



PUBLIC DISCLOSURE

May 6, 2024

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

SouthState Bank, National Association
Charter Number: 22311

1101 First Street South
Winter Haven, FL 33880

Office of the Comptroller of the Currency

400 7th Street SW
Washington, D.C. 20219

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 bank is rated Satisfactory.

The following table indicates the performance level of SouthState Bank, National Association (SSB or bank) with respect to the Lending, Investment, and Service Tests:

Performance Levels	SouthState Bank Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	X
Low Satisfactory			
Needs to Improve			
Substantial Noncompliance			

* The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.

The major factors that support this rating include:

- The Lending Test High Satisfactory rating is based on excellent performance in the states of Florida (FL) and South Carolina (SC), good performance in the Augusta-Richmond GA-SC Multistate Metropolitan Statistical Area (MMSA), Charlotte-Concord-Gastonia NC-SC MMSA, Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA, and the states of Alabama (AL), Georgia (GA), and North Carolina (NC), and adequate performance in the state of Virginia (VA). Community Development (CD) lending had a positive impact on the overall lending tests in all rating areas except for the Augusta-Richmond GA-SC MMSA.
- The Investment Test High Satisfactory rating is based on excellent performance in the states of FL, NC, and VA, good performance in the states of AL and GA, adequate performance in the Augusta-Richmond GA-SC MMSA, Charlotte-Concord-Gastonia NC-SC MMSA, and Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA and poor performance in the state of SC.
- The Service Test High Satisfactory rating is based on excellent performance in the state of FL, good performance in Augusta-Richmond GA-SC MMSA, Charlotte-Concord-Gastonia NC-SC MMSA, Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA and the state of SC, and adequate performance in the states of AL, GA, NC, and VA.

Lending in Assessment Area

A high percentage of the bank's loans are in its assessment areas (AAs).

The bank originated 88.0 percent of its total loans by number and 85.7 percent by dollar amount inside the bank's AAs 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.

Table D - Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans				Total \$
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage										
2021	16,957	85.2	2,952	14.8	19,909	5,534,865	85.2	961,361	14.8	6,496,226
2022	13,014	86.1	2,096	13.9	15,110	5,364,269	82.3	1,150,913	17.7	6,515,182
2023	9,290	88.6	1,191	11.4	10,481	2,858,949	89.5	336,142	10.5	3,195,091
Subtotal	39,261	86.7	6,239	13.3	45,500	13,758,083	85.7	2,448,416	14.3	16,206,499
Small Business										
2021	13,134	93.2	956	6.8	14,090	1,831,875	92.0	158,380	8.0	1,990,255
2022	6,284	89.6	730	10.4	7,014	1,452,333	86.6	224,301	13.4	1,676,634
2023	5,272	88.5	688	11.5	5,960	1,176,797	84.8	210,630	15.2	1,387,427
Subtotal	24,690	90.4	2,374	9.6	27,064	4,461,005	87.8	593,311	12.2	5,054,316
Small Farm										
2021	85	85.0	15	15.0	100	12,411	82.3	2,665	17.7	15,076
2022	71	88.8	9	11.2	80	12,128	89.4	1,440	10.6	13,568
2023	61	87.1	9	12.9	70	8,713	87.1	1,297	12.9	10,010,
Subtotal	217	87.0	33	13.0	250	33,252	86.3	5,402	13.7	38,654
Total	64,168	88.0	8,646	12.0	72,814	18,252,340	85.7	3,047,129	14.3	21,299,469
<i>Source: Bank Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>Dollar amounts for Small Business, Small Farm and Consumer loans are multiplied by 1000.</i>										

As a percentage of total loans originated inside the bank's AAs, Home Mortgage Disclosure Act (HMDA) reportable loans represented 61.2 percent of the total, small business loans represented 38.5 percent of the total, and small farm loans represented 0.3 percent of the total. Lending performance associated with HMDA reportable loans and small business loans are weighted equally. Small farm loans are not a primary loan product as the bank did not originate a sufficient number of loans for an analysis. Thus, performance in this category does not impact the overall geographic or borrower distribution of the lending conclusions, or the Lending Test conclusion.

Description of Institution

SSB is wholly owned by South State Corporation (SSC or company), a one-bank holding company headquartered in Winter Haven, FL. SSB is the company's nationally chartered bank subsidiary that provides consumer, commercial, mortgage, and wealth management solutions to their customers across six states in the southeastern part of the United States, which includes AL, FL, GA, NC, SC, and VA. The bank's footprint in these six states consist of 100 counties and 36 AAs.

SSB reported total assets of \$44.9 billion as of December 31, 2023 including total loans and leases of \$32.4 billion that consisted of \$13.2 billion (40.6 percent of loans and leases) in commercial real estate loans, \$8.6 billion (26.6 percent) in 1-4 family residential loans, \$3.9 billion (12 percent) in commercial and industrial loans, \$2.9 billion (8.9 percent) in construction and land development loans, \$1.2 billion (3.8 percent) in consumer loans, \$738 million (2.3 percent) in state and political loans, \$886 million (2.7

percent) in multi-family real estate loans, \$83 million (0.3 percent) in farm loans, and \$896 million (2.8 percent) in agricultural and other loans. SSB also reported total deposits of \$37.2 billion and tier 1 capital of \$4.4 billion. The \$32.4 billion in gross loans represented 72 percent of total assets.

As of December 31, 2023, SSB had a network of 251 branch office locations and 305 automated teller machines (ATMs), of which 281 were deposit-taking and 24 non-deposit taking ATMs located in all six states. This PE contains the evaluation of SSB's performance within 36 AAs in six states and three MMSA rating areas.

SSB has grown over the years through a series of mergers and acquisitions, which previously moved SSB's footprint into new market areas and new states. Since the previous Performance Evaluation (PE), SSB completed its acquisition of Atlantic Capital Bancshares, Inc. on March 1, 2022. This acquisition added \$3.8 billion in total assets, \$3.3 billion in total deposits, \$2.3 billion in total loans, and two branches (one in Atlanta, GA and one in Athens, GA) to the SSB portfolio. SSB did close and consolidate 31 branches (16 locations in FL, five locations in GA, two locations in NC, seven locations in SC, and one location in VA) in third quarter 2024, and also converted one branch to a drive-thru only facility and closed one ATM across the bank's footprint.

SSB offers a broad range of real estate, commercial, and consumer credit products; deposit products and services; and trust, investment, and wealth advisory services to personal, business, corporate, and institutional clients. SSB's personal banking products and services include checking accounts, statement savings accounts, money market accounts, and certificates of deposit; fixed and adjustable-rate mortgages; credit cards; retirement accounts and investments; home equity, personal loans and lines of credit (LOC); and auto loans. Some customized checking accounts are targeted to bank employees, seniors over 55, those with bad credit (fast start checking), and low-cost accounts for clubs, charities, and non-profits. SSB's banking products and services offer online and mobile banking for both consumer and small business customers, and a digital Treasury Management platform. Business accounts offered include business checking, free Interest-only Legal Tax Account (IOLTA) checking, and savings accounts, and certificates of deposit; business loans, business real estate loans, and government sponsored loan programs (Federal Housing Administration [FHA], Veteran Affairs [VA], and United States Department of Agriculture [USDA]), construction/lot loans, jumbo loans, and specialized portfolio loans. Commercial lending includes real estate loans, equipment loans, and LOC. Specialty banking services offer payment technology and private capital solutions, as well as franchise finance.

Paycheck Protection Program

In 2020, the U.S. Government passed the Coronavirus Aid, Relief and Economic Security Act (CARES Act) which created the Paycheck Protection Program (PPP) through the Small Business Administration (SBA), a program designed to provide economic support to businesses by offering forgivable loans to enable companies to retain employees and pay certain expenses incurred during the COVID-19 pandemic. Round one of the programs began in late March of 2020 and continued through Round two of the PPP in early 2021.

In response to the SBA expansion of Round Two of PPP, SSB's Community Engagement team contacted Community Development Financial Institution (CDFI), Community Development Corporation (CDC), and Minority Depository Institution (MDI) partners to learn how the bank could support their needs. The Bank partnered with a Business Resource Center in AL, a Community Economic Development (CED) organization in SC, a Women's Business Center in FL, an Economic

Development organization in FL, and two organizations located in NC and SC to either host PPP educational webinars or provide one-on-one assistance with small, minority, and underserved businesses. The bank had a dedicated lending team and entry channel with a designated application link for those that either attended one of the webinars, spoke directly with Community Engagement representatives, or were directly referred from one of the bank's partners. In 2021, the bank originated 8,150 PPP loans totaling over \$742.6 million with an average loan size of \$86,396 and the smallest loan amount of \$154.

