



PUBLIC DISCLOSURE

July 22, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Martinsville First Savings Bank
Charter Number: 703881

25 W Church Street
Martinsville, Virginia 24114-6217

Office of the Comptroller of the Currency
Roanoke Office
4419 Pheasant Ridge Road, Suite 300
Roanoke, Virginia 24014

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:

- Martinsville First Savings Bank's (MFSB's) quarterly average loan-to-deposit (LTD) ratio is reasonable based on the bank's size, financial condition, credit needs of the community served, and competition in its market.
- MFSB originates a substantial majority of its loans within its assessment area (AA).
- The bank exhibits reasonable geographic distribution of loans in its AA.
- The bank exhibits reasonable distribution of loans to individuals of different income levels in its AA.

Loan-to-Deposit Ratio

The bank's LTD ratio is reasonable, considering the bank's size, financial condition, and credit needs of the AA.

The bank's LTD ratio is calculated on a bank-wide basis covering the quarters as of March 31, 2019, through December 31, 2023. The bank's average quarterly LTD ratio for the 20 consecutive quarters is 56.08 percent. This is below the average quarterly LTD ratio of 80.66 percent for competitor institutions during the same time period. There are no similar asset-sized institutions in the AA.

The bank's average quarterly LTD ratio ranged from a high of 65.28 percent, to a low of 45.02 percent. The average quarterly LTD for the competitor banks ranged from a high of 98.44 percent, to a low of 61.18 percent over the same period.

Lending in Assessment Area

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

The bank originated 87.5 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.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	21	87.5	3	12.5	100.0	1,303	89.4	154	10.6	1,457
Total	21	87.5	3	12.5	100.0	1,303	89.4	154	10.6	1,457

*Source: Bank Data
Due to rounding, totals may not equal 100.0%*

Description of Institution

MFSB is a single-state, federally-chartered mutual savings association headquartered in Martinsville, Virginia. The bank is a wholly-owned subsidiary of First Mutual Holding Company, located in Lakewood, Ohio, with total assets of \$258.5 million. There have been no merger or acquisition activities since the previous evaluation. No branches were opened or closed during the evaluation period.

The bank operated in the state of Virginia during the evaluation period and will be evaluated as a single-state institution. The bank has one AA that consists of one county and one independent city in the state of Virginia. There were no similarly-situated financial institutions that serve the same AA.

MFSB offers regular business hours Monday through Friday. MFSB operates as a traditional savings association, serving its community through its one location, which features a drive-thru. The bank provides Automated Teller Machine (ATM) services through its partnership with MoneyPass to provide access to ATMs across the country.

MFSB primarily operates as a traditional residential mortgage lender. The bank offers a limited variety of deposit and loan products to meet consumer and commercial banking needs. Its primary credit product is home mortgage loans. Deposit products are limited to passbook savings accounts, money market deposit accounts, and certificates of deposit. The bank offers personal online banking and mobile banking. The bank's website, www.martinsvillefirst.com, provides details on products and services offered to both consumers and businesses.

There are no legal nor financial impediments to the bank's ability to help meet the credit needs of its AA. The bank received an Outstanding CRA rating at its last CRA Performance Evaluation (PE), dated April 1, 2019.

MFSB is primarily a real estate lender, with approximately 99.0 percent of the loan portfolio consisting of real estate secured loans. As of December 31, 2023, MFSB's total assets were \$32.4 million, and tier 1 capital was \$6.0 million. The bank's loan portfolio (portrayed in Table 1) totals approximately \$15.6 million in net loans and represents 48.3 percent of total assets.

Type of Loan	Balance Outstanding (\$,000)	% of Total Loans
1-4 Family Residential	15,425	98.78
Non-Farm/Non-Residential	137	0.88
Multi-family Residential	102	0.65
Loans to Individuals	82	0.52
Less loans and lease allowance	(131)	(0.83)
Total Net Loans	15,615	100.00

*Source: Schedule RC-C Part 1 - Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only and Total Assets Less than \$1 Billion – FFIEC 051 as of December 31, 2023.

