



PUBLIC DISCLOSURE

August 26, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Highland FS & LA
Charter Number 706581

106 S Main Street, Suite 103
Crossville, TN 38555-4694

Office of the Comptroller of the Currency

320 Seven Springs Way, Suite 310
Brentwood, TN 37027

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

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Overall CRA Rating

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

The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The Lending test rating is based on the bank’s reasonable loan-to-deposit (LTD) ratio, substantial majority of loans originated within the bank’s assessment area (AA), and the reasonable distribution of loans to geographies and borrowers of different income levels.
- The bank did not receive any CRA-related complaints during the evaluation period.

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 reasonable. The bank’s quarterly average LTD ratio was 49.0 percent for the 16 quarters between March 31, 2020, to December 31, 2023. The bank’s LTD ratio had a quarterly low of 36.3 percent and a quarterly high of 68.9 percent. We compared the bank’s LTD ratio to six similar banks. The quarterly average LTD ratio for banks in this peer group 63.3 percent, ranging from 41.4 percent to 80.7 percent.

Lending in Assessment Area

A substantial majority of the bank’s loans are inside its AA.

The bank originated and purchased 95.0 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

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	57	95.0	3	5.0	60	\$9,012	90.1	985	9.9	\$9,997
Total	57	95.0	3	5.0	60	\$9,012	90.1	985	9.9	\$9,997

Description of Institution

Highland FS & LA (bank, Highland) is a federally chartered, mutual savings association established in 1961. The bank is headquartered in Crossville, Tennessee, which is located within Cumberland County, the bank’s sole AA. The bank’s main office and one branch are in Crossville, Tennessee. Both locations offer automated teller machines (ATMs) and operating hours that are reasonable to meet customer needs. Highland primarily offers mortgage loan products, including construction loans, along with various deposit account types. Customers can access their accounts through internet and mobile banking

services. Mobile banking services include transfers between bank accounts, review of account balances and transactions, and bill-paying capacity. There have been no changes in the bank's corporate structure, and no offices have opened or closed since the last Community Reinvestment Act (CRA) performance evaluation dated May 4, 2020, when the bank received a "Satisfactory" rating.

As of December 31, 2023, the bank reported total assets of \$76.5 million and a leverage capital ratio of 21.3 percent. The loan portfolio totaled \$37.3 million, representing 48.8 percent of assets. The bank's primary loan product is residential mortgage loans, which account for 76.1 percent of the bank's lending activity. There are no known financial or legal impediments that would affect the bank's ability to meet the credit needs of its community.

Scope of the Evaluation

Evaluation Period/Products Evaluated

We completed a full-scope review of the bank's CRA performance under the Small Bank performance criteria, which includes a Lending Test. Our evaluation period was January 1, 2020, through December 31, 2023, with an emphasis on lending activity from January 1, 2021, through December 31, 2023. In evaluating lending performance, we reviewed home mortgage loans, the bank's primary loan product. As the bank is not a Home Mortgage Disclosure Act (HMDA) reporter, we based our lending analysis on a sample of home mortgage loans.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated assessment areas 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 its performance in the state of Tennessee. The state rating is based on performance in the bank's AA. Refer to the "Scope" section under the State of Tennessee Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, in determining a national bank's or federal savings association's (collectively, bank) CRA rating, the OCC considers evidence of discriminatory or other illegal credit practices in any geography by the bank, or in any AA by an affiliate whose loans have been considered as part of the bank's lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Bureau of Consumer Financial Protection, as applicable.

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

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

State Rating

State of Tennessee

CRA rating for the State of Tennessee¹: Satisfactory

The Lending Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibited a reasonable distribution of loans by geography income level.
- The bank exhibited a reasonable distribution of loans to borrowers of different income levels.
- The bank did not receive any CRA-related complaints during the evaluation period.