In many cases, the bank was unable to collect borrower income information due to the exigent nature of the PPP program. As a result, in 2021, SSB has a substantially higher volume of small business loans with income not reported in each of its full-scope AAs. Interagency guidance states, "When evaluating CRA performance, the agencies will take into account the unique circumstances affecting borrowers and banks resulting from the COVID-19 emergency and will not penalize a bank for making a large volume of loans for which gross annual revenue information is not available." To fully consider the bank's lending patterns within the context of the PPP program, OCC examiners analyzed bank performance both including and excluding PPP loans for which income was unavailable or uncollected. This generally resulted in better performance when considering the *Distribution of Loans by Income Level of the Borrower* for small businesses in most assessment areas. The impact of this analysis is described in the Lending Test section of each full-scope assessment area.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve AA credit needs of both consumers and small business owners. Since January 1, 2021, the bank provided more than 5,500 flexible home mortgage loans totaling approximately \$1.4 million to low- and moderate-income (LMI) borrowers and an additional \$3.4 million homebuyer assistance grants that supplemented various flexible lending programs. Additionally, the bank originated 69 flexible small loans to businesses totaling over \$62.6 million.

Home Mortgage Programs

Buyer's Advantage – a single-family mortgage loan program that offers flexible underwriting up to 105 percent Combined Loan-to-Value (CLTV) with a community sponsored down payment assistance product, no origination fee, and no private mortgage insurance (PMI) requirements. The minimum credit score for this program is 680 for up to 105 percent CLTV, while a credit score of 640 allows for up to 100 percent CLTV. A Department of Housing and Urban Development (HUD) sponsored home buyer education course is required. Income requirements are flexible, with no minimum income required if the property is located in an LMI geography or in a majority-minority census tract (MMCT). If the property is not located in an LMI CT, income must be 80 percent or less of the estimated MSA median income level. During the evaluation period, the bank originated 2,058 loans totaling \$485.9 million throughout the bank's AAs.

Community Advantage – a special purpose credit program (SPCP) where applicants must be first-time homebuyers and purchasing property in approved counties and meet income limitations. This program offers flexible underwriting up to 105 percent combined CLTV with a community sponsored down payment assistance product, no origination fee, maximum debt-to-income (DTI) of 45 percent and no PMI requirements. The minimum credit score for this program is 600 and non-traditional credit is allowed for applicants that do not have an established credit profile. A HUD-sponsored home buyer education course is required. If the property is located in a MMCT, there are no income requirements.

Otherwise, income cannot exceed 100 percent of the estimated MSA Area Median Income (AMI). During the evaluation period, the bank originated 389 loans totaling \$96.2 million.

Federal Home Loan Bank (FHLB) of Atlanta Lending Partnerships - SSB, as a member of the FHLB, participates in single-family mortgage lending programs for the benefit of LMI individuals, families, and veterans. The FHLB jurisdiction is consistent with the bank's regional footprint of AL, FL, GA, NC, SC, and VA. FHLB offers an Affordable Housing Program (AHP), which provides real estate finance equity for both rental and for-sale housing. AHP is more often referred to as a subsidy or grant program and is delivered to FHLB Atlanta-member financial institutions to assist in the funding for construction, rehabilitation, and purchase of affordable housing. The bank provided \$170,370 in AHP subsidies, equating to \$3.18 million in first mortgage home purchase activity by LMI individuals, through the following FHLB lending programs:

- Community Partners – subsidy of up to \$15,000 geared toward current or retired law enforcement officers, educators, firefighters, health care workers, other first responders, and veterans and active-duty members of the military or their surviving spouse. The subsidy can cover down payment, closing costs, and principal reduction for the purchase or purchase/rehabilitation or an existing unit. Borrower minimum contribution is \$1,000.
 - SSB provided nine Community Partner loans.
- First-time Homebuyer – subsidy of up to \$12,500, which can cover down payment, closing costs, and principal reduction for the purchase or purchase/rehabilitation of an existing unit. Borrower minimum contribution is \$1,000.
 - SSB provided nine First-time Homebuyer loans.

Fannie Mae HomeReady Product – Program assists LMI borrowers purchasing or refinancing a home by reducing the standard down payment and mortgage insurance premiums. Borrowers must have a minimum credit score of 620. Fannie Mae pays the closing costs and down payments can come from community service groups. During the evaluation period, SSB originated 168 loans totaling \$33.3 million.

Federal Housing Administration (FHA) – SSB is a participating lender in the FHA mortgage lending programs that offer borrowers meeting their underwriting standards low down payments on mortgage loans. These loans can be used along with down payment assistance programs. SC Housing, GA Dream, and NC Housing are three of the bank's community partners. These programs will be discussed in specific rating areas of this PE. Borrowers must have a DTI below 50 percent and minimum credit score of 620. During the evaluation period, the bank originated 976 loans totaling \$259.4 million.

Florida Housing Finance Corporation Hometown Heroes (Hometown Heroes) - Program that offers a lower interest rate first mortgage loan and additional benefits such as down payment assistance (DPA) to individuals who currently serve or have served their communities. Florida Hometown Heroes loans do not have an upfront origination fee. The program is offered to eligible FL workers and military personnel. With the bond alternative program (Hometown Heroes), the income and first-time homebuyer status of the borrower(s) is only considered. The Bond Alternative Program has higher income limits and looks at only uniform residential loan application qualifying income.

Florida Housing Finance Assistance (HFA) DPA Program – A Florida Housing Finance Corporation Bond program that offers down payment and closing cost assistance in the form of a second mortgage loan. Down payment assistance is only available when used with Florida Housing's first mortgage loans.

The program offers up to \$10,000 on FHA, VA, USDA, and conventional loans. The Bond program has lower income limits, looks at all household income, and has better first mortgage interest rates than traditional loans. During the evaluation period, SSB originated 56 loans totaling \$533,000.

Freddie Mac Home Possible – Program designed for first-time buyers and LMI borrowers to have access features of a low-down payment, fixed-rate mortgage, reduced mortgage insurance coverage levels, and flexible closing cost funding options. The borrowers’ annual income cannot exceed 100 percent of the AMI and credit scores must be at least 660 for purchase transactions, or 680 for no cash-out refinances. Alternative credit may be considered.

Habitat for Humanity – SSB works with several Habitat organizations throughout the bank’s footprint. The bank originated mortgages through the following programs:

- Zero-Equivalent Mortgage– SSB partnered with Habitat in several FL counties (Orange, Seminole, Lake-Sumter, Hillsborough) under Habitat’s traditional financing model. Using Buyer’s Advantage or other appropriate product best fit for the client, the bank provides a first mortgage at current market terms and interest rates while also considering available down payment assistance products. Habitat funds the difference with an interest-free second mortgage loan. The benefit to the homebuyer is a market rate product that reflects positively in their credit history. Over the course of the exam period, the bank originated 17 loans for \$2.3 million.
- Habitat Charlotte Portfolio First Mortgage – The bank has a signed commitment to originate mortgage loans to prospective homeowners proposed by Habitat for Humanity Charlotte (HFHC) that are likely to have incomes between 50 percent and 80 percent of the AMI, low credit scores, and will not qualify for conventional mortgages; however, have been selected and meet HFHC’s Underwriting Standards. The bank committed up to \$1.5 million, plus or minus five percent, between January 1, 2021, and December 31, 2022. Each loan bears an interest rate of approximately two percent, has an approximate original principal balance of between \$50,000 and \$185,000, provides for level payments of principal and interest, has a term not greater than 360 months and is in an amount equal to the lesser of the amount of cash due HFHC upon sale of the home and 90 percent of the appraised value of the mortgaged property.

Manufactured Housing – SSB originates manufactured home loans to borrowers whether the borrowers own or lease the land. During the evaluation period, the bank originated 3,752 loans totaling \$379.7 million. Of these totals, 84.5 percent of the loans were primary residence and 31 percent were granted to LMI borrowers.

NC Housing Finance Authority (NCHFA) - Four programs offered:

- Home Advantage – Borrower can receive DPA of up to three percent of the loan amount, a 15-year forgivable term, and a second mortgage with a zero percent interest rate.
- Community Partners Loan Pool – Borrower can receive DPA up to the lesser of 25 percent of loan amount or \$50,000, repayable with zero percent interest rate.
- First Home Advantage – Borrower can receive DPA up to \$15,000, forgivable second mortgage and 15-year term.

- Mortgage Credit Certificate – Thirty percent tax credit for purchase and 50 percent for new homes, up to \$2,000 per calendar year in federal income tax credit for first-time homebuyers.

Opportunity Advantage Loan Fund Forgivable Program – Qualified LMI homebuyers can use funds towards down payment, closing costs, or other fees related to the purchase of the primary residence. If the buyer owns the home for at least five years, the loan is 100 percent forgivable with no repayment and zero percent interest. However, there are repayment stipulations if the home is sold prior to five years of ownership. This program can only be combined with a Buyer's Advantage, Community Advantage, Home Ready, or Home Possible mortgage. Loans are underwritten to first mortgage financing guidelines and income must be less than 80 percent of the county AMI adjusted for HUD family size. Finally, this program will follow another community sponsored down payment assistance product allowing for layering of down payment assistance that lowers the borrower's monthly payment. SSB has directly assisted 260 LMI homebuyers and dispensed over \$3.2 million from this loan fund.

USDA – SSB is a participating lender in the USDA mortgage lending programs that offer low-down payments on mortgage loans to borrowers that meet their underwriting requirements. USDA loans are for single-family or multifamily loans originated in rural areas. In addition, USDA loans have a maximum borrower income of \$86,850; however, in certain high-cost areas, the maximum income threshold can increase with additional family members. During the evaluation period, the bank originated 111 loans totaling \$22.3 million.

