 10.6% |
| Upper | 81 | 49.1% | 21,199 | 60.4% | 42.5% | 49.8% | 60.2% |
| Unknown | 39 | 23.6% | 8,360 | 23.8% | 0.0% | 23.0% | 22.5% |
| TOTAL | 165 | 100.0% | 35,089 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 3.4% | 1.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.8% | 15.1% | 7.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.0% | 18.4% | 11.0% |
| Upper | 1 | 33.3% | 15 | 6.3% | 42.5% | 48.6% | 58.0% |
| Unknown | 2 | 66.7% | 225 | 93.8% | 0.0% | 14.5% | 21.2% |
| TOTAL | 3 | 100.0% | 240 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | | | |
|---------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 0.0% | 0.0% |
| Moderate | 1 | 25.0% | 500 | 24.8% | 16.8% | 2.5% | 0.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.0% | 0.8% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.5% | 12.5% | 4.4% |
| Unknown | 3 | 75.0% | 1,519 | 75.2% | 0.0% | 84.2% | 94.8% |
| TOTAL | 4 | 100.0% | 2,019 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 3 | 30.0% | 47 | 15.3% | 20.7% | 11.5% | 2.3% |
| Moderate | 2 | 20.0% | 46 | 15.0% | 16.8% | 11.5% | 5.7% |
| Middle | 1 | 10.0% | 25 | 8.1% | 20.0% | 21.2% | 15.8% |
| Upper | 4 | 40.0% | 189 | 61.6% | 42.5% | 53.8% | 75.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.9% | 1.1% |
| TOTAL | 10 | 100.0% | 307 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 12 | 3.4% | 827 | 1.2% | 20.7% | 3.8% | 1.8% |
| Moderate | 50 | 14.3% | 5,949 | 8.4% | 16.8% | 13.4% | 8.7% |
| Middle | 49 | 14.0% | 7,125 | 10.0% | 20.0% | 17.7% | 13.7% |
| Upper | 142 | 40.6% | 37,419 | 52.8% | 42.5% | 39.9% | 46.4% |
| Unknown | 97 | 27.7% | 19,606 | 27.6% | 0.0% | 25.2% | 29.4% |
| TOTAL | 350 | 100.0% | 70,926 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 319 | 71.2% | 48.0% | \$20,045 | 60.6% | 50.5% | 90.1% |
| | Over \$1 Million/ Unknown | 129 | 28.8% | 52.0% | \$13,017 | 39.4% | 49.5% | 9.9% |
| | TOTAL | 448 | 100.0% | 100.0% | \$33,062 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 373 | 83.3% | 88.2% | \$11,524 | 34.9% | 32.1% | |
| | \$100,001– \$250,000 | 50 | 11.2% | 6.9% | \$8,514 | 25.8% | 21.5% | |
| | \$250,001– \$1 Million | 25 | 5.6% | 5.0% | \$13,024 | 39.4% | 46.4% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 448 | 100.0% | 100.0% | \$33,062 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 269 | 84.3% | | \$7,483 | 37.3% | | |
| | \$100,001– \$250,000 | 37 | 11.6% | | \$6,243 | 31.1% | | |
| | \$250,001– \$1 Million | 13 | 4.1% | | \$6,319 | 31.5% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 319 | 100.0% | | \$20,045 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 462 | 65.1% | 46.0% | \$37,227 | 57.3% | 45.8% | 90.4% |
| | Over \$1 Million/ Unknown | 248 | 34.9% | 54.0% | \$27,692 | 42.7% | 54.2% | 9.6% |
| | TOTAL | 710 | 100.0% | 100.0% | \$64,919 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 559 | 78.7% | 83.4% | \$17,724 | 27.3% | 27.6% | |
| | \$100,001– \$250,000 | 83 | 11.7% | 9.5% | \$13,672 | 21.1% | 21.8% | |
| | \$250,001–\$1 Million | 68 | 9.6% | 7.1% | \$33,523 | 51.6% | 50.6% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 710 | 100.0% | 100.0% | \$64,919 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 381 | 82.5% | | \$10,912 | 29.3% | | |
| | \$100,001– \$250,000 | 42 | 9.1% | | \$7,023 | 18.9% | | |
| | \$250,001–\$1 Million | 39 | 8.4% | | \$19,292 | 51.8% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 462 | 100.0% | | \$37,227 | 100.0% | | |

Appendix C (continued)

| Distribution of 2019 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 139 | 81.3% | 59.0% | 20,916 | 81.9% | 79.8% | 97.0% |
| | Over \$1 Million/ Unknown | 32 | 18.7% | 41.0% | 4,623 | 18.1% | 20.2% | 3.0% |
| | TOTAL | 171 | 100.0% | 100.0% | 25,539 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 84 | 49.1% | 68.4% | 3,386 | 13.3% | 17.1% | |
| | \$100,001– \$250,000 | 52 | 30.4% | 16.9% | 9,452 | 37.0% | 29.8% | |
| | \$250,001– \$500,000 | 35 | 20.5% | 14.7% | 12,701 | 49.7% | 53.1% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 171 | 100.0% | 100.0% | 25,539 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 71 | 51.1% | | 3,016 | 14.4% | | |
| | \$100,001– \$250,000 | 38 | 27.3% | | 7,072 | 33.8% | | |
| | \$250,001–\$1 Million | 30 | 21.6% | | 10,828 | 51.8% | | |
| | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | TOTAL | 139 | 100.0% | | 20,916 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Farm Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Farm Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Farms |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Farm Revenue | \$1 Million or Less | 135 | 83.9% | 57.6% | 19,599 | 80.1% | 75.3% | 96.7% |
| | Over \$1 Million/ Unknown | 26 | 16.1% | 42.4% | 4,864 | 19.9% | 24.7% | 3.3% |
| | TOTAL | 161 | 100.0% | 100.0% | 24,463 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 77 | 47.8% | 65.5% | 3,099 | 12.7% | 17.0% | |
| | \$100,001– \$250,000 | 45 | 28.0% | 18.7% | 8,076 | 33.0% | 30.6% | |
| | \$250,001– \$500,000 | 39 | 24.2% | 15.8% | 13,288 | 54.3% | 52.4% | |
| | Over \$500,000 | 0 | 0.0% | 0.0% | 0 | 0.0% | 0.0% | |
| | TOTAL | 161 | 100.0% | 100.0% | 24,463 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 69 | 51.1% | | 2,728 | 13.9% | | |
| | \$100,001– \$250,000 | 34 | 25.2% | | 6,088 | 31.1% | | |
| | \$250,001–\$1 Million | 32 | 23.7% | | 10,783 | 55.0% | | |
| | Over \$1 Million | 0 | 0.0% | | 0 | 0.0% | | |
| | TOTAL | 135 | 100.0% | | 19,599 | 100.0% | | |

Appendix C (continued)

KANSAS

NonMSA Kansas

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|------------|---------------|--------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.5% | 21.1% | 14.5% |
| Middle | 2 | 66.7% | 211 | 74.8% | 47.7% | 43.9% | 39.6% |
| Upper | 1 | 33.3% | 71 | 25.2% | 29.8% | 35.0% | 45.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 282 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.5% | 11.4% | 6.2% |
| Middle | 1 | 50.0% | 183 | 55.0% | 47.7% | 51.7% | 47.4% |
| Upper | 1 | 50.0% | 150 | 45.0% | 29.8% | 36.9% | 46.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 333 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.5% | 17.8% | 12.0% |
| Middle | 3 | 60.0% | 394 | 64.1% | 47.7% | 46.9% | 43.6% |
| Upper | 2 | 40.0% | 221 | 35.9% | 29.8% | 35.3% | 44.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 5 | 100.0% | 615 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|------------|---------------|---------------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 33.3% | 111 | 48.1% | 22.5% | 20.7% | 12.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 47.7% | 44.4% | 40.0% |
| Upper | 2 | 66.7% | 120 | 51.9% | 29.8% | 34.9% | 47.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 231 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.5% | 10.2% | 6.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 47.7% | 46.2% | 41.7% |
| Upper | 1 | 100.0% | 186 | 100.0% | 29.8% | 43.6% | 52.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 186 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.5% | 8.8% | 5.5% |
| Middle | 2 | 100.0% | 65 | 100.0% | 47.7% | 41.2% | 32.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 29.8% | 50.0% | 61.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 65 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 16.7% | 111 | 23.0% | 22.5% | 15.7% | 9.6% |
| Middle | 2 | 33.3% | 65 | 13.5% | 47.7% | 45.2% | 42.3% |
| Upper | 3 | 50.0% | 306 | 63.5% | 29.8% | 39.1% | 48.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 6 | 100.0% | 482 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|--------------|---------------|--------------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | \$0 | 0.0% | 19.9% | 16.0% | 26.8% |
| Middle | 3 | 75.0% | \$31 | 12.1% | 59.1% | 57.5% | 51.4% |
| Upper | 1 | 25.0% | \$225 | 87.9% | 21.0% | 23.3% | 20.8% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 3.2% | 1.0% |
| TOTAL | 4 | 100.0% | \$256 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|--------------|---------------|--------------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 4 | 23.5% | \$79 | 8.3% | 19.5% | 19.2% | 26.8% |
| Middle | 10 | 58.8% | \$625 | 65.4% | 59.4% | 57.8% | 61.0% |
| Upper | 3 | 17.6% | \$251 | 26.3% | 21.1% | 22.4% | 12.0% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.6% | 0.2% |
| TOTAL | 17 | 100.0% | \$955 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17.3% | 11.1% | 6.5% |
| Moderate | 1 | 33.3% | 71 | 25.2% | 20.8% | 21.2% | 16.2% |
| Middle | 1 | 33.3% | 78 | 27.7% | 22.9% | 19.4% | 18.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 31.3% | 43.1% |
| Unknown | 1 | 33.3% | 133 | 47.2% | 0.0% | 17.0% | 15.8% |
| TOTAL | 3 | 100.0% | 282 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17.3% | 6.0% | 3.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 20.8% | 15.1% | 9.6% |
| Middle | 2 | 100.0% | 333 | 100.0% | 22.9% | 19.8% | 17.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 41.2% | 50.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 17.9% | 19.2% |
| TOTAL | 2 | 100.0% | 333 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17.3% | 8.8% | 5.2% |
| Moderate | 1 | 20.0% | 71 | 11.5% | 20.8% | 18.7% | 13.2% |
| Middle | 3 | 60.0% | 411 | 66.8% | 22.9% | 19.6% | 17.3% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 33.8% | 45.1% |
| Unknown | 1 | 20.0% | 133 | 21.6% | 0.0% | 19.1% | 19.2% |
| TOTAL | 5 | 100.0% | 615 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17.3% | 9.2% | 4.4% |
| Moderate | 1 | 33.3% | 27 | 11.7% | 20.8% | 24.4% | 18.8% |
| Middle | 1 | 33.3% | 111 | 48.1% | 22.9% | 24.1% | 23.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 27.8% | 39.8% |
| Unknown | 1 | 33.3% | 93 | 40.3% | 0.0% | 14.5% | 13.4% |
| TOTAL | 3 | 100.0% | 231 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17.3% | 5.2% | 2.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 20.8% | 14.9% | 9.6% |
| Middle | 1 | 100.0% | 186 | 100.0% | 22.9% | 19.0% | 15.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 43.6% | 52.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 17.2% | 19.7% |
| TOTAL | 1 | 100.0% | 186 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17.3% | 11.8% | 7.6% |
| Moderate | 1 | 50.0% | 35 | 53.8% | 20.8% | 17.6% | 11.4% |
| Middle | 1 | 50.0% | 30 | 46.2% | 22.9% | 29.4% | 18.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 29.4% | 49.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 11.8% | 12.6% |
| TOTAL | 2 | 100.0% | 65 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 17.3% | 6.9% | 3.2% |
| Moderate | 2 | 33.3% | 62 | 12.9% | 20.8% | 18.9% | 13.2% |
| Middle | 3 | 50.0% | 327 | 67.8% | 22.9% | 20.9% | 18.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 39.0% | 35.2% | 44.7% |
| Unknown | 1 | 16.7% | 93 | 19.3% | 0.0% | 18.0% | 20.4% |
| TOTAL | 6 | 100.0% | 482 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|----------|---------------|---------------|--------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 4 | 100.0% | 43.1% | \$256 | 100.0% | 37.0% | 87.5% |
| | Over \$1 Million/ Unknown | 0 | 0.0% | 56.9% | \$0 | 0.0% | 63.0% | 12.5% |
| | TOTAL | 4 | 100.0% | 100.0% | \$256 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 3 | 75.0% | 92.8% | \$31 | 12.1% | 36.2% | |
| | \$100,001– \$250,000 | 1 | 25.0% | 4.0% | \$225 | 87.9% | 17.6% | |
| | \$250,001– \$1 Million | 0 | 0.0% | 3.2% | \$0 | 0.0% | 46.2% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 4 | 100.0% | 100.0% | \$256 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 3 | 75.0% | | \$31 | 12.1% | | |
| | \$100,001– \$250,000 | 1 | 25.0% | | \$225 | 87.9% | | |
| | \$250,001– \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 4 | 100.0% | | \$256 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|--------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 9 | 52.9% | 46.5% | \$383 | 40.1% | 32.2% | 87.7% |
| | Over \$1 Million/ Unknown | 8 | 47.1% | 53.5% | \$572 | 59.9% | 67.8% | 12.3% |
| | TOTAL | 17 | 100.0% | 100.0% | \$955 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 15 | 88.2% | 86.8% | \$413 | 43.2% | 29.8% | |
| | \$100,001– \$250,000 | 1 | 5.9% | 6.8% | \$225 | 23.6% | 18.1% | |
| | \$250,001–\$1 Million | 1 | 5.9% | 6.4% | \$317 | 33.2% | 52.1% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 17 | 100.0% | 100.0% | \$955 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 8 | 88.9% | | \$158 | 41.3% | | |
| | \$100,001– \$250,000 | 1 | 11.1% | | \$225 | 58.7% | | |
| | \$250,001–\$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 9 | 100.0% | | \$383 | 100.0% | | |

Appendix C (continued)