Scope of the Evaluation

Evaluation Period/Products Evaluated

MFSB was evaluated using Small Bank CRA Evaluation procedures to assess the bank's performance under the Lending Test. The Lending Test evaluates the institution's record of meeting the credit needs of its AA through lending activities. The OCC analyzed lending activity in full-year increments during the evaluation period, January 1, 2020, through December 31, 2023. Since the bank is not a HMDA-reporter, the home mortgage information is considered in context because the analysis for non-HMDA reporting banks is typically based on a sample of loans originated during the evaluation period.

The bank's lending performance is based on its primary lending product, home mortgage lending. While the bank offers other lending products, these products were not primary products during the evaluation period. As a result, the OCC did not consider these as part of the performance evaluation, as an analysis of this data would not be meaningful. MFSB's primary lending products are discussed under the "Description of Institution" section in this report. For the Lending Test, the OCC evaluated all home mortgage loan originations during the performance evaluation period from January 1, 2020, through December 31, 2023.

The OCC generally gave equal weighting to geographic and borrower distribution components of the Lending Test. When evaluating the geographic distribution of loans within the AA, the OCC gave greater weight to MFSB's performance in moderate-income tracts in instances where there were a limited number of owner-occupied housing units (OOHU) in the low-income tracts. When evaluating the distribution of home mortgage loans based on the income level of the borrower, the OCC considered the poverty level to identify challenges in lending opportunities within the institution's AA. The loan distribution analyses compared home mortgage loans to demographic and aggregate data under the applicable Lending Test components. Aggregate data illustrates how the institution is performing relative to other lenders in the AA and provides context as to the reasonableness of the institution's performance.

The OCC used a combination of bank- and examiner-generated loan and/or demographic reports to assess the bank's CRA performance. For analysis purposes, the OCC compared the bank's lending performance with demographic data from the 2015 American Community Survey (ACS) U.S. Census for 2020 and 2021. The 2020 U.S. Census data were used for 2022 and 2023. The OCC put the most weight on the 2020-21 data as it represents the majority of the bank's originations during the assessment period by both dollar and volume. There are two sets of tables in appendix D for the different census periods. No affiliate activity was included in this analysis. Refer to the table in appendix A, Scope of the Examination, for more information on the scope of the review.

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 non-MSA AAs within the same state are evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under the 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 of Virginia rating. The state rating is based on performance in the bank's sole 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), 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 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 Virginia

CRA rating for the State of Virginia: Satisfactory.

The Lending Test is rated: Satisfactory.

The major factors that support this rating include:

- The bank exhibits reasonable geographic distribution of loans in low- and moderate-income (LMI) geographies.
- The bank exhibits a reasonable distribution of loans to individuals of different income levels.

Description of Institution's Operations in Virginia

The Henry County VA non-MSA AA consists of the city of Martinsville, and Henry County, Virginia. The city of Martinsville is considered a separate political subdivision, located within Henry County. MFSB operated its sole branch office and drive-thru in this AA within a middle-income CT.

The Henry County, VA non-MSA AA is comprised of 14 census tracts (CTs) in Henry County, and five CTs in the city of Martinsville. The CTs are delineated into nine moderate-, nine middle-, and one upper-income CT(s) for the 2020-2021 years. The 2020 U.S. Census resulted in CT income changes, such that there is one low-, eight moderate-, nine middle-, and one upper-income CTs for the 2022-2023 years. The AA does not arbitrarily exclude any low- or moderate-income CTs.

MFSB originated 24 home mortgage loans, representing 77.4 percent of total loans originated during the evaluation period.

The bank faces significant competition in its AA. Competition for deposits in the AA is strong given the number and size of financial institutions in the AA. Competition is comprised of local community banks and branches of larger financial institutions. According to the Federal Deposit Insurance Corporation (FDIC) Summary of Deposits Report as of June 30, 2023, there are eight institutions, with 17 offices, accepting retail deposits in the AA. MFSB ranked seventh among depository institutions in the AA with a deposit market share of 2.04 percent as of June 30, 2023. The bank's primary competitors include financial institutions with significant deposit activity in the AA such as Carter Bank and Trust, American National Bank and Trust Company, Truist Bank, and First Horizon Bank, holding a combined 84.0 percent of the deposit market share in the AA. All the bank's deposits are located within its AA.

The following information regarding demographic data, affordable housing cost, job market and economic conditions, competition, and community contacts/credit needs provides additional performance context for MFSB's operations in Virginia. The tables below provide a summary of the demographic data for the AA.