VA – SSB is a participating lender in the VA mortgage lending programs that offer low-down payments on home purchase mortgage loans for U.S. Servicemembers, veterans, or their eligible surviving spouses. During the evaluation period, the bank originated 833 loans totaling \$317.9 million.

Small Business Programs

Business Lending Express – Streamlined underwriting and origination online SSB platform offering quick 48-hour turnaround on select business loans including LOC, Term Loans, and Commercial Vehicle Loans. No financial statements are required on select term loans up to \$150,000, and most recent tax returns are required on other term loans and LOC for for-profit businesses. Products offered include Revolving LOC for up to \$350,000 with interest-only month payments on funds used, Term Loans/Commercial Vehicle Loans up to \$500,000 with up to 100 percent financing available on new equipment and vehicles, and Owner-Occupied Commercial Real Estate loans up to \$750,000 on purchase or refinances with 25-year amortization with as little as 15 percent down payment. During the evaluation period, the bank originated 5,432 loans totaling \$502.5 million.

Community Contribution Tax Credit Program (CCTCP) – Program designed to encourage FL businesses to donate to eligible CD and housing projects for low-income persons. Habitat for Humanity is an approved Sponsor, and their projects are approved housing for low-income or very low-income households. Contributions can equate to a free home or an almost free home. Funds put the dollars back into the coffers of Habitat and the ability to build another home. During the evaluation period, SSB partnered with Habitat Marion, Hillsborough, and Pensacola for total contributions of \$459,500.

FHLB Lending Partnerships

- AHP General Fund - program awards up to \$1 million in grant funding per project to support the acquisition, construction, or rehabilitation of multifamily and single-family housing. The General Fund provides an opportunity for financial institutions to work with for-profit and nonprofit

developers and community partners to improve access to affordable housing. For the evaluation period, the bank was awarded six grants totaling \$4 million, resulting in 216 affordable housing dwelling units in six multifamily projects that translates to approximately \$45.36 million in development costs.

SBA 7(a) Program – SSB is an SBA Preferred Lender that provides the bank the authority to make final credit decisions. The SBA 7(a) program is for small loans between \$50,000 and \$500,000 using a streamlined origination and closing process. Proceeds can be used for start-up financing, working capital, debt consolidation, equipment/vehicle purchases, owner occupied commercial real-estate, tenant improvements, business acquisitions, partner buyouts, and partner buy-ins. Applicants can apply online and prequalify within five minutes with no impact to the applicant’s credit score and approval times in as few as two weeks, with funding in five days thereafter. During the evaluation period, SSB originated 332 loans totaling \$64.2 million.

Partnerships

Circles Program – SSB partners with this organization whereby bank personnel provide financial literacy and mentoring, and SSB will provide loans to Circle Program participants to pay off high interest rate title and personal loans. Loans are small dollar loans up to \$750, with six-month terms and a three percent fixed rate with no loan fees. Loans are pledged to a certificate of deposit in the name of the Circles organization.

Other Initiatives

AL Multifamily Loan Consortium – A nonprofit based in Montgomery, AL that provides permanent mortgages for multifamily housing statewide. The nonprofit created 4,750 low-income housing units. Majority of the nonprofit’s work is on new construction that leverages low-income housing tax credits (LIHTC). Approximately 60 percent of its lending is in rural areas and is part of the Center for Community Lending. During the evaluation period, the bank participated in ten loans totaling \$2.6 million.

Neighborhood Lending Partners (NLP) – Organization is a certified CDFI and lending consortium of banking institutions that facilitate private investments for community revitalization and neighborhood preservation. SSB signed a two-year LIHTC pool participation commitment for \$5 million. During the evaluation period, SSB contributed to 14 participation loans with NLP totaling \$4.9 million.

CCTCP – During the evaluation period, SSB partnered with Habitat Marion and Hillsborough for total contributions of \$258,500 and in Pensacola, FL, contributions of \$201,000.

There were no legal or financial factors impeding the bank’s ability during the evaluation period to help meet credit needs in its AAs. SSB CRA performance was rated Satisfactory at the last CRA evaluation dated May 17, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This evaluation covers the bank's CRA-related activities from January 1, 2021, through December 31, 2023. We used this evaluation period to conduct analysis and form conclusions for all performance tests associated with this public evaluation, i.e., Lending Test, Investment, and Service Tests. For the lending test analysis, we placed equal weight on the loan products and distributions. For the HMDA analysis and conclusions for lending activity, geographic distribution, and borrower distribution, we consolidated the bank's home purchase, home refinance, and home improvement loans. We concluded on all home mortgage, small loans to businesses, and small farm loans that meet the definition of primary loan product in the bank's respective AAs. To be considered a primary loan product, there must have been at least 20 loans originated or purchased for a specific loan product within a respective AA throughout the evaluation period. When evaluating the lending test, equal emphasis is given to the geographic distribution of loans and lending by borrower income level. Lastly, the bank did not purchase any loans during the evaluation period and no affiliate activities were considered in the evaluation.

Small farm loans were not a primary loan product in most markets. However, in the state of SC, one AA originated a sufficient number of loans for an analysis; however, the AA was not chosen for a full-scope review. Therefore, no small farm loans will be analyzed in this evaluation. In the other MMSA and states, there were not a sufficient number of loan originations for a meaningful analysis. Due to the limited number of markets with small farm loans, small farm lending did not have a material impact on the Lending Test conclusion.

Due to updated 2020 Census data, census tract (CT) income level designation changes became effective January 1, 2022. Examiners analyze loan data against the applicable demographic data for each period, resulting in multiple analyses and presentation of data. Examiners analyzed home mortgage loans and small loans to businesses and farm data from January 1, 2021, through December 31, 2021 (2021 evaluation period), using 2015 American Community Survey (ACS) demographic information. Examiners analyzed home mortgage loans and small loans to businesses and farm data from January 1, 2022, through December 31, 2023 (2022-2023 evaluation period), using 2020 Census demographic information. Unless otherwise noted in a specific rating area, examiners placed more weight on the 2022-2023 evaluation period as it covered more of the overall evaluation period and had comparisons to both demographic and aggregate data.

Bank and branch deposit data, as of June 30, 2023, is based on information from the Federal Deposit Insurance Corporation (FDIC). The distribution of bank branches is compared to the U.S. Census 2020 ACS population estimates. Additionally, the bank complements its traditional service delivery methods with certain alternative delivery systems (ADS), such as deposit-taking ATM, telephone banking, mobile banking, and online banking. We placed no significant weight on these activities, as no data was available to determine their impact on LMI individuals.

For the Service Test, SSB provided data indicating middle- and upper-income (MUI) CTs branches are being used by customers residing in LMI geographies. The OCC considered this internal data and the extent MUI branches are being used by customers residing in LMI geographies. SSB provided a list of branches located in MUI geographies and the number and percentage of customers that used the MUI branch during the evaluation period, by AA. The MUI branch list also included LMI CTs adjacent to MUI CTs. The OCC gave positive consideration to MUI branches where there was a reasonable level of usage by customers residing in adjacent LMI geographies.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same metropolitan statistical area (MSA), 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 and MMSA Rating section 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 MMSA and state ratings are based on performance in all bank AAs and are based primarily on those areas that received full-scope reviews.

Refer to the “Scope” section under each State and MMSA Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

Affordability Analysis – We conducted an affordability analysis for all full-scope AAs. Our goal was to determine if either LMI borrowers could reasonably afford a home mortgage loan in their respective AA. To determine affordability, we used the median housing value and the adjusted median family income found in the respective Table A, for each full-scope AA. We calculated a payment based on a five percent mortgage interest rate, with a 30-year loan amortization. Our analysis concluded that home mortgages were unaffordable if the principal and interest payment exceeded 30 percent of the calculated AA DTI ratio.

This information was used as performance context in the borrower distribution of home mortgage loans when determined to be relevant. See individual AA conclusions for information relating to our determination of affordability.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 C.F.R. §25.28(c), in determining a national banks 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 assessment area 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 bank (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 bank 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.

Multistate Metropolitan Statistical Area Rating

Augusta-Richmond-GA-SC MMSA

CRA rating for the Augusta-Richmond-GA-SC MMSA¹: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank exhibits a good geographic distribution of loans in its AAs.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank has made an adequate level of CD loans which had a neutral impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB had an adequate level of qualified CD investments and grants.
- SSB's branches were accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community. Consideration was given to near-to branches that enhanced accessibility for residents in LMI areas and ADS provided additional accessibility.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in Augusta-Richmond-GA-SC MMSA

The Augusta-Richmond GA-SC MMSA is comprised of the complete counties of Columbia and Richmond in GA and the complete county of Aiken in SC.

Based on the FDIC Deposit Market Share data as of June 30, 2023, SSB had a 14.1 percent deposit market share in this MMSA and is ranked 2nd out of 20 financial institutions doing business in the MMSA. The deposits account for 4.1 percent of the bank's total deposits. Primary competitors include Wells Fargo Bank, National Association (NA), which ranked 1st in deposit market share (22.4 percent) with 12 offices, Bank of America, NA, which ranked 3rd in deposit market share (13.0 percent) with 13 offices, and Security Federal Bank, which ranked 4th in deposit market share (9.8 percent) with six offices. These competitors have deposits totaling \$4.8 billion, representing 45.2 percent of total deposit market share.

