



Office of the  
Comptroller of the Currency  
Washington, DC 20219

# **INTERMEDIATE SMALL BANK**

## **PUBLIC DISCLOSURE**

June 30, 2025

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Citizens National Bank  
Charter Number: 16076

200 Forks of the River Parkway  
Sevierville, TN 37862

Office of the Comptroller of the Currency

320 Seven Springs Way, Suite 310  
Brentwood, TN 37027

**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, and should not be construed as, an assessment of the financial condition of this 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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## Overall CRA Rating

**Institution's CRA Rating:** This institution is rated **Satisfactory**.

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on a reasonable loan-to-deposit (LTD) ratio, a substantial majority of loans originated inside the bank's assessment areas (AAs), a reasonable geographic distribution, a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, and no CRA-related complaints.
- The Community Development (CD) Test rating is based on the bank's satisfactory responsiveness to the needs of the communities within its AAs through its CD loans, investments, and services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio was reasonable.

The bank's quarterly average LTD ratio for the twelve quarters in the evaluation period was 72.8 percent, with a quarterly high of 81.7 percent and a quarterly low of 62.8 percent. We compared the bank's LTD ratio to similarly situated banks in the AAs. The quarterly average LTD ratio for banks in this peer group was 81.8 percent with a high average ratio 96.0 percent and a low average ratio of 66.1 percent. The LTDs are calculated on a bank-wide basis.

### Lending in Assessment Area

A substantial majority of the bank's loans were inside its AA(s).

The bank originated and purchased 77.58 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria. The following table reflects the distribution of loans by number and dollar volume, originated inside or outside of the AAs during the evaluation period.

Table 1: Lending Inside and Outside of the Assessment Area								2022-2024				
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)		
	Inside		Outside			Inside		Outside				
	#	%	#	%		\$	%	\$	%			
Home Mortgage	343	88.17	46	11.83	389	187,855	92.93	14,290	7.07	202,145		
Small Business	221	65.38	117	34.62	338	43,471	63.31	25,197	36.69	68,668		
<b>Total</b>	<b>564</b>	<b>77.58</b>	<b>163</b>	<b>22.42</b>	<b>727</b>	<b>231,326</b>	<b>85.42</b>	<b>39,487</b>	<b>14.58</b>	<b>270,813</b>		

Source: 1/1/2022 - 12/31/2024 Bank Data.  
Due to rounding, totals may not equal 100.0%

## Description of Institution

Citizens National Bank (CNB, bank) is an intrastate financial institution headquartered in Sevierville, Tennessee. CNB is wholly owned by CNB Bancshares, Inc. (CNB Bancshares), a one-bank holding company. The main offices for both CNB Bancshares and CNB are located in Sevierville, Tennessee, which is approximately 20 miles east of Knoxville, Tennessee. There have been no major changes in the bank's corporate structure, including merger or acquisition activities, since the previous CRA Performance Evaluation. There were no branch openings during the evaluation period and one branch closure, the Walmart branch in Knoxville, in March 2024.

CNB has four AAs which includes the Jefferson-Hamblen County MSA, the Knox County AA, the McMinn County AA, and the Sevier County AA. The Jefferson-Hamblen County MSA is part of the Morristown MSA and as of 2024, includes 24 census tracts (CTs), with one low- and three moderate-income CTs, made up of Jefferson and Hamblen Counties. The Knox County AA consisted of six CTs, with no low- or moderate-income (LMI) CTs. The McMinn County AA consists of 14 census tracts, with no low-income and three moderate-income CTs. The Sevier County AA consists of 27 census tracts, with no low-income and four moderate-income CTs. As the McMinn County AA and Sevier County AA were not located in an MSA, we combined these AAs into the Tennessee Non-MSA AA for the purposes of our evaluation.

CNB's last CRA performance evaluation was dated May 2, 2022, which rated its overall performance as "Satisfactory." There are no legal, financial, or other factors that impede CNB from meeting the credit needs of the community.

CNB offers traditional banking products and services, including residential and commercial lending products, as well as mobile deposits and digital banking. Digital banking services include retail online banking, access to deposit and loan balance information, transfers between CNB accounts, bill payment, and check images. Safe deposit box and wealth management services are also offered. Branch locations typically operate during traditional business hours, with some branches offering limited Saturday availability for customers. Branches are available throughout CNB's AAs, including in moderate-income CTs.