MISSOURI

Columbia

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.9% | 231 | 0.9% | 1.6% | 1.6% | 1.0% |
| Moderate | 8 | 7.3% | 993 | 3.7% | 8.3% | 10.4% | 7.3% |
| Middle | 53 | 48.6% | 13,947 | 51.4% | 56.2% | 57.7% | 54.8% |
| Upper | 45 | 41.3% | 11,571 | 42.7% | 33.5% | 29.7% | 36.3% |
| Unknown | 2 | 1.8% | 369 | 1.4% | 0.4% | 0.6% | 0.7% |
| TOTAL | 109 | 100.0% | 27,111 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 0.5% | 163 | 0.4% | 1.6% | 0.8% | 0.4% |
| Moderate | 13 | 6.5% | 1,680 | 4.3% | 8.3% | 6.4% | 4.3% |
| Middle | 89 | 44.7% | 18,255 | 47.0% | 56.2% | 54.4% | 52.4% |
| Upper | 96 | 48.2% | 18,741 | 48.3% | 33.5% | 38.2% | 42.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.4% | 0.3% | 0.3% |
| TOTAL | 199 | 100.0% | 38,839 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.6% | 3.4% | 1.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 8.3% | 8.9% | 6.9% |
| Middle | 1 | 100.0% | 14 | 100.0% | 56.2% | 52.1% | 48.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 33.5% | 35.6% | 43.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.4% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 14 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.2% | 15.9% | 13.0% |
| Moderate | 1 | 50.0% | 180 | 21.7% | 18.5% | 15.9% | 6.6% |
| Middle | 1 | 50.0% | 650 | 78.3% | 29.4% | 40.2% | 19.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 28.0% | 18.3% | 46.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 15.8% | 9.8% | 15.1% |
| TOTAL | 2 | 100.0% | 830 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 1.6% | 0.0% | 0.0% |
| Moderate | 1 | 12.5% | 10 | 2.2% | 8.3% | 8.6% | 2.5% |
| Middle | 5 | 62.5% | 350 | 77.4% | 56.2% | 55.2% | 46.7% |
| Upper | 2 | 25.0% | 92 | 20.4% | 33.5% | 36.2% | 50.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.4% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | 452 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 1.6% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 8.3% | 3.6% | 0.5% |
| Middle | 1 | 50.0% | 150 | 55.6% | 56.2% | 50.9% | 49.8% |
| Upper | 1 | 50.0% | 120 | 44.4% | 33.5% | 45.5% | 49.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.4% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 270 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 2 | 0.6% | 394 | 0.6% | 1.6% | 1.3% | 1.7% |
| Moderate | 23 | 7.2% | 2,863 | 4.2% | 8.3% | 8.3% | 5.7% |
| Middle | 150 | 46.7% | 33,366 | 49.4% | 56.2% | 55.9% | 50.8% |
| Upper | 144 | 44.9% | 30,524 | 45.2% | 33.5% | 34.1% | 40.2% |
| Unknown | 2 | 0.6% | 369 | 0.5% | 0.4% | 0.5% | 1.6% |
| TOTAL | 321 | 100.0% | 67,516 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 74 | 16.2% | \$14,878 | 18.6% | 11.2% | 11.1% | 14.1% |
| Moderate | 43 | 9.4% | \$8,266 | 10.3% | 10.9% | 8.9% | 11.3% |
| Middle | 148 | 32.5% | \$26,346 | 32.9% | 43.5% | 43.4% | 40.9% |
| Upper | 175 | 38.4% | \$28,982 | 36.2% | 28.8% | 31.8% | 27.5% |
| Unknown | 16 | 3.5% | \$1,644 | 2.1% | 5.6% | 4.6% | 6.1% |
| TOTAL | 456 | 100.0% | \$80,116 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 3.7% | 544 | 2.0% | 19.9% | 9.2% | 5.5% |
| Moderate | 19 | 17.4% | 3,653 | 13.5% | 16.0% | 20.9% | 16.1% |
| Middle | 25 | 22.9% | 5,581 | 20.6% | 21.5% | 20.0% | 18.8% |
| Upper | 45 | 41.3% | 13,985 | 51.6% | 42.5% | 32.5% | 43.2% |
| Unknown | 16 | 14.7% | 3,348 | 12.3% | 0.0% | 17.4% | 16.4% |
| TOTAL | 109 | 100.0% | 27,111 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 7 | 3.5% | 590 | 1.5% | 19.9% | 4.1% | 2.2% |
| Moderate | 26 | 13.1% | 3,395 | 8.7% | 16.0% | 13.4% | 9.0% |
| Middle | 33 | 16.6% | 5,872 | 15.1% | 21.5% | 18.8% | 15.4% |
| Upper | 113 | 56.8% | 25,114 | 64.7% | 42.5% | 41.6% | 50.4% |
| Unknown | 20 | 10.1% | 3,868 | 10.0% | 0.0% | 22.1% | 23.1% |
| TOTAL | 199 | 100.0% | 38,839 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 6.8% | 4.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 17.8% | 12.2% |
| Middle | 1 | 100.0% | 14 | 100.0% | 21.5% | 24.7% | 19.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.5% | 43.2% | 56.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.5% | 8.1% |
| TOTAL | 1 | 100.0% | 14 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 2.4% | 0.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.5% | 0.0% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.5% | 3.7% | 0.5% |
| Unknown | 2 | 100.0% | 830 | 100.0% | 0.0% | 93.9% | 99.2% |
| TOTAL | 2 | 100.0% | 830 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 12.5% | 10 | 2.2% | 19.9% | 1.7% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 10.3% | 4.1% |
| Middle | 2 | 25.0% | 122 | 27.0% | 21.5% | 25.9% | 23.3% |
| Upper | 5 | 62.5% | 320 | 70.8% | 42.5% | 60.3% | 70.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 1.7% | 2.1% |
| TOTAL | 8 | 100.0% | 452 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 5.5% | 1.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.0% | 25.5% | 20.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.5% | 27.3% | 18.6% |
| Upper | 2 | 100.0% | 270 | 100.0% | 42.5% | 27.3% | 38.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 14.5% | 21.7% |
| TOTAL | 2 | 100.0% | 270 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | | | |
| Low | 12 | 3.7% | 1,144 | 1.7% | 19.9% | 6.2% | 3.3% |
| Moderate | 45 | 14.0% | 7,048 | 10.4% | 16.0% | 16.4% | 11.1% |
| Middle | 61 | 19.0% | 11,589 | 17.2% | 21.5% | 19.0% | 15.4% |
| Upper | 165 | 51.4% | 39,689 | 58.8% | 42.5% | 36.8% | 43.0% |
| Unknown | 38 | 11.8% | 8,046 | 11.9% | 0.0% | 21.7% | 27.3% |
| TOTAL | 321 | 100.0% | 67,516 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------|------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | | |
| | | Count | | | Dollars | | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % | |
| Business Revenue | \$1 Million or Less | 180 | 39.5% | 38.4% | \$37,769 | 47.1% | 38.2% | 91.9% | |
| | Over \$1 Million/ Unknown | 276 | 60.5% | 61.6% | \$42,347 | 52.9% | 61.8% | 8.1% | |
| | TOTAL | 456 | 100.0% | 100.0% | \$80,116 | 100.0% | 100.0% | 100.0% | |
| Loan Size | \$100,000 or Less | 277 | 60.7% | 81.4% | \$9,600 | 12.0% | 23.5% | | |
| | \$100,001– \$250,000 | 77 | 16.9% | 9.8% | \$12,896 | 16.1% | 19.5% | | |
| | \$250,001– \$1 Million | 102 | 22.4% | 8.8% | \$57,620 | 71.9% | 57.0% | | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | | |
| | TOTAL | 456 | 100.0% | 100.0% | \$80,116 | 100.0% | 100.0% | | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 105 | 58.3% | | \$3,890 | 10.3% | | | |
| | \$100,001– \$250,000 | 22 | 12.2% | | \$4,222 | 11.2% | | | |
| | \$250,001– \$1 Million | 53 | 29.4% | | \$29,657 | 78.5% | | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | | |
| | TOTAL | 180 | 100.0% | | \$37,769 | 100.0% | | | |

Appendix C (continued)

Joplin

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 13.3% | 165 | 7.5% | 10.7% | 12.8% | 9.0% |
| Middle | 9 | 60.0% | 908 | 41.5% | 71.0% | 65.9% | 66.1% |
| Upper | 4 | 26.7% | 1,115 | 51.0% | 18.3% | 21.3% | 24.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 15 | 100.0% | 2,188 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 25.0% | 59 | 11.6% | 10.7% | 8.5% | 5.8% |
| Middle | 6 | 75.0% | 450 | 88.4% | 71.0% | 68.5% | 68.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.3% | 23.1% | 25.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | 509 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 14.5% | 12.2% |
| Middle | 2 | 66.7% | 86 | 74.1% | 71.0% | 61.6% | 63.0% |
| Upper | 1 | 33.3% | 30 | 25.9% | 18.3% | 23.8% | 24.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 116 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 31.7% | 35.7% | 34.9% |
| Middle | 2 | 66.7% | 3,273 | 70.0% | 58.9% | 51.8% | 44.8% |
| Upper | 1 | 33.3% | 1,400 | 30.0% | 9.4% | 12.5% | 20.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 4,673 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 6.3% | 4.4% |
| Middle | 2 | 100.0% | 54 | 100.0% | 71.0% | 66.3% | 71.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.3% | 27.5% | 24.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 54 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|-----------|---------------|--------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 6.3% | 3.7% |
| Middle | 1 | 100.0% | 40 | 100.0% | 71.0% | 66.7% | 64.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.3% | 27.1% | 31.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 40 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 4 | 12.5% | 224 | 3.0% | 10.7% | 11.7% | 9.4% |
| Middle | 22 | 68.8% | 4,811 | 63.5% | 71.0% | 66.4% | 65.7% |
| Upper | 6 | 18.8% | 2,545 | 33.6% | 18.3% | 21.9% | 24.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 32 | 100.0% | 7,580 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 8 | 24.2% | 568 | 13.4% | 10.7% | 12.8% | 8.7% |
| Middle | 20 | 60.6% | 3,006 | 71.0% | 71.0% | 65.9% | 67.3% |
| Upper | 5 | 15.2% | 659 | 15.6% | 18.3% | 21.3% | 24.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 33 | 100.0% | 4,233 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 10.7% | 6.5% | 4.5% |
| Middle | 11 | 57.9% | 1,540 | 45.1% | 71.0% | 70.9% | 70.4% |
| Upper | 8 | 42.1% | 1,873 | 54.9% | 18.3% | 22.5% | 25.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 19 | 100.0% | 3,413 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 40.0% | 53 | 26.8% | 10.7% | 17.7% | 11.4% |
| Middle | 3 | 60.0% | 145 | 73.2% | 71.0% | 62.0% | 69.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.3% | 20.3% | 19.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 5 | 100.0% | 198 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|---------------------------|-----------|---------------|--------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 50.0% | 20 | 40.0% | 10.7% | 6.4% | 5.6% |
| Middle | 1 | 50.0% | 30 | 60.0% | 71.0% | 61.7% | 61.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 18.3% | 31.9% | 32.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 50 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 11 | 18.6% | 641 | 8.1% | 10.7% | 10.5% | 8.4% |
| Middle | 35 | 59.3% | 4,721 | 59.8% | 71.0% | 67.6% | 67.4% |
| Upper | 13 | 22.0% | 2,532 | 32.1% | 18.3% | 21.9% | 24.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 59 | 100.0% | 7,894 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|----------------|---------------|-----------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 5 | 22.7% | \$1,015 | 42.0% | 18.8% | 17.9% | 20.2% |
| Middle | 16 | 72.7% | \$1,392 | 57.7% | 67.7% | 65.9% | 62.4% |
| Upper | 1 | 4.5% | \$7 | 0.3% | 13.5% | 14.2% | 16.9% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 2.0% | 0.5% |
| TOTAL | 22 | 100.0% | \$2,414 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 11 | 15.9% | \$2,570 | 27.0% | 18.9% | 17.0% | 18.7% |
| Middle | 49 | 71.0% | \$6,526 | 68.5% | 67.8% | 69.7% | 67.3% |
| Upper | 9 | 13.0% | \$435 | 4.6% | 13.3% | 12.8% | 13.7% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.4% | 0.2% |
| TOTAL | 69 | 100.0% | \$9,531 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 20.0% | 468 | 21.4% | 19.9% | 7.4% | 4.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 22.5% | 18.0% |
| Middle | 4 | 26.7% | 362 | 16.5% | 21.2% | 21.4% | 20.9% |
| Upper | 5 | 33.3% | 1,123 | 51.3% | 40.6% | 30.5% | 39.9% |
| Unknown | 3 | 20.0% | 235 | 10.7% | 0.0% | 18.2% | 16.6% |
| TOTAL | 15 | 100.0% | 2,188 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 12.5% | 46 | 9.0% | 19.9% | 8.2% | 4.0% |
| Moderate | 2 | 25.0% | 66 | 13.0% | 18.3% | 13.3% | 9.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 17.5% | 16.1% |
| Upper | 4 | 50.0% | 309 | 60.7% | 40.6% | 41.4% | 49.7% |
| Unknown | 1 | 12.5% | 88 | 17.3% | 0.0% | 19.6% | 20.9% |
| TOTAL | 8 | 100.0% | 509 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 9.3% | 6.5% |
| Moderate | 2 | 66.7% | 86 | 74.1% | 18.3% | 17.4% | 13.5% |
| Middle | 1 | 33.3% | 30 | 25.9% | 21.2% | 15.1% | 13.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.6% | 49.4% | 59.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.7% | 6.9% |
| TOTAL | 3 | 100.0% | 116 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 1.8% | 0.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.6% | 23.2% | 7.4% |
| Unknown | 3 | 100.0% | 4,673 | 100.0% | 0.0% | 75.0% | 92.2% |
| TOTAL | 3 | 100.0% | 4,673 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 6.3% | 3.1% |
| Moderate | 1 | 50.0% | 30 | 55.6% | 18.3% | 10.0% | 6.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 23.8% | 21.7% |
| Upper | 1 | 50.0% | 24 | 44.4% | 40.6% | 53.8% | 66.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.3% | 2.6% |
| TOTAL | 2 | 100.0% | 54 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|------------------------------------|-----------|---------------|--------------|---------------|------------------------------------|---------------|---------------|
| Low | 1 | 100.0% | 40 | 100.0% | 19.9% | 18.8% | 15.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 17.7% | 13.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 20.8% | 24.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.6% | 36.5% | 38.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.3% | 7.5% |
| TOTAL | 1 | 100.0% | 40 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
| Low | 5 | 15.6% | 554 | 7.3% | 19.9% | 7.7% | 4.2% |
| Moderate | 5 | 15.6% | 182 | 2.4% | 18.3% | 19.1% | 14.5% |
| Middle | 5 | 15.6% | 392 | 5.2% | 21.2% | 19.7% | 18.4% |
| Upper | 10 | 31.3% | 1,456 | 19.2% | 40.6% | 33.9% | 41.0% |
| Unknown | 7 | 21.9% | 4,996 | 65.9% | 0.0% | 19.8% | 21.9% |
| TOTAL | 32 | 100.0% | 7,580 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 9.1% | 213 | 5.0% | 19.9% | 9.7% | 5.9% |
| Moderate | 12 | 36.4% | 1,377 | 32.5% | 18.3% | 24.5% | 19.5% |
| Middle | 5 | 15.2% | 690 | 16.3% | 21.2% | 21.3% | 21.0% |
| Upper | 9 | 27.3% | 1,586 | 37.5% | 40.6% | 28.0% | 38.2% |
| Unknown | 4 | 12.1% | 367 | 8.7% | 0.0% | 16.5% | 15.4% |
| TOTAL | 33 | 100.0% | 4,233 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 10.5% | 145 | 4.2% | 19.9% | 5.3% | 2.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 13.7% | 8.9% |
| Middle | 7 | 36.8% | 782 | 22.9% | 21.2% | 18.1% | 15.3% |
| Upper | 10 | 52.6% | 2,486 | 72.8% | 40.6% | 39.3% | 48.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 23.7% | 25.1% |
| TOTAL | 19 | 100.0% | 3,413 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 8.9% | 6.6% |
| Moderate | 1 | 20.0% | 40 | 20.2% | 18.3% | 15.2% | 9.9% |
| Middle | 1 | 20.0% | 37 | 18.7% | 21.2% | 18.4% | 19.3% |
| Upper | 1 | 20.0% | 75 | 37.9% | 40.6% | 45.6% | 56.0% |
| Unknown | 2 | 40.0% | 46 | 23.2% | 0.0% | 12.0% | 8.2% |
| TOTAL | 5 | 100.0% | 198 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.9% | 6.4% | 2.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.3% | 6.4% | 2.8% |
| Middle | 1 | 50.0% | 20 | 40.0% | 21.2% | 23.4% | 16.2% |
| Upper | 1 | 50.0% | 30 | 60.0% | 40.6% | 53.2% | 65.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.6% | 13.5% |
| TOTAL | 2 | 100.0% | 50 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families By Family Income % | | |
| Low | 5 | 8.5% | 358 | 4.5% | 19.9% | 7.5% | 4.1% |
| Moderate | 13 | 22.0% | 1,417 | 18.0% | 18.3% | 18.8% | 13.5% |
| Middle | 14 | 23.7% | 1,529 | 19.4% | 21.2% | 19.3% | 17.3% |
| Upper | 21 | 35.6% | 4,177 | 52.9% | 40.6% | 32.6% | 40.4% |
| Unknown | 6 | 10.2% | 413 | 5.2% | 0.0% | 21.8% | 24.8% |
| TOTAL | 59 | 100.0% | 7,894 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 14 | 63.6% | 40.1% | \$1,531 | 63.4% | 34.9% | 91.0% |
| | Over \$1 Million/ Unknown | 8 | 36.4% | 59.9% | \$883 | 36.6% | 65.1% | 9.0% |
| | TOTAL | 22 | 100.0% | 100.0% | \$2,414 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 16 | 72.7% | 92.1% | \$735 | 30.4% | 32.3% | |
| | \$100,001–\$250,000 | 4 | 18.2% | 4.3% | \$749 | 31.0% | 18.4% | |
| | \$250,001– \$1 Million | 2 | 9.1% | 3.7% | \$930 | 38.5% | 49.3% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 22 | 100.0% | 100.0% | \$2,414 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 10 | 71.4% | | \$303 | 19.8% | | |
| | \$100,001–\$250,000 | 3 | 21.4% | | \$648 | 42.3% | | |
| | \$250,001– \$1 Million | 1 | 7.1% | | \$580 | 37.9% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 14 | 100.0% | | \$1,531 | 100.0% | | |

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 29 | 42.0% | 34.2% | \$2,955 | 31.0% | 26.7% | 91.2% |
| | Over \$1 Million/ Unknown | 40 | 58.0% | 65.8% | \$6,576 | 69.0% | 73.3% | 8.8% |
| | TOTAL | 69 | 100.0% | 100.0% | \$9,531 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 50 | 72.5% | 86.4% | \$1,498 | 15.7% | 28.5% | |
| | \$100,001– \$250,000 | 6 | 8.7% | 7.9% | \$1,024 | 10.7% | 22.0% | |
| | \$250,001–\$1 Million | 13 | 18.8% | 5.8% | \$7,009 | 73.5% | 49.4% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 69 | 100.0% | 100.0% | \$9,531 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 23 | 79.3% | | \$544 | 18.4% | | |
| | \$100,001– \$250,000 | 3 | 10.3% | | \$501 | 17.0% | | |
| | \$250,001–\$1 Million | 3 | 10.3% | | \$1,910 | 64.6% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 29 | 100.0% | | \$2,955 | 100.0% | | |

Appendix C (continued)

