



PUBLIC DISCLOSURE

June 22, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank & Trust
Charter # 10697

111 South Main Street
Atmore, AL 36502

Office of the Comptroller of the Currency

3595 Grandview Parkway, Suite 655
Birmingham, AL 35243

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 major factors that support this rating include:

The lending test rating is based on:

- The loan-to-deposit ratio is reasonable given the bank's size, financial condition, economic environment, and assessment area (AA) credit needs.
- The bank originates a substantial majority of loans within its AA.
- The bank had reasonable penetration for lending to borrowers of different income levels within its AA.
- The bank had an excellent dispersion of home loans to moderate-income census tracts in the AA.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's loan-to-deposit (LTD) ratio is reasonable.

First National Bank and Trust (FNB&T)'s quarterly LTD ratio since the previous CRA Performance Evaluation (PE) averaged 63.68 percent. We compared the bank's LTD ratio to four similarly situated banks in their market area. The aggregate average LTD ratio for the competing banks was 63.12 percent, with a low average of 38.79 percent and a high average of 75.74 percent.

The following table reflects FNB&T's and similarly situated institutions' net LTD ratios over the review period of March 31, 2016, through December 31, 2019:

Loan-To-Deposit Ratios		
Institution	Total Assets (in 000s) as of 12/31/19	Avg. LTD
<i>First National Bank and Trust</i>	\$157,662	63.68%
United Bank	\$711,540	65.12%
Citizens' Bank, Inc	\$107,444	72.83%
Escambia County Bank	\$73,283	38.79%
Peoples Exchange Bank of Monroe County	\$69,897	75.74%

Source: Institution Reports of Condition for the 16-quarter period from March 31, 2016 to December 31, 2019.

Lending in Assessment Area

A Substantial majority of the bank's loans are inside its AAs.

The bank originated and purchased 87.5 percent of its total loans inside the bank's AA during the evaluation period. We perform this analysis 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.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	19	95.00%	1	5.00%	20	\$1,758	89.44%	\$208	10.56%	\$1,966
Small Business	16	80.00%	4	20.00%	20	\$943	27.85%	\$2,444	72.15%	\$3,387
Total	35	87.50%	5	12.50%	40	\$2,701	50.46%	\$2,652	49.54%	\$5,353

Description of Institution

FNB&T is a national bank with total assets of \$165.8 million as of March 31, 2020. The bank is wholly owned by First Suncoast Trust Bancshares, Inc., a one bank holding company located in Atmore, AL. FNB&T has five offices and five automated teller machines located in the AA. The bank provides services from their main location and two branches in Atmore and one branch each in Excel and Mobile. The bank's lending products offered include residential mortgages, commercial and agricultural loans, and consumer loans. The bank primarily has three home loan products including a 5- year balloon, 5/1 adjustable rate mortgage, and 30-year fixed rate loan. FNB&T offers various deposit products, including personal checking, savings, money market, business checking accounts, certificates of deposits, and cash management services. The Bank also offers on-line banking to its customers.

Loan Portfolio Composition as of March 31, 2020		
Loan Type	Dollar Amount (000's)	Percent of Total Loans
Commercial Real Estate Loans	\$47,953	47.68%
Commercial and Industrial	\$15,260	15.17%
Total Commercial Loans	\$63,216	62.86%
Residential Real Estate	\$25,611	25.47%
Agricultural	\$3,655	3.63%
Consumer	\$5,322	5.29%
Other loans	2,765	2.75%
Total Loans	\$100,566	100%

Source: March 31, 2020 Call Report

As of June 30, 2019, FNB&T ranked fourth in deposits out of 15 financial institutions in Escambia County, AL and Monroe County, AL. FNB&T reported total deposits of \$146 million, or a 13.49 percent market share, as of June 30, 2019. Note that the bank opened a branch in Mobile County, AL in September 2019; which is outside the FDIC's Market Share June 30, 2019 reporting time period. As a result, we did not have a deposit ranking of the Mobile County market for comparative purposes.

The bank's Escambia/Monroe non-MSA AA is made up of 17 census tracts (CTs). There are eight CT's in Monroe County. There are nine CT's in Escambia County. Of the 17 CT's, there are no low-income, five moderate-income, 10 middle-income, and two upper-income. The federal government designated eight of the ten middle-income CT's as distressed and four of the distressed CT's as underserved.

There are 114 CTs in the Mobile MSA. Within the 114 CTs, there are 19 low-income, 27 moderate-income, 36 middle-income, 30 upper-income, and two unknown.

Local competition is moderate in the Escambia/Monroe AA. The bank's competition consists of United Bank, Trustmark National Bank, Regions Bank, and Escambia County Bank. Local competition in the Mobile MSA is significant. The bank's competition consists of large regional and nationwide banks including: Regions Bank; PNC Bank, National Association; BBVA USA; and Well Fargo Bank, National Association.

The bank's preceding CRA examination was dated January 19, 2016 and the bank received a Satisfactory rating. No legal or financial constraints exist which prohibit the bank from meeting AA credit needs.

