



PUBLIC DISCLOSURE

October 15, 2019

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Woodruff Federal Savings and Loan Association
Charter Number 703150

247 N. Main Street
Woodruff, SC 29388-1847

Office of the Comptroller of the Currency

212 S. Tryon St.
Suite 700
Charlotte, NC 28281

NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending Test rating is based on the State of South Carolina. The bank did not have branches or deposit-taking ATMs outside of South Carolina during the evaluation period. As a result, we have only one rating area.
- The bank's quarterly average loan-to-deposit ratio is more than reasonable based on the bank's size, financial condition, and relevant competitive factors and totaled 95.78 percent.
- The bank exhibits a reasonable geographic distribution of loans in the assessment area (AA).
- The bank exhibits a reasonable distribution of loans to borrowers of different incomes.

Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AA, the bank's loan-to-deposit (LTD) ratio is more than reasonable. Beginning with the quarter ending June 30, 2015 to June 30, 2019, the average quarterly LTD ratio for Woodruff Federal was 95.78 percent, ranging from a quarterly low of 84.74 percent and a quarterly high of 103.94 percent. In comparison, over the same 17 quarters, the quarterly average LTD ratio among similarly sized financial institutions in South Carolina and North Carolina was 83.26, ranging from a quarterly low of 64.59 percent and a quarterly high of 121.4 percent.

Lending in Assessment Area

A substantial majority of the bank's loans are inside its assessment area (AA).

The bank originated 181 home mortgage loans representing 97.3 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA level.

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										
2016	52	100	0	0	52	7,310	100	0	0	7,310
2017	69	93.2	5	6.8	74	11,156	92.1	960	7.9	12,116
2018	60	100	0	0	60	11,039	100	0	0	11,039
Total	181	97.3	5	2.7	186	29,505	96.80	960	3.2	30,465

Description of Institution

Woodruff Federal Savings and Loan Association (Woodruff Federal) is a single branch, federally chartered, mutual savings association headquartered in Woodruff, South Carolina. The bank offers conventional fixed rate residential mortgages, first-time homebuyer loans, construction-to-permanent loans, refinances, second mortgages, home equity lines of credit (HELOC), vacant land and lot loans, and church loans. Woodruff also offers deposit products including certificates of deposits (CD), and regular passbook savings accounts.

Woodruff Federal operates as a traditional savings association, concentrating on originating home mortgages. As of June 30, 2019, the bank had total assets of \$91.1 million and Tier One Capital of \$31.6 million. Net loans and leases represented 63.52 percent of total assets. The residential and commercial loan portfolios totaled \$45.9 million or 78.39 percent and \$12.7 million or 21.61 percent respectively. The bank has identified 1-4 family home mortgages as their primary product.

The bank has identified one AA for our review period, the Greenville-Spartanburg-Anderson combined statistical area (CSA). The CSA consists of Cherokee County, Greenville County, Laurens County, Spartanburg County, and Union County. It is included in the State of South Carolina Rating Area. The bank did not have any branches or deposit-taking ATMs outside of the state.

The bank received a “Satisfactory” rating during the prior CRA evaluation dated July 13, 2015. There are no known legal, financial, or other factors impeding Woodruff Federal’s ability to help meet the credit needs of its AAs.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This performance evaluation assesses Woodruff Federal’s capacity to help meet the credit needs of the community in which it operates. The review period for this evaluation includes January 1, 2016 through December 31, 2018. We assessed the bank’s performance using HMDA LAR data for home mortgages during this time period.

Selection of Areas for 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 a blend of the state ratings, and where applicable, multistate ratings. The bank has only one rating area, the State of South Carolina. Home mortgages are the bank's primary product.

The state rating is based on performance in the AA. Refer to the "Scope" section under the 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) 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 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 major factors that support this rating include:

- The bank's quarterly average loan-to-deposit ratio is more than reasonable based on the bank's size, financial condition, and relevant competitive factors and totaled 95.78 percent.
- A substantial majority of loans were made inside the AA. The bank originated 181 loans representing 97.3 percent of total loans inside the AA.
- The bank's distribution of loans represents a reasonable geographic distribution throughout the Greenville-Spartanburg-Anderson AA.
- The bank's distribution of loans represents a reasonable penetration among borrowers of different income levels in the Greenville-Spartanburg-Anderson AA.

Description of Institution's Operations in the State of South Carolina

Woodruff Federal operates as a traditional savings association with a single branch located in the AA. The bank has identified the Greenville-Spartanburg-Anderson combined statistical area (CSA) as its AA, including Cherokee County, Greenville County, Laurens County, Spartanburg County, and Union County.