Springfield

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 9 | 4.6% | 646 | 2.0% | 2.5% | 2.6% | 1.2% |
| Moderate | 30 | 15.5% | 3,036 | 9.4% | 13.2% | 12.1% | 7.1% |
| Middle | 113 | 58.2% | 19,579 | 60.9% | 61.0% | 64.6% | 64.8% |
| Upper | 42 | 21.6% | 8,883 | 27.6% | 23.3% | 20.7% | 27.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 194 | 100.0% | 32,144 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 1.0% | 92 | 0.6% | 2.5% | 1.5% | 0.8% |
| Moderate | 4 | 4.1% | 347 | 2.4% | 13.2% | 8.6% | 4.6% |
| Middle | 63 | 64.3% | 9,264 | 64.0% | 61.0% | 63.7% | 61.2% |
| Upper | 30 | 30.6% | 4,776 | 33.0% | 23.3% | 26.1% | 33.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 98 | 100.0% | 14,479 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 2.5% | 4.4% |
| Moderate | 2 | 14.3% | 180 | 18.3% | 13.2% | 13.4% | 8.2% |
| Middle | 8 | 57.1% | 555 | 56.5% | 61.0% | 61.3% | 57.2% |
| Upper | 4 | 28.6% | 248 | 25.2% | 23.3% | 22.8% | 30.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 14 | 100.0% | 983 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 8.4% | 14.0% | 8.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 41.0% | 27.9% | 38.3% |
| Middle | 1 | 50.0% | 50 | 4.0% | 40.8% | 47.1% | 39.3% |
| Upper | 1 | 50.0% | 1,200 | 96.0% | 7.4% | 8.8% | 10.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 2.3% | 2.2% | 4.1% |
| TOTAL | 2 | 100.0% | 1,250 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 13.2% | 5.8% | 3.1% |
| Middle | 11 | 73.3% | 651 | 80.1% | 61.0% | 58.5% | 53.5% |
| Upper | 4 | 26.7% | 162 | 19.9% | 23.3% | 35.7% | 43.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 15 | 100.0% | 813 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 1.9% | 2.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 13.2% | 11.3% | 7.8% |
| Middle | 2 | 50.0% | 219 | 46.2% | 61.0% | 61.5% | 58.7% |
| Upper | 2 | 50.0% | 255 | 53.8% | 23.3% | 25.4% | 31.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 474 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 10 | 3.1% | 738 | 1.5% | 2.5% | 2.3% | 1.5% |
| Moderate | 36 | 11.0% | 3,563 | 7.1% | 13.2% | 11.1% | 8.3% |
| Middle | 198 | 60.6% | 30,318 | 60.5% | 61.0% | 63.9% | 62.0% |
| Upper | 83 | 25.4% | 15,524 | 31.0% | 23.3% | 22.6% | 27.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.3% |
| TOTAL | 327 | 100.0% | 50,143 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 2.5% | 1.3% |
| Moderate | 9 | 23.1% | 788 | 10.7% | 13.2% | 11.4% | 6.9% |
| Middle | 21 | 53.8% | 4,617 | 62.5% | 61.0% | 64.9% | 64.5% |
| Upper | 9 | 23.1% | 1,987 | 26.9% | 23.3% | 21.2% | 27.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 39 | 100.0% | 7,392 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.9% | 0.4% |
| Moderate | 6 | 11.1% | 378 | 4.6% | 13.2% | 6.5% | 3.7% |
| Middle | 34 | 63.0% | 4,890 | 59.6% | 61.0% | 63.3% | 60.0% |
| Upper | 14 | 25.9% | 2,941 | 35.8% | 23.3% | 29.3% | 35.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 54 | 100.0% | 8,209 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 3.7% | 2.0% |
| Moderate | 1 | 16.7% | 66 | 21.0% | 13.2% | 12.7% | 11.5% |
| Middle | 4 | 66.7% | 148 | 47.1% | 61.0% | 54.9% | 50.6% |
| Upper | 1 | 16.7% | 100 | 31.8% | 23.3% | 28.7% | 35.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 6 | 100.0% | 314 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.8% | 0.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 13.2% | 4.5% | 2.5% |
| Middle | 4 | 80.0% | 319 | 56.1% | 61.0% | 65.7% | 58.3% |
| Upper | 1 | 20.0% | 250 | 43.9% | 23.3% | 28.9% | 38.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 5 | 100.0% | 569 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.7% | 0.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 13.2% | 7.0% | 4.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 61.0% | 60.7% | 55.1% |
| Upper | 1 | 100.0% | 92 | 100.0% | 23.3% | 31.6% | 40.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 92 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 1.8% | 2.2% |
| Moderate | 16 | 15.2% | 1,232 | 7.4% | 13.2% | 9.1% | 6.8% |
| Middle | 63 | 60.0% | 9,974 | 60.2% | 61.0% | 63.8% | 61.3% |
| Upper | 26 | 24.8% | 5,370 | 32.4% | 23.3% | 25.2% | 29.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.1% |
| TOTAL | 105 | 100.0% | 16,576 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 1 | 0.6% | \$25 | 0.1% | 2.5% | 1.7% | 2.1% |
| Moderate | 30 | 17.5% | \$4,724 | 16.4% | 25.0% | 23.4% | 32.4% |
| Middle | 100 | 58.5% | \$17,025 | 59.1% | 54.4% | 54.0% | 47.0% |
| Upper | 40 | 23.4% | \$7,049 | 24.5% | 17.9% | 19.6% | 18.2% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.3% | 1.3% | 0.3% |
| TOTAL | 171 | 100.0% | \$28,823 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 8 | 1.8% | \$1,677 | 4.1% | 2.5% | 1.9% | 2.0% |
| Moderate | 76 | 16.8% | \$7,088 | 17.1% | 25.1% | 23.4% | 32.5% |
| Middle | 249 | 55.1% | \$22,832 | 55.2% | 54.1% | 56.2% | 48.6% |
| Upper | 119 | 26.3% | \$9,781 | 23.6% | 18.0% | 18.1% | 16.5% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.3% | 0.4% | 0.3% |
| TOTAL | 452 | 100.0% | \$41,378 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 14 | 7.2% | 1,448 | 4.5% | 19.7% | 6.3% | 3.5% |
| Moderate | 36 | 18.6% | 4,754 | 14.8% | 18.4% | 19.2% | 14.2% |
| Middle | 52 | 26.8% | 8,111 | 25.2% | 21.2% | 21.7% | 20.2% |
| Upper | 76 | 39.2% | 15,495 | 48.2% | 40.7% | 33.2% | 43.7% |
| Unknown | 16 | 8.2% | 2,336 | 7.3% | 0.0% | 19.6% | 18.4% |
| TOTAL | 194 | 100.0% | 32,144 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 9 | 9.2% | 750 | 5.2% | 19.7% | 6.2% | 3.1% |
| Moderate | 16 | 16.3% | 1,794 | 12.4% | 18.4% | 13.9% | 8.7% |
| Middle | 20 | 20.4% | 2,649 | 18.3% | 21.2% | 17.6% | 13.8% |
| Upper | 47 | 48.0% | 8,581 | 59.3% | 40.7% | 39.2% | 49.6% |
| Unknown | 6 | 6.1% | 705 | 4.9% | 0.0% | 23.1% | 24.8% |
| TOTAL | 98 | 100.0% | 14,479 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 14.3% | 35 | 3.6% | 19.7% | 6.0% | 3.2% |
| Moderate | 1 | 7.1% | 25 | 2.5% | 18.4% | 14.3% | 10.4% |
| Middle | 4 | 28.6% | 140 | 14.2% | 21.2% | 23.0% | 19.3% |
| Upper | 7 | 50.0% | 783 | 79.7% | 40.7% | 48.6% | 61.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.1% | 5.4% |
| TOTAL | 14 | 100.0% | 983 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Multifamily Loans | | | | | | | |
|-----------------------------|------------|---------------|---------------|-----------------------------|---------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 0.7% | 0.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 0.7% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 7.4% | 1.8% |
| Unknown | 2 | 100.0% | 1,250 | 100.0% | 0.0% | 91.2% | 98.0% |
| TOTAL | 2 | 100.0% | 1,250 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 5.0% | 2.2% |
| Moderate | 2 | 13.3% | 40 | 4.9% | 18.4% | 12.3% | 8.1% |
| Middle | 6 | 40.0% | 315 | 38.7% | 21.2% | 21.2% | 19.6% |
| Upper | 7 | 46.7% | 458 | 56.3% | 40.7% | 55.4% | 65.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.1% | 4.6% |
| TOTAL | 15 | 100.0% | 813 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 25.0% | 85 | 17.9% | 19.7% | 4.7% | 3.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 15.5% | 13.4% |
| Middle | 2 | 50.0% | 320 | 67.5% | 21.2% | 26.8% | 19.5% |
| Upper | 1 | 25.0% | 69 | 14.6% | 40.7% | 41.8% | 50.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 11.3% | 13.7% |
| TOTAL | 4 | 100.0% | 474 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | Families by Family Income % | | | |
| Low | 26 | 8.0% | 2,318 | 4.6% | 19.7% | 6.1% | 3.1% |
| Moderate | 55 | 16.8% | 6,613 | 13.2% | 18.4% | 16.9% | 11.5% |
| Middle | 84 | 25.7% | 11,535 | 23.0% | 21.2% | 20.2% | 16.9% |
| Upper | 138 | 42.2% | 25,386 | 50.6% | 40.7% | 35.4% | 43.0% |
| Unknown | 24 | 7.3% | 4,291 | 8.6% | 0.0% | 21.5% | 25.5% |
| TOTAL | 327 | 100.0% | 50,143 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 4 | 10.3% | 318 | 4.3% | 19.7% | 7.5% | 4.2% |
| Moderate | 6 | 15.4% | 752 | 10.2% | 18.4% | 21.2% | 16.4% |
| Middle | 11 | 28.2% | 1,918 | 25.9% | 21.2% | 21.6% | 20.8% |
| Upper | 12 | 30.8% | 3,542 | 47.9% | 40.7% | 30.3% | 40.1% |
| Unknown | 6 | 15.4% | 862 | 11.7% | 0.0% | 19.4% | 18.5% |
| TOTAL | 39 | 100.0% | 7,392 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 7 | 13.0% | 645 | 7.9% | 19.7% | 4.7% | 2.3% |
| Moderate | 9 | 16.7% | 917 | 11.2% | 18.4% | 12.7% | 8.4% |
| Middle | 10 | 18.5% | 1,248 | 15.2% | 21.2% | 17.7% | 14.6% |
| Upper | 22 | 40.7% | 4,573 | 55.7% | 40.7% | 39.1% | 48.5% |
| Unknown | 6 | 11.1% | 826 | 10.1% | 0.0% | 25.8% | 26.1% |
| TOTAL | 54 | 100.0% | 8,209 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 7.2% | 4.7% |
| Moderate | 1 | 16.7% | 50 | 15.9% | 18.4% | 14.6% | 10.0% |
| Middle | 3 | 50.0% | 98 | 31.2% | 21.2% | 21.5% | 22.5% |
| Upper | 2 | 33.3% | 166 | 52.9% | 40.7% | 50.1% | 58.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.5% | 4.7% |
| TOTAL | 6 | 100.0% | 314 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.7% | 5.0% | 1.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 14.5% | 8.6% |
| Middle | 1 | 20.0% | 15 | 2.6% | 21.2% | 17.8% | 11.7% |
| Upper | 4 | 80.0% | 554 | 97.4% | 40.7% | 49.6% | 62.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 13.2% | 15.8% |
| TOTAL | 5 | 100.0% | 569 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 100.0% | 92 | 100.0% | 19.7% | 5.8% | 3.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 18.7% | 13.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 21.2% | 23.1% | 19.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 40.7% | 48.1% | 60.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 4.4% | 4.0% |
| TOTAL | 1 | 100.0% | 92 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | Families By Family Income % | | | |
|---------------------------|------------|---------------|---------------|---------------|-----------------------------|---------------|---------------|--|
| Low | 12 | 11.4% | 1,055 | 6.4% | 19.7% | 5.9% | 2.8% | |
| Moderate | 16 | 15.2% | 1,719 | 10.4% | 18.4% | 16.3% | 10.7% | |
| Middle | 25 | 23.8% | 3,279 | 19.8% | 21.2% | 19.2% | 15.4% | |
| Upper | 40 | 38.1% | 8,835 | 53.3% | 40.7% | 34.6% | 39.5% | |
| Unknown | 12 | 11.4% | 1,688 | 10.2% | 0.0% | 24.0% | 31.5% | |
| TOTAL | 105 | 100.0% | 16,576 | 100.0% | 100.0% | 100.0% | 100.0% | |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------|-----------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | | Total Businesses % |
| | | Count | | | Dollars | | | | |
| | | Bank | | Aggregate | Bank | | Aggregate | | |
| | | # | % | % | \$(000s) | \$ % | \$ % | | |
| Business Revenue | \$1 Million or Less | 91 | 53.2% | 46.8% | \$11,771 | 40.8% | 38.7% | 90.7% | |
| | Over \$1 Million/ Unknown | 80 | 46.8% | 53.2% | \$17,052 | 59.2% | 61.3% | 9.3% | |
| | TOTAL | 171 | 100.0% | 100.0% | \$28,823 | 100.0% | 100.0% | 100.0% | |
| Loan Size | \$100,000 or Less | 96 | 56.1% | 87.9% | \$3,065 | 10.6% | 26.2% | | |
| | \$100,001– \$250,000 | 34 | 19.9% | 6.5% | \$5,719 | 19.8% | 20.0% | | |
| | \$250,001–\$1 Million | 41 | 24.0% | 5.6% | \$20,039 | 69.5% | 53.8% | | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | | |
| | TOTAL | 171 | 100.0% | 100.0% | \$28,823 | 100.0% | 100.0% | | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 61 | 67.0% | | \$1,675 | 14.2% | | | |
| | \$100,001– \$250,000 | 14 | 15.4% | | \$2,637 | 22.4% | | | |
| | \$250,001–\$1 Million | 16 | 17.6% | | \$7,459 | 63.4% | | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | | |
| | TOTAL | 91 | 100.0% | | \$11,771 | 100.0% | | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 185 | 40.9% | 35.6% | \$15,086 | 36.5% | 28.4% | 91.1% |
| | Over \$1 Million/ Unknown | 267 | 59.1% | 64.4% | \$26,292 | 63.5% | 71.6% | 8.9% |
| | TOTAL | 452 | 100.0% | 100.0% | \$41,378 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 349 | 77.2% | 85.2% | \$10,840 | 26.2% | 27.5% | |
| | \$100,001– \$250,000 | 58 | 12.8% | 8.3% | \$9,139 | 22.1% | 21.2% | |
| | \$250,001–\$1 Million | 45 | 10.0% | 6.5% | \$21,399 | 51.7% | 51.3% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 452 | 100.0% | 100.0% | \$41,378 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 150 | 81.1% | | \$4,005 | 26.5% | | |
| | \$100,001– \$250,000 | 14 | 7.6% | | \$2,251 | 14.9% | | |
| | \$250,001–\$1 Million | 21 | 11.4% | | \$8,830 | 58.5% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 185 | 100.0% | | \$15,086 | 100.0% | | |

Appendix C (continued)