See appendix A for a listing of all bank AAs.

¹ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

The following table provide a summary of the demographics, including housing and business information, for the Augusta-Richmond GA-SC MMSA for each evaluation period.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Augusta-Richmond GA-SC MMSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	100	11.0	26.0	37.0	25.0	1.0
Population by Geography	501,403	7.6	23.0	38.4	30.9	0.0
Housing Units by Geography	212,855	8.1	24.2	37.3	30.4	0.0
Owner-Occupied Units by Geography	120,744	4.3	20.6	39.0	36.1	0.0
Occupied Rental Units by Geography	60,174	14.5	30.0	34.2	21.3	0.0
Vacant Units by Geography	31,937	10.5	27.0	36.7	25.9	0.0
Businesses by Geography	43,623	7.9	18.8	32.7	40.6	0.0
Farms by Geography	1,275	5.3	19.6	39.3	35.8	0.0
Family Distribution by Income Level	122,367	23.4	15.8	18.1	42.7	0.0
Household Distribution by Income Level	180,918	24.8	14.8	16.5	43.9	0.0
Median Family Income MSA - 12260 Augusta-Richmond County, GA-SC MSA		\$58,059	Median Housing Value			\$133,242
			Median Gross Rent			\$814
			Families Below Poverty Level			14.3%
<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: Augusta-Richmond GA-SC MMSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	124	10.5	25.0	38.7	21.8	4.0
Population by Geography	531,425	7.3	20.1	40.8	29.6	2.3
Housing Units by Geography	225,314	7.7	21.7	41.3	26.6	2.7
Owner-Occupied Units by Geography	126,090	4.3	17.1	42.8	34.8	1.0
Occupied Rental Units by Geography	62,935	13.5	29.3	38.8	13.0	5.5
Vacant Units by Geography	36,289	9.6	24.6	40.0	21.7	4.1
Businesses by Geography	64,320	7.3	16.7	40.6	30.1	5.4
Farms by Geography	2,001	5.0	21.3	42.7	28.9	2.0
Family Distribution by Income Level	124,484	22.2	16.0	19.8	42.1	0.0
Household Distribution by Income Level	189,025	24.7	15.1	17.3	42.9	0.0
Median Family Income MSA - 12260 Augusta-Richmond County, GA-SC MSA		\$67,596	Median Housing Value			\$154,413
			Median Gross Rent			\$936

	Families Below Poverty Level	11.5%
<i>Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>		

The Augusta-Richmond GA-SC MMSA includes the entire counties of Columbia and Richmond in GA and Aiken County in SC. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 124 CTs, of which 13 are low-income, 31 are moderate-income, 48 are middle-income, 27 are upper-income, and five have not been assigned an income classification. The percentage of households living below the poverty level is 11.5 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 4.3 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. Bureau of Labor Statistics (BLS), the Augusta-Richmond County, GA-SC MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 4.4 percent compared to 3.8 percent in December 2023. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are excellent medical institutions, stable economic base in Fort Gordon, and reduced exposure to cyclical downturns due to government and healthcare. The leading industries by comparative employment and income include government, education and health services, and professional and business services. Major employers include U.S. Army Signal Center & Fort Gordon, Augusta University, and Augusta University Hospitals.

One method of assessing housing affordability in the Augusta-Richmond County GA-SC MMSA is to compare the average adjusted median family income (AMFI) to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 Federal Financial Institutions Examination Council (FFIEC) AMFI in the AA is \$77,600. According to Realtor.com data, the median housing value in the AA is \$249,900 and \$309,999 in January 2021 and December 2023, respectively, reflecting a 24.1 percent increase.

Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$38,800 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$180,693 mortgage with a payment of \$970 per month. A moderate-income borrower making \$62,080 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$289,109 mortgage with a payment of \$1,552 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted community contacts working in the AA. The contacts consisted of a county CDC and an economic development organization. The following needs were identified within the AA:

- Flexible loan programs to assist with home improvements.
- Preserve and expand the supply of affordable rental and owner-occupied housing options.

- Small loans to small businesses, particularly to start-up businesses.

Scope of Evaluation in Augusta-Richmond-GA-SC MMSA

The Augusta-Richmond GA-SC MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The AA represents all the bank's deposits, branches, and lending activities in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN AUGUSTA-RICHMOND-GA-SC MMSA

LENDING TEST

The bank's performance under the Lending Test in the Augusta-Richmond-GA-SC MMSA is rated High Satisfactory.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Augusta-Richmond-GA-SC MMSA is -adequate.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Augusta-Richmond GA-SC MMSA	1,924	1,134	23	9	3,090	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Augusta-Richmond GA-SC MMSA	527,778	144	2	8,331	536,255	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 2nd among 20 deposit banks with a market share of 14.1 percent placing SSB in the top tenth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 6th out of 510 mortgage lenders with a market share of 3.3 percent, placing the bank in the second percentile of all mortgage lenders in the AA. The bank's HMDA market share, taking into consideration the level of competition, is higher than their deposit market share when considering competition for deposits. The HMDA lending market share is far more

competitive with 510 lenders versus only 20 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share. This is due to the much smaller number of small business lenders in the AA and the bank's percentile ranking but is considered good performance given the number of deposit competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 11th out of 105 small business lenders with 2.8 percent market share, placing it in the thirteenth percentile of small business lenders in the Augusta-Richmond GA-SC MMSA. When considering the number of depository institutions and small business lenders, the bank's small business lending market share is stronger than the deposit market share in the Augusta-Richmond-GA-SC MMSA. The top five small business lending competitors are four nationwide lenders, and one is a credit card bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

2021

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and exceeded the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and below the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and near to the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and exceeded the aggregate.

Small Loans to Businesses

Refer to Table Q in the "MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

2021

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was near to the percentage of businesses in low-income geographies and exceeded the aggregate. The proportion of loans was below the percentage of businesses in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was near to the percentage of businesses in moderate-income geographies and exceeded the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

2021

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was significantly below the percentage of low-income families and exceeded the aggregate. The proportion of loans was near to the percentage of moderate-income families and exceeded the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was excellent. The proportion of loans was well below the percentage of low-income families and exceeded the aggregate. The proportion of loans exceeded the percentage of moderate-income families and the aggregate.

Small Loans to Businesses

Refer to Table R in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations of small loans to businesses.

2021

When determining the conclusion in this AA, we considered the fact that 50.8 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 57.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was well below the percentage of small businesses and below the aggregate.

Community Development Lending

The bank has made an adequate level of CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the bank's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated nine CD loan totaling \$8.3 million in the Augusta-Richmond GA-SC MMSA, which represents 4.7 percent of the bank's allocated tier 1 capital. The bank's CD loans had a neutral impact on lending performance in the AA. CD loans exhibited an adequate level of responsiveness to the credit and community needs in the AA. CD loans supported affordable housing, community services, and economic development.

Examples of CD loans originated include:

- A \$3.2 million loan to purchase land and build an additional classroom and office building for an academy school located in a low-income CT where 99 percent of the participants qualify for scholarships based on income and 84 percent are at or below federal poverty guidelines.
- Two \$1 million loan renewals to a housing authority to provided various affordable housing programs, including HUD Section 8 and Public Housing to LMI individuals and families.
- A \$766,000 loan guaranteed by the USDA to refinance a small poultry farm located in a moderate-income CT. The County Comprehensive Plan includes preserving and supporting small food producing farms as a vital part of the community and economy.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to order to serve Augusta-Richmond GA-SC MMSA credit needs of both consumer and small business owners. Refer to the Description of the Institution" section for additional details regarding various mortgage loan programs. In addition, see the States of GA and SC for various mortgage loan programs that encompass the MMSA Rating.

INVESTMENT TEST

The institution’s performance under the Investment Test in Augusta-Richmond-GA-SC MMSA is rated Low Satisfactory.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Augusta-Richmond-GA-SC MMSA is adequate.

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Augusta-Richmond GA-SC MMSA	0	0	31	5,090	31	100.00	5,090	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

SSB made 31 current period investments and donations totaling \$5.1 million. Total investments are equivalent to 2.8 percent of allocated tier 1 capital. There were no prior period investments or unfunded investment commitments.

There was one qualified investment totaling \$5.0 million and 30 grants totaling \$90,000. The grants were to 20 nonprofit organizations who provide services to LMI residents in the AA.

Examples of qualified investments in this AA include:

- A \$5 million multi-family investment that financed the development of an affordable housing complex to provide 126 affordable housing units.
- A \$25,000 grant to a nonprofit organization that owns two buildings and the organization provides offices to four nonprofit organizations whereby the non-profits provide various community services to LMI families.
- Three grants totaling \$9,500 to an economic development agency to support workforce, leadership, and business development initiatives in Columbia County.