Henry County VA non-MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: Henry County VA non-MSA AA (2020-2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	0.0	47.4	47.4	5.3	0.0
Population by Geography	66,204	0.0	43.7	51.6	4.7	0.0
Housing Units by Geography	33,320	0.0	45.1	50.4	4.5	0.0
Owner-Occupied Units by Geography	19,807	0.0	42.6	51.8	5.5	0.0
Occupied Rental Units by Geography	8,465	0.0	48.7	48.2	3.2	0.0
Vacant Units by Geography	5,048	0.0	48.5	48.5	3.0	0.0
Businesses by Geography	4,552	0.0	35.0	60.9	4.0	0.0
Farms by Geography	141	0.0	29.1	65.2	5.7	0.0
Family Distribution by Income Level	18,141	26.0	19.6	23.1	31.3	0.0
Household Distribution by Income Level	28,272	28.4	19.0	17.8	34.8	0.0
Median Family Income Non-MSAs - VA		\$51,647	Median Housing Value			\$94,429
			Median Gross Rent			\$590
			Families Below Poverty Level			14.9%
<i>Source: 2015 ACS 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: Henry County VA non-MSA AA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	19	5.3	42.1	47.4	5.3	0.0
Population by Geography	64,433	3.1	41.1	51.1	4.8	0.0
Housing Units by Geography	33,255	4.0	41.5	50.4	4.1	0.0
Owner-Occupied Units by Geography	18,242	2.3	40.8	51.4	5.6	0.0
Occupied Rental Units by Geography	8,367	5.6	40.7	51.0	2.7	0.0
Vacant Units by Geography	6,646	6.5	44.5	47.1	1.9	0.0
Businesses by Geography	5,791	4.9	29.9	60.7	4.5	0.0
Farms by Geography	195	1.0	32.3	59.5	7.2	0.0
Family Distribution by Income Level	15,464	27.3	20.9	21.4	30.4	0.0
Household Distribution by Income Level	26,609	29.9	20.3	18.0	31.7	0.0
Median Family Income Non-MSAs - VA		\$60,947	Median Housing Value			\$97,936
			Median Gross Rent			\$617
			Families Below Poverty Level			14.1%
<i>Source: 2020 U.S. 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>						

Demographic Data

As of the 2015 ACS U.S. Census data in the table above, the population of the Henry County VA non-MSA AA was 66,204, with 43.7 percent of the population living in moderate-income CTs, 51.6 percent living in middle-income CTs, and 4.7 percent living in upper-income CTs. As of the 2015 ACS U.S. Census, the AA consisted of 19 CTs, and was comprised of no low-income, nine moderate-income, nine middle-income, and one upper-income CT(s).

There were CT classification changes in the AA during the evaluation period between the 2015 ACS U.S. Census and the 2020 U.S. Census. As of the 2020 U.S. Census data in the table above, the population of the Henry non-MSA AA was 64,433, with 3.1 percent of the population living in low-income CTs, 41.1 percent in moderate-income CTs, 51.1 percent in middle-income CTs, and 4.8 percent in upper-income CTs. As of the 2020 U.S. Census, the AA consisted of 19 CTs, and was comprised of one low-income, eight moderate-income, nine middle-income, and one upper-income CT(s).

Affordable Housing Cost

According to the 2015 ACS U.S. Census data, the median housing value was \$94,429. The median family income (MFI) was \$51,647, which translates to moderate-income families' MFI of \$41,312 and low-income families' MFI of \$25,823, annually. Median housing values were 2.3 times the annual income of moderate-income families and 3.7 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-, and moderate-income families. The 2015 ACS U.S. Census data shows that there were 33,320 total housing units in the Henry County VA non-MSA AA, of which 59.4 percent were owner-occupied, 25.4 percent were rental-occupied, and 15.2 percent were vacant units. As of the 2015 ACS U.S. Census, 1971 was the weighted average of median year built for housing, with the median age of housing stock within the AA being approximately 50 years. Additionally, the median age of housing stock in moderate-income CTs was 50 years. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 20.4 percent of the families in moderate-income CTs lived below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

