



PUBLIC DISCLOSURE

May 30, 2023

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First Piedmont FS & LA of Gaffney
Charter Number 702502

1229 W Floyd Baker Blvd
Gaffney, SC 29341-1413

Office of the Comptroller of the Currency

101 South Tryon Street, Suite 400
Charlotte, NC 28280

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 for First Piedmont Federal Savings and Loan Association of Gaffney (First Piedmont or the bank) is based on the rating for the State of South Carolina.
- The loan-to-deposit (LTD) ratio is reasonable considering the bank's size, financial condition, and credit needs in its assessment areas (AAs).
- A substantial majority of the bank's loans were originated or purchased inside the AAs.
- The bank exhibits a reasonable distribution of loans in the AAs.
- The bank exhibits a reasonable distribution of loans to borrowers of different income levels.
- The bank exhibits reasonable responsiveness to CD needs in the AA through CD loans, qualified investments, grants and donations, and CD services.

Loan-to-Deposit Ratio

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

The bank's LTD ratio is calculated on a bank-wide basis covering the quarters ended March 31, 2020, through December 31, 2022. The bank's average quarterly LTD ratio for the 12 consecutive quarters since the previous Community Reinvestment Act (CRA) evaluation is 82.65 percent. This is significantly above the average quarterly LTD ratio of 62.50 percent for similar asset-sized institutions that operate within the AAs and within South Carolina. The bank's quarterly LTD ratios ranged from a high of 98.63 percent to a low of 72.99 percent. The quarterly LTD for similar asset-sized institutions ranged from a high of 105.88 percent to a low of 25.91 percent over the same period.

Lending in Assessment Area

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

The bank originated and purchased 89.2 percent of its total loans inside the AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level.

The table below illustrates the number and dollar volume of home mortgage and consumer loans originated inside and outside of its AAs.

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										
2020	447	89.0	55	11.0	502	95,685	84.1	18,041	15.9	113,726
2021	331	89.2	40	10.8	371	77,073	84.3	14,349	15.7	91,422
2022	271	87.4	39	12.6	310	74,740	83.4	14,866	16.6	89,606
Subtotal	1,049	88.7	134	11.3	1,183	247,498	84.0	47,256	16.0	294,754
Consumer										
2020	40	90.9	4	9.1	44	1,913	93.0	144	7.0	2,057
2021	40	97.6	1	2.4	41	1,986	80.3	488	19.7	2,474
2022	41	95.3	2	4.7	43	2,515	91.0	250	9.0	2,765
Subtotal	121	94.5	7	5.5	128	6,414	87.9	882	12.1	7,296
Total	1,170	89.2	141	10.8	1,311	253,912	84.1	48,138	15.9	302,050
<i>Source: Bank Data Due to rounding, totals may not equal 100.0%</i>										

Description of Institution

First Piedmont is a federally chartered, mutual savings association headquartered in Gaffney, South Carolina. First Piedmont designated Cherokee and Spartanburg counties in South Carolina as its AAs. It operates six full-service branches in these counties. There are no branch locations in low-income census tracts (CTs) and one branch in a moderate-income CT. All branch locations maintain the same operating hours Monday-Friday. The main branch is the only location open on Saturday. First Piedmont operates automated teller machines (ATMs) at each branch location. There are also two additional standalone ATMs, with one located in a moderate-income CT.

Offerings include consumer and commercial loan and deposit products traditionally offered by thrift institutions. Products include a full line of mortgage, consumer, and commercial loan products as well as business and personal checking and savings accounts. The primary loan products include home mortgage loans (purchases and refinances), consumer loans, home equity lines of credit, and commercial real estate loans. Product offerings are consistent across all seven branch locations. Twenty-four hour telephone banking services are available, as well as online and mobile banking services to both business and consumers. First Piedmont's website provides detailed information on branch hours, location, and products and services.

As of December 31, 2022, total assets were \$563.7 million, with tier 1 capital representing 24.0 percent of total assets. First Piedmont's gross loans totaled \$415.4 million, deposits totaled \$420.8 million, and tier 1 capital totaled \$135.3 million. One-to-four family residential real estate loans totaled 63.46 percent of total loans. This is followed by construction and land development loans at 17.38 percent and non-farm/non-residential loans at 15.46 percent, respectively. There are no legal, financial, or other factors impeding the bank's ability to meet

the credit needs within its AAs. The bank received a “Satisfactory” rating at the previous CRA evaluation dated May 26, 2020.

