

PUBLIC DISCLOSURE

May 18, 2020

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Newton Federal Bank Charter # 703575

3175 Highway 278 Covington, Georgia 30014

Office of the Comptroller of the Currency

Three Ravinia Drive Suite 1950 Atlanta, Georgia 30346

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.

Table of Contents

Overall CRA Rating	1
Description of Institution	
Scope of the Evaluation	
Discriminatory or Other Illegal Credit Practices Review	
State Rating	5
State of Georgia	5
Lending Test	
Appendix A: Scope of Examination	Appendix-A-1
Appendix B: Summary of MMSA and State Ratings	Appendix B-1
Appendix C: Definitions and Common Abbreviations	Appendix C-1
Appendix D: Tables of Performance Data	Appendix D-1

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:

- Newton Federal Bank's (NFB or the bank) level of lending, as reflected in its net loan to deposit (LTD) ratio, is considered more than reasonable.
- NFB's overall distribution of consumer automobile and mortgage loans among borrowers of different income levels reflects reasonable penetration, given local assessment area (AA) competition and demographic characteristics of the AA.
- The overall geographic distribution of loans during the evaluation period reflects reasonable dispersion in the moderate-income tracts located within the bank's AA.
- There were no CRA-related complaints received by the bank or the OCC during the evaluation period of July 1, 2017 through December 31, 2019.

Loan-to-Deposit Ratio

The bank's LTD is more than reasonable considering the bank's size, financial condition, and credit needs of the AA. Beginning with the quarter ending December 31, 2017 to December 31, 2019, the average LTD ratio for NFB was 100.6 percent. The bank's quarterly LTD ratio ranged from a high of 104.8 percent at March 31, 2018, to a low of 96.0 percent at September 30, 2018. At December 31, 2019, the AA had 10 banks with a combined 14 branches. Many of the banks in the AA are much larger than NFB with respect to branch networks, total deposits, and asset size. The four closest banks, range in size from \$230.6 million to \$277.7 million, and had a combined average LTD ratio of 64.7 percent, which is much lower than NFB's average LTD.

Lending in Assessment Area

A majority of the bank's home mortgage and consumer automobile loans are outside its AA. Due to the performance factors considered below, we did not place significant weight on this test in determining the bank's overall lending performance in the bank's AA.

During the evaluation period, NFB originated 47.0 percent by number and 42.0 percent by dollar volume of its total home mortgage and consumer automobile loans inside the bank's AA. The bank's designated AA is only a portion of its overall lending platform. Performance is considered in the context of the bank's business model, which includes generating consumer automobile loans through third-party channels and home mortgages in counties surrounding the bank's AA. This analysis is performed at the bank, rather than the AA, level. Refer to the table below for details.

Lending Inside and Out	side of th	e Assessi	ment Area	a							
	N	lumber o	f Loans			Dollar .	Amount o	of Loans \$(000s)		
Loan Category	Insid	le	Outsi	ide	Total	Insid	e	Outsio	de	Total	
	#	%	#	%	#	\$	%	\$	%	\$(000s)	
Home Mortgage											
2017	33	52.0	31	48.0	64	5,711	49.0	5,860	51.0	11,571	
2018	48	47.0	55	53.0	103	5,710	33.0	11,763	67.0	17,473	
2019	24	47.0	27	53.0	51	2,870	32.0	6,161	68.0	9,031	
Subtotal	105	48.2	113	51.8	218	14,291	37.5	23,784	62.5	38,075	
Consumer -Autos											
2017	15	75.0	5	25.0	20	197	81.0	46	19.0	243	
2018	6	30.0	14	70.0	20	116	36.0	208	64.0	324	
2019	5	25.0	15	75.0	20	82	22.0	295	78.0	377	
Subtotal	26	43.0	34	57.0	60	395	42.0	548	58.0	943	
Total	131	47.0	147	53.0	278	14,686	42.0	24,332	58.0	39,018	

Source: Home Mortgages: All home mortgages originated during the evaluation period were considered. Consumer-Autos: Randomly selected sample of 20 consumer-auto loans originated for each year under review.

Description of Institution

Newton Federal Bank, located in Covington, GA, was established in November 1928, as a single state, traditional federal savings association. NFB converted to a federal stock savings association on February 13, 2017, through a mutual holding company reorganization. NFB is wholly owned by Community First Bancshares, a one-bank holding company also located in Covington, GA. The bank currently offers residential mortgage loans, consumer automobile loans, home equity lines of credit, construction permanent loans, personal loans and commercial loans.