Management has not received any public comments or complaints regarding the bank's CRA performance since our prior evaluation. The bank has not been a Home Mortgage Disclosure Act (HMDA) reporter. However, due to the opening of a new branch in Mobile, AL in September 2019 (located within an MSA), the bank began collecting HMDA data in 2020.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of FNB&T's CRA activities in its AA under the small bank CRA procedures. This includes the lending test which evaluates the bank's record of meeting the credit needs of the AA through its lending activities. We based conclusions regarding the lending test on samples of residential mortgage loans and small business loans. As of March 31, 2020, residential loans represented 25.47 percent and commercial loans represented 56.12 percent of the loan portfolio, respectively. We selected home loans and small business loans for review since these two products comprise a significant portion of the loan portfolio. For the lending test, we analyzed years 2017, 2018, and 2019.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, we selected one or more of AAs within that state for a full-scope review. For purposes of this evaluation, we combined and evaluated bank delineated assessment areas located within the same metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) as a single AA. Similarly, we combined and evaluated bank delineated non-MSA AAs within the same state as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how we selected full-scope AAs. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs. We selected the non-MSA AA for full scope since the majority of the bank's lending activities occurred in this AA. The Mobile MSA AA was not selected for a full or limited scope review due to the limited time that the Mobile branch was conducting business during the review period, only four months, beginning in September 2019. Additionally, the Mobile branch originated only a total

of 15 loans during these four months. Thus, the Mobile MSA loan origination population was insufficient for analysis.

Ratings

The bank's overall rating is a blend of the state ratings. The non-MSA AA was the single focus for this CRA examination. Weighting was equally proportioned to mortgage loans and small business loans, due to their similar size within the loan portfolio.

The state rating is based on performance in all bank AAs. Refer to the "Scope" section under each state and MMSA Rating section for details regarding how we weighted each area in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's 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 Bureau of Consumer Financial Protection, 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 Alabama

CRA rating for the State of Alabama¹: Satisfactory.

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The LTD ratio is reasonable given the Bank's size, financial condition, economic environment, and AA credit needs.
- The bank originates a substantial majority of loans within its AA.
- The bank had reasonable penetration for lending to borrowers of different income levels within its AA.
- The bank had an excellent dispersion of home loans to moderate-income census tracts in the AA.

Description of Institution's Operations in Alabama

FNB&T operates five offices and five automated teller machines within the state of Alabama. The bank provides services from the main location and two branches in Atmore and one branch each in Excel and Mobile. The bank's Escambia/Monroe non-MSA AA is made up of 17 CTs. There are eight CT's in Monroe County. There are nine CT's in Escambia County. Of the 17 CT's, there are no low-income, five moderate-income, 10 middle-income, and two upper-income. The federal government designated eight of the ten middle-income CT's as distressed and four of the distressed CT's as underserved. The non-MSA AA was selected for full scope since the majority of the bank's lending activities occurred in this AA.

There are 114 CTs in the Mobile MSA. Within the 114 CTs, there are 19 low-income, 27 moderate-income, 36 middle-income, 30 upper-income, and two unknown. We did not select the Mobile MSA AA for a full or limited scope review due to the limited time that the Mobile branch was conducting business during the review period, only four months, beginning in September 2019. Additionally, the Mobile branch originated only a total of 15 loans during these four months. Thus, the Mobile MSA loan origination population was insufficient for analysis.

The primary credit needs of the community, identified by three community contacts, are small business loans, low-down payment home loans, and affordable housing. All three community contacts also stated financial literacy and credit counseling are needs within the community. The community contacts noted that financial institutions in the area have shown commitment to meeting the needs of the community. Examiners also received a letter from Alabama Multi-family Loan Consortium, which stated FNB&T regularly participates in loans with this entity of which provide permanent financing on low- and moderate-income apartment communities in Alabama.

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

Escambia/Monroe non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Escambia/Monroe non-MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	31.3	56.3	12.5	0.0
Population by Geography	60,152	0.0	20.3	66.0	13.7	0.0
Housing Units by Geography	27,731	0.0	22.9	63.3	13.8	0.0
Owner-Occupied Units by Geography	15,335	0.0	19.3	65.7	15.0	0.0
Occupied Rental Units by Geography	6,730	0.0	24.4	61.3	14.3	0.0
Vacant Units by Geography	5,666	0.0	30.8	59.1	10.0	0.0
Businesses by Geography	2,897	0.0	27.1	52.6	20.3	0.0
Farms by Geography	153	0.0	14.4	71.2	14.4	0.0
Family Distribution by Income Level	14,529	27.6	17.7	18.7	36.0	0.0
Household Distribution by Income Level	22,065	31.6	15.0	15.4	38.0	0.0
Median Family Income Non-MSA - AL		\$45,454	Median Housing Value			\$89,426
			Median Gross Rent			\$564
			Families Below Poverty Level			21.8%
<i>Source: 2015 ACS Census and 2019 D&B Data</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 Alabama

We selected the non-MSA AA for full scope since the majority of the bank's lending activities occurred in this AA. We did not select the Mobile MSA AA for a full or limited scope review due to the limited time that the Mobile branch was conducting business during the review period, only four months, September 2019. Additionally, the Mobile branch originated only a total of 15 loans during these four months. Thus, the Mobile MSA loan origination population was insufficient for analysis. Residential loans and small business loans were selected for review since these two products comprise a significant portion of the loan portfolio. For the lending test, we analyzed years 2017, 2018, and 2019.