Table 1: Distribution of Loan Portfolio*		
Type of Loan	Balance Outstanding (\$,000)	% of Total Loans
1-4 Family Residential	263,639	63.46
Construction & Land Development	72,200	17.38
Non-Farm/Non-Residential	64,210	15.46
Loans to Individuals	8,149	1.96
Commercial and Industrial	3,676	0.88
Multi-family Residential	3,144	0.76
Lease Financing Receivables	298	0.07
Loans to farmers/secured by farmland	108	0.03
Total Gross Loans	415,424	100.00

*Source: Schedule RC-C Part 1 – Loans and Leases as reported in the Consolidated Report of Condition and Income as of December 31, 2022.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation (PE) assesses First Piedmont’s performance under the Intermediate Small Bank procedures, which includes a Lending Test and CD Test. The Lending Test evaluates the institution’s record of meeting the credit needs of its AAs through its lending activities. The CD Test evaluates the institution’s responsiveness to CD needs in its AAs through CD lending, services, and qualified investments. The evaluation period under the Lending Test and the CD Test covers the institution’s performance from January 1, 2020, through December 31, 2022. Home mortgage and consumer loans are the bank’s primary products. For this evaluation, we analyzed home mortgage and consumer loans the bank reported under the Home Mortgage Disclosure Act (HMDA). Given the timing of our review, peer data for 2022 was not available for comparison.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more 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) 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 each State 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 based on the state rating.

The state rating is based on performance in the bank's two AAs in the state, which included full-scope reviews of the Cherokee County, SC Non-MSA AA and the Spartanburg, SC MSA AA. No limited-scope reviews were performed.

Refer to the "Scope" section under each State 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) 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 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 South Carolina

CRA rating for the State of South Carolina: Satisfactory

The Lending Test is rated: Satisfactory

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in the state.
- The bank exhibits reasonable distribution of loans to borrowers of different income levels.
- CD activities, including CD loans, qualified investments, and CD services, reflect adequate responsiveness to the CD needs of the AAs.

Description of Institution's Operations in South Carolina

First Piedmont identifies the entire area of the Cherokee County, SC Non-MSA and Spartanburg, SC MSA as its AAs. The bank operates three full-service branches with deposit-taking ATMs, including the main office, in Gaffney, SC located in the Cherokee County, SC Non-MSA. In addition to the branches, there are two standalone ATMs in Gaffney and Blacksburg, SC which are located in middle-income CTs. In the Spartanburg, SC MSA AA there are four full-service branches with deposit-taking ATMs. Two branches are located in Spartanburg, SC, one is located in Boiling Springs, SC and one is in Duncan, SC. The AAs include full counties and do not arbitrarily exclude and low- or moderate-income (LMI) CTs. There are no distressed or underserved CTs within the AAs.

Cherokee County, SC Non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cherokee County non-MSA 2020-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	13	0.0	30.8	53.8	15.4	0.0
Population by Geography	55,863	0.0	27.5	51.4	21.1	0.0
Housing Units by Geography	23,993	0.0	27.0	52.3	20.7	0.0
Owner-Occupied Units by Geography	13,941	0.0	23.1	52.8	24.0	0.0
Occupied Rental Units by Geography	6,582	0.0	34.9	51.9	13.2	0.0
Vacant Units by Geography	3,470	0.0	27.9	50.8	21.3	0.0
Businesses by Geography	2,382	0.0	21.7	60.7	17.5	0.0
Farms by Geography	103	0.0	13.6	62.1	24.3	0.0
Family Distribution by Income Level	13,630	23.7	16.5	18.0	41.8	0.0
Household Distribution by Income Level	20,523	25.2	15.2	16.1	43.4	0.0
Median Family Income Non-MSAs - SC		\$44,609	Median Housing Value			\$88,914
			Median Gross Rent			\$629
			Families Below Poverty Level			18.9%
<p><i>Source: 2015 ACS and 2020 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></p>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cherokee County non-MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	16	0.0	18.8	62.5	18.8	0.0
Population by Geography	56,216	0.0	17.7	62.7	19.7	0.0
Housing Units by Geography	24,675	0.0	20.6	60.0	19.4	0.0
Owner-Occupied Units by Geography	14,722	0.0	15.4	59.2	25.4	0.0
Occupied Rental Units by Geography	6,057	0.0	31.1	59.9	8.9	0.0
Vacant Units by Geography	3,896	0.0	23.7	63.5	12.8	0.0
Businesses by Geography	3,777	0.0	17.0	67.1	16.0	0.0
Farms by Geography	162	0.0	6.2	70.4	23.5	0.0
Family Distribution by Income Level	11,465	19.7	19.2	18.8	42.2	0.0
Household Distribution by Income Level	20,779	26.5	17.4	16.4	39.6	0.0
Median Family Income Non-MSAs - SC	\$53,588	Median Housing Value				\$101,964
		Median Gross Rent				\$698
		Families Below Poverty Level				12.2%
<i>Source: 2020 U.S. Census and 2022 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>						