OKLAHOMA

Tulsa

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 1.1% | 0.5% |
| Moderate | 2 | 22.2% | 624 | 27.4% | 20.5% | 14.9% | 9.0% |
| Middle | 3 | 33.3% | 517 | 22.7% | 32.9% | 35.6% | 32.9% |
| Upper | 4 | 44.4% | 1,134 | 49.8% | 42.1% | 48.5% | 57.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 9 | 100.0% | 2,275 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 1.0% | 0.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 20.5% | 12.0% | 6.7% |
| Middle | 2 | 50.0% | 372 | 51.8% | 32.9% | 30.5% | 24.1% |
| Upper | 2 | 50.0% | 346 | 48.2% | 42.1% | 56.6% | 68.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 718 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 2.2% | 1.2% |
| Moderate | 1 | 33.3% | 20 | 19.0% | 20.5% | 13.0% | 9.8% |
| Middle | 1 | 33.3% | 10 | 9.5% | 32.9% | 31.0% | 25.9% |
| Upper | 1 | 33.3% | 75 | 71.4% | 42.1% | 53.7% | 63.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 105 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 0.9% | 0.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 20.5% | 10.8% | 5.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 32.9% | 26.5% | 19.6% |
| Upper | 1 | 100.0% | 100 | 100.0% | 42.1% | 61.8% | 74.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 100 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|------------------------------------|-----------|---------------|--------------|---------------|----------------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 1.8% | 1.3% |
| Moderate | 1 | 50.0% | 110 | 54.5% | 20.5% | 12.9% | 8.4% |
| Middle | 1 | 50.0% | 92 | 45.5% | 32.9% | 35.4% | 30.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.1% | 49.8% | 60.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 202 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 1.2% | 0.9% |
| Moderate | 4 | 21.1% | 754 | 22.2% | 20.5% | 14.4% | 9.5% |
| Middle | 7 | 36.8% | 991 | 29.1% | 32.9% | 34.0% | 34.1% |
| Upper | 8 | 42.1% | 1,655 | 48.7% | 42.1% | 50.4% | 55.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 19 | 100.0% | 3,400 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------------------|------------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 1.4% | 0.5% |
| Moderate | 1 | 12.5% | 78 | 3.5% | 20.5% | 13.1% | 8.0% |
| Middle | 3 | 37.5% | 952 | 42.3% | 32.9% | 33.9% | 29.3% |
| Upper | 4 | 50.0% | 1,221 | 54.2% | 42.1% | 51.6% | 62.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 8 | 100.0% | 2,251 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 0.5% | 0.3% |
| Moderate | 3 | 20.0% | 370 | 12.8% | 20.5% | 8.0% | 4.7% |
| Middle | 3 | 20.0% | 331 | 11.4% | 32.9% | 29.2% | 24.2% |
| Upper | 9 | 60.0% | 2,190 | 75.8% | 42.1% | 62.3% | 70.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 15 | 100.0% | 2,891 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 1.5% | 0.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 20.5% | 14.2% | 7.6% |
| Middle | 1 | 100.0% | 66 | 100.0% | 32.9% | 33.8% | 23.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.1% | 50.5% | 68.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 66 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner- Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 4.5% | 1.1% | 0.6% |
| Moderate | 4 | 16.7% | 448 | 8.6% | 20.5% | 11.4% | 8.4% |
| Middle | 7 | 29.2% | 1,349 | 25.9% | 32.9% | 31.9% | 27.3% |
| Upper | 13 | 54.2% | 3,411 | 65.5% | 42.1% | 55.7% | 63.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 24 | 100.0% | 5,208 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 1 | 2.7% | \$150 | 1.4% | 4.0% | 3.3% | 4.5% |
| Moderate | 8 | 21.6% | \$1,788 | 17.2% | 22.0% | 20.3% | 24.0% |
| Middle | 14 | 37.8% | \$5,070 | 48.9% | 34.7% | 34.1% | 36.1% |
| Upper | 14 | 37.8% | \$3,362 | 32.4% | 39.3% | 40.0% | 34.7% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 2.4% | 0.6% |
| TOTAL | 37 | 100.0% | \$10,370 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 3 | 2.3% | \$505 | 2.1% | 4.0% | 3.2% | 4.0% |
| Moderate | 30 | 22.7% | \$5,342 | 22.0% | 22.0% | 20.8% | 23.8% |
| Middle | 54 | 40.9% | \$11,623 | 47.9% | 34.8% | 35.3% | 37.8% |
| Upper | 45 | 34.1% | \$6,786 | 28.0% | 39.3% | 40.3% | 34.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.4% | 0.1% |
| TOTAL | 132 | 100.0% | \$24,256 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 7.0% | 3.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 19.8% | 14.1% |
| Middle | 1 | 11.1% | 15 | 0.7% | 19.6% | 20.6% | 18.6% |
| Upper | 8 | 88.9% | 2,260 | 99.3% | 41.4% | 35.4% | 48.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 17.2% | 14.8% |
| TOTAL | 9 | 100.0% | 2,275 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 25.0% | 92 | 12.8% | 22.0% | 6.5% | 3.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 12.5% | 7.3% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 18.2% | 13.2% |
| Upper | 2 | 50.0% | 346 | 48.2% | 41.4% | 44.6% | 56.0% |
| Unknown | 1 | 25.0% | 280 | 39.0% | 0.0% | 18.2% | 20.5% |
| TOTAL | 4 | 100.0% | 718 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|-----------|---------------|--------------|---------------|-----------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 5.6% | 3.9% |
| Moderate | 1 | 33.3% | 20 | 19.0% | 16.9% | 13.0% | 8.8% |
| Middle | 1 | 33.3% | 10 | 9.5% | 19.6% | 17.8% | 13.4% |
| Upper | 1 | 33.3% | 75 | 71.4% | 41.4% | 51.9% | 58.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 11.7% | 15.9% |
| TOTAL | 3 | 100.0% | 105 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 5.5% | 3.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 13.5% | 9.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 17.8% | 13.7% |
| Upper | 1 | 100.0% | 100 | 100.0% | 41.4% | 56.6% | 68.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.5% | 5.7% |
| TOTAL | 1 | 100.0% | 100 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 8.5% | 6.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 17.7% | 13.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 15.1% | 8.0% |
| Upper | 2 | 100.0% | 202 | 100.0% | 41.4% | 51.3% | 63.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.4% | 9.6% |
| TOTAL | 2 | 100.0% | 202 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
| Low | 1 | 5.3% | 92 | 2.7% | 22.0% | 6.6% | 3.1% |
| Moderate | 1 | 5.3% | 20 | 0.6% | 16.9% | 17.0% | 10.5% |
| Middle | 2 | 10.5% | 25 | 0.7% | 19.6% | 19.2% | 14.7% |
| Upper | 14 | 73.7% | 2,983 | 87.7% | 41.4% | 37.7% | 44.0% |
| Unknown | 1 | 5.3% | 280 | 8.2% | 0.0% | 19.5% | 27.6% |
| TOTAL | 19 | 100.0% | 3,400 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 5.3% | 2.9% |
| Moderate | 1 | 12.5% | 78 | 3.5% | 16.9% | 19.4% | 14.0% |
| Middle | 2 | 25.0% | 452 | 20.1% | 19.6% | 20.3% | 18.4% |
| Upper | 5 | 62.5% | 1,721 | 76.5% | 41.4% | 38.6% | 50.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 16.4% | 14.6% |
| TOTAL | 8 | 100.0% | 2,251 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 22.0% | 3.0% | 1.4% |
| Moderate | 2 | 13.3% | 161 | 5.6% | 16.9% | 10.7% | 6.4% |
| Middle | 3 | 20.0% | 234 | 8.1% | 19.6% | 16.1% | 11.8% |
| Upper | 10 | 66.7% | 2,496 | 86.3% | 41.4% | 49.6% | 59.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 20.7% | 20.7% |
| TOTAL | 15 | 100.0% | 2,891 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 100.0% | 66 | 100.0% | 22.0% | 6.9% | 2.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.9% | 18.6% | 14.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 12.7% | 6.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.4% | 48.5% | 63.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 13.2% | 13.5% |
| TOTAL | 1 | 100.0% | 66 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families By Family Income % | | |
| Low | 1 | 4.2% | 66 | 1.3% | 22.0% | 4.1% | 2.1% |
| Moderate | 3 | 12.5% | 239 | 4.6% | 16.9% | 14.7% | 9.8% |
| Middle | 5 | 20.8% | 686 | 13.2% | 19.6% | 17.7% | 14.3% |
| Upper | 15 | 62.5% | 4,217 | 81.0% | 41.4% | 42.6% | 51.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 21.0% | 22.3% |
| TOTAL | 24 | 100.0% | 5,208 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | Total Businesses |
| | | Count | | | Dollars | | | |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | |
| Business Revenue | \$1 Million or Less | 19 | 51.4% | 44.5% | \$3,999 | 38.6% | 32.5% | 90.6% |
| | Over \$1 Million/ Unknown | 18 | 48.6% | 55.5% | \$6,371 | 61.4% | 67.5% | 9.4% |
| | TOTAL | 37 | 100.0% | 100.0% | \$10,370 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 13 | 35.1% | 92.3% | \$429 | 4.1% | 31.9% | |
| | \$100,001–\$250,000 | 10 | 27.0% | 3.7% | \$1,732 | 16.7% | 15.1% | |
| | \$250,001–\$1 Million | 14 | 37.8% | 4.1% | \$8,209 | 79.2% | 53.0% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 37 | 100.0% | 100.0% | \$10,370 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 8 | 42.1% | | \$178 | 4.5% | | |
| | \$100,001–\$250,000 | 6 | 31.6% | | \$986 | 24.7% | | |
| | \$250,001–\$1 Million | 5 | 26.3% | | \$2,835 | 70.9% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 19 | 100.0% | | \$3,999 | 100.0% | | |

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | Total Businesses |
| | | Count | | | Dollars | | | |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | |
| Business Revenue | \$1 Million or Less | 40 | 30.3% | 31.8% | \$7,374 | 30.4% | 22.1% | 90.9% |
| | Over \$1 Million/ Unknown | 92 | 69.7% | 68.2% | \$16,882 | 69.6% | 77.9% | 9.1% |
| | TOTAL | 132 | 100.0% | 100.0% | \$24,256 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 78 | 59.1% | 87.0% | \$3,009 | 12.4% | 27.8% | |
| | \$100,001–\$250,000 | 20 | 15.2% | 6.6% | \$3,467 | 14.3% | 17.3% | |
| | \$250,001–\$1 Million | 34 | 25.8% | 6.4% | \$17,780 | 73.3% | 54.9% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 132 | 100.0% | 100.0% | \$24,256 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 22 | 55.0% | | \$719 | 9.8% | | |
| | \$100,001–\$250,000 | 7 | 17.5% | | \$1,192 | 16.2% | | |
| | \$250,001– \$1 Million | 11 | 27.5% | | \$5,463 | 74.1% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 40 | 100.0% | | \$7,374 | 100.0% | | |

Appendix C (continued)

Payne County

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | #% | \$ | \$% | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 3.1% | 931 | 4.8% | 0.6% | 1.1% | 0.9% |
| Moderate | 22 | 22.7% | 2,892 | 15.0% | 22.0% | 26.1% | 17.8% |
| Middle | 25 | 25.8% | 4,639 | 24.1% | 43.1% | 31.8% | 29.8% |
| Upper | 47 | 48.5% | 10,809 | 56.1% | 34.3% | 41.0% | 51.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 97 | 100.0% | 19,271 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 3.7% | 175 | 3.0% | 0.6% | 1.7% | 1.2% |
| Moderate | 2 | 7.4% | 218 | 3.7% | 22.0% | 19.1% | 11.9% |
| Middle | 4 | 14.8% | 304 | 5.2% | 43.1% | 31.6% | 27.1% |
| Upper | 20 | 74.1% | 5,204 | 88.2% | 34.3% | 47.6% | 59.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 27 | 100.0% | 5,901 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 2 | 16.7% | 169 | 21.4% | 22.0% | 18.0% | 13.1% |
| Middle | 1 | 8.3% | 20 | 2.5% | 43.1% | 24.0% | 12.4% |
| Upper | 9 | 75.0% | 601 | 76.1% | 34.3% | 58.0% | 74.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 12 | 100.0% | 790 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 1 | 20.0% | 13 | 3.8% | 22.0% | 25.0% | 12.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 43.1% | 14.3% | 10.9% |
| Upper | 4 | 80.0% | 331 | 96.2% | 34.3% | 60.7% | 76.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 5 | 100.0% | 344 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.0% | 22.9% | 14.8% |
| Middle | 1 | 50.0% | 120 | 54.5% | 43.1% | 17.1% | 15.3% |
| Upper | 1 | 50.0% | 100 | 45.5% | 34.3% | 60.0% | 69.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 220 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
|---------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 4 | 2.8% | 1,106 | 4.2% | 0.6% | 1.5% | 14.8% |
| Moderate | 27 | 18.9% | 3,292 | 12.4% | 22.0% | 24.2% | 17.4% |
| Middle | 31 | 21.7% | 5,083 | 19.2% | 43.1% | 30.6% | 20.8% |
| Upper | 81 | 56.6% | 17,045 | 64.3% | 34.3% | 43.7% | 47.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 143 | 100.0% | 26,526 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | ##% | \$ | ##% | | ##% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 2.4% | 295 | 1.1% | 0.6% | 0.9% | 0.6% |
| Moderate | 34 | 27.6% | 4,937 | 18.5% | 22.0% | 28.2% | 20.2% |
| Middle | 15 | 12.2% | 2,661 | 10.0% | 43.1% | 28.2% | 24.0% |
| Upper | 71 | 57.7% | 18,746 | 70.4% | 34.3% | 42.7% | 55.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 123 | 100.0% | 26,639 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 1.0% | 261 | 1.2% | 0.6% | 0.8% | 0.7% |
| Moderate | 7 | 6.9% | 1,031 | 4.6% | 22.0% | 12.9% | 8.8% |
| Middle | 19 | 18.6% | 3,388 | 15.0% | 43.1% | 28.5% | 25.4% |
| Upper | 75 | 73.5% | 17,911 | 79.3% | 34.3% | 57.8% | 65.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 102 | 100.0% | 22,591 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 16.7% | 316 | 46.3% | 0.6% | 5.4% | 13.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.0% | 13.5% | 14.1% |
| Middle | 2 | 33.3% | 196 | 28.7% | 43.1% | 40.5% | 32.9% |
| Upper | 3 | 50.0% | 170 | 24.9% | 34.3% | 40.5% | 39.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 6 | 100.0% | 682 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.0% | 14.3% | 6.5% |
| Middle | 1 | 50.0% | 125 | 91.2% | 43.1% | 17.9% | 21.6% |
| Upper | 1 | 50.0% | 12 | 8.8% | 34.3% | 67.9% | 71.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 137 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 22.0% | 6.5% | 4.5% |
| Middle | 1 | 50.0% | 158 | 66.9% | 43.1% | 16.1% | 10.7% |
| Upper | 1 | 50.0% | 78 | 33.1% | 34.3% | 77.4% | 84.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 236 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 5 | 2.1% | 872 | 1.7% | 0.6% | 1.0% | 1.2% |
| Moderate | 41 | 17.4% | 5,968 | 11.9% | 22.0% | 21.2% | 14.0% |
| Middle | 38 | 16.2% | 6,528 | 13.0% | 43.1% | 28.4% | 25.6% |
| Upper | 151 | 64.3% | 36,917 | 73.4% | 34.3% | 49.4% | 59.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 235 | 100.0% | 50,285 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | #% | \$ 000s | \$ % | | % | \$ % |
| Low | 4 | 5.1% | \$281 | 1.4% | 10.3% | 8.0% | 7.8% |
| Moderate | 28 | 35.9% | \$6,545 | 32.8% | 29.2% | 23.7% | 25.4% |
| Middle | 6 | 7.7% | \$2,426 | 12.2% | 33.3% | 30.2% | 28.8% |
| Upper | 40 | 51.3% | \$10,680 | 53.6% | 27.2% | 35.4% | 37.5% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 2.6% | 0.4% |
| TOTAL | 78 | 100.0% | \$19,932 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | #% | \$ 000s | \$ % | | % | \$ % |
| Low | 31 | 13.1% | \$5,185 | 17.3% | 10.4% | 8.9% | 13.5% |
| Moderate | 85 | 36.0% | \$10,490 | 34.9% | 29.1% | 30.5% | 29.6% |
| Middle | 33 | 14.0% | \$4,645 | 15.5% | 33.2% | 28.5% | 23.6% |
| Upper | 87 | 36.9% | \$9,731 | 32.4% | 27.3% | 32.0% | 33.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.1% | 0.0% |
| TOTAL | 236 | 100.0% | \$30,051 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | #% | \$ | \$% | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 2 | 2.1% | 130 | 0.7% | 19.8% | 3.1% | 1.3% |
| Moderate | 3 | 3.1% | 367 | 1.9% | 17.5% | 10.4% | 6.2% |
| Middle | 15 | 15.5% | 2,399 | 12.4% | 18.7% | 14.4% | 12.1% |
| Upper | 74 | 76.3% | 15,881 | 82.4% | 44.0% | 53.1% | 61.0% |
| Unknown | 3 | 3.1% | 494 | 2.6% | 0.0% | 19.1% | 19.4% |
| TOTAL | 97 | 100.0% | 19,271 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.8% | 2.8% | 1.4% |
| Moderate | 2 | 7.4% | 244 | 4.1% | 17.5% | 8.0% | 4.3% |
| Middle | 4 | 14.8% | 388 | 6.6% | 18.7% | 12.5% | 9.1% |
| Upper | 21 | 77.8% | 5,269 | 89.3% | 44.0% | 54.6% | 60.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 22.2% | 24.5% |
| TOTAL | 27 | 100.0% | 5,901 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.8% | 6.0% | 3.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 2.0% | 1.0% |
| Middle | 2 | 16.7% | 80 | 10.1% | 18.7% | 10.0% | 7.2% |
| Upper | 10 | 83.3% | 710 | 89.9% | 44.0% | 80.0% | 86.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 2.0% | 1.5% |
| TOTAL | 12 | 100.0% | 790 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.8% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 10.7% | 7.5% |
| Middle | 3 | 60.0% | 174 | 50.6% | 18.7% | 17.9% | 13.9% |
| Upper | 2 | 40.0% | 170 | 49.4% | 44.0% | 57.1% | 54.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 14.3% | 24.1% |
| TOTAL | 5 | 100.0% | 344 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.8% | 5.7% | 1.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 8.6% | 7.6% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 11.4% | 7.9% |
| Upper | 2 | 100.0% | 220 | 100.0% | 44.0% | 65.7% | 66.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.6% | 16.6% |
| TOTAL | 2 | 100.0% | 220 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
|---------------------------|------------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 2 | 1.4% | 130 | 0.5% | 19.8% | 2.9% | 0.9% |
| Moderate | 5 | 3.5% | 611 | 2.3% | 17.5% | 9.0% | 3.9% |
| Middle | 24 | 16.8% | 3,041 | 11.5% | 18.7% | 13.1% | 7.6% |
| Upper | 109 | 76.2% | 22,250 | 83.9% | 44.0% | 51.6% | 41.3% |
| Unknown | 3 | 2.1% | 494 | 1.9% | 0.0% | 23.4% | 46.2% |
| TOTAL | 143 | 100.0% | 26,526 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|---|------------|---------------|---------------|---------------|-----------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | #% | \$ | \$% | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.8% | 43 | 0.2% | 19.8% | 2.1% | 0.9% |
| Moderate | 12 | 9.8% | 1,632 | 6.1% | 17.5% | 11.2% | 7.5% |
| Middle | 13 | 10.6% | 2,512 | 9.4% | 18.7% | 15.0% | 12.5% |
| Upper | 95 | 77.2% | 22,093 | 82.9% | 44.0% | 52.2% | 60.7% |
| Unknown | 2 | 1.6% | 359 | 1.3% | 0.0% | 19.6% | 18.4% |
| TOTAL | 123 | 100.0% | 26,639 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 5 | 4.9% | 445 | 2.0% | 19.8% | 2.3% | 1.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 4.4% | 2.4% |
| Middle | 14 | 13.7% | 2,067 | 9.1% | 18.7% | 14.7% | 11.1% |
| Upper | 77 | 75.5% | 18,872 | 83.5% | 44.0% | 57.6% | 64.1% |
| Unknown | 6 | 5.9% | 1,207 | 5.3% | 0.0% | 21.1% | 21.4% |
| TOTAL | 102 | 100.0% | 22,591 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.8% | 2.7% | 1.8% |
| Moderate | 2 | 33.3% | 80 | 11.7% | 17.5% | 16.2% | 10.9% |
| Middle | 1 | 16.7% | 60 | 8.8% | 18.7% | 8.1% | 4.4% |
| Upper | 2 | 33.3% | 226 | 33.1% | 44.0% | 64.9% | 63.9% |
| Unknown | 1 | 16.7% | 316 | 46.3% | 0.0% | 8.1% | 18.9% |
| TOTAL | 6 | 100.0% | 682 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 1 | 50.0% | 12 | 8.8% | 19.8% | 7.1% | 2.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 3.6% | 3.2% |
| Upper | 1 | 50.0% | 125 | 91.2% | 44.0% | 78.6% | 72.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.7% | 21.4% |
| TOTAL | 2 | 100.0% | 137 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 19.8% | 3.2% | 1.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.5% | 3.2% | 3.2% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 16.1% | 18.5% |
| Upper | 2 | 100.0% | 236 | 100.0% | 44.0% | 61.3% | 63.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 16.1% | 13.5% |
| TOTAL | 2 | 100.0% | 236 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families By Family Income % | | |
| Low | 7 | 3.0% | 500 | 1.0% | 19.8% | 2.2% | 0.9% |
| Moderate | 14 | 6.0% | 1,712 | 3.4% | 17.5% | 8.0% | 4.7% |
| Middle | 28 | 11.9% | 4,639 | 9.2% | 18.7% | 14.3% | 10.6% |
| Upper | 177 | 75.3% | 41,552 | 82.6% | 44.0% | 54.0% | 57.1% |
| Unknown | 9 | 3.8% | 1,882 | 3.7% | 0.0% | 21.6% | 26.8% |
| TOTAL | 235 | 100.0% | 50,285 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|-----------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 48 | 61.5% | 48.6% | \$13,552 | 68.0% | 52.9% | 91.5% |
| | Over \$1 Million/ Unknown | 30 | 38.5% | 51.4% | \$6,380 | 32.0% | 47.1% | 8.5% |
| | TOTAL | 78 | 100.0% | 100.0% | \$19,932 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 31 | 39.7% | 88.9% | \$1,563 | 7.8% | 28.7% | |
| | \$100,001– \$250,000 | 21 | 26.9% | 6.0% | \$4,179 | 21.0% | 21.4% | |
| | \$250,001–\$1 Million | 26 | 33.3% | 5.1% | \$14,190 | 71.2% | 49.9% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 78 | 100.0% | 100.0% | \$19,932 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 16 | 33.3% | | \$738 | 5.4% | | |
| | \$100,001– \$250,000 | 13 | 27.1% | | \$2,629 | 19.4% | | |
| | \$250,001–\$1 Million | 19 | 39.6% | | \$10,185 | 75.2% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 48 | 100.0% | | \$13,552 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|---------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 114 | 48.3% | 35.0% | \$14,747 | 49.1% | 40.6% | 91.9% |
| | Over \$1 Million/ Unknown | 122 | 51.7% | 65.0% | \$15,304 | 50.9% | 59.4% | 8.1% |
| | TOTAL | 236 | 100.0% | 100.0% | \$30,051 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 164 | 69.5% | 85.5% | \$5,337 | 17.8% | 30.4% | |
| | \$100,001– \$250,000 | 36 | 15.3% | 9.1% | \$6,627 | 22.1% | 25.9% | |
| | \$250,001–\$1 Million | 36 | 15.3% | 5.4% | \$18,087 | 60.2% | 43.7% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 236 | 100.0% | 100.0% | \$30,051 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 84 | 73.7% | | \$2,630 | 17.8% | | |
| | \$100,001– \$250,000 | 11 | 9.6% | | \$2,237 | 15.2% | | |
| | \$250,001–\$1 Million | 19 | 16.7% | | \$9,880 | 67.0% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 114 | 100.0% | | \$14,747 | 100.0% | | |