At December 31, 2019, NFB operated two full-service branches located in moderate-income census tracts (CTs) in Covington, GA. NFB offers deposit-taking ATMs at its two branch locations for customers to inquire and access their account balances, make deposits and withdraw funds. Non-complex products offered by the bank include personal and business checking and savings accounts, money market, individual retirement, and certificate of deposit accounts. Additionally, NFB offers remote deposit capture, on-line banking and mobile banking services for both deposit and loan transactions. Bank operations also include two loan production offices (LPOs). The LPOs, which primarily originate commercial loans, are located in Braselton and Bogart, GA.

At December 31, 2019, total assets were \$319.2 million. The bank's net loans totaled \$247.9 million and represented 77.7 percent of total assets. Total real estate loans were \$138.4 million and represented 55.8 percent of total loans and 43.4 percent of total assets. Total consumer automobile loans were \$30.1 million and represented 12.1 percent of total loans and 9.4 percent of total assets.

NFB has designated Newton County in the Atlanta-Sandy Springs-Alpharetta MSA as its AA and is the only rating area for this evaluation. The AA meets the requirements of the CRA regulation and does not arbitrarily exclude low-or moderate-income CTs. NFB's last CRA evaluation was dated October 2, 2017, and the institution was rated Satisfactory. There are no legal, financial, or other factors impeding the bank's ability to help meet the credit needs in its AA during the evaluation period.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The performance evaluation is an assessment of NFB CRA performance utilizing the Small Bank CRA procedures. The assessment determines the bank's record of meeting the credit needs of its AA through lending activities. The evaluation period for lending activities covers the bank's performance from July 1, 2017 through December 31, 2019. To determine the bank's primary lending products, we assessed the composition of NFB's loan originations during the evaluation period. This resulted in two primary products identified for assessment under both the geographic and borrower distribution of lending tests: residential mortgage loans and consumer automobile loans. Residential mortgage and consumer automobile loans accounted for approximately 56 and 12 percent by dollar amount of all loans originated during the review period, respectively.

NFB is subject to the Home Mortgage Disclosure Act (HMDA), which requires the collection and reporting of application data concerning home purchase, home refinance, and home improvement loans. During the evaluation period, the bank originated 218 HMDA reportable loans.

With an evaluation period end date of December 31, 2019, qualifying activities performed in response to the significant impact of the coronavirus pandemic across the United States are not addressed in this evaluation. Bank qualifying activities will be considered in the subsequent evaluation.

Selection of Areas for Full-Scope Review

The CRA requires an institution to define the AA in which it will be evaluated. NFB's AA consists of Newton County in the Atlanta-Sandy Springs-Alpharetta, Georgia MSA and was selected for a full-scope review. There are no limited-scope AAs to consider for the evaluation. Refer to Appendix A, Scope of Examination, for full-scope AA information.

Ratings

The bank's overall rating is for the State of Georgia. Home mortgage and consumer automobile loans were the bank's primary loan products reviewed for the evaluation. The products were weighed equally in arriving at overall conclusions.

The state rating is based on performance in the bank's AA. Refer to the "Scope" section under the state section for details regarding how the state rating was determined for the evaluation.

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 Georgia

CRA rating for the State of Georgia¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The geographic distribution of mortgage loans reflects reasonable distribution throughout the AA.
- Mortgage lending to borrowers of different income levels in the state show a reasonable distribution.
- The geographic distribution of consumer automobile loans reflects reasonable distribution throughout the AA.
- The distribution of consumer automobile loans to borrowers of different income levels is more than reasonable.

Description of Institution's Operations in Georgia

Newton Federal Bank has operated as federal stock savings association since February 13, 2017. During the evaluation period, the bank operated two full-service branches with deposit-taking ATMs in Covington, GA. Covington, GA is located 35 miles east of Atlanta, Georgia, in Newton County. NFB designated Newton County as its AA. According to the 2015 American Community Survey (ACS) Census data, the AA includes 13 CTs by income level, which is comprised of seven moderate-income and six middle-income CTs. There are no low-income CTs in the bank's AA. The population in the Newton County AA is 102.6 thousand with 24.8 thousand families. Approximately 27 percent of the families in the AA are low-income, with another 21 percent at the moderate-income level. Approximately 13.2 percent of the families live below the poverty level.