Based on the 2015 and 2020 American Community Survey (ACS) U.S. Census data, the Cherokee County, SC non-MSA had 13 CTs during the 2020-2021 evaluation period and 16 CTs during the 2022 evaluation period. In 2020-2021, the Non-MSA consisted of no low-income CTs, four moderate-income CTs, seven middle-income CTs, and two upper-income CTs. In 2022, the non-MSA consisted of no low-income CTs, three moderate-income CTs, ten middle-income CTs, and three upper-income CTs.

First Piedmont does not have much competition for deposits in the non-MSA. According to June 30, 2022, Federal Deposit Corporation (FDIC) summary of deposit data, the bank ranks first out of six lenders in the market, holding 50.22 percent of the total deposit market share. The top three competitors holding 44.01 percent of the deposit market share combined were First National Bank of Pennsylvania, Wells Fargo Bank National Association, and United Community Bank.

The bank faces some lending competition in the non-MSA. According to 2021 peer mortgage data, First Piedmont ranked second among 168 lenders in the AA. The bank made 100 loans in the AA capturing 7.32 percent of the market share by loan count. The top three lenders, besides the bank, in the AA holding 21.08 percent of the market share were Rocket Mortgage, Midland Mortgage Corporation, and PennyMac Loan Services LLC.

Employment and Economic Factors

The U.S. Bureau of Labor Statistics reported the annual average unemployment rate in the AA for 2020, 2021, and 2022, was 7.8 percent, 4.9 percent, and 4.1 percent, respectively. The national annual average unemployment rate for 2020, 2021, and 2022 totaled 8.1 percent, 5.3 percent, and 3.6 percent, respectively. The unemployment rate in the AA exceeded the national annual average in 2022, but it was below the national annual average in 2020 and 2021. The state of South Carolina unemployment rates for 2020, 2021, and 2022, were below the AA rates, reporting an annual average of 6.0 percent, 3.9 percent, and 3.3 percent, respectively.

The primary industries in the AA include manufacturing, retail trade, and educational services. The top employers in the AA include the Cherokee County School District, Spartanburg Regional Healthcare System, and Freightliner.

Housing

The 2020 ACS U.S. Census data reported single family homes make up most of the housing units in the AA, with 66.18 percent of the homes consisting of one-unit, detached dwellings. Total rental occupied units are 24.55 percent, and multifamily units accounted for 5.81 percent of the housing units in the AA. The median housing value in the AA was \$101,964 for the 2022 evaluation period and the median gross rent was \$698 per month. Based on the 2015 ACS U.S. Census data, single family units and multifamily units represented 63.95 percent and 6.26 percent of the housing units, respectively, in the AA for the 2020 and 2021 evaluation period. The median housing value in the AA for 2020 and 2021 evaluation period was \$88,914 and the median gross rent was \$629 per month.

Homeownership in the LMI geographies may be difficult due to high median housing prices compared to median family incomes. According to the 2020 ACS U.S. Census data, the median family income for the AA was \$53,588, which would result in a low-income household annual income below \$26,794, and moderate-income household annual income between \$26,794 and \$42,870. The 2015 ACS U.S. Census data reported the median family income for the AA was \$44,609, which would result in a low-income household annual income below \$22,304 and moderate-income household annual income between \$22,304 and \$35,687. Additionally, 12.2 percent of households are below the poverty level. These income levels may make it difficult to afford housing at the median housing value in the AA for LMI borrowers.

Community Contacts

The OCC made a community contact in the AA during the evaluation period, which included a nonprofit agency focused on youth programs for LMI families in the area. The community contact indicated that the following are identified needs within the AA.