Appendix C (continued)

TENNESSEE

Jackson

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.3% | 0.1% |
| Moderate | 29 | 24.0% | 4,289 | 20.7% | 21.5% | 19.8% | 15.9% |
| Middle | 39 | 32.2% | 5,410 | 26.1% | 41.2% | 33.1% | 27.4% |
| Upper | 53 | 43.8% | 11,017 | 53.2% | 34.6% | 46.6% | 56.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.0% |
| TOTAL | 121 | 100.0% | 20,716 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.6% | 0.4% |
| Moderate | 9 | 14.8% | 633 | 7.0% | 21.5% | 16.7% | 13.2% |
| Middle | 23 | 37.7% | 1,895 | 20.9% | 41.2% | 32.9% | 26.3% |
| Upper | 29 | 47.5% | 6,530 | 72.1% | 34.6% | 49.5% | 60.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.3% | 0.1% |
| TOTAL | 61 | 100.0% | 9,058 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.7% | 0.2% |
| Moderate | 6 | 22.2% | 390 | 20.4% | 21.5% | 22.7% | 18.9% |
| Middle | 11 | 40.7% | 822 | 42.9% | 41.2% | 46.8% | 39.5% |
| Upper | 10 | 37.0% | 704 | 36.7% | 34.6% | 29.8% | 41.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 27 | 100.0% | 1,916 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 15.3% | 5.3% | 22.7% |
| Moderate | 2 | 66.7% | 330 | 28.0% | 44.1% | 34.2% | 12.3% |
| Middle | 1 | 33.3% | 850 | 72.0% | 9.2% | 28.9% | 48.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 24.9% | 28.9% | 15.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 6.5% | 2.6% | 0.9% |
| TOTAL | 3 | 100.0% | 1,180 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 1.4% | 0.8% |
| Moderate | 2 | 15.4% | 116 | 9.1% | 21.5% | 13.6% | 7.4% |
| Middle | 6 | 46.2% | 420 | 32.8% | 41.2% | 44.3% | 47.3% |
| Upper | 5 | 38.5% | 744 | 58.1% | 34.6% | 40.7% | 44.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 13 | 100.0% | 1,280 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.0% | 0.0% |
| Moderate | 1 | 33.3% | 20 | 5.2% | 21.5% | 25.4% | 25.5% |
| Middle | 1 | 33.3% | 70 | 18.4% | 41.2% | 39.0% | 31.8% |
| Upper | 1 | 33.3% | 291 | 76.4% | 34.6% | 32.2% | 41.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 3.4% | 1.6% |
| TOTAL | 3 | 100.0% | 381 | 100.0% | 100.0% | 0.0% | 0.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.5% | 1.4% |
| Moderate | 49 | 21.5% | 5,778 | 16.7% | 21.5% | 19.0% | 15.0% |
| Middle | 81 | 35.5% | 9,467 | 27.4% | 41.2% | 34.2% | 28.9% |
| Upper | 98 | 43.0% | 19,286 | 55.9% | 34.6% | 46.1% | 54.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.2% | 0.1% |
| TOTAL | 228 | 100.0% | 34,531 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 0.6% | 63 | 0.2% | 2.5% | 0.7% | 0.3% |
| Moderate | 30 | 18.1% | 3,910 | 13.6% | 21.5% | 17.4% | 13.9% |
| Middle | 49 | 29.5% | 6,671 | 23.2% | 41.2% | 31.1% | 25.5% |
| Upper | 86 | 51.8% | 18,133 | 63.0% | 34.6% | 50.7% | 60.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 166 | 100.0% | 28,777 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 0.2% | 0.2% |
| Moderate | 8 | 7.5% | 733 | 4.2% | 21.5% | 14.8% | 12.1% |
| Middle | 39 | 36.4% | 6,028 | 34.6% | 41.2% | 29.8% | 25.3% |
| Upper | 60 | 56.1% | 10,653 | 61.2% | 34.6% | 55.1% | 62.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% |
| TOTAL | 107 | 100.0% | 17,414 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 1.0% | 0.6% |
| Moderate | 3 | 25.0% | 100 | 15.9% | 21.5% | 21.9% | 15.7% |
| Middle | 5 | 41.7% | 225 | 35.8% | 41.2% | 33.3% | 36.5% |
| Upper | 4 | 33.3% | 303 | 48.2% | 34.6% | 43.8% | 47.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 12 | 100.0% | 628 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 15.3% | 4.2% | 1.1% |
| Moderate | 1 | 100.0% | 600 | 100.0% | 44.1% | 62.5% | 86.4% |
| Middle | 0 | 0.0% | 0 | 0.0% | 9.2% | 25.0% | 10.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 24.9% | 4.2% | 1.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 6.5% | 4.2% | 0.8% |
| TOTAL | 1 | 100.0% | 600 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 2.2% | 0.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 21.5% | 14.3% | 6.9% |
| Middle | 2 | 66.7% | 174 | 82.5% | 41.2% | 27.5% | 30.5% |
| Upper | 1 | 33.3% | 37 | 17.5% | 34.6% | 56.0% | 61.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 3 | 100.0% | 211 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.5% | 2.0% | 0.5% |
| Moderate | 1 | 25.0% | 56 | 18.3% | 21.5% | 20.4% | 14.2% |
| Middle | 1 | 25.0% | 58 | 19.0% | 41.2% | 40.8% | 33.5% |
| Upper | 2 | 50.0% | 192 | 62.7% | 34.6% | 36.7% | 51.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 306 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 1 | 0.3% | 63 | 0.1% | 2.5% | 0.5% | 0.3% |
| Moderate | 43 | 14.7% | 5,399 | 11.3% | 21.5% | 16.5% | 14.1% |
| Middle | 96 | 32.8% | 13,156 | 27.4% | 41.2% | 30.7% | 25.4% |
| Upper | 153 | 52.2% | 29,318 | 61.2% | 34.6% | 52.2% | 60.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.1% |
| TOTAL | 293 | 100.0% | 47,936 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|---------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 1 | 0.5% | \$100 | 0.4% | 2.1% | 1.9% | 1.4% |
| Moderate | 38 | 18.6% | \$3,358 | 12.9% | 30.1% | 26.6% | 23.1% |
| Middle | 94 | 46.1% | \$11,211 | 43.1% | 34.6% | 31.7% | 33.8% |
| Upper | 54 | 26.5% | \$9,568 | 36.8% | 27.1% | 31.1% | 30.0% |
| Unknown | 17 | 8.3% | \$1,792 | 6.9% | 6.2% | 8.7% | 11.7% |
| TOTAL | 204 | 100.0% | \$26,029 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 7 | 1.7% | \$238 | 0.6% | 2.0% | 1.3% | 1.2% |
| Moderate | 102 | 24.5% | \$8,039 | 20.8% | 30.2% | 28.2% | 28.9% |
| Middle | 169 | 40.6% | \$14,021 | 36.2% | 34.4% | 31.3% | 29.2% |
| Upper | 125 | 30.0% | \$13,961 | 36.1% | 27.4% | 32.1% | 29.4% |
| Unknown | 13 | 3.1% | \$2,446 | 6.3% | 6.0% | 7.0% | 11.3% |
| TOTAL | 416 | 100.0% | \$38,705 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 3 | 2.5% | 278 | 1.3% | 21.2% | 3.9% | 2.0% |
| Moderate | 35 | 28.9% | 3,438 | 16.6% | 17.7% | 17.4% | 11.8% |
| Middle | 25 | 20.7% | 2,880 | 13.9% | 18.8% | 23.0% | 20.2% |
| Upper | 52 | 43.0% | 10,494 | 50.7% | 42.3% | 38.4% | 49.7% |
| Unknown | 6 | 5.0% | 3,626 | 17.5% | 0.0% | 17.3% | 16.3% |
| TOTAL | 121 | 100.0% | 20,716 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 3.3% | 133 | 1.5% | 21.2% | 4.2% | 1.7% |
| Moderate | 8 | 13.1% | 618 | 6.8% | 17.7% | 12.6% | 7.4% |
| Middle | 10 | 16.4% | 676 | 7.5% | 18.8% | 17.7% | 12.9% |
| Upper | 35 | 57.4% | 4,869 | 53.8% | 42.3% | 44.7% | 52.3% |
| Unknown | 6 | 9.8% | 2,762 | 30.5% | 0.0% | 20.8% | 25.7% |
| TOTAL | 61 | 100.0% | 9,058 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 7.8% | 4.0% |
| Moderate | 2 | 7.4% | 173 | 9.0% | 17.7% | 15.6% | 10.4% |
| Middle | 6 | 22.2% | 308 | 16.1% | 18.8% | 17.0% | 11.2% |
| Upper | 14 | 51.9% | 940 | 49.1% | 42.3% | 54.6% | 67.0% |
| Unknown | 5 | 18.5% | 495 | 25.8% | 0.0% | 5.0% | 7.3% |
| TOTAL | 27 | 100.0% | 1,916 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.8% | 2.6% | 0.3% |
| Upper | 1 | 33.3% | 850 | 72.0% | 42.3% | 23.7% | 8.6% |
| Unknown | 2 | 66.7% | 330 | 28.0% | 0.0% | 73.7% | 91.1% |
| TOTAL | 3 | 100.0% | 1,180 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 7.7% | 67 | 5.2% | 21.2% | 7.9% | 3.3% |
| Moderate | 4 | 30.8% | 398 | 31.1% | 17.7% | 15.7% | 10.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.8% | 14.3% | 7.6% |
| Upper | 8 | 61.5% | 815 | 63.7% | 42.3% | 56.4% | 73.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.7% | 4.6% |
| TOTAL | 13 | 100.0% | 1,280 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 6.8% | 3.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 23.7% | 12.8% |
| Middle | 1 | 33.3% | 20 | 5.2% | 18.8% | 15.3% | 9.9% |
| Upper | 2 | 66.7% | 361 | 94.8% | 42.3% | 45.8% | 63.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.5% | 11.0% |
| TOTAL | 3 | 100.0% | 381 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
| Low | 6 | 2.6% | 478 | 1.4% | 21.2% | 4.2% | 1.8% |
| Moderate | 49 | 21.5% | 4,627 | 13.4% | 17.7% | 15.6% | 9.9% |
| Middle | 42 | 18.4% | 3,884 | 11.2% | 18.8% | 20.3% | 16.7% |
| Upper | 112 | 49.1% | 18,329 | 53.1% | 42.3% | 40.5% | 48.3% |
| Unknown | 19 | 8.3% | 7,213 | 20.9% | 0.0% | 19.4% | 23.3% |
| TOTAL | 228 | 100.0% | 34,531 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 11 | 6.6% | 977 | 3.4% | 21.2% | 3.9% | 2.1% |
| Moderate | 33 | 19.9% | 3,955 | 13.7% | 17.7% | 19.1% | 13.6% |
| Middle | 46 | 27.7% | 7,425 | 25.8% | 18.8% | 23.3% | 21.0% |
| Upper | 69 | 41.6% | 15,048 | 52.3% | 42.3% | 37.9% | 47.8% |
| Unknown | 7 | 4.2% | 1,372 | 4.8% | 0.0% | 15.7% | 15.5% |
| TOTAL | 166 | 100.0% | 28,777 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 2.8% | 161 | 0.9% | 21.2% | 3.1% | 1.2% |
| Moderate | 10 | 9.3% | 1,142 | 6.6% | 17.7% | 8.8% | 5.1% |
| Middle | 27 | 25.2% | 2,786 | 16.0% | 18.8% | 16.2% | 11.7% |
| Upper | 65 | 60.7% | 11,761 | 67.5% | 42.3% | 51.5% | 59.6% |
| Unknown | 2 | 1.9% | 1,564 | 9.0% | 0.0% | 20.4% | 22.4% |
| TOTAL | 107 | 100.0% | 17,414 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 7.3% | 2.7% |
| Moderate | 3 | 25.0% | 130 | 20.7% | 17.7% | 13.5% | 6.6% |
| Middle | 2 | 16.7% | 45 | 7.2% | 18.8% | 16.7% | 12.1% |
| Upper | 6 | 50.0% | 377 | 60.0% | 42.3% | 57.3% | 70.3% |
| Unknown | 1 | 8.3% | 76 | 12.1% | 0.0% | 5.2% | 8.3% |
| TOTAL | 12 | 100.0% | 628 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.8% | 4.2% | 0.7% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.3% | 54.2% | 24.2% |
| Unknown | 1 | 100.0% | 600 | 100.0% | 0.0% | 41.7% | 75.1% |
| TOTAL | 1 | 100.0% | 600 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 3.3% | 1.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.7% | 12.1% | 8.4% |
| Middle | 2 | 66.7% | 66 | 31.3% | 18.8% | 14.3% | 9.6% |
| Upper | 1 | 33.3% | 145 | 68.7% | 42.3% | 63.7% | 76.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 6.6% | 4.1% |
| TOTAL | 3 | 100.0% | 211 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|------------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 21.2% | 10.2% | 5.2% |
| Moderate | 1 | 25.0% | 64 | 20.9% | 17.7% | 22.4% | 16.2% |
| Middle | 1 | 25.0% | 58 | 19.0% | 18.8% | 24.5% | 22.0% |
| Upper | 2 | 50.0% | 184 | 60.1% | 42.3% | 32.7% | 47.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 10.2% | 9.6% |
| TOTAL | 4 | 100.0% | 306 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families By Family Income % | | |
| Low | 14 | 4.8% | 1,138 | 2.4% | 21.2% | 3.5% | 1.7% |
| Moderate | 47 | 16.0% | 5,291 | 11.0% | 17.7% | 13.8% | 9.3% |
| Middle | 78 | 26.6% | 10,380 | 21.7% | 18.8% | 19.3% | 16.1% |
| Upper | 143 | 48.8% | 27,515 | 57.4% | 42.3% | 43.6% | 52.3% |
| Unknown | 11 | 3.8% | 3,612 | 7.5% | 0.0% | 19.7% | 20.6% |
| TOTAL | 293 | 100.0% | 47,936 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------|------------|---------------|---------------|-----------------|---------------|---------------|------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 126 | 61.8% | 43.9% | \$11,141 | 42.8% | 46.5% | 89.6% |
| | Over \$1 Million/Unknown | 78 | 38.2% | 56.1% | \$14,888 | 57.2% | 53.5% | 10.4% |
| | TOTAL | 204 | 100.0% | 100.0% | \$26,029 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 140 | 68.6% | 87.4% | \$5,047 | 19.4% | 30.5% | |
| | \$100,001–\$250,000 | 31 | 15.2% | 7.1% | \$4,957 | 19.0% | 20.5% | |
| | \$250,001–\$1 Million | 33 | 16.2% | 5.5% | \$16,025 | 61.6% | 49.1% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 204 | 100.0% | 100.0% | \$26,029 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 99 | 78.6% | | \$3,148 | 28.3% | | |
| | \$100,001–\$250,000 | 15 | 11.9% | | \$2,371 | 21.3% | | |
| | \$250,001–\$1 Million | 12 | 9.5% | | \$5,622 | 50.5% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 126 | 100.0% | | \$11,141 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|--------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 223 | 53.6% | 43.4% | \$15,115 | 39.1% | 41.6% | 89.7% |
| | Over \$1 Million/ Unknown | 193 | 46.4% | 56.6% | \$23,590 | 60.9% | 58.4% | 10.3% |
| | TOTAL | 416 | 100.0% | 100.0% | \$38,705 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 316 | 76.0% | 83.5% | \$9,413 | 24.3% | 28.4% | |
| | \$100,001– \$250,000 | 62 | 14.9% | 9.8% | \$10,193 | 26.3% | 23.6% | |
| | \$250,001–\$1 Million | 38 | 9.1% | 6.7% | \$19,099 | 49.3% | 48.0% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 416 | 100.0% | 100.0% | \$38,705 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 189 | 84.8% | | \$4,839 | 32.0% | |
| | | \$100,001– \$250,000 | 18 | 8.1% | | \$2,859 | 18.9% | |
| | | \$250,001–\$1 Million | 16 | 7.2% | | \$7,417 | 49.1% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 223 | 100.0% | | \$15,115 | 100.0% | |