The Greenville-Spartanburg-Anderson (GSA) CSA is comprised of 219 census tracts, of which, 17 are low-income census tracts, 60 are moderate-income census tracts, 84 are middle-income census tracts, and 58 are upper-income census tracts. The AA consists of entire cities and counties and does not arbitrarily exclude low- or moderate-income tracts. The population of the CSA is approximately 1.5 million and the poverty level has increased during the evaluation period from 11.3 percent to 13.3 percent. According to the Bureau of Labor Statistics, the unemployment rate for the CSA as of December 2018 was 3 percent, slightly below the 3.2 percent unemployment rate for the state of South Carolina. Primary industries in the AA include the automotive, automation, health care, and telecommunication industries. Major employers include BMW, GE Power, Keurig Green Mountain, Milliken & Co, and Nestle.

Woodruff faces considerable deposit competition from large regional and national banks. As of June 30, 2018, the bank operated one branch in the AA and ranked 26th out of the 36 financial institutions in that market; representing 0.30 percent of the deposit market share in the AA. Wells Fargo, Bank of America, BB&T and SunTrust Bank are the major competitors and together represent approximately 50 percent of the deposit market share.

Woodruff participates in the Centrant Community Capital participation program. This program focuses on partnering with affordable housing developers in the Southeast and banks of all sizes. During our evaluation period, Woodruff purchased a total of 52 Centrant loan participations totaling \$4.1 million. In total, the bank currently has 80 Centrant participations with a total principal balance of \$6.215 million. To qualify for financing through the program, at least 51 percent of the housing units must provide housing for individuals earning no more than 60 percent of the area median family income. Additionally, residents of the developments cannot spend more than 30 percent of their monthly income on housing. Most of these communities receive an allocation of Federal low-income housing tax credits with an addition of some form of subordinate debt. The subordinate debt typically comes from city, county, affordable housing grants, Federal HOME funds, or Centrant Loans.

As part of our evaluation, we conducted a community contact with a local community organization. The local organization provides housing assistance and relief to the homeless and provides low-income individuals resources in an effort to keep them in their homes. The organization works in the upstate area of South Carolina, which comprises part of the Greenville-Spartanburg-Anderson CSA. The contact stated recent economic development has increased the costs of living in the upstate area and as a result, one of the greatest needs in the community is affordable housing, specifically for one-bedroom units.

The following table provides demographic information for 2016 and 2017-2018.

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2016 Greenville-Anderson-Spartanburg CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	219	7.3	25.6	42.0	25.1	0.0
Population by Geography	886,372	4.9	21.4	44.9	28.8	0.0
Housing Units by Geography	380,959	5.2	23.3	44.5	27.0	0.0
Owner-Occupied Units by Geography	233,558	2.7	17.7	47.8	31.7	0.0
Occupied Rental Units by Geography	102,736	9.8	32.7	38.0	19.5	0.0
Vacant Units by Geography	44,665	7.7	30.8	41.9	19.5	0.0
Businesses by Geography	50,165	4.3	21.4	37.5	36.8	0.0
Farms by Geography	1,287	1.9	17.2	50.3	30.5	0.0
Family Distribution by Income Level	226,918	21.4	17.2	19.4	42.0	0.0
Household Distribution by Income Level	336,294	24.3	15.7	17.2	42.7	0.0
Median Family Income MSA - 24860 Greenville-Anderson-Mauldin, SC MSA		\$54,957	Median Housing Value			\$127,998
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$51,848	Median Gross Rent			\$648
Median Family Income Non-MSAs - SC		\$43,494	Families Below Poverty Level			11.6%
<i>Source: 2010 U.S. Census and 2016 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>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2017-2018 Greenville-Anderson-Spartanburg CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	219	7.8	27.4	38.4	26.5	0.0
Population by Geography	916,520	5.1	23.5	39.5	32.0	0.0
Housing Units by Geography	391,972	5.2	24.9	39.4	30.4	0.0
Owner-Occupied Units by Geography	234,363	2.7	19.8	41.3	36.2	0.0
Occupied Rental Units by Geography	112,740	9.7	32.0	36.4	21.8	0.0
Vacant Units by Geography	44,869	7.3	33.9	36.7	22.1	0.0
Businesses by Geography	52,438	4.7	20.8	36.1	38.4	0.0
Farms by Geography	1,344	2.1	19.3	46.0	32.7	0.0
Family Distribution by Income Level	236,603	22.3	16.5	18.5	42.6	0.0
Household Distribution by Income Level	347,103	24.1	15.5	16.5	43.9	0.0
Median Family Income MSA - 24860 Greenville-Anderson-Mauldin, SC MSA		\$58,097	Median Housing Value			\$134,342
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$52,792	Median Gross Rent			\$731
Median Family Income Non-MSAs - SC		\$44,547	Families Below Poverty Level			13.3%
<i>Source: 2015 ACS Census and 2018 D&B Data</i>						
<i>Due to rounding, totals may not equal 100.0</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Scope of Evaluation in South Carolina

We performed a full-scope evaluation on the Greenville-Anderson-Spartanburg CSA using the small bank Community Reinvestment ACT (CRA) examination procedures. Based on the bank's strategy and the loans originated during the evaluation period, we determined that home mortgages are the bank's primary loan product.