As of December 31, 2024, CNB reported total assets of \$1.93 billion and deposits of \$1.75 billion. The bank's net loan portfolio totaled \$1.2 billion, representing 63.2 percent of total assets. Tier one leverage capital was 10.0 percent.

## Scope of the Evaluation

### Evaluation Period/Products Evaluated

We evaluated CNB's performance under Lending and Community Development (CD) tests, for the period of January 1, 2022, to December 31, 2024. In evaluating the bank's lending performance, we reviewed data subject to filing standards under the Home Mortgage Disclosure Act (HMDA), as well as small business lending data subject to CRA filing requirements. We reviewed a supplemental sample of small business loans for 2022, during the time CRA reporting requirements did not apply to the bank. The CD test included an assessment of CD loans, investments, and services that meet the regulatory definition of meeting the needs of the community.

## **Selection of Areas for Full-Scope Review**

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under the state of Tennessee Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

## **Ratings**

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings. We placed more weight on the bank’s two non-MSA AAs (Sevier County and McMinn County, collectively the Tennessee Non-MSA AAs) as these contained the highest concentration of lending activities. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. Refer to the “Scope” section under the state of Tennessee Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

Pursuant to 12 CFR 25.28(c) (March 29, 2024) in determining a national banks or federal savings association’s (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution (or any affiliate whose loans have been considered as part of the institution’s lending performance) has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

The OCC will consider any information that this institution engaged in discriminatory or other illegal credit practices, identified by or provided to the OCC before the end of the institution’s next performance evaluation in that subsequent evaluation, even if the information concerns activities that occurred during the evaluation period addressed in this performance evaluation.

## State Rating

### State of Tennessee

**CRA rating for the State of Tennessee<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank exhibited a reasonable distribution by income of the geographies inside the AAs.
- The bank exhibited a reasonable distribution of lending to individuals of different income levels and businesses of different sizes.
- The bank did not receive any CRA-related complaints in the evaluation period.
- The bank's performance under the CD Test is satisfactory.

### Description of Institution's Operations in Tennessee

CNB operates only in Tennessee. The information provided in the “Description of Institution” section of this Performance Evaluation describes the institution’s operations in Tennessee.

CNB has 23 banking offices, 24 automated teller machines (ATMs), and 23 ATM cash dispensers located in Tennessee. Competition is strong within the four AAs. In the Tennessee Non-MSA AA (Sevier and McMinn Counties), CNB maintains a 29.9 percent market share deposits, ranking second among seven institutions. In the Jefferson-Hamblen AA, CNB has an 8.7 percent market share, ranking sixth among 11 institutions in the two counties. In the Knox County AA, CNB has an 0.23 percent market share, ranking 24th among 32 institutions in the Knox County MSA. Notably, CNB’s AA consists of a small portion of the Knox County MSA.

We obtained three community contacts from non-profit agencies that operate within CNB’s full-scope AAs in order to identify and assess the credit needs of the communities. Each contact reiterated the need for affordable housing opportunities, as well as expanded retail banking services for LMI individuals.

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<sup>1</sup> This rating reflects performance within the state. The statewide evaluations do not reflect performance in the parts of those states contained within the MMSA.

## Jefferson-Hamblen County MSA

Assessment Area(s) - Jefferson-Hamblen County MSA								
2022-2024								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
<b>Geographies (Census Tracts)</b>	24	4.17	12.50	66.67	16.67	0.00		
<b>Population by Geography</b>	119,182	3.01	12.88	67.43	16.68	0.00		
<b>Housing Units by Geography</b>	51,593	2.73	13.13	67.80	16.34	0.00		
<b>Owner-Occupied Housing by Geography</b>	31,523	1.39	10.46	69.36	18.79	0.00		
<b>Occupied Rental Units by Geography</b>	13,005	6.16	21.41	59.00	13.43	0.00		
<b>Vacant Units by Geography</b>	7,065	2.41	9.77	77.04	10.79	0.00		
<b>Businesses by Geography</b>	3,185	7.66	16.73	58.08	17.52	0.00		
<b>Farms by Geography</b>	181	0.55	7.18	80.11	12.15	0.00		
<b>Family Distribution by Income Level</b>	30,583	19.71	19.42	20.05	40.82	0.00		
<b>Household Distribution by Income Level</b>	44,528	23.28	16.58	17.99	42.15	0.00		
<b>Unemployment rate (%)</b>	6.98	14.22	9.89	6.86	4.73	0.00		
<b>Households Below Poverty Level (%)</b>	14.51	45.84	25.96	12.33	8.77	0.00		
<b>Median Family Income (34100 - Morristown, TN MSA)</b>	\$59,764			<b>Median Housing Value</b>	\$145,550			
<b>Median Family Income (34100 - Morristown, TN MSA) for 2024</b>	\$75,000			<b>Median Gross Rent</b>	\$726			
				<b>Families Below Poverty Level</b>	11.23			
<i>FFIEC File - 2020 Census</i>								
<i>FFIEC File – 2024 Census</i>								
<i>2024 Dun &amp; Bradstreet SBSF Demographics</i>								
<i>Due to rounding, totals may not equal 100.0%</i>								
<i>(*) The NA category consists of geographies that have not been assigned an income classification</i>								