SERVICE TEST

The institution's performance under the Service Test in Augusta-Richmond-GA-SC MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Augusta-Richmond-GA-SC MMSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System								Population			
Assessment Area	Deposits		Branches					% of Population within Each Geography*			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				Low	Mod	Mid	Upper
				Low	Mod	Mid	Upper				
Augusta Richmond County GA-SC	100	9	100	11.1	11.1	44.5	33.3	7.3	20.1	40.8	29.6

*Remaining percentage represents geographies where income information was not available

The bank has nine branches in the AA, with one located in a low-income geography and one located in a moderate-income geography. The percentage of branches located in low-income geographies exceeds the percentage of the population residing in these geographies, while the percentage of branches in moderate-income geographies was below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has nine ATMs in the AA, all of which are deposit-taking and located at SSB branches, including branches in LMI geographies. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Augusta-Richmond GA-SC MMSA	0	2	0	0	-1	-1

To the extent changes have been made, the bank's closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or LMI individuals. During the evaluation period, there were no branches opened in the AA and two branches closed, one in a middle-income geography and one in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Conclusions for Area Receiving a Full-Scope Review

The bank provided an excellent level of CD services in the Augusta-Richmond MMSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 14 different CD organizations totaling 317 hours. SSB staff served on nine boards and committees for organizations that provide community services targeted to LMI individuals. Of the total 317 hours, 203 hours were in leadership roles as board or committee members.

Examples of some of these services:

- An employee provided 60 service hours as a member of a fundraising committee for an organization that provides free medical services to LMI individuals.
- Eight employees provided 28 service hours of financial education to students at a school where 79 percent of students qualify for free or reduced lunch.
- Two employees provided five service hours of financial education to start-up entrepreneurial businesses on topics that included access to capital and small business financing. Another employee served on the finance committee of the organization.

Multistate Metropolitan Statistical Area Rating

Charlotte-Concord-Gastonia NC-SC MMSA

CRA rating for the Charlotte-Concord-Gastonia NC-SC MMSA²: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank exhibits a good geographic distribution of loans in its AAs.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB had an adequate level of qualified CD investments and grants.
- SSB's branches were accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community. Consideration was given to near-to branches that enhanced accessibility for residents in LMI areas and ADS provided additional accessibility.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in Charlotte-Concord-Gastonia NC-SC MMSA

The Charlotte-Concord-Gastonia NC-SC MMSA is comprised of the complete counties of Gaston, Iredell, Mecklenburg, Rowan, and Union counties in NC and the complete county of York in SC.

Based on the FDIC Deposit Market Share data as of June 30, 2023, SSB had a 0.6 percent deposit market share in this MMSA and is ranked 6th out of 45 financial institutions doing business within the Charlotte MMSA. The deposits account for 6.5 percent of the bank's total deposits. Primary competitors include Bank of America, NA which ranked 1st in deposit market share (62.9 percent) with 43 offices, Truist Bank, which ranked 2nd in deposit market share (21.1 percent) with 56 offices, and Wells Fargo Bank, NA, which ranked 3rd in deposit market share (10.0 percent) with 67 offices. These competitors have deposits totaling \$352.9 trillion representing 94.0 percent of total deposit market share.

² This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

See appendix A for a listing of all bank AAs.

The following tables provide a summary of the demographics, including housing and business information for the Charlotte-Concord-Gastonia NC-SC MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlotte-Concord-Gastonia NC-SC MMSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	429	9.1	23.3	32.2	34.3	1.2
Population by Geography	1,818,659	7.8	21.7	33.0	37.1	0.4
Housing Units by Geography	745,351	7.9	22.2	33.3	36.5	0.1
Owner-Occupied Units by Geography	436,035	3.3	17.3	36.1	43.2	0.0
Occupied Rental Units by Geography	244,843	15.1	29.7	28.4	26.6	0.2
Vacant Units by Geography	64,473	12.5	26.4	32.4	28.6	0.2
Businesses by Geography	214,239	7.2	17.0	28.1	47.0	0.7
Farms by Geography	4,534	4.9	15.8	42.6	36.4	0.2
Family Distribution by Income Level	454,024	22.0	16.4	18.5	43.1	0.0
Household Distribution by Income Level	680,878	22.9	15.9	17.2	44.0	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$64,187	Median Housing Value			\$193,825
			Median Gross Rent			\$913
			Families Below Poverty Level			11.1%
<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: Charlotte-Concord-Gastonia NC-SC MMSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	570	5.3	27.9	31.9	32.8	2.1
Population by Geography	2,197,350	4.3	27.4	33.1	34.4	0.9
Housing Units by Geography	879,684	4.6	28.8	32.6	33.0	1.0
Owner-Occupied Units by Geography	520,388	2.1	24.3	34.9	38.3	0.4
Occupied Rental Units by Geography	290,732	8.4	36.0	28.9	24.7	2.0
Vacant Units by Geography	68,564	7.2	32.5	30.5	27.7	2.1
Businesses by Geography	363,201	4.5	24.4	28.1	41.0	2.0
Farms by Geography	7,502	2.8	26.3	38.9	31.2	0.7
Family Distribution by Income Level	533,328	21.1	17.7	19.4	41.8	0.0
Household Distribution by Income Level	811,120	22.7	16.8	17.9	42.6	0.0
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA		\$80,486	Median Housing Value			\$245,537

	Median Gross Rent	\$1,112
	Families Below Poverty Level	7.9%
<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>		

The Charlotte-Concord-Gastonia NC-SC MMSA includes all of Gaston, Iredell, Mecklenburg, Rowan, and Union counties in NC and York County in SC. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 570 CTs, of which 30 are low-income, 159 are moderate-income, 182 are middle-income, 187 are upper-income, and 12 have not been assigned an income classification. The percentage of households living below the poverty level is 7.9 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 7.4 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Charlotte-Concord-Gastonia, NC-SC MMSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 5.1 percent compared to 3.2 percent in December 2023. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the February 2024 Moody's Analytics report, the AA strengths are increasing technology presence attracts new workers and business investment, low living costs, and favorable demographic trends, including strong, positive net migration, low business costs, and a highly skilled workforce. The leading industries by wage tier include government, professional and business services, education, and health services. Major employers include Atrium Health, Wells Fargo & Co, and Walmart Inc.

One method of assessing housing affordability in the Charlotte-Concord-Gastonia, NC-SC MMSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$98,700. According to Realtor.com data, the median housing value in the AA is \$368,500 and \$400,000 in January 2021 and December 2023, respectively, reflecting an 8.6 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$49,350 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$229,825 mortgage with a payment of \$1,234 per month. A moderate-income borrower making \$78,960 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$367,720 mortgage with a payment of \$1,974 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted community contacts working in the AA. The contacts were from an EDC, a nonprofit community organization, and a CD organization. The following needs were identified within the AA:

- Financial and technical assistance to businesses.
- Assistance to redevelop distressed areas.

- Providing funding, grants, donations, or low/no interest loans for nonprofit programming for financial education, affordable housing, and small business support.

Scope of Evaluation in Charlotte-Concord-Gastonia NC-SC MMSA

The Charlotte-Concord-Gastonia NC-SC MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The AA represents all the bank’s deposits, branches, and lending activities in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLOTTE-CONCORD-GASTONIA NC-SC MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Charlotte-Concord-Gastonia NC-SC MMSA is rated High Satisfactory when taking into consideration the positive impact of CD lending.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Charlotte-Concord-Gastonia NC-SC MMSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charlotte-Concord-Gastonia NC-SC MMSA	3,123	2,692	4	20	5,839	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charlotte-Concord-Gastonia NC-SC MMSA	1,290,373	489	1	132,398	1,423,261	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 6th among 45 deposit banks with a market share of 0.6 percent placing SSB in the top thirteenth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 19th out of 802 mortgage lenders with a market share of 1.3 percent, placing the bank in the third percentile of all mortgage lenders in the AA. The bank's HMDA market share is stronger than their deposit market share. The HMDA lending market share is far more competitive with 802 lenders versus only 45 deposit taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the Charlotte-Concord-Gastonia NC-SC MMSA, is stronger than its deposit market share. This is due to the number of depository banks in the AA and the bank's percentile ranking but is considered good performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 16th out of 181 small business lenders with 1.0 percent market share, placing it in the ninth percentile of small business lenders in the AA. The bank's small business lending market share is stronger than the deposit market share in the Charlotte-Concord-Gastonia NC-SC MMSA. The top five small business lending competitors are four nationwide lenders, and one credit card bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

2021

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and near to the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Small Loans to Businesses

Refer to Table Q in the "MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

2021

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was near to the percentage of businesses in moderate-income geographies and the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

2021

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and was near to the aggregate. The proportion of loans was well below the percentage of moderate-income families and below the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and below the aggregate. The proportion of loans was below the percentage of moderate-income families and well below the aggregate.

Small Loans to Businesses

Refer to Table R in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations of small loans to businesses.

2021

When determining the conclusion in this AA, we considered the fact that 46.9 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 49.6 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was well below the percentage of small businesses and the aggregate.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated 20 CD loans totaling \$132 million in the Charlotte-Concord-Gastonia NC-SC MMSA, which represents 46 percent of the bank's allocated tier 1 capital. CD loans exhibited excellent responsiveness to the credit and community needs in the MMSA. CD loans primarily supported affordable housing and revitalization/stabilization of the MMSA.