The evaluation period for home mortgages is January 1, 2016 through December 31, 2018. The evaluation period for the loan-to-deposit ratio is June 30, 2015 to June 30, 2019. No area of review was weighted more heavily when concluding on overall performance in the state.

LENDING TEST

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

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

Distribution of Loans by Income Level of the Geography

The bank exhibits a reasonable geographic distribution of loans in the State of North Carolina.

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.

The bank exhibits a reasonable distribution of loans in the AA. In 2016, the bank out-performed peer institutions lending to moderate-income borrowers, lending 21.2 percent of loans in moderate-income census tracts. In 2017-2018, the bank made 20.9 percent of loans in moderate-income census tracts, which was higher than the 19.8 percent of owner-occupied housing units. The bank did not make any loans in low-income census tracts during the evaluation period. However, this is reasonable considering that most of the low-income census tracts are located in and around downtown Greenville and Spartanburg where competition for loans is substantial. Additionally, four of the middle-income census tracts in the AA were designated as underserved or distressed middle-income tracts. The bank made 16.67 percent of middle-income census tract loans in census tracts with the underserved or distressed designation.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a reasonable distribution of loans to individuals of different income 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.

The bank's distribution of home mortgages represents a reasonable penetration. In 2016, the bank did not make any loans to low-income borrowers. The 2017-2018 percentage of loans made to low-income borrowers at 3.9 percent was less than the 22.3 percent of low-income families and lower than the 6.1 percent of loans made by aggregate lenders to low-income families. The total percentage of home mortgages to moderate-income borrowers in 2016 and 2017-2018 was lower than the percentage of moderate-income families in the AA. In 2016 and 2017-2018, the bank made 7.7 percent and 13.2 percent of loans to moderate-income borrowers, respectively.

Distribution of loans to borrowers of different income levels in the AA is reasonable given the poverty level, high level of competition, and small market share. The poverty level in the AA increased from 11.6 percent to 13.3 percent during the evaluation period. Borrowers below the poverty line are likely unable to afford the traditional products offered by the bank including construction-permanent and 80 percent loan to value mortgages. Additionally, the bank faces considerable competition from large and regional financial institutions who offer a wider range of products in the AA. Woodruff's deposits represent only 0.30 percent of all market deposits in the AA and ranked 26th out of 36 institutions in the AA.

Responses to Complaints

The bank did not receive any CRA related complaints since the previous examination.

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”.

Time Period Reviewed:	January 1, 2016 to December 31, 2018	
Bank Products Reviewed:	Home mortgages	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
South Carolina		
Greenville-Spartanburg-Anderson CSA	Full-Scope	Greenville County, Laurens County, Union County, Cherokee County, and Spartanburg County

Appendix B: Summary of State Rating

RATINGS Woodruff Federal	
Overall Bank:	Lending Test Rating
Woodruff Federal	Satisfactory
State:	
South Carolina	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 multistate metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multistate metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have

original amounts of \$500,000 or less and are either secured by farmland or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

- Table O. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents aggregate peer data for the years the data is available.
- Table P. Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MMSA/assessment area. The table also presents aggregate peer data for the years the data is available.
- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and, 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.

- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1 million; and, 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm 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.

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
2016 Greenville-Anderson-Spartanburg CSA	52	7,310	100.0	30,307	2.7	0.0	1.2	17.7	21.2	11.0	47.8	46.2	44.3	31.7	32.7	43.5	0.0	0.0	0.0
Total	52	7,310	100.0	30,307	2.7	0.0	1.2	17.7	21.2	11.0	47.8	46.2	44.3	31.7	32.7	43.5	0.0	0.0	0.0

*Source: 2010 U.S. Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0*

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
Greenville-Anderson-Spartanburg CSA	129	22,195	100.0	31,214	2.7	0.0	2.1	19.8	20.9	13.9	41.3	46.5	39.5	36.2	32.6	44.5	0.0	0.0	0.0
Total	129	22,195	100.0	31,214	2.7	0.0	2.1	19.8	20.9	13.9	41.3	46.5	39.5	36.2	32.6	44.5	0.0	0.0	0.0

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

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
2016 Greenville-Anderson-Spartanburg CSA	52	7,310	100.0	30,307	21.4	0.0	4.8	17.2	7.7	15.5	19.4	15.4	21.2	42.0	76.9	41.1	0.0	0.0	17.3
Total	52	7,310	100.0	30,307	21.4	0.0	4.8	17.2	7.7	15.5	19.4	15.4	21.2	42.0	76.9	41.1	0.0	0.0	17.3

Source: 2010 U.S Census; 01/01/2016 - 12/31/2016 Bank Data, 2016 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0

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
Greenville-Anderson-Spartanburg CSA	129	22,195	100.0	31,214	22.3	3.9	6.1	16.5	13.2	18.5	18.5	20.9	22.7	42.6	62.0	37.9	0.0	0.0	14.7
Total	129	22,195	100.0	31,214	22.3	3.9	6.1	16.5	13.2	18.5	18.5	20.9	22.7	42.6	62.0	37.9	0.0	0.0	14.7

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