## Tennessee Non-MSA

Assessment Area(s) - TN Non-MSA								
2022-2024								
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #		
<b>Geographies (Census Tracts)</b>	41	0.00	17.07	60.98	19.51	2.44		
<b>Population by Geography</b>	151,656	0.00	16.55	59.56	23.88	0.01		
<b>Housing Units by Geography</b>	81,619	0.00	16.36	62.38	21.26	0.01		
<b>Owner-Occupied Housing by Geography</b>	42,716	0.00	13.48	60.48	26.02	0.02		
<b>Occupied Rental Units by Geography</b>	16,424	0.00	27.78	54.72	17.50	0.00		
<b>Vacant Units by Geography</b>	22,479	0.00	13.47	71.57	14.96	0.00		
<b>Businesses by Geography</b>	5,646	0.00	22.69	56.96	19.89	0.46		
<b>Farms by Geography</b>	216	0.00	12.96	69.91	17.13	0.00		
<b>Family Distribution by Income Level</b>	40,862	18.33	17.49	20.66	43.53	0.00		
<b>Household Distribution by Income Level</b>	59,140	19.69	15.90	17.85	46.56	0.00		
<b>Unemployment rate (%)</b>	5.23	0.00	6.28	5.61	3.72	0.00		
<b>Households Below Poverty Level (%)</b>	14.31	0.00	22.24	14.13	8.90	0.00		
<b>Median Family Income (Non-MSAs - TN)</b>	\$55,998			<b>Median Housing Value</b>	\$167,600			
<b>Median Family Income (Non-MSAs - TN) for 2024</b>	\$69,100			<b>Median Gross Rent</b>	\$776			
				<b>Families Below Poverty Level</b>	11.29			
<i>FFIEC File - 2020 Census</i>								
<i>FFIEC File – 2024 Census</i>								
<i>2024 Dun &amp; Bradstreet SBSF Demographics</i>								
<i>Due to rounding, totals may not equal 100.0%</i>								
<i>(*) The NA category consists of geographies that have not been assigned an income classification</i>								

## Scope of Evaluation in Tennessee

We completed full-scope reviews of the Sevier County Non-MSA AA and the McMinn County Non-MSA (collectively, the Tennessee Non-MSA AA) and the Jefferson-Hamblen County AA, with the Knox County MSA AA receiving a limited-scope review. These assessments were based on volume of lending performed in these areas, such that would allow for a meaningful analysis to be performed.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

### LENDING TEST

The bank's performance under the Lending Test in Tennessee is rated Satisfactory.

#### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Tennessee was reasonable.

#### Distribution of Loans by Income Level of the Geography

The bank exhibited reasonable geographic distribution of loans in the state.

##### *Home Mortgage Loans*

Refer to Table 7 in appendix D for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

##### Tennessee Non-MSA AA

In 2022-2024, 19.03 percent of the bank's home mortgage loans were made in the moderate-income CTs, which is higher than both the peer aggregate lending level (13.18 percent) and the percentage of owner-occupied housing units in the AA (13.48 percent). There were no low-income CTs in the AAs for this time period.

##### Jefferson-Hamblen County MSA

In 2022-2024, the bank made no loans in low-income CTs, which is below both the peer aggregate lending level (1.44 percent) and the percentage of owner-occupied housing units in the AA (1.39 percent), although these comparators indicate limited opportunities to lend. In moderate-income CTs, the bank originated 4.44 percent of loans, which is lower than both the peer aggregate lending level (9.83 percent) and the percentage of owner-occupied housing units (10.46 percent).