Appendix C (continued)

Knoxville

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 2.1% | 1.3% |
| Moderate | 5 | 19.2% | 551 | 9.3% | 11.8% | 11.4% | 7.9% |
| Middle | 13 | 50.0% | 2,932 | 49.6% | 53.6% | 50.5% | 45.3% |
| Upper | 8 | 30.8% | 2,423 | 41.0% | 32.0% | 36.0% | 45.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 26 | 100.0% | 5,906 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 1.5% | 0.9% |
| Moderate | 3 | 10.3% | 844 | 15.8% | 11.8% | 8.5% | 5.9% |
| Middle | 18 | 62.1% | 2,999 | 56.0% | 53.6% | 50.9% | 45.0% |
| Upper | 8 | 27.6% | 1,513 | 28.2% | 32.0% | 39.1% | 48.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 29 | 100.0% | 5,356 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 8.3% | 140 | 15.4% | 2.6% | 2.1% | 2.1% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 9.8% | 8.5% |
| Middle | 8 | 66.7% | 636 | 69.8% | 53.6% | 44.7% | 40.6% |
| Upper | 3 | 25.0% | 135 | 14.8% | 32.0% | 43.4% | 48.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 12 | 100.0% | 911 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 1.7% | 1.5% |
| Moderate | 2 | 50.0% | 21 | 10.2% | 11.8% | 8.2% | 4.4% |
| Middle | 1 | 25.0% | 34 | 16.6% | 53.6% | 45.7% | 36.8% |
| Upper | 1 | 25.0% | 150 | 73.2% | 32.0% | 44.4% | 57.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 205 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 2.5% | 2.7% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 13.8% | 13.8% |
| Middle | 2 | 100.0% | 201 | 100.0% | 53.6% | 50.3% | 46.6% |
| Upper | 0 | 0.0% | 0 | 0.0% | 32.0% | 33.3% | 36.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 201 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
|---------------------------|-----------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 1 | 1.4% | 140 | 1.1% | 2.6% | 2.0% | 1.7% |
| Moderate | 10 | 13.7% | 1,416 | 11.3% | 11.8% | 10.4% | 8.5% |
| Middle | 42 | 57.5% | 6,802 | 54.1% | 53.6% | 50.1% | 44.5% |
| Upper | 20 | 27.4% | 4,221 | 33.6% | 32.0% | 37.5% | 45.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 73 | 100.0% | 12,579 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 2.3% | 1.4% |
| Moderate | 4 | 19.0% | 524 | 9.4% | 11.8% | 11.7% | 8.2% |
| Middle | 11 | 52.4% | 3,113 | 55.9% | 53.6% | 49.8% | 45.2% |
| Upper | 6 | 28.6% | 1,935 | 34.7% | 32.0% | 36.2% | 45.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 21 | 100.0% | 5,572 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 1.0% | 0.5% |
| Moderate | 5 | 9.4% | 699 | 6.2% | 11.8% | 7.3% | 5.3% |
| Middle | 31 | 58.5% | 6,403 | 57.1% | 53.6% | 47.8% | 42.5% |
| Upper | 17 | 32.1% | 4,121 | 36.7% | 32.0% | 44.0% | 51.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 53 | 100.0% | 11,223 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 1.8% | 1.1% |
| Moderate | 2 | 50.0% | 136 | 44.0% | 11.8% | 10.1% | 6.8% |
| Middle | 1 | 25.0% | 37 | 12.0% | 53.6% | 43.7% | 41.5% |
| Upper | 1 | 25.0% | 136 | 44.0% | 32.0% | 44.4% | 50.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 309 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 11.0% | 13.2% | 6.1% |
| Moderate | 1 | 100.0% | 596 | 100.0% | 32.1% | 34.0% | 16.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 36.2% | 37.7% | 32.4% |
| Upper | 0 | 0.0% | 0 | 0.0% | 20.4% | 15.1% | 45.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.3% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 596 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 2.6% | 1.2% | 0.5% |
| Moderate | 1 | 25.0% | 23 | 10.3% | 11.8% | 6.4% | 3.9% |
| Middle | 3 | 75.0% | 200 | 89.7% | 53.6% | 44.8% | 36.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 32.0% | 47.6% | 58.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 223 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 1 | 100.0% | 146 | 100.0% | 2.6% | 2.8% | 1.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 11.8% | 10.3% | 8.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 53.6% | 47.3% | 41.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 32.0% | 39.8% | 48.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 146 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 1 | 1.2% | 146 | 0.8% | 2.6% | 1.6% | 1.2% |
| Moderate | 13 | 15.5% | 1,978 | 10.9% | 11.8% | 9.4% | 7.1% |
| Middle | 46 | 54.8% | 9,753 | 54.0% | 53.6% | 48.6% | 43.3% |
| Upper | 24 | 28.6% | 6,192 | 34.3% | 32.0% | 40.4% | 48.4% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 84 | 100.0% | 18,069 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 1 | 0.9% | \$68 | 0.5% | 4.3% | 3.3% | 3.9% |
| Moderate | 8 | 7.3% | \$469 | 3.5% | 14.2% | 12.3% | 12.7% |
| Middle | 79 | 71.8% | \$8,451 | 62.4% | 43.9% | 44.7% | 42.8% |
| Upper | 22 | 20.0% | \$4,564 | 33.7% | 36.9% | 37.7% | 39.1% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.7% | 2.0% | 1.4% |
| TOTAL | 110 | 100.0% | \$13,552 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 1 | 0.6% | \$40 | 0.3% | 4.2% | 3.2% | 3.6% |
| Moderate | 18 | 11.3% | \$867 | 5.9% | 14.3% | 11.7% | 11.8% |
| Middle | 108 | 67.5% | \$9,127 | 61.8% | 43.8% | 42.9% | 40.6% |
| Upper | 32 | 20.0% | \$4,670 | 31.6% | 37.0% | 41.5% | 42.7% |
| Unknown | 1 | 0.6% | \$74 | 0.5% | 0.7% | 0.8% | 1.3% |
| TOTAL | 160 | 100.0% | \$14,778 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|-----------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 1 | 3.8% | 66 | 1.1% | 21.5% | 6.2% | 3.1% |
| Moderate | 3 | 11.5% | 507 | 8.6% | 16.3% | 18.4% | 12.5% |
| Middle | 4 | 15.4% | 720 | 12.2% | 20.0% | 22.1% | 19.2% |
| Upper | 18 | 69.2% | 4,613 | 78.1% | 42.2% | 40.9% | 53.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 12.3% | 11.6% |
| TOTAL | 26 | 100.0% | 5,906 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 2 | 6.9% | 163 | 3.0% | 21.5% | 6.3% | 3.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.3% | 14.3% | 8.9% |
| Middle | 7 | 24.1% | 984 | 18.4% | 20.0% | 19.3% | 15.3% |
| Upper | 18 | 62.1% | 4,073 | 76.0% | 42.2% | 41.8% | 52.8% |
| Unknown | 2 | 6.9% | 136 | 2.5% | 0.0% | 18.3% | 19.9% |
| TOTAL | 29 | 100.0% | 5,356 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 16.7% | 43 | 4.7% | 21.5% | 6.5% | 3.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.3% | 14.1% | 10.3% |
| Middle | 2 | 16.7% | 40 | 4.4% | 20.0% | 19.1% | 14.3% |
| Upper | 7 | 58.3% | 705 | 77.4% | 42.2% | 56.5% | 66.9% |
| Unknown | 1 | 8.3% | 123 | 13.5% | 0.0% | 3.8% | 4.7% |
| TOTAL | 12 | 100.0% | 911 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose LOC | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 1 | 25.0% | 10 | 4.9% | 21.5% | 8.1% | 3.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.3% | 12.5% | 7.2% |
| Middle | 2 | 50.0% | 45 | 22.0% | 20.0% | 19.7% | 14.0% |
| Upper | 1 | 25.0% | 150 | 73.2% | 42.2% | 56.1% | 71.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.6% | 3.7% |
| TOTAL | 4 | 100.0% | 205 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 10.0% | 4.8% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.3% | 14.3% | 9.7% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.0% | 21.8% | 17.2% |
| Upper | 2 | 100.0% | 201 | 100.0% | 42.2% | 48.8% | 57.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.2% | 11.1% |
| TOTAL | 2 | 100.0% | 201 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
| Low | 6 | 8.2% | 282 | 2.2% | 21.5% | 6.3% | 2.9% |
| Moderate | 3 | 4.1% | 507 | 4.0% | 16.3% | 16.3% | 10.3% |
| Middle | 15 | 20.5% | 1,789 | 14.2% | 20.0% | 20.7% | 16.3% |
| Upper | 46 | 63.0% | 9,742 | 77.4% | 42.2% | 42.2% | 49.9% |
| Unknown | 3 | 4.1% | 259 | 2.1% | 0.0% | 14.5% | 20.6% |
| TOTAL | 73 | 100.0% | 12,579 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 6.7% | 3.4% |
| Moderate | 5 | 23.8% | 817 | 14.7% | 16.3% | 20.0% | 13.7% |
| Middle | 3 | 14.3% | 469 | 8.4% | 20.0% | 21.6% | 19.0% |
| Upper | 10 | 47.6% | 3,597 | 64.6% | 42.2% | 41.4% | 54.2% |
| Unknown | 3 | 14.3% | 689 | 12.4% | 0.0% | 10.4% | 9.7% |
| TOTAL | 21 | 100.0% | 5,572 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 5 | 9.4% | 738 | 6.6% | 21.5% | 4.0% | 1.9% |
| Moderate | 9 | 17.0% | 1,490 | 13.3% | 16.3% | 12.0% | 7.8% |
| Middle | 9 | 17.0% | 1,538 | 13.7% | 20.0% | 17.6% | 14.4% |
| Upper | 28 | 52.8% | 7,290 | 65.0% | 42.2% | 43.4% | 52.5% |
| Unknown | 2 | 3.8% | 167 | 1.5% | 0.0% | 23.0% | 23.5% |
| TOTAL | 53 | 100.0% | 11,223 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Home Improvement | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 1 | 25.0% | 84 | 27.2% | 21.5% | 6.5% | 3.5% |
| Moderate | 2 | 50.0% | 173 | 56.0% | 16.3% | 12.9% | 7.9% |
| Middle | 1 | 25.0% | 52 | 16.8% | 20.0% | 20.3% | 15.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.2% | 56.6% | 69.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.8% | 3.6% |
| TOTAL | 4 | 100.0% | 309 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.3% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.0% | 1.9% | 0.1% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.2% | 18.9% | 2.8% |
| Unknown | 1 | 100.0% | 596 | 100.0% | 0.0% | 79.2% | 97.1% |
| TOTAL | 1 | 100.0% | 596 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 4.2% | 1.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.3% | 12.4% | 7.7% |
| Middle | 1 | 25.0% | 28 | 12.6% | 20.0% | 16.9% | 11.1% |
| Upper | 3 | 75.0% | 195 | 87.4% | 42.2% | 63.5% | 76.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.0% | 2.3% |
| TOTAL | 4 | 100.0% | 223 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 21.5% | 7.3% | 2.2% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 16.3% | 15.3% | 9.5% |
| Middle | 0 | 0.0% | 0 | 0.0% | 20.0% | 23.8% | 15.2% |
| Upper | 1 | 100.0% | 146 | 100.0% | 42.2% | 45.5% | 67.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.3% | 5.8% |
| TOTAL | 1 | 100.0% | 146 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families By Family Income % | | |
| Low | 6 | 7.1% | 822 | 4.5% | 21.5% | 5.2% | 2.5% |
| Moderate | 16 | 19.0% | 2,480 | 13.7% | 16.3% | 15.2% | 10.0% |
| Middle | 14 | 16.7% | 2,087 | 11.6% | 20.0% | 19.1% | 15.6% |
| Upper | 42 | 50.0% | 11,228 | 62.1% | 42.2% | 42.8% | 51.1% |
| Unknown | 6 | 7.1% | 1,452 | 8.0% | 0.0% | 17.8% | 20.8% |
| TOTAL | 84 | 100.0% | 18,069 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 73 | 66.4% | 45.9% | \$8,332 | 61.5% | 32.1% | 90.2% |
| | Over \$1 Million/ Unknown | 37 | 33.6% | 54.1% | \$5,220 | 38.5% | 67.9% | 9.8% |
| | TOTAL | 110 | 100.0% | 100.0% | \$13,552 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 78 | 70.9% | 89.1% | \$2,887 | 21.3% | 26.9% | |
| | \$100,001– \$250,000 | 18 | 16.4% | 5.4% | \$3,012 | 22.2% | 17.1% | |
| | \$250,001– \$1 Million | 14 | 12.7% | 5.5% | \$7,653 | 56.5% | 56.0% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 110 | 100.0% | 100.0% | \$13,552 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 54 | 74.0% | | \$2,013 | 24.2% | | |
| | \$100,001– \$250,000 | 11 | 15.1% | | \$1,893 | 22.7% | | |
| | \$250,001– \$1 Million | 8 | 11.0% | | \$4,426 | 53.1% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 73 | 100.0% | | \$8,332 | 100.0% | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 95 | 59.4% | 39.8% | \$7,247 | 49.0% | 24.2% | 90.5% |
| | Over \$1 Million/ Unknown | 65 | 40.6% | 60.2% | \$7,531 | 51.0% | 75.8% | 9.5% |
| | TOTAL | 160 | 100.0% | 100.0% | \$14,778 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 124 | 77.5% | 82.9% | \$3,695 | 25.0% | 25.5% | |
| | \$100,001– \$250,000 | 19 | 11.9% | 9.5% | \$3,263 | 22.1% | 21.6% | |
| | \$250,001–\$1 Million | 17 | 10.6% | 7.6% | \$7,820 | 52.9% | 52.9% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 160 | 100.0% | 100.0% | \$14,778 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 76 | 80.0% | | \$2,017 | 27.8% | | |
| | \$100,001– \$250,000 | 12 | 12.6% | | \$2,103 | 29.0% | | |
| | \$250,001–\$1 Million | 7 | 7.4% | | \$3,127 | 43.1% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 95 | 100.0% | | \$7,247 | 100.0% | | |

Appendix C (continued)