As of December 2019, the Georgia Department of Labor reported the unemployment rate for both the AA and the State of Georgia was 3.1 percent. The AA is home to top employers such as Newton County Board of Education, Takeda Pharmaceuticals, Becton Dickinson & Company, Piedmont Newton Hospital and Pactiv Corporation. Additionally, Covington, GA is home to Three Rings Studio, which produces television shows, media for gaming products and music productions. Triple Horse Studios, a media and production company, also produces movie and television shows in Covington, GA.

In addition to NFB, there are nine other FDIC-insured financial institutions with 12 branch locations throughout the AA. At June 30, 2019, NFB ranked 2nd with total deposits of \$237 million, representing a 22.60 percent market share. Competition is very strong for lending and deposits from large regional state and national banks. Leading competitors in the market are Synovus Bank, Truist, United Bank, Pinnacle Bank and Wells Fargo.

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

The evaluation considers the input from one community contact with an affordable housing organization. The identified credit needs include more affordable housing, housing rehabilitation financing and financial literacy. The contact organization's interaction with the bank and other banks in the AA has been minimal. The information provided from the community contact did not affect the bank's performance for the evaluation.

Atlanta-Sandy Springs-Alpharetta Newton County, Georgia

Table A – Dei	nographic I	nformation	of the Assessn	nent Area									
Assessment Area: Newton Federal Bank													
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #							
Geographies (Census Tracts)	13	0.0	53.8	46.2	0.0	0.0							
Population by Geography	102,645	0.0	47.2	52.8	0.0	0.0							
Housing Units by Geography	38,364	0.0	48.7	51.3	0.0	0.0							
Owner-Occupied Units by Geography	24,301	0.0	42.3	57.7	0.0	0.0							
Occupied Rental Units by Geography	10,340	0.0	61.7	38.3	0.0	0.0							
Vacant Units by Geography	3,723	0.0	53.9	46.1	0.0	0.0							
Businesses by Geography	7,448	0.0	50.8	49.2	0.0	0.0							
Farms by Geography	251	0.0	38.6	61.4	0.0	0.0							
Family Distribution by Income Level	24,836	26.8	20.5	21.8	30.8	0.0							
Household Distribution by Income Level	34,641	27.5	18.6	20.2	33.7	0.0							
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housi	ing Value		\$120,307							
			Median Gross		\$921								
			Families Belo	w Poverty Le	vel	13.2%							

Source: 2015 ACS and 2019 D&B Data

Due to rounding, totals may not equal 100.0%

(*) The NA category consists of geographies that have not been assigned an income classification.

Scope of Evaluation in Georgia

This analysis reflects a full-scope review of the bank's AA in Newton County, which is located in the Atlanta-Sandy Springs-Alpharetta, Georgia MSA.

Refer to the table in Appendix A: Scope of Examination for additional information on the AA.

LENDING TEST

The bank's performance under the Lending Test in the State of Georgia is rated Satisfactory.

Based on a full-scope review, NFB's lending performance in the State of Georgia is reasonable. The geographic distribution of home mortgage and consumer automobile lending in the Newton County AA,

is satisfactory. We compared the bank's performance with both demographic comparators and aggregate lender information.

Distribution of Loans by Income Level of the Geography

The bank exhibits reasonable geographic distribution of loans in the State of Georgia.

Home Mortgage Loans

Refer to Table O in the State of Georgia 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.

Overall, the geographic distribution of loans during the evaluation period reflects reasonable dispersion in the moderate-income tracts located within NFB's AA. NFB's AA is comprised on 13 CTs, of which there are no low-income CTs. The level of home mortgage lending was compared to the aggregate peer mortgage data. Approximately 42 percent of owner-occupied housing units in the AA are located in a moderate CT. 51 percent of NFB's home mortgages originated within the AA were within those CTs. NFB continues to offer home mortgages, which positively affects the bank's lending in the AA.

Consumer Automobile Loans

Refer to Table U in the State of Georgia section of Appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer automobile loan originations and purchases.

The distribution of consumer automobile loans to geographies of different income levels originated during the evaluation period reflects reasonable dispersion, given competition and AA demographics. During the evaluation period, the proportion of consumer automobile loans originated in moderate-income CTs exceeded the percentage of households reported in those CTs. NFB began offering consumer automobile loans through indirect channels in November 2018 and plans to continue to offer the product through both direct and indirect channels.