Description of Institution’s Operations in Tennessee

Highland’s AA includes all of Cumberland County, Tennessee. The AA meets regulatory requirements and does not arbitrarily exclude low- or moderate-income (LMI) areas. Highland faces significant competition from other state and national banks. As of June 30, 2023, Highland was one of nine financial institutions with offices in the AA. Highland was the only bank without offices outside the AA and was the sixth largest bank by deposit size in the AA, holding a deposit market share of 3.6 percent.

Economic conditions in the AA improved during the evaluation period. Tables A below reflect population and income-level growth from 2021 and 2022-2023. The total population of the county in the 2022-2023 time period was approximately 61 thousand. There were 17 census tracts (CTs) during this time and no low-income CTs. The U.S. Census Bureau estimated that, as of July 2023, the median household income of Cumberland County, TN was \$56 thousand, with a county poverty rate of 14.0 percent. The OCC contacted one individual within Cumberland County to determine AA credit needs. The community contact, from an area nonprofit, indicated the need to support workforce development through affordable housing, as well as aiding in the expansion of new business and industrial prospects.

The following tables provide a summary of the AA demographics, including housing and income-related information.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cumberland County AA - 2021						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	14	0.0	14.3	71.4	14.3	0.0
Population by Geography	57,455	0.0	17.6	72.1	10.3	0.0
Housing Units by Geography	28,483	0.0	16.7	72.6	10.7	0.0

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

Owner-Occupied Units by Geography	19,014	0.0	10.8	76.4	12.7	0.0
Occupied Rental Units by Geography	5,163	0.0	39.3	54.4	6.3	0.0
Vacant Units by Geography	4,306	0.0	15.5	77.2	7.2	0.0
Businesses by Geography	3,684	0.0	39.8	50.6	9.6	0.0
Farms by Geography	151	0.0	16.6	72.8	10.6	0.0
Family Distribution by Income Level	16,712	18.3	18.6	23.1	40.1	0.0
Household Distribution by Income Level	24,177	20.5	16.0	21.6	42.0	0.0
Median Family Income Non-MSAs – TN		\$46,066	Median Housing Value			\$139,767
			Median Gross Rent			\$632
			Families Below Poverty Level			11.2%
<i>Source: 2015 ACS Census and 2021 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: Cumberland County AA – 2022-2023						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	17	0.0	11.8	70.6	17.6	0.0
Population by Geography	61,145	0.0	14.3	66.3	19.4	0.0
Housing Units by Geography	30,081	0.0	13.6	67.4	19.0	0.0
Owner-Occupied Units by Geography	20,869	0.0	6.7	72.0	21.3	0.0
Occupied Rental Units by Geography	5,520	0.0	39.1	43.3	17.6	0.0
Vacant Units by Geography	3,692	0.0	13.8	77.8	8.4	0.0
Businesses by Geography	4,488	0.0	32.7	53.6	13.7	0.0
Farms by Geography	190	0.0	16.8	70.5	12.6	0.0
Family Distribution by Income Level	18,245	16.9	19.3	22.6	41.2	0.0
Household Distribution by Income Level	26,389	20.2	15.2	18.8	45.8	0.0
Median Family Income Non-MSAs – TN		\$56,418	Median Housing Value			\$162,730
			Median Gross Rent			\$708
			Families Below Poverty Level			8.2%
<i>Source: 2020 ACS Census and 2023 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 Tennessee

The State of Tennessee rating is based on a full-scope review of the bank's performance in its one AA, Cumberland County, Tennessee.

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cumberland County AA is good.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

In 2021, 15.0 percent of the bank's home mortgage loans were made in moderate-income CTs, which exceeds the peer aggregate lending level (9.8 percent) and the percentage of owner-occupied housing units (10.8 percent) in these CTs.

In 2022 and 2023, 10.0 percent of the bank's home mortgage loans were made in moderate-income CTs, which exceeds the peer aggregate lending level (7.8 percent) and the percentage of owner-occupied housing units (6.7 percent) in these CTs.