According to the 2020 U.S. Census data, the median housing value was \$97,936. The MFI was \$60,947, which translates to moderate-income families' MFI of \$48,751 and low-income families' MFI of \$30,467, annually. Median housing values were 2.0 times the annual income of moderate-income families and 3.2 times the annual income of low-income families. Thus, the cost of housing may create a significant financial barrier to homeownership among low-income families. The 2020 U.S. Census data shows that there were 33,255 total housing units in the AA, of which 54.9 percent were owner-occupied, 25.2 percent were rental occupied, and 20.0 percent were vacant units. As of the 2020 U.S. Census, the weighted average of median year built for housing was 1972, with the median age of housing stock within the AA being 51 years. Additionally, the median age of housing stock in low-income CTs was 67 years and 50 years in moderate-income CTs. The cost of homeownership in older housing stock is typically higher than in newer housing; thus, the median age of housing is also a significant barrier to mortgage lending in those CTs. Additionally, 16.8 percent of the families in moderate-income CTs and 59.8 percent of the families in low-income CTs lived below the poverty level, making it especially difficult for this segment of the population to afford and maintain a home or qualify for a loan.

Job Market and Economic Conditions

The economic conditions in the Henry County VA non-MSA AA have improved since the start of the pandemic. The unemployment rate in the AA and the state as well as the national unemployment rate experienced a spike in 2020, followed by a gradual recovery through the end of 2021, and continual declines through the end of 2023. According to the U.S. Bureau of Labor Statistics, the annual unemployment rate in the city of Martinsville for 2020, 2021, 2022, and 2023, was 11.3, 7.3, 4.6, and 4.6 percent, respectively. The annual unemployment rate in Henry County for 2020, 2021, 2022, and 2023, was 7.9, 4.7, 3.4, and 3.5 percent, respectively. This is reasonable when compared to the state of Virginia annual unemployment rate of 6.5, 3.9, 2.9, and 2.9 percent, and the national annual unemployment rate of 8.1, 5.4, 3.6, and 3.6 percent for the same period.

The unemployment rates in the AA exceeded the state and national averages due to multiple reasons including the impact to tourism during the pandemic, a mismatch between the jobs that are available, and the skill sets of unemployed workers, and low-wage workers experiencing high rates of burnout.

The largest employment categories by industry are manufacturing, government, health care and social assistance, and retail trade. Top employers include Henry County Public Schools, city of Martinsville Public Schools, Sovah Health, Eastman, and Monogram Food Solutions.

Statistics provided by Environmental System Research Institute (ERSI) showed that both the city of Martinsville and Henry County have been losing population over the past 20+ years. Data provided by ERSI shows that the combined population of the city of Martinsville and Henry County (63,371) is growing older, largely between the ages of 40 and 79, with the highest percentage (15.2 percent) aged 60-69.

Community Contacts/Credit Needs

As part of the review, examiners reached out to several potential community contacts for an assessment of the local market area and to gain perspective regarding the area's community development needs for low- and moderate-income and at-risk communities. Examiners reached out to a Planning District organization for comment but were unable to speak directly with a contact. Based upon the review of their 2024 Housing Study, examiners identified housing as a primary need. A concern throughout the region is adding housing to accommodate growing demand without displacing low-wage workers in some of the top occupations by number employed. To increase the viability of smaller-scale development, development plans should accommodate new workers, low-wage workers who qualify for housing support, and seniors who also face housing affordability and condition challenges.

Scope of Evaluation in Virginia

The OCC performed a full-scope review of the Henry County VA non-MSA AA. The data in the AA was analyzed and presented as one AA for the purposes of this evaluation.

Lending Test

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Henry County VA non-MSA AA is reasonable.

Distribution of Loans by Income Level of the Geography

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

In determining the rating, the OCC weighed demographic factors of the AA that could affect the bank's ability to lend. These factors include competition from other financial institutions, the number of LMI geographies, limited branch presence, and area demographics. Refer to the "Description of Institution's Operations in Virginia" section for more details.

Home Mortgage Loans

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

The overall geographic distribution of home mortgage loans is reasonable.

Henry County VA non-MSA AA

The distribution of home mortgage loans in CTs of different income levels in the Henry County VA non-MSA AA is reasonable.

In 2020 and 2021, the bank's percentage of loans in moderate-income CTs exceeded the percentage of OOHUs and aggregate lending data. There were no low-income CTs located within the AA during this period.