Lending Gap Analysis

Unexplained conspicuous gaps were not identified in NFB's lending practices in either the home mortgage or consumer automobile lending products.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income levels given the product lines offered by the bank in the Newton County, GA AA.

Home Mortgage Loans

Refer to Table P in the State of Georgia 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.

NFB's overall distribution of lending among borrowers of different income levels reflects reasonable penetration, given local AA competition and demographic characteristics of the AA. The percentage of

home mortgage lending to both low-and moderate-income borrowers during the evaluation period falls within a reasonable range compared to peer, when considering performance context.

Consumer Automobile Loans

Refer to Table V in the State of Georgia section of Appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer automobile loan originations.

The distribution of consumer automobile loans to geographies of different income levels originated during the evaluation period reflects more than reasonable dispersion, given competition and AA demographics.

During the evaluation period, the percentage of consumer automobile lending to low-income borrowers was somewhat higher than the percentage of low-income households, and much higher to moderate-income households. NFB lends to borrowers of all income levels in the AA.

Responses to Complaints

During the evaluation period, neither NFB nor the OCC Customer Assistance Group received any complaints regarding NFB's CRA performance in the State of Georgia.

Appendix A: Scope of Examination

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 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".

	T	
Time Period Reviewed:	(07/01/2017 to 12/31/2019)	
Bank Products Reviewed:	(Home mortgage, Consumer	automobile)
		,
		T
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	None	None
List of Assessment Areas and Type of	of Examination	
Rating and Assessment Areas	Type of Exam	Other Information
States		
Georgia	Full-Scope	Newton County

Appendix B: Summary of MMSA and State Ratings

RATINGS	Newton Federal Bank
Overall Bank:	Lending Test Rating
Newton Federal Bank	Satisfactory
State:	
Georgia	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 U.** Assessment Area Distribution of Consumer 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 households in those geographies.
- **Table V.** Assessment Area Distribution of Consumer 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 households by income level in each MMSA/assessment area.

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography

2017-19

	Total Home Mortgage Loan			e Loans	Low-Income Tracts			Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts			Not Available-Income Tracts						
Assessment Area:	#	\$	% of Total	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		
Newton Fed Bank	105	14,291	100.0	3,974	0.0	0.0	0.0	42.3	50.7	43.7	57.7	49.3	56.3	0.0	0.0	0.0	0.0	0.0	0.0		
Total	105	14,291	100.0	3,974	0.0	0.0	0.0	42.3	50.7	43.7	57.7	49.3	56.3	0.0	0.0	0.0	0.0	0.0	0.0		

Source: 2015 ACS Census; 07/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower

2017-19

	Tota	Total Home Mortgage Loans			Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$		Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Newton Fed Bank	105	14,291	100.0	3,974	26.8	12.8	12.2	20.5	17.6	23.7	21.8	25.7	22.3	30.8	37.2	17.7	0.0	6.8	24.1
Total	105	14,291	100.0	3,974	26.8	12.8	12.2	20.5	17.6	23.7	21.8	25.7	22.3	30.8	37.2	17.7	0.0	6.8	24.1

Source: 2015 ACS Census; 07/01/2017 - 12/31/2019 Bank Data, 2018 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Automobile Loans by Income Category of the Geography

2017-19

	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Incom	ne Tracts	Not Available-Income Tracts	
Assessment Area:	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Newton Fed Bank	26	394,719	100%	0.0	0.0	48.1	54.0	51.9	46.0	0.0	0.0	0.0	0.0

Source: 2015 ACS Census; 07/01/2017 - 12/31/2019 Bank Data.

Due to rounding, totals may not equal 100.0%

Table V	- Assessment Area	Distribution of C	onsumer Auto	omobile Loans b	v Income	Category of the	Borrower

2017-19

	Tot	al Consumer l	Loans	Low-In Borro		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
Assessment Area:	#	\$	% of Total	% of Households			% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Newton Fed Bank	26	394,719	100%	27.5	30.8	18.6	42.3	20.2	19.2	33.7	7.7	0.0	0.0
Total	26	394,719	100%	27.5	30.8	18.6	42.3	20.2	19.2	33.7	7.7	0.0	0.0

Source: 2015 ACS Census; 07/01/2017 - 12/31/2019 Bank Data. Due to rounding, totals may not equal 100.0%