- Funding for nonprofit programs
- Volunteers for programs and mentorship
- Financial literacy education, specifically to young students

Spartanburg, SC MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Spartanburg SC MSA 2020-21						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	69	8.7	24.6	40.6	26.1	0.0
Population by Geography	291,240	4.8	20.8	43.6	30.8	0.0
Housing Units by Geography	123,931	5.3	21.5	43.8	29.4	0.0
Owner-Occupied Units by Geography	75,378	2.3	15.6	47.1	35.1	0.0
Occupied Rental Units by Geography	34,514	10.7	31.1	38.8	19.5	0.0
Vacant Units by Geography	14,039	8.7	29.8	38.3	23.2	0.0
Businesses by Geography	17,488	2.3	20.7	41.1	35.9	0.0
Farms by Geography	518	1.2	16.8	47.3	34.7	0.0
Family Distribution by Income Level	76,454	21.0	17.4	18.9	42.7	0.0
Household Distribution by Income Level	109,892	23.6	15.6	17.3	43.5	0.0
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$53,959	Median Housing Value			\$122,515
			Median Gross Rent			\$695
			Families Below Poverty Level			13.5%
<p><i>Source: 2015 ACS and 2020 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></p>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: Spartanburg SC MSA 2022						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	87	5.7	19.5	50.6	21.8	2.3
Population by Geography	327,997	4.2	15.0	54.9	24.7	1.2
Housing Units by Geography	131,725	4.3	16.2	55.6	23.1	0.9
Owner-Occupied Units by Geography	84,689	2.3	10.1	59.6	27.5	0.5
Occupied Rental Units by Geography	34,099	8.5	27.4	46.8	15.3	1.9
Vacant Units by Geography	12,937	5.7	26.2	52.3	15.2	0.5
Businesses by Geography	32,622	2.9	14.6	50.4	31.1	1.0
Farms by Geography	961	2.1	9.6	61.6	26.4	0.3
Family Distribution by Income Level	80,467	20.1	18.2	20.8	40.9	0.0
Household Distribution by Income Level	118,788	24.1	16.2	18.1	41.7	0.0
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$65,214	Median Housing Value			\$149,727
			Median Gross Rent			\$809
			Families Below Poverty Level			10.7%
<i>Source: 2020 U.S. Census and 2022 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>						

Based on the 2015 and 2020 ACS U.S. Census data, the Spartanburg, SC MSA consisted of 69 CTs during 2020-2021, and 87 CTs during 2022. In 2020-2021, the MSA consisted of six low-income CTs, 17 moderate-income CTs, 28 middle-income CTs, and 18 upper-income CTs. For 2022, the MSA consisted of five low-income CTs, 17 moderate-income CTs, 44 middle-income CTs, 19 upper-income CTs, and two CTs with no assigned income classification.

The bank experiences strong competition in the MSA. According to the June 30, 2022, FDIC deposit market share report, the bank ranked 11th out of 17 lenders and held 2.45 percent of the total deposit market share in the MSA. The top three competitors in the MSA holding 56.64 percent of total deposit were Truist Bank, First Citizens Bank and Trust Company, and Bank of America.

First Piedmont also experiences strong competition from mortgage lenders for home mortgage loans in the MSA. According to 2021 peer mortgage data, the bank ranked 21st out of 446 lenders in the market, with a market share of 1.26 percent. The top three lenders in the MSA holding 16.97 percent of the market share were Rocket Mortgage, PennyMac Loan Services LLC, and Freedom Mortgage Corporation.

Employment and Economic Factors

The Bureau of Labor Statistics reported the annual average unemployment rate in the MSA for 2020, 2021, and 2022, was 6.5 percent, 4.1 percent, and 3.3 percent, respectively. This compared favorably to the national annual average. The national annual average unemployment rate totaled

8.1 percent, 5.3 percent, and 3.6 percent for 2020, 2021, and 2022, respectively. The state of South Carolina unemployment rates were similar to the MSA rates for 2020, 2021, and 2022, reporting an annual average of 6.0 percent, 3.9 percent, and 3.3 percent, respectively.

The primary industries in the MSA include advanced manufacturing, automotive, and distribution/logistics. The top employers included BMW of North America, Spartanburg Regional Health Services, and Milliken and Company.

Housing

The 2020 ACS U.S. Census data reported single family homes make up most of the housing units in the MSA, with 79.06 percent of the homes consisting of one-unit, detached dwellings. Total rental occupied units are 25.89 percent, and multifamily units accounted for 8.07 percent of the housing units in the MSA. The median housing value in the MSA was \$149,727 for the 2022 evaluation period and the median gross rent was \$809 per month. Based on the 2015 ACS U.S. Census data, single family units and multifamily units represented 76.29 percent and 9.11 percent of the housing units, respectively, in the MSA for the 2020 and 2021 evaluation period. The median housing value in the AA for the 2020 and 2021 evaluation period was \$122,515, and the median gross rent was \$695 per month.