##### *Small Loans to Businesses*

Refer to Table 9 in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

##### Tennessee Non-MSA AA

In 2022-2024, the bank originated 22.22 percent of the bank's small business loans in the moderate-income CTs, which is in-line with the peer aggregate lending level (20.66 percent) and the percentage of business (22.69 percent). There were no low-income CTs in the AA for this time period.

##### Jefferson-Hamblen County MSA

In 2022-2024, the bank did not originate any small business loans in the low-income CTs. This is below the peer aggregate lending level (5.10 percent) and the overall percentage of housing units (7.66 percent). The bank originated 11.54 of small business loans in moderate-income CTs, which is in-line with the peer aggregate lending level (11.81 percent) and lower than the overall percentage of business (16.73 percent).

## ***Lending Gap Analysis***

We did not identify any unexplained conspicuous gaps during our review.

## **Distribution of Loans by Income Level of the Borrower**

The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses and farms of different sizes, given the product lines offered by the bank.

### ***Home Mortgage Loans***

Refer to Table 8 in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

#### **Tennessee Non-MSA AA**

In 2022-2024, the bank originated 3.64 percent of loans to low-income borrowers, which is the bank's lending activity in the Tennessee non-MSA AAs, which is in-line with the peer aggregate lending level (4.32 percent) and below the percentage of low-income families in the AA (18.33 percent). The bank originated 8.91 percent of loans to moderate-income borrowers, which is in-line with the peer aggregate lending level (10.76 percent) and below the overall percentage of low-income families in the AA (17.49 percent).

#### **Jefferson-Hamblen County MSA**

In 2022-2024, the bank originated 5.56 percent of loans to low-income borrowers, which is in-line with the peer aggregate lending level (5.76 percent) and below the overall percentage of low-income families in the AA (19.71 percent). The bank originated 10.00 percent of loans to moderate-income borrowers, which is lower than the peer aggregate (16.61 percent) and overall percentage of low-income families in the AA (19.42 percent).

### ***Small Loans to Businesses***

Refer to Table 10 in appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

#### **Tennessee Non-MSA AA**

In 2022-2024, the bank originated 42.93 percent of loans to businesses with gross revenues equal to or less than \$1 million. This lending level is below the peer aggregate lending level (54.51 percent) and the percentage of businesses (77.70 percent).

#### **Jefferson-Hamblen AA**

In 2022-2024, the bank originated 42.31 percent of loans to businesses with gross revenues equal to or less than \$1 million. This lending level was in-line with the peer aggregate lending level (50.92 percent) and below the overall percentage of businesses (76.30 percent). Note, revenues were not available for 38.46 percent of the bank's loans.

## **Responses to Complaints**

CNB received no CRA-related complaints during the evaluation period.

## Conclusions for Area Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Knox County AA was consistent with the bank's overall performance under the Lending Test in the full-scope areas.

## COMMUNITY DEVELOPMENT TEST

The bank's performance under the Community Development Test in the state of Tennessee is rated Satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope and limited-scope reviews, the bank exhibited adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's AAs.

### Number and Amount of Community Development Loans

CNB did not make any CD loans inside its AAs during the evaluation period. Four loans, totaling \$7.5 million, remain outstanding for loans made within the AAs in prior periods. Outside of its AA, the bank made two CD loans during the evaluation period. These two loans, originated in 2022 and 2023, for \$4.7 million, were made to provide housing opportunities for low-income families in the surrounding communities. Five loans, totaling \$8 million, remain outstanding for loans made in Tennessee, outside of the AAs, in prior periods.

### Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Jefferson-Hamblen County AA	1	\$164	0	\$0	1	33.33	\$164	4.60	0	\$0
Knox County AA	2	\$3,365	0	\$0	2	66.67	\$3,365	95.40	0	\$0
TN Non-MSA	0	\$0	0	\$0	0	0	\$0	0	0	\$0
Broader Statewide or Regional Area	-	\$0	0	\$0	0	0	\$0	0	0	\$0
Total	3	3,529	0	\$0	3	100.00	\$3,529	100.00	0	\$0

CNB's investments made prior to the current evaluation period continue to benefit LMI communities inside its AAs. The following are examples of qualified investments in the AAs:

- Two investments in the rehabilitation of existing affordable housing complexes in Knox County.
- Investment in permanent housing units for chronically homeless men and women in Morristown, TN (Jefferson-Hamblen AA).