Memphis

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 7 | 15.9% | 439 | 6.1% | 13.3% | 5.6% | 2.1% |
| Moderate | 12 | 27.3% | 1,103 | 15.4% | 17.6% | 12.1% | 5.8% |
| Middle | 10 | 22.7% | 1,806 | 25.2% | 18.7% | 17.3% | 12.5% |
| Upper | 15 | 34.1% | 3,824 | 53.3% | 50.3% | 65.1% | 79.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 44 | 100.0% | 7,172 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 16.7% | 1,921 | 37.6% | 13.3% | 3.2% | 1.2% |
| Moderate | 1 | 5.6% | 60 | 1.2% | 17.6% | 7.9% | 3.8% |
| Middle | 5 | 27.8% | 368 | 7.2% | 18.7% | 16.2% | 10.7% |
| Upper | 9 | 50.0% | 2,761 | 54.0% | 50.3% | 72.7% | 84.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 18 | 100.0% | 5,110 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 13.3% | 7.5% | 3.8% |
| Moderate | 1 | 33.3% | 5 | 13.5% | 17.6% | 9.7% | 5.5% |
| Middle | 1 | 33.3% | 17 | 45.9% | 18.7% | 14.1% | 8.8% |
| Upper | 1 | 33.3% | 15 | 40.5% | 50.3% | 68.7% | 81.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.0% |
| TOTAL | 3 | 100.0% | 37 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | % of Multifamily Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 32.6% | 35.0% | 16.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 21.0% | 20.0% | 16.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 13.1% | 10.8% | 3.3% |
| Upper | 1 | 100.0% | 16,660 | 100.0% | 32.7% | 34.2% | 63.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.6% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 16,660 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 13.3% | 4.1% | 1.8% |
| Moderate | 1 | 25.0% | 50 | 10.3% | 17.6% | 6.6% | 3.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 11.1% | 7.0% |
| Upper | 3 | 75.0% | 437 | 89.7% | 50.3% | 78.2% | 88.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 4 | 100.0% | 487 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
|---------------------------|-----------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 10 | 14.3% | 2,360 | 8.0% | 13.3% | 5.3% | 3.5% |
| Moderate | 15 | 21.4% | 1,218 | 4.1% | 17.6% | 10.9% | 6.5% |
| Middle | 16 | 22.9% | 2,191 | 7.4% | 18.7% | 16.7% | 10.9% |
| Upper | 29 | 41.4% | 23,697 | 80.4% | 50.3% | 67.2% | 79.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 70 | 100.0% | 29,466 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|---------------|---------------|---------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 7 | 14.0% | 606 | 5.7% | 13.3% | 6.1% | 2.4% |
| Moderate | 15 | 30.0% | 1,440 | 13.6% | 17.6% | 11.6% | 5.5% |
| Middle | 12 | 24.0% | 2,768 | 26.2% | 18.7% | 17.3% | 12.6% |
| Upper | 16 | 32.0% | 5,767 | 54.5% | 50.3% | 65.0% | 79.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 50 | 100.0% | 10,581 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 3 | 8.8% | 202 | 4.7% | 13.3% | 1.6% | 0.9% |
| Moderate | 6 | 17.6% | 899 | 21.0% | 17.6% | 5.0% | 2.7% |
| Middle | 8 | 23.5% | 823 | 19.2% | 18.7% | 12.2% | 8.1% |
| Upper | 17 | 50.0% | 2,358 | 55.1% | 50.3% | 81.2% | 88.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 34 | 100.0% | 4,282 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 13.3% | 5.6% | 2.5% |
| Moderate | 2 | 40.0% | 62 | 36.7% | 17.6% | 8.9% | 5.3% |
| Middle | 2 | 40.0% | 37 | 21.9% | 18.7% | 13.1% | 8.9% |
| Upper | 1 | 20.0% | 70 | 41.4% | 50.3% | 72.3% | 83.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.1% | 0.0% |
| TOTAL | 5 | 100.0% | 169 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 1 | 50.0% | 35 | 60.3% | 13.3% | 2.6% | 1.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 5.7% | 2.9% |
| Middle | 0 | 0.0% | 0 | 0.0% | 18.7% | 9.8% | 4.8% |
| Upper | 1 | 50.0% | 23 | 39.7% | 50.3% | 82.0% | 90.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 58 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 13.3% | 8.2% | 3.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 17.6% | 10.9% | 6.2% |
| Middle | 1 | 50.0% | 61 | 44.9% | 18.7% | 12.8% | 6.7% |
| Upper | 1 | 50.0% | 75 | 55.1% | 50.3% | 68.1% | 84.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.0% |
| TOTAL | 2 | 100.0% | 136 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 11 | 11.8% | 843 | 5.5% | 13.3% | 3.9% | 2.3% |
| Moderate | 23 | 24.7% | 2,401 | 15.8% | 17.6% | 8.3% | 4.4% |
| Middle | 23 | 24.7% | 3,689 | 24.2% | 18.7% | 14.7% | 10.7% |
| Upper | 36 | 38.7% | 8,293 | 54.5% | 50.3% | 73.0% | 82.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.2% | 0.0% | 0.3% |
| TOTAL | 93 | 100.0% | 15,226 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 6 | 3.8% | \$707 | 2.2% | 15.1% | 11.8% | 12.3% |
| Moderate | 14 | 8.8% | \$3,512 | 10.8% | 16.8% | 15.6% | 17.5% |
| Middle | 44 | 27.7% | \$11,361 | 34.9% | 17.2% | 16.2% | 17.0% |
| Upper | 93 | 58.5% | \$16,826 | 51.7% | 49.9% | 52.8% | 49.7% |
| Unknown | 2 | 1.3% | \$120 | 0.4% | 1.0% | 3.6% | 3.4% |
| TOTAL | 159 | 100.0% | \$32,526 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | # % | \$ 000s | \$ % | | % | \$ % |
| Low | 16 | 5.3% | \$2,196 | 4.7% | 15.1% | 12.6% | 12.4% |
| Moderate | 23 | 7.7% | \$5,729 | 12.3% | 16.7% | 15.6% | 17.6% |
| Middle | 67 | 22.3% | \$10,702 | 22.9% | 17.1% | 15.5% | 15.8% |
| Upper | 191 | 63.7% | \$27,671 | 59.3% | 50.0% | 54.7% | 51.4% |
| Unknown | 3 | 1.0% | \$395 | 0.8% | 1.0% | 1.5% | 2.7% |
| TOTAL | 300 | 100.0% | \$46,693 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 7 | 15.9% | 614 | 8.6% | 25.9% | 3.0% | 1.4% |
| Moderate | 15 | 34.1% | 1,871 | 26.1% | 15.4% | 12.6% | 8.2% |
| Middle | 6 | 13.6% | 915 | 12.8% | 16.4% | 20.2% | 17.5% |
| Upper | 12 | 27.3% | 3,518 | 49.1% | 42.3% | 48.3% | 58.7% |
| Unknown | 4 | 9.1% | 254 | 3.5% | 0.0% | 15.8% | 14.2% |
| TOTAL | 44 | 100.0% | 7,172 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 1 | 5.6% | 80 | 1.6% | 25.9% | 4.1% | 1.9% |
| Moderate | 2 | 11.1% | 144 | 2.8% | 15.4% | 9.0% | 5.3% |
| Middle | 1 | 5.6% | 187 | 3.7% | 16.4% | 17.5% | 13.0% |
| Upper | 8 | 44.4% | 998 | 19.5% | 42.3% | 47.7% | 56.9% |
| Unknown | 6 | 33.3% | 3,701 | 72.4% | 0.0% | 21.7% | 23.0% |
| TOTAL | 18 | 100.0% | 5,110 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.9% | 5.6% | 2.5% |
| Moderate | 2 | 66.7% | 22 | 59.5% | 15.4% | 11.9% | 6.9% |
| Middle | 1 | 33.3% | 15 | 40.5% | 16.4% | 18.1% | 12.9% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.3% | 59.5% | 72.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 4.9% | 5.2% |
| TOTAL | 3 | 100.0% | 37 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.9% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 16.4% | 0.8% | 0.0% |
| Upper | 0 | 0.0% | 0 | 0.0% | 42.3% | 5.8% | 0.3% |
| Unknown | 1 | 100.0% | 16,660 | 100.0% | 0.0% | 93.3% | 99.6% |
| TOTAL | 1 | 100.0% | 16,660 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.9% | 4.0% | 1.5% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 9.6% | 5.0% |
| Middle | 1 | 25.0% | 50 | 10.3% | 16.4% | 14.8% | 8.6% |
| Upper | 2 | 50.0% | 370 | 76.0% | 42.3% | 68.9% | 82.3% |
| Unknown | 1 | 25.0% | 67 | 13.8% | 0.0% | 2.7% | 2.6% |
| TOTAL | 4 | 100.0% | 487 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
|---------------------------|-----------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 8 | 11.4% | 694 | 2.4% | 25.9% | 3.4% | 1.4% |
| Moderate | 19 | 27.1% | 2,037 | 6.9% | 15.4% | 11.0% | 6.3% |
| Middle | 9 | 12.9% | 1,167 | 4.0% | 16.4% | 18.6% | 13.9% |
| Upper | 22 | 31.4% | 4,886 | 16.6% | 42.3% | 47.6% | 51.4% |
| Unknown | 12 | 17.1% | 20,682 | 70.2% | 0.0% | 19.4% | 27.0% |
| TOTAL | 70 | 100.0% | 29,466 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|---------------|---------------|--------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | # % | \$ | \$ % | | # % | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 8 | 16.0% | 679 | 6.4% | 25.9% | 3.2% | 1.4% |
| Moderate | 19 | 38.0% | 2,710 | 25.6% | 15.4% | 14.3% | 9.4% |
| Middle | 4 | 8.0% | 796 | 7.5% | 16.4% | 20.1% | 17.8% |
| Upper | 15 | 30.0% | 5,116 | 48.4% | 42.3% | 46.3% | 56.7% |
| Unknown | 4 | 8.0% | 1,280 | 12.1% | 0.0% | 16.2% | 14.6% |
| TOTAL | 50 | 100.0% | 10,581 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.9% | 1.7% | 0.7% |
| Moderate | 4 | 11.8% | 485 | 11.3% | 15.4% | 7.0% | 4.1% |
| Middle | 7 | 20.6% | 777 | 18.1% | 16.4% | 15.5% | 11.4% |
| Upper | 19 | 55.9% | 2,671 | 62.4% | 42.3% | 52.9% | 60.6% |
| Unknown | 4 | 11.8% | 349 | 8.2% | 0.0% | 22.9% | 23.2% |
| TOTAL | 34 | 100.0% | 4,282 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.9% | 3.8% | 1.3% |
| Moderate | 1 | 20.0% | 12 | 7.1% | 15.4% | 9.8% | 5.4% |
| Middle | 2 | 40.0% | 76 | 45.0% | 16.4% | 17.4% | 13.8% |
| Upper | 2 | 40.0% | 81 | 47.9% | 42.3% | 63.7% | 73.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 5.3% | 5.7% |
| TOTAL | 5 | 100.0% | 169 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 25.9% | 2.2% | 0.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 7.7% | 4.8% |
| Middle | 1 | 50.0% | 35 | 60.3% | 16.4% | 12.6% | 7.9% |
| Upper | 1 | 50.0% | 23 | 39.7% | 42.3% | 74.5% | 80.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 3.0% | 5.7% |
| TOTAL | 2 | 100.0% | 58 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix C (continued)

| Other Purpose Closed/Exempt | | | | | | | |
|-----------------------------|-----------|---------------|---------------|---------------|-----------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 25.9% | 6.2% | 2.6% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 15.4% | 10.5% | 7.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 16.4% | 12.5% | 8.5% |
| Upper | 2 | 100.0% | 136 | 100.0% | 42.3% | 57.6% | 70.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 13.2% | 11.0% |
| TOTAL | 2 | 100.0% | 136 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families By Family Income % | | |
| Low | 8 | 8.6% | 679 | 4.5% | 25.9% | 2.3% | 1.0% |
| Moderate | 24 | 25.8% | 3,207 | 21.1% | 15.4% | 9.8% | 6.0% |
| Middle | 14 | 15.1% | 1,684 | 11.1% | 16.4% | 16.6% | 13.2% |
| Upper | 39 | 41.9% | 8,027 | 52.7% | 42.3% | 48.6% | 55.2% |
| Unknown | 8 | 8.6% | 1,629 | 10.7% | 0.0% | 22.7% | 24.7% |
| TOTAL | 93 | 100.0% | 15,226 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | | |
|--|--------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------|------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | | |
| | | Count | | | Dollars | | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | % | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | | |
| Business Revenue | \$1 Million or Less | 90 | 56.6% | 40.9% | \$16,414 | 50.5% | 30.6% | 89.4% | |
| | Over \$1 Million/Unknown | 69 | 43.4% | 59.1% | \$16,112 | 49.5% | 69.4% | 10.6% | |
| | TOTAL | 159 | 100.0% | 100.0% | \$32,526 | 100.0% | 100.0% | 100.0% | |
| Loan Size | \$100,000 or Less | 87 | 54.7% | 91.3% | \$3,659 | 11.2% | 30.1% | | |
| | \$100,001–\$250,000 | 33 | 20.8% | 4.4% | \$6,191 | 19.0% | 16.5% | | |
| | \$250,001–\$1 Million | 39 | 24.5% | 4.3% | \$22,676 | 69.7% | 53.4% | | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | | |
| | TOTAL | 159 | 100.0% | 100.0% | \$32,526 | 100.0% | 100.0% | | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 58 | 64.4% | | \$2,048 | 12.5% | | | |
| | \$100,001–\$250,000 | 15 | 16.7% | | \$2,953 | 18.0% | | | |
| | \$250,001–\$1 Million | 17 | 18.9% | | \$11,413 | 69.5% | | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | | |
| | TOTAL | 90 | 100.0% | | \$16,414 | 100.0% | | | |

Appendix C (continued)

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|--------------------------------|---------------------------|---------------|---------------|-----------------|-----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 147 | 49.0% | 33.6% | \$13,191 | 28.3% | 22.5% | 90.0% |
| | Over \$1 Million/ Unknown | 153 | 51.0% | 66.4% | \$33,502 | 71.7% | 77.5% | 10.0% |
| | TOTAL | 300 | 100.0% | 100.0% | \$46,693 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 187 | 62.3% | 86.5% | \$6,734 | 14.4% | 28.8% | |
| | \$100,001– \$250,000 | 51 | 17.0% | 7.5% | \$8,595 | 18.4% | 20.1% | |
| | \$250,001– \$1 Million | 62 | 20.7% | 6.0% | \$31,364 | 67.2% | 51.1% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 300 | 100.0% | 100.0% | \$46,693 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 117 | 79.6% | | \$3,678 | 27.9% | |
| | | \$100,001– \$250,000 | 13 | 8.8% | | \$1,822 | 13.8% | |
| | | \$250,001– \$1 Million | 17 | 11.6% | | \$7,691 | 58.3% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 147 | 100.0% | | \$13,191 | 100.0% | |

Appendix D

Eastern NonMSA Tennessee

| Distribution of 2019 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner- Occupied Units | Aggregate HMDA Data | |
| | # | #% | \$ | \$% | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 3.6% | 6.0% | 4.3% |
| Middle | 16 | 84.2% | 2,344 | 81.7% | 90.2% | 85.6% | 87.5% |
| Upper | 3 | 15.8% | 526 | 18.3% | 6.2% | 8.3% | 8.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 19 | 100.0% | 2,870 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 7.7% | 182 | 6.5% | 3.6% | 2.9% | 2.2% |
| Middle | 22 | 84.6% | 2,426 | 87.1% | 90.2% | 90.4% | 91.6% |
| Upper | 2 | 7.7% | 177 | 6.4% | 6.2% | 6.7% | 6.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 26 | 100.0% | 2,785 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 9.1% | 50 | 10.3% | 3.6% | 5.0% | 3.3% |
| Middle | 8 | 72.7% | 295 | 60.7% | 90.2% | 87.0% | 89.8% |
| Upper | 2 | 18.2% | 141 | 29.0% | 6.2% | 8.0% | 6.9% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 11 | 100.0% | 486 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose LOC | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 3.6% | 1.3% | 0.7% |
| Middle | 9 | 90.0% | 632 | 95.9% | 90.2% | 96.2% | 96.7% |
| Upper | 1 | 10.0% | 27 | 4.1% | 6.2% | 2.5% | 2.6% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 10 | 100.0% | 659 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 3.6% | 0.0% | 0.0% |
| Middle | 1 | 100.0% | 32 | 100.0% | 90.2% | 97.4% | 98.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.2% | 2.6% | 1.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 32 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix D

| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
|---------------------------|-----------|---------------|--------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 4.5% | 232 | 3.4% | 3.6% | 4.8% | 3.5% |
| Middle | 56 | 83.6% | 5,729 | 83.9% | 90.2% | 87.7% | 89.1% |
| Upper | 8 | 11.9% | 871 | 12.7% | 6.2% | 7.5% | 7.3% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 67 | 100.0% | 6,832 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Income Level of Geography | | | | | | | |
|--|------------|---------------|--------------|---------------|---------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | % of Owner-Occupied Units | Aggregate HMDA Data | |
| | # | ##% | \$ | % | | ##% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 2 | 7.4% | 93 | 2.3% | 3.6% | 5.0% | 3.8% |
| Middle | 20 | 74.1% | 3,271 | 80.1% | 90.2% | 87.7% | 89.0% |
| Upper | 5 | 18.5% | 719 | 17.6% | 6.2% | 7.4% | 7.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 27 | 100.0% | 4,083 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 1 | 2.5% | 70 | 1.2% | 3.6% | 2.7% | 1.8% |
| Middle | 35 | 87.5% | 5,135 | 86.5% | 90.2% | 89.6% | 90.4% |
| Upper | 4 | 10.0% | 728 | 12.3% | 6.2% | 7.7% | 7.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 40 | 100.0% | 5,933 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 3.6% | 1.6% | 1.6% |
| Middle | 4 | 66.7% | 235 | 62.7% | 90.2% | 83.6% | 74.7% |
| Upper | 2 | 33.3% | 140 | 37.3% | 6.2% | 14.8% | 23.7% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 6 | 100.0% | 375 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix D

| Multifamily Loans | | | | | % of Multifamily Units | | |
|-----------------------------|-----------|---------------|---------------|---------------|---------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 34.6% | 10.0% | 1.5% |
| Middle | 1 | 100.0% | 225 | 100.0% | 59.7% | 90.0% | 98.5% |
| Upper | 0 | 0.0% | 0 | 0.0% | 5.7% | 0.0% | 0.0% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 225 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 3.6% | 13.3% | 12.7% |
| Middle | 1 | 100.0% | 80 | 100.0% | 90.2% | 80.0% | 79.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 6.2% | 6.7% | 8.1% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 1 | 100.0% | 80 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | % of Owner-Occupied Units | | |
| Low | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 3 | 4.0% | 163 | 1.5% | 3.6% | 4.0% | 2.9% |
| Middle | 61 | 81.3% | 8,946 | 83.6% | 90.2% | 88.5% | 89.6% |
| Upper | 11 | 14.7% | 1,587 | 14.8% | 6.2% | 7.5% | 7.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 0.0% | 0.0% |
| TOTAL | 75 | 100.0% | 10,696 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|-----------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | #% | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 19 | 11.2% | \$4,605 | 25.1% | 12.9% | 11.8% | 21.8% |
| Middle | 134 | 78.8% | \$12,460 | 68.0% | 80.6% | 78.2% | 73.5% |
| Upper | 17 | 10.0% | \$1,255 | 6.9% | 6.5% | 7.9% | 4.3% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 2.1% | 0.3% |
| TOTAL | 170 | 100.0% | \$18,320 | 100.0% | 100.0% | 100.0% | 100.0% |