Examples of CD loans originated include:

- A \$51.7 million loan to finance the remediation and redevelopment of a brownfield property located in the North Davidson neighborhood of Charlotte, NC whereby the property is located in a low-income CT and an opportunity zone.
- A \$47 million loan to build a multi-family apartment complex on 13 acres in the university area of Charlotte, NC whereby 60 percent of the 333 units are expected to meet the median rent standard (30 percent of 80 percent AMI).
- An \$802,000 LOC to a non-profit senior service organization in Salisbury, NC which will convert a former commercial business into 64 affordable housing units available to those earning no more than 60 percent of the AMI. Thirty-six of the units will receive a HUD 202 Project Rental Assistance Contract to subsidize rent. The LOC is required to meet FHLB of Atlanta grant requirements for affording housing projects for LMI multi-generational households.

Product Innovation and Flexibility

The bank makes limited use of innovative and/or flexible lending practices to serve the Charlotte-Concord-Gastonia NC-SC MMSA credit needs of both consumers and small business owners. Refer to the "Description of the Bank" section for additional details regarding mortgage lending programs. In addition, see the States of NC and SC for mortgage loan programs that encompass the MMSA.

SSB participated in the City of Concord's First Time Homebuyer down payment or home buyer assistance programs. If the borrower's household income is less than 80 percent of the median family

income, the bank provides up to \$10,000 in down payment and closing cost assistance. During the evaluation period, SSB originated a \$10,000 loan.

INVESTMENT TEST

The institution’s performance under the Investment Test in Charlotte-Concord-Gastonia NC-SC MMSA is rated Low Satisfactory.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Charlotte-Concord-Gastonia NC-SC MMSA is adequate.

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Charlotte-Concord-Gastonia NC-SC MMSA	-	-	98	4,876	98	100.0	4,876	100.0	-	-

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

SSB had 98 qualified investments and grants totaling \$4.9 million, with current period investments totaling \$4.5 million and grants totaling \$376,000 which is equivalent to 1.70 percent of allocated tier 1 capital. There were no prior period investments or unfunded investment commitments.

The bank provided 97 grants to 51 nonprofit organizations who provide services to LMI residents in the AA. The bank’s funding to these nonprofits positively impacted LMI residents in the Charlotte-Concord-Gastonia NC-SC MMSA. Grants were primarily made to community-based nonprofit service organizations whose missions are to serve LMI individuals.

Examples of qualified investments include:

- A \$4.5 million Commercial Mortgage-Backed Security (CMBS) secured by a multifamily complex consisting of 91 affordable housing units located in a low-income CT in the AA.
- Three grants totaling \$10,000 to an organization that raises funds to provide financial emergency assistance to individuals and families in crisis.

- A \$5,000 grant to a nonprofit community-based organization, which supports affordable housing initiatives for LMI families and individuals, increases access to education and workforce development, increases access to health and wellness needs, and provides workforce and economic development within the community.

SERVICE TEST

The bank’s performance under the Service Test in Charlotte-Concord-Gastonia NC-SC MMSA is rated High Satisfactory.

Based on a full-scope review, the bank’s performance in the Charlotte-Concord-Gastonia NC-SC MMSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Charlotte-Concord-Gastonia NC-SC MMSA	100	19	100	10.5	21.1	31.6	36.8	4.3	27.4	33.1	34.4

*Remaining percentage represents geographies where income information was not available

The bank has 19 branches in the AA, with two located in low-income geographies and four in moderate-income geographies. The percentage of branches located in low-income geographies exceeds the percentage of the population residing in these geographies and the percentage of branches in moderate-income geographies was below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has 19 ATMs in the AA, 16 of which are deposit-taking and located at SSB branches, including branches in LMI geographies. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Charlotte-Concord-Gastonia NC-SC MMSA	0	1	0	0	0	-1

To the extent changes have been made, the bank's closing of branches has not adversely affected the accessibility of its delivery systems, particularly in low-and moderate-income geographies and/or low-and moderate-income individuals. During the evaluation period, there were no branches opened in the AA and one branch closed in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Conclusions for Area Receiving a Full-Scope Review

The bank provided an excellent level of CD services in the Charlotte-Concord-Gastonia MMSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 23 different CD organizations totaling 535 hours during the evaluation period. SSB staff served on 15 boards and committees for organizations that provide community services targeted to LMI individuals. Of the total 535 service hours, 388 hours were in leadership roles as board or committee members.

Examples of some of these services:

- An employee provided 122 service hours as a board and committee member to an organization that supports an innovative neighborhood redevelopment initiative to end intergenerational poverty and improve economic mobility. The organization provides wraparound services including housing, health, after-school and academic support, and job training programs.
- An employee provided 33 service hours by conducting money management workshops for LMI individuals.
- An employee provided 29 service hours as a board and committee member to an organization whose mission is providing housing and home repairs to LMI individuals.

Multistate Metropolitan Statistical Area Rating

Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA

CRA rating for the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA³: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank exhibits a good geographic distribution of loans in its AAs.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB had an adequate level of qualified CD investments and grants.
- SSB's branches in moderate-income geographies were reasonably accessible to geographies and individuals of different incomes and responsive in helping SB provide services across the community. Consideration was given to near-to branches that enhanced accessibility for residents in LMI areas and ADS provided additional accessibility.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA

The Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA is comprised of the complete county of Brunswick in NC and the complete county of Horry in SC.

Based on the FDIC Deposit Market Share data as of June 30, 2023, SSB had a 4.7 percent deposit market share in this MMSA and is ranked 9th out of 22 financial institutions doing business in the states. The deposits account for 1.8 percent of the bank's total deposits. Primary competitors include Truist Bank, which ranked 1st in deposit market share (17.1 percent) with 18 offices, The Conway National Bank, which ranked 2nd in deposit market share (9.9 percent) with 14 offices, and Bank of America, NA, which ranked 3rd in deposit market share (8.6 percent) with eight offices. These competitors have deposits totaling \$4.9 billion, representing 35.7 percent of total deposit market share.

³ This rating reflects performance within the multistate metropolitan statistical area. The statewide evaluations do not reflect performance in the parts of those states contained within the multistate metropolitan statistical area.

See appendix A for a listing of all bank AAs.

The following tables provide a summary of the demographics, including housing and business information for the Myrtle-Beach-Conway-North Myrtle Beach NC-SC MMSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Myrtle Beach-Conway-North Myrtle Beach-NC-SC MMSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	19.0	56.2	19.0	3.8
Population by Geography	406,656	1.5	19.0	63.6	15.7	0.2
Housing Units by Geography	271,514	1.5	14.4	60.7	23.2	0.1
Owner-Occupied Units by Geography	119,389	0.4	16.1	64.9	18.4	0.2
Occupied Rental Units by Geography	48,542	3.6	20.6	61.7	13.9	0.2
Vacant Units by Geography	103,583	1.7	9.5	55.5	33.2	0.1
Businesses by Geography	36,447	3.7	15.8	57.6	22.4	0.5
Farms by Geography	1,168	0.9	24.1	60.4	14.0	0.5
Family Distribution by Income Level	110,740	20.1	18.4	21.2	40.3	0.0
Household Distribution by Income Level	167,931	23.1	16.4	19.1	41.4	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA		\$53,695	Median Housing Value			\$194,604
			Median Gross Rent			\$849
			Families Below Poverty Level			12.8%
<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: Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	122	3.3	14.8	55.7	24.6	1.6
Population by Geography	487,722	3.2	16.1	60.5	20.3	0.0
Housing Units by Geography	302,532	2.6	12.5	55.7	29.2	0.0
Owner-Occupied Units by Geography	148,662	1.7	12.8	61.5	23.9	0.0
Occupied Rental Units by Geography	46,973	6.3	23.4	55.6	14.7	0.0
Vacant Units by Geography	106,897	2.2	7.2	47.6	43.1	0.0
Businesses by Geography	70,936	5.7	15.8	53.8	24.7	0.0
Farms by Geography	2,008	2.9	15.0	64.9	17.1	0.0
Family Distribution by Income Level	128,181	19.4	18.4	21.9	40.2	0.0
Household Distribution by Income Level	195,635	22.6	16.8	19.6	41.1	0.0

Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	\$65,152	Median Housing Value	\$223,589
		Median Gross Rent	\$984
		Families Below Poverty Level	9.0%
<i>Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>			

The Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA includes all of Brunswick County in NC and Horry County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 122 CTs, of which four are low-income, 18 are moderate-income, 68 are middle-income, 30 are upper-income, and two have not been assigned an income classification. The percentage of households living below the poverty level is 9.0 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 3.2 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 5.0 percent compared to 3.6 percent in December 2023. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are popular destination for tourists and retirees, strong population growth, and low cost of doing business. The leading industries by comparative employment and income include leisure and hospitality services, retail trade, and government. Major employers include Walmart Inc., Coastal Carolina University, and Food Lion.

One method of assessing housing affordability in the Myrtle Beach-Conway-North Myrtle Beach SC-NC MMSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$79,000. According to Realtor.com data, the median housing value in the AA is \$259,900 and \$349,900 in January 2021 and December 2023, respectively, reflecting a 34.6 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,500 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$183,953 mortgage with a payment of \$988 per month. A moderate-income borrower making \$63,200 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$294,325 mortgage with a payment of \$1,580 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted two community contacts working in the AA. The contacts were from a nonprofit housing organization and a regional EDC. The following needs were identified within the AA:

- Financial literacy resources for college students.