## **Extent to Which the Bank Provides Community Development Services**

### Tennessee Non MSA AA

CNB demonstrated satisfactory responsiveness to CD needs of the community in the Tennessee Non-MSA AAs. Bankers volunteered significant hours during the evaluation period to local organizations that provide services to LMI youth, families, and senior citizens. Employees also served in advisory capacities on the board of a local economic development organization. The bank also provided monetary donations to local organizations that primarily benefit LMI individuals.

### Jefferson-Hamblen County AA

CNB employees provided volunteer services in area non-profit agencies. Two employees serve on the board in advisory capacities for organization that support LMI programs. The bank also provided monetary donations to local organizations that primarily benefit LMI individuals.

## **Conclusions for Area Receiving a Limited Scope Review**

Based on a limited-scope review, the bank's performance under the CD Test in the Knox County AA was consistent with the bank's overall performance under the CD Test in the full-scope areas.

## Appendix A: Scope of Examination

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The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSA(s) and non-MSA(s) that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	01/01/2022 to 12/31/2024	
<b>Bank Products Reviewed:</b>	Home mortgage, small business, Community development loans, qualified investments, community development services	
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
Tennessee		
Sevier County AA (TN Non-MSA)	Full-scope	Entirety of Sevier County, combined into TN Non-MSA AA
McMinn County AA (TN Non-MSA)	Full-scope	Entirety of McMinn County, combined into TN Non-MSA AA
Jefferson-Hamblen County MSA AA	Full-scope	Entireties of Hamblen and Jefferson Counties
Knox County AA	Limited-scope	Six CTs in Knox County

## Appendix B: Summary of MMSA and State Ratings

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RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Multistate Rating
Citizens National Bank	Satisfactory	Satisfactory	Satisfactory
Tennessee	Satisfactory	Satisfactory	Satisfactory

(\*) The Lending Test and Community Development Test carry equal weight in the overall rating.

## Appendix C: Definitions and Common Abbreviations

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The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

**Affiliate:** Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

**Community Reinvestment Act (CRA):** The statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its entire community, including LMI areas, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

**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, other secured consumer loans, and other unsecured consumer loans.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives 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 that conduct 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 the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

**Home Mortgage Loans:** A closed-end mortgage loan or an open-end line of credit as these terms are defined under 12 CFR 1003.2, and that is not an excluded transaction under 12 CFR 1003.3(c)(1) through (c)(10) and (c)(13).

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

**Limited-Scope Review:** Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of CD loans and qualified investments, branch distribution, and CD services).

**Low-Income:** Individual income that is at 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 state/assessment area.

**Median Family Income (MFI):** The median income determined by the U.S. Census Bureau every five years and used to determine the income level category of geographies. The median is the point at which half of the families have income above, and half below, a range of incomes. Also, the median income determined by the Federal Financial Institutions Examination Council (FFIEC) annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above, and half below, a range of incomes.

**Metropolitan Division:** As defined by Office of Management and Budget, a county or group of counties within a Core Based Statistical Area that contains an urbanized population of at least 2.5 million. A Metropolitan Division consists of one or more main/secondary counties that represent an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

**Metropolitan Statistical Area:** An area, defined by the Office of Management and Budget, as a core based statistical area associated with at least one urbanized area that has a population of at least 50,000. The Metropolitan Statistical Area comprises the central county or counties containing the core, plus adjacent outlying counties having a high degree of social and economic integration with the central county or counties as measured through commuting.

**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.

**Multistate Metropolitan Statistical Area (MMSA):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

**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.

**Prior Period Investments:** Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

**Rating Area:** A rated area is a state or multistate metropolitan statistical 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 statistical area, the institution will receive a rating for the multistate metropolitan statistical area.

**Small Loan(s) to Business(es):** A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans.

**Small Loan(s) to Farm(s):** A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report 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.

**Tier 1 Capital:** The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

**Unfunded Commitments:** Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. Deposit data are compiled by the FDIC and are available as of June 30<sup>th</sup> of each year. Tables without data are not included in this PE.

The following is a listing and brief description of the tables included in each set:

**Table 7. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.

**Table 8. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/AA. The table also presents aggregate peer data for the years the data is available.

**Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s AA.

**Table 10. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Assessment Area:	Table 7: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2022-2024		
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	% Aggregate
Jefferson-Hamblen County MSA	90	58,840	26.24	7,070	1.39	--	1.44	10.46	4.44	9.83	69.36	77.78	68.68	18.79	17.78	20.04	--	--	--
Knox County MSA	6	9,370	1.75	1,588	--	--	--	--	--	--	80.36	66.67	76.13	19.64	33.33	23.87	--	--	--
TN Non-MSA	247	119,645	72.01	11,772	--	--	--	13.48	19.03	13.18	60.48	63.56	61.31	26.02	17.41	25.45	0.02	--	0.05
<b>Total</b>	<b>343</b>	<b>187,855</b>	<b>100.00</b>	<b>20,430</b>	<b>0.54</b>	--	<b>0.50</b>	<b>11.16</b>	<b>14.87</b>	<b>11.00</b>	<b>65.62</b>	<b>67.35</b>	<b>65.02</b>	<b>22.67</b>	<b>17.78</b>	<b>23.46</b>	<b>0.01</b>	--	<b>0.03</b>

Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

Assessment Area:	Table 8: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2022-2024		
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$	% of Total Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
Jefferson-Hamblen County MSA	90	58,840	26.24	7,070	19.71	5.56	5.76	19.42	10.00	16.61	20.05	16.67	23.85	40.82	50.00	38.18	--	17.78	15.62
Knox County MSA	6	9,370	1.75	1,588	21.35	--	7.93	17.19	--	23.61	25.19	16.67	26.26	36.27	50.00	29.35	--	33.33	12.85
TN Non-MSA	247	119,645	72.01	11,772	18.33	3.64	4.32	17.49	8.91	10.76	20.66	9.31	16.42	43.53	59.11	50.16	--	19.03	18.33
<b>Total</b>	<b>343</b>	<b>187,855</b>	<b>100.00</b>	<b>20,430</b>	<b>19.10</b>	<b>4.08</b>	<b>5.10</b>	<b>18.23</b>	<b>9.04</b>	<b>13.78</b>	<b>20.75</b>	<b>11.37</b>	<b>19.76</b>	<b>41.92</b>	<b>56.56</b>	<b>44.40</b>	--	<b>18.95</b>	<b>16.97</b>

Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2022, 2023 HMDA Aggregate Data, "--" data not available.

Due to rounding, totals may not equal 100.0%

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.

Assessment Area:	2022-2024																		
	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
Jefferson-Hamblen County MSA	26	4,673	11.26	3,649	7.66	--	5.10	16.73	11.54	11.81	58.08	69.23	63.47	17.52	19.23	19.62	--	--	--
Knox County MSA	7	2,496	3.03	21,549	--	--	4.46	--	--	10.78	84.18	85.71	31.24	15.82	14.29	53.07	--	--	0.45
TN Non-MSA	198	37,920	85.71	7,208	--	--	--	22.69	22.22	20.66	56.96	59.60	57.67	19.89	18.18	21.52	0.46	--	0.15
<b>Total</b>	231	45,089	100.00	32,406	2.56	--	3.54	19.02	20.35	13.09	59.36	61.47	40.75	18.80	18.18	42.29	0.27	--	0.33

Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, “-” data not available.  
Due to rounding, totals may not equal 100.0%.

Assessment Area:	2022-2024																		
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM			Businesses with Revenues Not Available								
	#	\$	% of Total Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate		
Jefferson-Hamblen County MSA	26	4,673	11.26	3,649	76.30	42.31	50.92	10.36	19.23	13.34	38.46	--	--	--	--	--	--		
Knox County MSA	7	2,496	3.03	21,549	75.56	14.29	48.51	10.59	57.14	13.84	28.57	--	--	--	--	--	--		
TN Non-MSA	198	37,920	85.71	7,208	77.70	42.93	54.51	10.04	31.31	12.26	25.76	--	--	--	--	--	--		
<b>Total</b>	231	45,089	100.00	32,406	77.07	41.99	50.11	10.19	30.74	12.74	27.27	--	--	--	--	--	--		

Source: FFIEC File – 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2022, 2023 CRA Aggregate Data, “-” data not available.  
Due to rounding, totals may not equal 100.0%.

The total loan amount presented in the tables for each assessment area may differ from the total loan amount reported in the aggregate table due to how the underlying loan data is rounded in each table.