Our analysis of the geographic distribution of home mortgage loans is based on analysis of loan activity within moderate-income CTs as there were no low-income CTs in this AA.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

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

Home Mortgage Loans

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

In 2021, the bank originated no loans to low-income borrowers while peer aggregate lending levels totaled 3.7 percent and the percentage of low-income families in the AA was 18.3 percent. The bank originated 15 percent of home mortgage loans to moderate-income borrowers, which is in-line with the peer aggregate lending level (15.4 percent) and the percentage of moderate-income families in the AA (18.6 percent).

In 2022-2023, the bank originated 7.5 percent of home mortgage loans to low-income borrowers, which exceeded the peer aggregate lending level (5.7 percent) and was below the percentage of low-income

families in the AA (16.9 percent). The bank originated 25.0 percent of loans to moderate-income borrowers, which exceeded the peer aggregate lending level (16.5 percent) and the percentage of moderate-income families in the AA (19.3 percent).

Responses to Complaints

The bank did not receive any CRA-related complaints during the evaluation period.

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:	01/01/2020 to 12/31/2023	
Bank Products Reviewed:	Home mortgage loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
States		
Cumberland County AA	Full-Scope	Entirety of Cumberland County

Appendix B: Summary of MMSA and State Ratings

RATINGS: Highland FS & LA	
Overall Bank:	Lending Test Rating
Highland FS & LA	Satisfactory
MMSA or State:	
Tennessee	Satisfactory

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into ‘male householder’ (a family with a male householder and no wife present) or ‘female householder’ (a family with a female householder and no husband present).

Full-Scope Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that conduct business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applicants, the amount of loan requested, the disposition of the application (e.g., approved, denied, and withdrawn), the lien status of the collateral, any requests for preapproval, and loans for manufactured housing.

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

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

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

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

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

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

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

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

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

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

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

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

Rating Area: A rated area is a state or multi-state metropolitan statistical area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan statistical area, the institution will receive a rating for the multi-state metropolitan statistical area.

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

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2021
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	
Cumberland County AA	20	3,309	100.0	2,733	0.0	0.0	0.0	10.8	15.0	9.8	76.4	25.0	73.4	12.7	60.0	16.8	0.0	0.0	0.0	
Total	20	3,309	100.0	2,733	0.0	0.0	0.0	10.8	15.0	9.8	76.4	25.0	73.4	12.7	60.0	16.8	0.0	0.0	0.0	

Source: 2015 ACS; 01/01/2021 - 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																				2022-23
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	
Cumberland County AA	40	6,088	100.0	1,365	0.0	0.0	0.0	6.7	10.0	7.8	72.0	70.0	69.5	21.3	20.0	22.8	0.0	0.0	0.0	
Total	40	6,088	100.0	1,365	0.0	0.0	0.0	6.7	10.0	7.8	72.0	70.0	69.5	21.3	20.0	22.8	0.0	0.0	0.0	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
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
Cumberland County AA	20	3,309	100.0	2,733	18.3	0.0	3.7	18.6	15.0	15.4	23.1	25.0	21.7	40.1	60.0	41.2	0.0	0.0	18.0
Total	20	3,309	100.0	2,733	18.3	0.0	3.7	18.6	15.0	15.4	23.1	25.0	21.7	40.1	60.0	41.2	0.0	0.0	18.0

*Source: 2015 ACS ; 01/01/2021 - 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																			2022-23
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
Cumberland County AA	40	6,088	100.0	1,365	16.9	7.5	5.7	19.3	25.0	16.5	22.6	7.5	23.2	41.2	60.0	37.4	0.0	0.0	17.2
Total	40	6,088	100.0	1,365	16.9	7.5	5.7	19.3	25.0	16.5	22.6	7.5	23.2	41.2	60.0	37.4	0.0	0.0	17.2

*Source: 2020 U.S. Census ; 01/01/2022 - 12/31/2023 Bank Data, 2023 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

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