- Workforce housing for LMI.
- Small business loans from local institutions

Scope of Evaluation in Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA

The Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The AA represents all the bank’s deposits, branches, and lending activities in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MYRTLE BEACH-CONWAY-NORTH MYRTLE BEACH NC-SC MMSA

LENDING TEST

The bank’s performance under the Lending Test in the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA is rated High Satisfactory when taking into consideration the positive impact of CD lending.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA	1,653	474	3	13	2,143	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA	459,024	56	1	11,426	470,507	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 9th among 22 deposit banks with a market share of 4.7 percent placing SSB in the top 41st percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 10th out of 737 mortgage lenders with a market share of 1.9 percent, placing the bank in the second percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share; however, the HMDA lending market share is far more competitive with 737 lenders versus only 22 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share.

According to the 2022 Peer Small Business data, the bank ranked 22nd out of 102 small business lenders with 0.6 percent market share, placing it in the twenty-second percentile of small business lenders in the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA. The bank's small business lending market share is stronger than the deposit market share in the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA. The top five small business lending competitors are three nationwide lenders, one is a credit card bank, and one community bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AA.

Home Mortgage Loans

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

2021

The geographic distribution of the bank's home mortgage lending was very poor. The proportion of loans were significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and well below the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Small Loans to Businesses

Refer to Table Q in the "MMSA" section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

2021

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was near to the percentage of businesses in low-income geographies and below the aggregate. The proportion of loans was near to the percentage of businesses in moderate-income geographies and near to the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was near to the percentage of businesses in moderate-income geographies and exceeded the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

2021

When taking housing affordability into consideration, the borrower distribution is good. The proportion of loans was significantly below the percentage of low-income families and exceeded the aggregate. The proportion of loans was below to the percentage of moderate-income families and near to the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was excellent. The proportion of loans was below the percentage of low-income families and exceeded the aggregate. The proportion of loans was below the percentage of moderate-income families and near to the aggregate.

Small Loans to Businesses

Refer to Table R in the "MMSA" section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations of small loans to businesses.

2021

When determining the conclusion in this AA, we considered the fact that 52.4 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 54.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was well below the percentage of small businesses and the aggregate.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank originated 13 CD loans totaling \$11.4 million in the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA which represents 14.7 percent of the bank's allocated tier 1 capital. CD loans had a positive impact on the level of responsiveness to the credit and community needs in the MMSA. CD loans primarily supported affordable housing and economic development.

Examples of CD loans originated include:

- A \$3.3 million loan to build a national retail automobile service business that will create jobs. The property is located in a middle-income CT and Federal Emergency Management Agency (FEMA) disaster area.
- A \$3.2 million loan to refinance and improve a 72-unit multi-family property that provides affordable rental housing for LMI individuals and families.
- A \$1.8 million loan to renovate a building for a national retail business that will create jobs. The property is located in a low-income CT and FEMA disaster area.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA credit needs of both consumers and small business owners. Refer to the "Description of the Bank" section for additional details regarding various mortgage loan programs. In addition, see the States of NC and SC for various mortgage loan programs that cover the MMSA.

INVESTMENT TEST

The bank's performance under the Investment Test in Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA is rated Low Satisfactory.

Conclusion for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA is adequate.

The bank has an adequate level of qualified CD investments and grants, although rarely in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Number and Amount of Qualified Investments

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA	1	111	36	927	37	100.0	1,038	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

SSB made a total of \$1.0 million in investments and donations. Total investments and donations are equivalent to 1.3 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments of \$927,000 include three qualified investments totaling \$857,000 and 33 grants totaled totaling \$70,000. Additionally, the AA benefited from an ongoing impact of one prior period investment with an outstanding balance of \$111,000. Grants were provided to 15 nonprofit organizations who provide services to LMI residents in the AA.

Examples of qualified investments include:

- Investments totaling \$857,000 in three mortgage-backed securities (MBS) pools to support LMI affordable housing complexes.
- A \$10,000 grant to an organization for a five-year economic development initiative to increase economic development and growth in the MSA.
- Three grants totaling \$7,500 to an organization that provides affordable housing initiatives to LMI, homeless and disabled individuals.

SERVICE TEST

The institution’s performance under the Service Test in Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA is rated High Satisfactory.

Based on a full-scope review, the bank's performance in the Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA	100	7	100	0	28.6	71.4	0	3.2	16.1	60.5	20.3

The bank has seven branches in the AA, with none located in low-income geographies and two located in moderate-income geographies. The percentage of branches located in low-income geographies was significantly below the percentage of the population residing in these geographies. The percentage of branches in moderate-income geographies exceeds the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has seven ATMs in the AA, five of which are deposit-taking and located at SSB branches. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA	0	1	0	-1	0	0

To the extent changes have been made, the bank's closing of branches has adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, there was one branch closed in a moderate-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Conclusions for Area Receiving a Full-Scope Review

The bank provided an excellent level of CD services in the Myrtle Beach-Conway-North Myrtle Beach MMSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to eight different CD organizations totaling 152 hours during the evaluation period. SSB staff served on five boards and committees for organizations that provide community services targeted to LMI individuals. Of the total 152 hours of services, 52 hours were in a leadership role as a board or committee member.

Examples of some of these services:

- An employee provided 21 service hours as a board member of an organization focused on providing housing to LMI individuals and families.
- An employee provided 18 service hours on the board of directors of an organization that assists individuals and families with immediate, short-term needs such as food, rent, utilities, and other specialized services, which if not met, would threaten stability. By providing these services, they seek to prevent those in need of basic services from falling into homelessness.
- An employee provided eight service hours of financial education and information related to small business lending for an organization committed to assisting small and minority businesses.

State Rating

State of AL

CRA rating for the State of AL: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: High Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibits an adequate geographic distribution of loans in its AAs.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB had a good level of qualified CD investments and grants.
- SSB's branches were reasonably accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community. Consideration was given to near-to branches that enhanced accessibility for residents in LMI areas and ADS provided additional accessibility.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in AL

SSB has five AAs within the state of AL. These AAs include the Auburn-Opelika MSA, Birmingham-Hoover MSA, Daphne-Fairhope-Foley MSA, Huntsville MSA, and AL Non-MSA. SSB's Auburn-Opelika MSA is comprised of the whole county of Lee, the Birmingham- Hoover MSA is comprised of the whole county of Jefferson, the Daphne-Fairhope-Foley MSA is comprised of the whole county of Baldwin, the Huntsville MSA is comprised of the whole county of Madison, and the AL Non-MSA is comprised of the whole county of Chambers.

In this evaluation, the Huntsville MSA will receive a full-scope review.

Based on the FDIC State Market Share data as of June 30, 2023, SSB had a 1.3 percent deposit market share in the state of AL and is ranked 15th out of 134 financial institutions doing business in the state. The deposits account for 4.9 percent of the bank's total deposits. Primary competitors include Regions Bank, which ranked 1st in deposit market share (23.7 percent) with 188 offices, PNC Bank, NA, which ranked 2nd in deposit market share (8.4 percent) with 102 offices, and Wells Fargo Bank, NA, which

ranked 3rd in deposit market share (7.5 percent) with 80 offices. These competitors have deposits totaling \$53.4 billion, representing 39.6 percent of total deposit market share.

See appendix A for a listing of all bank AAs.

Huntsville MSA

The following tables provide a summary of the demographics, including housing and business information for the Huntsville MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Huntsville MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	73	16.4	26.0	28.8	28.8	0.0
Population by Geography	346,438	10.8	20.8	31.2	37.2	0.0
Housing Units by Geography	152,720	12.3	21.9	32.1	33.7	0.0
Owner-Occupied Units by Geography	93,319	5.1	18.3	33.0	43.6	0.0
Occupied Rental Units by Geography	44,448	23.9	28.3	30.9	16.9	0.0
Vacant Units by Geography	14,953	22.7	25.3	30.2	21.8	0.0
Businesses by Geography	27,224	12.4	21.6	28.7	37.3	0.0
Farms by Geography	809	7.7	20.1	37.0	35.2	0.0
Family Distribution by Income Level	89,551	22.9	16.0	17.4	43.8	0.0
Household Distribution by Income Level	137,767	24.5	15.6	15.6	44.3	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$72,576	Median Housing Value			\$164,667
			Median Gross Rent			\$800
			Families Below Poverty Level			10.0%
<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: Huntsville MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	95	15.8	18.9	27.4	36.8	1.1
Population by Geography	388,153	14.8	15.5	30.3	38.7	0.7
Housing Units by Geography	164,100	15.6	16.9	29.8	36.9	0.8
Owner-Occupied Units by Geography	102,658	7.6	14.7	32.1	45.6	0.1
Occupied Rental Units by Geography	48,970	30.1	20.8	25.7	21.0	2.4
Vacant Units by Geography	12,472	25.3	20.2	26.5	27.1	0.9
Businesses by Geography	44,514	16.0	15.3	23.5	42.3	2.9

Farms by Geography	1,272	10.0	16.6	34.5	37.9	1.0
Family Distribution by Income Level	96,331	23.0	15.4	18.4	43.1	0.0
Household Distribution by Income Level	151,628	25.6	15.3	15.8	43.3	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$85,279	Median Housing Value			\$190,104
			Median Gross Rent			\$904
			Families Below Poverty Level			8.4%
<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>						

The Huntsville MSA includes all of Madison County. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 95 CTs of which 15 are low-income, 18 are moderate-income, 26 are middle-income, 35 are upper-income, and one has not been assigned an income classification. The percentage of households living below the poverty level is 8.4 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the Bank made 0.8 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Huntsville MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 2.9 percent compared to 2.1 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of AL, which was 2.8 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are highly educated workforce, strong migration trends and population growth, robust concentration of high-paying jobs, and above-average per capita income in the state. The leading industries by comparative employment and income include professional and business services, government, and manufacturing. Major employers include U.S. Army/Redstone Arsenal, Huntsville Hospital, and NASA/Marshall Space Flight Center.