In 2022 and 2023, the bank's geographic distribution of home mortgage loans in low-income CTs is significantly lower than the OOHUs and aggregate lending data. There were no loan originations in the sole low-income CT. The percentage of loans in moderate-income CTs is lower than the percentage of OOHUs and near the aggregate lending data.

The OCC considered several factors that may have impacted MFSB's opportunities to originate loans within LMI CTs. Low loan demand and significant competition from numerous larger lenders with more resources contributed negatively to the ability of MFSB to lend to LMI CTs. Additionally, bank performance in 2020-2021, in moderate-income tracts outpaced aggregate performance in those areas. Given these limitations and considerations, examiners determined geographic distribution of loans was reasonable within the AA.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations.

Henry County VA non-MSA AA

The bank exhibits reasonable distribution of home mortgage loans among borrowers of different income levels, given performance context factors.

For 2020 and 2021, the bank's percentage of home mortgage loans to low-income borrowers was lower than the percentage of low-income families but exceeded aggregate lending data. There were no loan originations to moderate-income borrowers.

For 2022 and 2023, the bank's percentage of loans to low-income borrowers is significantly lower than the percentage of low-income families and aggregate lending data. There were no loan originations to low-income borrowers. The percentage of home mortgage loans to moderate-income borrowers was lower than the percentage of moderate-income families and aggregate lending data.

Low loan demand and significant competition from numerous larger lenders with more resources contributed negatively to the ability of MFSB to lend to LMI borrowers. The OCC considered other factors in the bank's performance during the evaluation period, including the cost of homeownership and the percentage of families living below the poverty level in the AA as obstacles to homeownership for low- and moderate-income borrowers. Refer to the "Description of Institution's Operations in Virginia" section for more details.

Responses to Complaints

There were no CRA complaints received by the bank nor the OCC since the previous examination regarding performance in meeting the credit needs of the bank's established AA.

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	
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
State of Virginia		
Henry County VA non-MSA	Full-scope	AA includes all CTs in Henry County and the city of Martinsville

Appendix B: Summary of State Ratings

RATINGS MARTINSVILLE FIRST SAVINGS BANK	
Overall Bank:	Lending Test Rating
Martinsville First Savings Bank	Satisfactory
MMSA or State:	
State of Virginia	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.

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.

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.

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.

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.

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.

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 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		
	#	\$ (,000)	% of Total	Overall Market (,000)	% 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
Henry County non-MSA	14	805	100.0	1,703	0.0	0.0	0.0	42.6	64.3	34.1	51.8	28.6	55.0	5.5	7.1	10.9	0.0	0.0	0.0
Total	14	805	100.0	1,703	0.0	0.0	0.0	42.6	64.3	34.1	51.8	28.6	55.0	5.5	7.1	10.9	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																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$ (,000)	% of Total	Overall Market (,000)	% 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
Henry County non-MSA	7	498	100.0	1,256	2.3	0.0	2.0	40.8	28.6	35.8	51.4	57.1	51.9	5.6	14.3	10.3	0.0	0.0	0.0
Total	7	498	100.0	1,256	2.3	0.0	2.0	40.8	28.6	35.8	51.4	57.1	51.9	5.6	14.3	10.3	0.0	0.0	0.0

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2023 Bank Data, 2022 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																			2020-21
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (,000)	% of Total (,000)	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Henry County non-MSA	14	805	100.0	1,703	26.0	14.3	9.6	19.6	0.0	19.1	23.1	14.3	20.7	31.3	71.4	28.0	0.0	0.0	22.6
Total	14	805	100.0	1,703	26.0	14.3	9.6	19.6	0.0	19.1	23.1	14.3	20.7	31.3	71.4	28.0	0.0	0.0	22.6

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																			2022-23
Assessment Area:	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
	#	\$ (,000)	% of Total (,000)	Overall Market (,000)	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
Henry County non-MSA	7	498	100.0	1,256	27.3	0.0	10.7	20.9	14.3	22.9	21.4	28.6	20.0	30.4	57.1	24.1	0.0	0.0	22.3
Total	7	498	100.0	1,256	27.3	0.0	10.7	20.9	14.3	22.9	21.4	28.6	20.0	30.4	57.1	24.1	0.0	0.0	22.3

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