Homeownership in the LMI geographies may be difficult due to high median housing prices compared to median family incomes. According to the 2020 ACS U.S. Census data, the median family income for the AA was \$65,214, which would result in a low-income household annual income below \$32,607, and moderate-income household annual income between \$32,607 and \$52,171. The 2015 ACS U.S. Census data reported the median family income for the AA was \$53,959, which would result in a low-income household annual income below \$26,979, and moderate-income household annual income between \$26,979 and \$43,167. Additionally, 10.7 percent of households are below the poverty level. These income levels may make it difficult to afford housing at the median housing value in the AA for LMI borrowers.

Community Contacts

The OCC made a community contact in the AA during the evaluation period, which included a nonprofit organization focused on economic development for small businesses. The community contact indicated that the following are identified needs within the AA.

- Small business lending to access capital needs
- Small business technical assistance
- Funding for nonprofit programs

Scope of Evaluation in South Carolina

First Piedmont's AAs consist of Cherokee County, SC non-MSA and the Spartanburg, SC MSA. We will perform a full-scope review of both AAs. Home mortgage loans and consumer loans were the primary products during the evaluation period.

The analysis for borrower and geographic distribution is based on origination of home mortgage and consumer loans during the evaluation period. Home mortgage data was analyzed using the Home Mortgage Disclosure Act Loan Register (HMDA-LAR) information.

During the 2020-2021 period, 65.8 percent of the bank's total home mortgage loan originations and 50.0 percent of its total consumer loan originations were in the Spartanburg, SC MSA compared to 34.2 percent of home mortgage loan originations and 50.0 percent total consumer loan originations were in the Cherokee County Non-MSA AA. During the 2022 period, 65.7 percent of total home mortgage loan originations and 51.2 of total consumer loan originations were in the Spartanburg, SC MSA, compared to 34.3 percent of home mortgage loan originations and 48.8 percent of consumer loan originations in the Cherokee County, SC Non-MSA.

At the start of the evaluation, peer comparison data was not available for 2022. To ensure a meaningful analysis was conducted, 2022 lending data was analyzed separately from combined 2020 and 2021 lending data.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

Lending Test

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of South Carolina is reasonable.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

Refer to Table O in the state of South Carolina 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 home mortgage loans is reasonable.

We placed more weight on the performance in moderate-income geographies than in low-income geographies in the AAs because of significantly fewer opportunities to lend in low-income geographies. For 2020-2021, there were a combined total of 21 moderate-income CTs in the AAs compared to six low-income CTs. For 2022, there were a combined total of 20 moderate-income CTs compared to only five low-income CTs.

Cherokee County, SC non-MSA AA

For the 2020-2021 evaluation period, the percentage of home mortgage loans to borrowers in moderate-income CTs was well below both the percentage of owner-occupied housing units and the percentage of aggregate loans originated.

For 2022, the percentage of home mortgage loans to borrowers in moderate-income CTs was well below the percentage of owner-occupied housing units.

The AA does not have any low-income CTs.

We considered the demographic characteristics of LMI CTs in evaluating geographic distribution of mortgage loans in the AA. Moderate-income CTs were 30.77 percent of all CTs in the AA for 2020-2021 and declined to 18.75 percent of all CTs in the AA for 2022. The percent of owner-occupied housing units located in moderate-income CTs were 23.13 percent of all CTs in the AA for 2020-2021 and declined to 15.4 percent of all CTs in the AA for 2022. The decline in moderate-income CTs and the percentage of owner-occupied housing in these tracts may have impacted the bank's ability to make home mortgage loans to individuals residing in these geographies. Given these constraints, distribution within the AA is reasonable.

Spartanburg SC MSA AA

For 2020-2021 evaluation period, the bank made no home mortgage loans to borrowers in low-income CTs. However, the percentage of owner-occupied housing units in these tracts was only 2.3 percent and the percentage of aggregate lending was only 1.1 percent. The percentage of home mortgage loans to borrowers in moderate-income CTs was well below the percentage of owner-occupied housing units but was near the aggregate peer lending percentage.

For 2022, the percentage of home mortgage loans to borrowers in low-income CTs was near the percentage of owner-occupied housing units. The percentage of home mortgage loans to borrowers in moderate-income CTs was below the percentage of owner-occupied housing units.