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| Distribution of 2020 Small Business Lending By Income Level of Geography | | | | | | | |
|---|---------------------------|---------------|-----------------|---------------|--------------------|------------------------|---------------|
| Census Tract Income Level | Bank Small Business Loans | | | | % of Businesses | Aggregate of Peer Data | |
| | # | #% | \$ 000s | \$ % | | % | \$ % |
| Low | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.0% | 0.0% |
| Moderate | 28 | 11.5% | \$1,923 | 7.9% | 13.1% | 14.7% | 15.6% |
| Middle | 181 | 74.5% | \$20,170 | 83.0% | 80.3% | 76.6% | 79.4% |
| Upper | 34 | 14.0% | \$2,198 | 9.0% | 6.7% | 8.2% | 4.9% |
| Unknown | 0 | 0.0% | \$0 | 0.0% | 0.0% | 0.5% | 0.1% |
| TOTAL | 243 | 100.0% | \$24,291 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2019 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|-----------------------------------|---------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families by Family Income % | Aggregate HMDA Data | |
| | # | #% | \$ | \$% | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 4.0% | 2.1% |
| Moderate | 5 | 26.3% | 709 | 24.7% | 18.4% | 16.7% | 11.3% |
| Middle | 3 | 15.8% | 673 | 23.4% | 19.6% | 23.7% | 19.6% |
| Upper | 6 | 31.6% | 980 | 34.1% | 41.3% | 39.4% | 51.6% |
| Unknown | 5 | 26.3% | 508 | 17.7% | 0.0% | 16.2% | 15.4% |
| TOTAL | 19 | 100.0% | 2,870 | 100.0% | 100.0% | 100.0% | 100.0% |
| Refinance | | | | | | | |
| Low | 4 | 15.4% | 203 | 7.3% | 20.7% | 6.2% | 2.9% |
| Moderate | 2 | 7.7% | 210 | 7.5% | 18.4% | 11.3% | 7.8% |
| Middle | 4 | 15.4% | 569 | 20.4% | 19.6% | 16.4% | 14.0% |
| Upper | 11 | 42.3% | 1,214 | 43.6% | 41.3% | 41.3% | 46.0% |
| Unknown | 5 | 19.2% | 589 | 21.1% | 0.0% | 24.8% | 29.3% |
| TOTAL | 26 | 100.0% | 2,785 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 2 | 18.2% | 100 | 20.6% | 20.7% | 8.0% | 6.6% |
| Moderate | 3 | 27.3% | 85 | 17.5% | 18.4% | 15.0% | 10.5% |
| Middle | 5 | 45.5% | 276 | 56.8% | 19.6% | 25.0% | 19.1% |
| Upper | 1 | 9.1% | 25 | 5.1% | 41.3% | 44.0% | 52.8% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 8.0% | 11.0% |
| TOTAL | 11 | 100.0% | 486 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix D

| Other Purpose LOC | | | | | | | |
|-----------------------------|-----------|---------------|--------------|---------------|-----------------------------|---------------|---------------|
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 3.8% | 0.9% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 12.7% | 8.4% |
| Middle | 1 | 10.0% | 72 | 10.9% | 19.6% | 19.0% | 18.7% |
| Upper | 6 | 60.0% | 456 | 69.2% | 41.3% | 59.5% | 69.3% |
| Unknown | 3 | 30.0% | 131 | 19.9% | 0.0% | 5.1% | 2.8% |
| TOTAL | 10 | 100.0% | 659 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 10.5% | 3.5% |
| Moderate | 1 | 100.0% | 32 | 100.0% | 18.4% | 13.2% | 7.8% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 18.4% | 12.2% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.3% | 50.0% | 58.2% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 7.9% | 18.3% |
| TOTAL | 1 | 100.0% | 32 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | | Families by Family Income % | | |
| Low | 6 | 9.0% | 303 | 4.4% | 20.7% | 4.8% | 2.4% |
| Moderate | 11 | 16.4% | 1,036 | 15.2% | 18.4% | 14.5% | 9.9% |
| Middle | 13 | 19.4% | 1,590 | 23.3% | 19.6% | 20.9% | 17.4% |
| Upper | 24 | 35.8% | 2,675 | 39.2% | 41.3% | 40.2% | 50.0% |
| Unknown | 13 | 19.4% | 1,228 | 18.0% | 0.0% | 19.6% | 20.4% |
| TOTAL | 67 | 100.0% | 6,832 | 100.0% | 100.0% | 100.0% | 100.0% |

| Distribution of 2020 Home Mortgage Lending By Borrower Income Level | | | | | | | |
|--|------------|---------------|--------------|---------------|--------------------------------|------------------------|---------------|
| Census Tract Income Level | Bank Loans | | | | Families By Family Income % | Aggregate HMDA Data | |
| | # | #% | \$ | % | | #% | \$ % |
| Home Purchase Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 4.2% | 2.2% |
| Moderate | 5 | 18.5% | 607 | 14.9% | 18.4% | 18.5% | 13.2% |
| Middle | 7 | 25.9% | 1,164 | 28.5% | 19.6% | 24.8% | 21.8% |
| Upper | 10 | 37.0% | 1,730 | 42.4% | 41.3% | 38.9% | 50.4% |
| Unknown | 5 | 18.5% | 582 | 14.3% | 0.0% | 13.6% | 12.4% |
| TOTAL | 27 | 100.0% | 4,083 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix D

| Refinance | | | | | | | |
|-----------------------------|-----------|---------------|---------------|-----------------------------|---------------|---------------|---------------|
| Low | 7 | 17.5% | 483 | 8.1% | 20.7% | 4.1% | 1.8% |
| Moderate | 6 | 15.0% | 634 | 10.7% | 18.4% | 8.6% | 5.2% |
| Middle | 8 | 20.0% | 1,171 | 19.7% | 19.6% | 17.7% | 13.9% |
| Upper | 14 | 35.0% | 3,042 | 51.3% | 41.3% | 41.6% | 49.4% |
| Unknown | 5 | 12.5% | 603 | 10.2% | 0.0% | 28.1% | 29.7% |
| TOTAL | 40 | 100.0% | 5,933 | 100.0% | 100.0% | 100.0% | 100.0% |
| Home Improvement | | | | | | | |
| Low | 1 | 16.7% | 55 | 14.7% | 20.7% | 6.6% | 2.3% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 11.5% | 8.1% |
| Middle | 1 | 16.7% | 35 | 9.3% | 19.6% | 19.7% | 20.0% |
| Upper | 3 | 50.0% | 235 | 62.7% | 41.3% | 54.1% | 63.8% |
| Unknown | 1 | 16.7% | 50 | 13.3% | 0.0% | 8.2% | 5.8% |
| TOTAL | 6 | 100.0% | 375 | 100.0% | 100.0% | 100.0% | 100.0% |
| Multifamily Loans | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 0.0% | 0.0% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 0.0% | 0.0% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 10.0% | 1.5% |
| Upper | 1 | 100.0% | 225 | 100.0% | 41.3% | 70.0% | 79.5% |
| Unknown | 0 | 0.0% | 0 | 0.0% | 0.0% | 20.0% | 19.0% |
| TOTAL | 1 | 100.0% | 225 | 100.0% | 100.0% | 100.0% | 100.0% |
| Other Purpose Closed/Exempt | | | | | | | |
| Low | 0 | 0.0% | 0 | 0.0% | 20.7% | 6.7% | 4.4% |
| Moderate | 0 | 0.0% | 0 | 0.0% | 18.4% | 10.0% | 7.1% |
| Middle | 0 | 0.0% | 0 | 0.0% | 19.6% | 26.7% | 18.8% |
| Upper | 0 | 0.0% | 0 | 0.0% | 41.3% | 50.0% | 63.9% |
| Unknown | 1 | 100.0% | 80 | 100.0% | 0.0% | 6.7% | 5.9% |
| TOTAL | 1 | 100.0% | 80 | 100.0% | 100.0% | 100.0% | 100.0% |
| Total Home Mortgage Loans | | | | Families By Family Income % | | | |
| Low | 8 | 10.7% | 538 | 5.0% | 20.7% | 4.1% | 2.0% |
| Moderate | 11 | 14.7% | 1,241 | 11.6% | 18.4% | 13.3% | 9.1% |
| Middle | 16 | 21.3% | 2,370 | 22.2% | 19.6% | 20.9% | 17.6% |
| Upper | 28 | 37.3% | 5,232 | 48.9% | 41.3% | 39.8% | 49.8% |
| Unknown | 12 | 16.0% | 1,315 | 12.3% | 0.0% | 21.8% | 21.5% |
| TOTAL | 75 | 100.0% | 10,696 | 100.0% | 100.0% | 100.0% | 100.0% |

Appendix D

| Distribution of 2019 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|------------|---------------|---------------|-----------------|---------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2019 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | |
| | | # | % | % | \$ (000s) | \$ % | \$ % | % |
| Business Revenue | \$1 Million or Less | 119 | 70.0% | 50.9% | \$8,103 | 44.2% | 39.1% | 91.5% |
| | Over \$1 Million/ Unknown | 51 | 30.0% | 49.1% | \$10,217 | 55.8% | 60.9% | 8.5% |
| | TOTAL | 170 | 100.0% | 100.0% | \$18,320 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 122 | 71.8% | 86.6% | \$4,252 | 23.2% | 25.7% | |
| | \$100,001– \$250,000 | 31 | 18.2% | 7.8% | \$5,687 | 31.0% | 23.2% | |
| | \$250,001–\$1 Million | 17 | 10.0% | 5.7% | \$8,381 | 45.7% | 51.1% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 170 | 100.0% | 100.0% | \$18,320 | 100.0% | 100.0% | |
| Loan Size Revenue \$1 Million or Less | \$100,000 or Less | 93 | 78.2% | | \$3,069 | 37.9% | | |
| | \$100,001– \$250,000 | 23 | 19.3% | | \$4,153 | 51.3% | | |
| | \$250,001–\$1 Million | 3 | 2.5% | | \$881 | 10.9% | | |
| | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | | |
| | TOTAL | 119 | 100.0% | | \$8,103 | 100.0% | | |

Appendix D

| Distribution of 2020 Small Business Lending By Borrower Income Level | | | | | | | | |
|---|------------------------------|-----------------------|---------------|---------------|-----------------|----------------|---------------|---------------------|
| Business Revenue and Loan Size | | 2020 | | | | | | |
| | | Count | | | Dollars | | | Total Businesses |
| | | Bank | | Aggregate | Bank | | Aggregate | % |
| | | # | % | % | \$ (000s) | \$ % | \$ % | |
| Business Revenue | \$1 Million or Less | 141 | 58.0% | 36.8% | \$9,992 | 41.1% | 29.1% | 91.8% |
| | Over \$1 Million/ Unknown | 102 | 42.0% | 63.2% | \$14,299 | 58.9% | 70.9% | 8.2% |
| | TOTAL | 243 | 100.0% | 100.0% | \$24,291 | 100.0% | 100.0% | 100.0% |
| Loan Size | \$100,000 or Less | 178 | 73.3% | 81.3% | \$5,244 | 21.6% | 24.3% | |
| | \$100,001–\$250,000 | 39 | 16.0% | 11.3% | \$6,773 | 27.9% | 24.4% | |
| | \$250,001–\$1 Million | 26 | 10.7% | 7.4% | \$12,274 | 50.5% | 51.3% | |
| | Over \$1 Million | 0 | 0.0% | 0.0% | \$0 | 0.0% | 0.0% | |
| | TOTAL | 243 | 100.0% | 100.0% | \$24,291 | 100.0% | 100.0% | |
| Loan Size | Revenue \$1 Million or Less | \$100,000 or Less | 111 | 78.7% | | \$2,876 | 28.8% | |
| | | \$100,001–\$250,000 | 22 | 15.6% | | \$3,711 | 37.1% | |
| | | \$250,001–\$1 Million | 8 | 5.7% | | \$3,405 | 34.1% | |
| | | Over \$1 Million | 0 | 0.0% | | \$0 | 0.0% | |
| | | TOTAL | 141 | 100.0% | | \$9,992 | 100.0% | |

GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Assessment area: One or more of the geographic areas delineated by the bank and used by the regulatory agency to assess an institution's record of CRA performance.

Census tract: A small subdivision of metropolitan and nonmetropolitan counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan statistical areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely, depending on population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community contact: Interviews conducted as part of the CRA examination to gather information that might assist examiners in understanding the bank's community, available opportunities for helping to meet local credit and community development needs, and perceptions on the performance of financial institutions in helping meet local credit needs. Communications and information gathered can help to provide a context to assist in the evaluation of an institution's CRA performance.

Community development: An activity associated with one of the following five descriptions: (1) affordable housing (including multifamily rental housing) for low- or moderate-income individuals (LMI); (2) community services targeted to LMI individuals; (3) activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; (4) activities that revitalize or stabilize low- or moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies; or (5) Neighborhood Stabilization Program (NSP) eligible activities in areas with HUD-approved NSP plans, which are conducted within two years after the date when NSP program funds are required to be spent and benefit low-, moderate-, and middle-income individuals and geographies.

Consumer loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Demographics: The statistical characteristics of human populations (e.g., age, race, sex, and income) used especially to identify markets.

Appendix D (continued)

Distressed nonmetropolitan middle-income geography: A middle-income, nonmetropolitan geography will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20 percent or more, or (3) a population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include nonrelatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into “male householder” (a family with a male householder and no wife present) or “female householder” (a family with a female householder and no husband present).

Full-scope review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders who do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and income of applicants; the amount of loan requested; and the disposition of the application (e.g., approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes, and refinancing of home improvement and home purchase loans.

Household: One or more persons who occupy a housing unit. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

Housing affordability ratio: Calculated by dividing the median household income by the median housing value. It represents the amount of single family, owner-occupied housing that a dollar of income can purchase for the median household in the census tract. Values closer to 100 percent indicate greater affordability.

Limited-scope review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Appendix D (continued)

Low-income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Median family income: The dollar amount that divides the family income distribution into two equal groups, half having incomes above the median, half having incomes below the median. The median family income is based on all families within the area being analyzed.

Metropolitan area (MA): A metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

Middle-income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent in the case of a geography.

Moderate-income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Nonmetropolitan statistical area (nonMSA): Not part of a metropolitan area. (See metropolitan area.)

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-occupied units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Performance context: The performance context is a broad range of economic, demographic, and institution- and community-specific information that an examiner reviews to understand the context in which an institution's record of performance should be evaluated. The performance context is not a formal or written assessment of community credit needs.

Appendix D (continued)

Performance criteria: These are the different criteria against which a bank's performance in helping to meet the credit needs of its assessment area(s) is measured. The criteria relate to lending, investment, retail service, and community development activities performed by a bank. The performance criteria have both quantitative and qualitative aspects. There are different sets of criteria for large banks, intermediate small banks, small banks, wholesale/limited purpose banks, and strategic plan banks.

Performance evaluation (PE): A written evaluation of a financial institution's record of meeting the credit needs of its community, as prepared by the federal financial supervision agency responsible for supervising the institution.

Qualified investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated area: A rated area is a state or multistate metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan area, the institution will receive a rating for the multistate metropolitan area.

Small businesses/small farms: A small business/farm is considered to be one in which gross annual revenues for the preceding calendar year were \$1 million or less.

Small loan(s) to business(es): That is, "small business loans" are included in "loans to small businesses" as defined in the Consolidated Reports of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are secured either by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): That is, "small farm loans" are included in "loans to small farms" as defined in the instructions for preparation of the Consolidated Reports of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

Underserved middle-income geography: A middle-income, nonmetropolitan geography will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

Upper-income: Individual income that is 120 percent or more of the area median income, or a median family income that is 120 percent or more, in the case of a geography.