LENDING TEST

The bank's performance under the lending test in Alabama is rated Satisfactory.

Conclusions for (Area/Areas) Receiving (a Full-Scope Review/Full-Scope Reviews)

Based on a full-scope review, the bank's performance in the Escambia/Monroe non-MSA AA is good.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable distribution of loans in the State.

There were no low-income CTs in the AA during the evaluation period.

Home Mortgage Loans

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

For 2017-2019, the percentage of bank loans in moderate-income CTs was near the ratio for the percentage of owner-occupied housing units and exceeded the aggregate lending in those geographies.

Small Loans to Businesses

Refer to Table Q in the state of Alabama 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.

For 2017-2019, the bank's small business loans in moderate-income geographies did not meet standards of both the businesses located in the moderate-income CTs and the aggregate lending in those CTs. small business loans. The bank experiences considerable competition for small business loans, resulting in fewer opportunities to lend in these areas.

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

For 2017-2019, the percentage of bank loans to low-income borrowers did not meet the standards for the percentage of families with low income. The bank exceeded the aggregate lending to those borrowers. For 2017-2019, the percentage of bank loans to moderate-income borrowers exceeded both the percentage of moderate-income families and the aggregate percentage of lending to those borrowers. The AA has a high percentage of families living below the poverty level; which limits the opportunities to lending in the AA.

Small Loans to Businesses

Refer to Table R in the state of Alabama section of 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.

For 2017-2019, the percentage of bank loans to small businesses with revenues less than or equal to \$1 million exceeded both the percentage of small businesses as having revenues of less than or equal to \$1 million and the aggregate lending for these businesses.

Responses to Complaints

Management has not received any public comments or complaints regarding the bank's CRA performance since our prior evaluation. The bank has not been a HMDA reporter. However, due to the opening of a new branch in Mobile, AL in September 2019 (located within an MSA), the bank will begin collecting HMDA data in 2020.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that we reviewed, and the loan products we considered. The table also reflects the MSAs and non-MSAs 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”.

Time Period Reviewed:	(01/17/2016 to 12/31/19)	
Bank Products Reviewed:	Home mortgage, and small business	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		None
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
Escambia/Monroe non-MSA	Full-scope	
States - Alabama	Full-scope	

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank & Trust, Atmore, AL	
Overall Bank:	Lending Test Rating
	Satisfactory
State of Alabama:	Satisfactory

Appendix C: Definitions and Common Abbreviations

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 investments, and branch distribution).

Low-Income Individual: Individual income that is less than 50 percent of the area median income.

Low Income Geography: A census tract with a median family income that is less than 50 percent.

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.

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

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

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

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

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/assessment area. Deposit data are compiled by the FDIC and are available as of June 30th 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 O. 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 P. 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/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. 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 assessment area.
- Table R. 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 not available. The table also presents aggregate peer small business data for the years the data is available.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																2017-2019		
Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
Non-MSA AA	#	\$	% of Total	% 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
	20	\$1,774	100%	0.0	0.0	0.0	19.3	15.0	12.8	65.7	70.0	62.2	15.0	9.1	25.0	0.0	0.0	0.0
Total	20	\$1,774	100%	0.0	0.0	0.0	19.3	15.0	12.8	65.7	70.0	62.2	15.0	9.1	25.0	0.0	0.0	0.0

*Source: 2015ACS Census; 01/01/2017 - 12/31/2019
Due to rounding, totals may not equal 100.0*

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																2017-2019		
Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate	% of Families	% Bank Loans	Aggregate
Non MSA AA	20	\$1,774	100%	27.6	10.0	6.1	17.7	20.0	13.2	18.7	20.0	22.1	36.0	50.0	39.0	0.0	0.0	19.6
Total	20	\$1,774	100%	27.6	10.0	6.1	17.7	20.0	13.2	18.7	20.0	22.1	36.0	50.0	39.0	0.0	0.0	19.6

*Source: 2015 ACS Census; 01/01/2017 - 12/31/2019
Due to rounding, totals may not equal 100.0*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																2017-2019		
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available- Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Non-MSA AA	20	\$1,292	100%	0.0	0.0	0.0	27.1	10.0	27.9	52.6	70.0	52.4	20.3	20.0	19.7	0.0	0.0	0.0
Total	20	\$1,292	100%	0.0	0.0	0.0	27.1	10.0	27.9	52.6	70.0	52.4	20.3	20.0	19.7	0.0	0.0	0.0

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019
Due to rounding, totals may not equal 100.0*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2017-2019	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Non-MSA AA	20	\$1,292	100%	527	75.7%	100%	41.4	5.6	0.0	18.7	0.0		
Total	20	\$1,292	100%	527	75.7%	100%	41.4	5.6	0.0	18.7	0.0		

*Source: 2019 D&B Data; 01/01/2017 - 12/31/2019
Due to rounding, totals may not equal 100.0*