We again considered the demographic characteristics of LMI CTs in evaluating geographic distribution of mortgage loans in this AA. Low-income CTs totaled only 8.7 percent of all CTs in the AA for 2020-2021, and declined further to 5.7 percent of all CTs in the AA for 2022, with only 2.3 percent of owner-occupied housing units located in these CTs for the three years. Moderate-income CTs totaled 24.6 percent of all CTs in the AA for 2020-2021, and totaled 19.5 percent of all CTs for 2022. The percent of owner-occupied units in moderate-income CTs was 15.6 percent for 2020-2021, and 10.1 percent for 2022. These factors may have limited opportunities to lend and impacted the bank's ability to make home mortgage loans to individuals residing in these LMI CTs. Given these constraints, responsiveness near the aggregate lender percentage in moderate-income tracts in 2020-2021, and near the percentage of owner-occupied units in low-income CTs in 2022, evidences reasonable distribution in the AA.

Consumer Loans

Refer to Table U in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

Overall, the geographic distribution of consumer loans is poor.

Cherokee County non-MSA AA

For the 2020-2021 evaluation period, the percentage of consumer loans to borrowers in moderate-income CTs was well below the percentage of households in those CTs.

For 2022, the percentage of consumer loans to borrowers in moderate-income CTs was well below the percentage of households in those CTs.

There are no low income CTs in the AA.

We considered the demographic characteristics of LMI CTs in evaluating geographic distribution of consumer loans in the Cherokee County non-MSA AA. For the evaluation period, the percentage of households in moderate-income CTs was 26.9 percent for 2020-2021, and 20 percent for 2022. Since the majority of households in the AA are located in middle-income CTs, this may have made it difficult for the bank to lend to borrowers in moderate-income CTs.

Spartanburg SC MSA AA

For the 2020-2021 evaluation period, the percentage of consumer loans to borrowers in LMI CTs was well below the percentage of households in both low- and moderate- income CTs.

For 2022, the percentage of consumer loans to borrowers in low-and moderate-income CTs was below the percentage of households in those CTs.

We assessed the demographic characteristics of the AA during our evaluation of the consumer loans. During the evaluation period, the percentage of households in low-income CTs in the AA were only 4.89 percent for 2020-2021, and declined further to 4.10 percent for 2022. The percentage of households in moderate-income CTs for the 2020-2021 and 2022, evaluation periods were 20.47 percent and 15.08 percent, respectively. Due to the low percentage of households in LMI CTs, this may have made it difficult to lend to consumers in these CTs.

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.

Home Mortgage Loans

Refer to Table P in the state of South Carolina 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.

Overall, the borrower distribution of home mortgage loans is reasonable.

Cherokee County non-MSA AA

In the 2020-2021 evaluation period, the percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families but was near the percentage of aggregate lending. The percentage of home mortgage loans to moderate-income borrowers was well below both the percentage of moderate-income families and the percentage of aggregate lending.

In 2022, the percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families in the AA. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families in the AA.

In evaluating the borrower's income distribution as reasonable, we considered the need for affordable housing and the rise in housing prices that may impact the bank's ability to originate loans to LMI borrowers. Given the median housing prices have risen from \$88,914 to \$101,964 in the AA during the review period, it has become increasingly difficult for these families to afford housing. The median family income was \$44,609 in 2020-2021, and \$53,588 in 2022. Additionally, 12.2 percent of families are below the poverty level. Due to the increase in housing prices and low median family income, LMI borrowers may have difficulty qualifying for home mortgage loans.

Spartanburg SC MSA AA

In the 2020-2021 evaluation period, the percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families and was below the percentage of aggregate lending. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families and was well below the percentage of aggregate lending.

In 2022, the percentage of home mortgage loans to low-income borrowers was well below the percentage of low-income families in the AA. The percentage of home mortgage loans to moderate-income borrowers was below the percentage of moderate-income families in the AA.

When assessing performance as reasonable, examiners considered the affordability of housing for low-income borrowers in the AA due to demographic constraints. The median housing value for the AA was \$122,515 per the 2015 ACS US Census data. The median family income was \$53,959 for the AA, which means the maximum income for low-income families is \$26,979; and the maximum income for moderate-income families is \$43,167. Additionally, 13.5 percent of families are below the poverty level. Due to lower family incomes and higher housing prices, LMI individuals may not be able to afford to purchase a home.

Consumer Loans

Refer to Table V in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases. Overall, the borrower distribution of consumer loans is reasonable.

Cherokee County non-MSA AA

For the 2020-2021 evaluation period, the percentage of consumer loans to low-income borrowers was below the percentage of low-income households, while the percentage of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

For 2022, the percentage of consumer loans to low-income borrowers was well below the percentage of low-income households, while the percentage of consumer loans to moderate-income borrowers exceeded the percentage of moderate-income households.

When assessing performance, examiners considered the affordability of consumer loans in the AA due to demographic constraints. The median family income was \$44,609 from 2020-2021, and \$53,588 in 2022. This means the maximum income for low-income families is \$26,794; and the maximum income for moderate-income families is \$42,870. Due to income constraints, LMI borrowers may have difficulty qualifying for consumer loans. Given these constraints, bank lending to moderate income households in the AA is particularly responsive.

Spartanburg SC MSA AA

For the 2020-2021 evaluation period, the percentage of consumer loans to low-income borrowers was well below the percentage of low-income households, while the percentage of consumer loans to moderate-income borrowers was above the percentage of moderate-income households.

For 2022, the percentage of consumer loans to low-income borrowers was below the percentage of low-income households. However, the percentage of consumer loans to moderate-income borrowers was above the percentage of moderate-income households.

When assessing performance, examiners considered the income constraints of LMI borrowers in the AA. The median family income was \$53,959 in 2020-2021 and \$65,214 in 2022. This means the maximum income for low-income families during the review period is \$32,607; and the maximum income for moderate-income families is \$52,171. Due to lower income, LMI borrowers may have difficulty qualifying for consumer loans. Given these constraints, the bank's performance to moderate income borrowers in the AA is particularly impactful.

Responses to Complaints

There were no complaints related to the institution's CRA performance within the state of South Carolina.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits 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 AAs.

Number and Amount of Community Development Loans

The Community Development Loans Table, shown below, sets forth the information and data used to evaluate the bank's level of CD lending. The table includes all CD loans, including multifamily loans that also qualify as CD loans.

Community Development Loans				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Cherokee County non-MSA AA	0	0	0	0.0
Spartanburg SC MSA AA	4	80.0	1,798	94.7
Broader Statewide Area	1	20.0	100	5.3
Total	5	100.0	1,898	100.0

First Piedmont demonstrated adequate responsiveness to CD needs by offering qualified CD loans to LMI individuals within the AAs and in the state of South Carolina. During the evaluation period, the bank extended five loans totaling \$1.9 million, representing 1.4 percent of tier 1 capital in the AAs and in the state of South Carolina. These CD loans promoted economic development through the creation of affordable housing for LMI individuals. Notable loans to support CD activities included:

- \$100,000 to purchase interests in loan participations to fund the construction of 50 affordable housing units.
- \$100,000 to purchase interests in loan participants to fund the construction of 41 senior citizen housing units.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Cherokee County non-MSA	0	0	15	99	15	82.6	99	82.6	0	0
Spartanburg SC MSA	0	0	0	0	0	0.0	0	0.0	0	0
Broader Statewide	0	0	6	36	6	17.4	36	17.4	0	0
Total	0	0	21	135	21	100.0	135	100.0	0	0

* *Prior Period Investments'* means investments made in a previous evaluation period that are outstanding as of the examination date.

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

First Piedmont demonstrated adequate responsiveness to CD needs within the AAs and in the state of South Carolina during the evaluation period. The bank made 21 qualified investments to several organizations totaling approximately \$135,000. Notable donations included:

- \$25,000 donation to a non-profit organization that provides food and utility payment assistance services to LMI individuals.
- \$18,000 donation to a non-profit organization that provides services to LMI individuals, such as food, shelter, clothing, counseling, and personal development services.
- \$13,000 donation to a non-profit organization that provides to homeless children of LMI families.

Extent to Which the Bank Provides Community Development Services

First Piedmont demonstrated adequate responsiveness to CD needs when offering qualified services to LMI individuals within the AAs. Five employees volunteered significant time during the evaluation period by providing financial literacy programs for six qualified CD organizations.

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 metropolitan and nonmetropolitan areas 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:	January 1, 2020 to December 31, 2022	
Bank Products Reviewed:	Home Mortgage, and Consumer Loans Community Development Loans, Qualified Investments, and Community Development Services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
Not applicable	Not applicable	Not applicable
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
South Carolina		
Cherokee County, SC non-MSA	Full-scope	All census tracts in Cherokee County, South Carolina
Spartanburg, SC MSA	Full-scope	All census tracts in Spartanburg County, South Carolina

Appendix B: Summary of State Ratings

RATINGS: FIRST PIEDMONT FS & LA OF GAFFNEY			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/ Rating
First Piedmont FS & LA of Gaffney	Satisfactory	Satisfactory	Satisfactory
State:			
South Carolina	Satisfactory	Satisfactory	Satisfactory

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

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																				2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% 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		
Cherokee County	266	48,257	34.2	1,366	0.0	0.0	0.0	23.1	7.5	15.7	52.8	50.4	54.0	24.0	42.1	30.2	0.0	0.0	0.0		
Spartanburg SC MSA	512	124,501	65.8	18,312	2.3	0.0	1.1	15.6	8.8	9.3	47.1	49.2	42.7	35.1	42.0	46.9	0.0	0.0	0.0		
Total	778	172,758	100.0	19,678	1.9	0.0	1.0	16.8	8.4	9.8	48.0	49.6	43.5	33.3	42.0	45.7	0.0	0.0	0.0		

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2022	
Assessment Area:	Total Home Mortgage Loans			Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% 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			
Cherokee County	93	19,685	34.3	0.0	0.0	--	15.4	3.2	--	59.2	50.5	--	25.4	46.2	--	0.0	0.0	--			
Spartanburg SC MSA	178	55,055	65.7	2.3	1.1	--	10.1	6.2	--	59.6	64.0	--	27.5	28.1	--	0.5	0.6	--			
Total	271	74,740	100.0	2.0	0.7	--	10.9	5.2	--	59.6	59.4	--	27.2	34.3	--	0.4	0.4	--			

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank 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																			2020-21	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cherokee County	266	48,257	34.2	1,366	23.7	1.9	3.0	16.5	7.5	16.8	18.0	24.1	24.9	41.8	62.4	38.4	0.0	4.1	17.0	
Spartanburg SC MSA	512	124,501	65.8	18,312	21.0	2.7	6.4	17.4	12.7	21.5	18.9	19.3	22.1	42.7	60.4	30.3	0.0	4.9	19.7	
Total	778	172,758	100.0	19,678	21.4	2.4	6.2	17.3	10.9	21.2	18.8	21.0	22.3	42.5	61.1	30.8	0.0	4.6	19.5	

*Source: 2015 ACS ; 01/01/2020 - 12/31/2021 Bank Data, 2021 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																			2022	
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers			
	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	
Cherokee County	93	19,685	34.3	19.7	4.3	--	19.2	11.8	--	18.8	17.2	--	42.2	57.0	--	0.0	9.7	--		
Spartanburg SC MSA	178	55,055	65.7	20.1	2.8	--	18.2	11.8	--	20.8	18.5	--	40.9	61.8	--	0.0	5.1	--		
Total	271	74,740	100.0	20.0	3.3	--	18.4	11.8	--	20.6	18.1	--	41.0	60.1	--	0.0	6.6	--		

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2022 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2020-21	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cherokee County	40	1,071	50.0	0.0	0.0	26.9	10.0	52.6	47.5	20.5	42.5	0.0	0.0	
Spartanburg SC MSA	40	2,827	50.0	4.9	0.0	20.5	7.5	44.5	50.0	30.2	42.5	0.0	0.0	
Total	80	3,898	100.0	4.1	0.0	21.5	8.8	45.7	48.7	28.7	42.5	0.0	0.0	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cherokee County	20	671	48.8	0.0	0.0	20.0	5.0	59.4	70.0	20.6	25.0	0.0	0.0	
Spartanburg SC MSA	21	1,844	51.2	4.1	0.0	15.1	9.5	55.9	66.7	24.0	23.8	0.9	0.0	
Total	41	2,515	100.0	3.5	0.0	15.8	7.3	56.5	68.3	23.5	24.4	0.8	0.0	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2020-21
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cherokee County	40	1,071	27.5	25.2	20.0	15.2	20.0	16.1	22.5	43.4	37.5	0.0	0.0	
Spartanburg SC MSA	40	2,827	72.5	23.6	12.5	15.6	20.0	17.3	25.0	43.5	42.5	0.0	0.0	
Total	80	3,898	100.0	23.9	16.3	15.5	20.0	17.1	23.7	43.5	40.0	0.0	0.0	

*Source: 2015 ACS; 01/01/2020 - 12/31/2021 Bank Data.
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower														2022
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cherokee County	20	671	26.7	26.5	10.0	17.4	25.0	16.4	25.0	39.6	35.0	0.0	5.0	
Spartanburg SC MSA	21	1,844	73.3	24.1	14.3	16.2	19.0	18.1	23.8	41.7	42.9	0.0	0.0	
Total	41	2,515	100.0	24.5	12.2	16.3	22.0	17.8	24.4	41.4	39.0	0.0	2.4	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.
Due to rounding, totals may not equal 100.0%*