One method of assessing housing affordability in the Huntsville MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among low-income borrowers. The 2023 FFIEC AMFI in the AA is \$108,200. According to Realtor.com data, the median housing value in the AA is \$322,861 and \$365,000 in January 2021 and December 2023, respectively, reflecting a 13.1 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$54,100 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$251,946 mortgage with a payment of \$1,353 per month. A moderate-income borrower making \$86,560 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$403,113 mortgage with a payment of \$2,164 per month. This illustrates that low-income borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted a community contact working in the AA. The contact was from a CDC. The following needs were identified within the AA:

- Affordable housing rehab and new construction close to public transportation.
- Affordable mortgages for LMI borrowers.
- Development of grocery stores in LMI areas.

Scope of Evaluation in AL

For the state of AL, the Huntsville MSA was selected for analysis using full-scope procedures because it has the largest percentage of deposits (29.8 percent) and loans (31.3 percent) within the state. We completed limited-scope reviews of Auburn-Opelika MSA, Birmingham-Hoover MSA, Daphne-Fairhope-Foley MSA, and AL Non-MSA.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN

LENDING TEST

The bank's performance under the Lending Test in AL is rated High Satisfactory when taking into consideration the positive impact of CD lending.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Huntsville MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope:							
Huntsville MSA	312	421	5	8	746	29.7	29.8
Limited Scope:							
Auburn-Opelika MSA	435	263	1	7	706	20.0	24.5
Birmingham-Hoover MSA	397	286	2	12	697	19.8	26.5
Daphne-Fairhope-Foley MSA	776	205	0	6	987	28.0	14.8
AL Non-MSA	71	19	0	0	90	2.6	4.4

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope:							
Huntsville MSA	386,922	92	1	20,709	407,724	37.8	29.8
Limited Scope:							
Auburn-Opelika MSA	130,618	43	0	5,795	136,456	12.7	24.5
Birmingham-Hoover MSA	116,972	73	0	20,544	137,590	12.8	26.5
Daphne-Fairhope-Foley MSA	332,313	33	0	57,648	389,994	36.2	14.8
AL Non-MSA	6,452	1	0	0	6,453	0.6	4.4

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Huntsville MSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked sixth among 33 deposit banks with a market share of 5.4 percent placing SSB in the top 18th percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 29th out of 433 mortgage lenders with a market share of 1.0 percent, placing the bank in the seventh percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share. The HMDA lending market share is far more competitive with 433 lenders versus only 33 deposit taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the Huntsville MSA, is greater than its deposit market share. This is due to the smaller number of depository banks in the AA and the bank's percentile ranking and is considered good performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 13th out of 103 small business lenders with 1.9 percent market share, placing it in the thirteenth percentile of small business lenders in the AA. The bank's small business lending market share is weaker than the deposit market share in the Huntsville MSA. The small business lending market share is far more competitive with 103 lenders versus only 33 deposit-taking banks. The bank's market share ranking for small business lending, relative to the number of small business lenders in the MSA, is greater than its deposit market share. This is due to the number of depository banks in the AA and the bank's percentile ranking and is considered good performance given the number of competitors in the market. The top five small business lending competitors are four nationwide lenders, and one is a credit card bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits an adequate geographic distribution of loans in its AA.

Home Mortgage Loans

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

2021

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and exceeded the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Small Loans to Businesses

Refer to Table Q in the state of AL section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

2021

The geographic distribution of the bank's small loans to businesses was adequate. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of businesses in moderate-income geographies and well below the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was poor. The proportion of loans was significantly below the percentage of businesses in low-income geographies and well below the aggregate. The proportion of loans was well below the percentage of businesses in moderate-income geographies and the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

2021

The borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of low-income families and well below the aggregate. The proportion of loans was well below to the percentage of moderate-income families and below the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of low-income families and well below the aggregate. The proportion of loans was significantly below the percentage of moderate-income families and the aggregate.

Small Loans to Businesses

Refer to Table R in the state of AL section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

2021

When determining the conclusion in this AA, we considered the fact that 41.9 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 50 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was well below the percentage of small businesses and below the aggregate.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

The bank made a relative high level of CD loans in the AA had a positive impact on lending performance in the AA. The bank originated eight CD loans totaling \$20.7 million in the Huntsville MSA representing 31.7 percent of allocated tier 1 capital. CD loans exhibited excellent responsiveness to the credit and community needs in the AA. CD loans primarily supported community services and economic development.

Examples of CD loans originated include:

- A \$10 million loan to a non-profit behavioral healthcare provider to build a Crisis Diversion Center located in a low-income CT. The provider offers a sliding fee scale for individuals without insurance where over 50 percent of fees are paid by Medicaid.
- A \$2.7 million loan to purchase a new building located in a moderate-income CT that is leased by a local hospital and national pharmacy.
- A \$1.4 million loan to build two county-owned public recreation centers located in moderate-income CTs.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve state of AL credit needs to both consumers and small business owners. Refer to the “Description of the Bank” section for additional details regarding mortgage loan programs.

Mortgage Loan Programs

During the evaluation period, SSB originated mortgage loans through the following programs:

- VA – Originated 139 loans totaling \$67 million.
- Buyers Advantage – Originated 101 loans totaling \$17 million.
- Community Advantage – Originated 65 loans totaling \$13 million.
- Opportunity Advantage – Originated 65 loans totaling \$810,000.
- FHA - Originated 61 loans totaling \$15 million.
- USDA – Originated six loans totaling \$922,000.
- HomeReady – Originated three loans totaling \$755,000.
- FHLB – Originated three loans totaling \$38,000 through one of the FHLB lending programs.

Small Business Programs

During the evaluation period, SSB originated small business loans through the following programs:

- Business Lending Express – Originated 312 loans totaling over \$26.6 million.
- SBA (7a) – Originated eight loans totaling \$996,500.

Partnerships

SSB participates in the AL Housing Step Up mortgage lending programs. Down payment assistance includes the lesser of \$10,000 or four percent of the purchase price for closing costs and down payment based on income limits of \$159,000 for FHA and VA loans or 80 percent of adjusted median income for conventional loans. During the evaluation period, SSB originated three loans totaling \$27,760 through this program.

SSB participates with the City of Birmingham on the Buyer's and Community Advantage program for FHA, VA, USDA, and conventional products. The program provides down payment assistance up to \$10,000 based on household income at or below 80 percent adjusted median income. During the evaluation period, SSB originated one loan totaling \$10,000.

SSB participates with the City of Opelika on the Buyer's and Community Advantage program for FHA, VA, USDA, and conventional products. The program provides 50 percent down payment assistance up to \$6,000 and household income below 80 percent and above 50 percent adjusted median income. During the evaluation period, SSB originated one loan totaling \$5,459.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Lending Test in the Auburn-Opelika MSA and Daphne-Fairhope-Foley MSA is consistent with the overall performance in the state under the Lending Test in the full-scope area. Performance in the AL Non-MSA and Birmingham-Hoover MSA is stronger than the performance in the state. The stronger performance is due to stronger geographic and borrower lending distribution. Performance in the limited-scope AAs had a positive impact on the overall Lending Test rating.

Refer to Tables O through R in the state of AL section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in AL is rated High Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

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

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development need through an expanded relationship with a nonprofit. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Huntsville MSA	3	599	34	1,902	37	28.5	2,501	18.1	0	0
Limited Scope:										
AL-Non-MSA	0	0	8	11	8	6.1	11	0.2	0	0
Auburn-Opelika MSA	1	4,244	19	391	20	15.4	4,635	33.5	0	0
Birmingham-Hoover MSA	0	0	51	5,876	51	39.2	5,876	42.5	0	0
Daphne-Fairhope-Foley MSA	3	582	11	212	14	10.8	794	5.7	0	0
Total	7	5,425	123	8,392	130	100.0	13,817	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

Huntsville MSA

SSB made a total of \$2.5 million in investments and donations. Total investments and donations are equivalent to 3.8 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments include three qualified investments totaling \$1.8 million and 31 grants totaling \$79,000. Additionally, the AA benefited from the ongoing impact of three prior period investments totaling \$599,000. The 31 grants were to 20 nonprofit organizations who provide services to small businesses and LMI residents in the AA.

Examples of qualified investments include:

- Three current period investments totaling \$1.8 million consisting of pools of MBS whereby the underlying mortgage loans were to LMI individuals residing in the AA.
- Three grants totaling \$15,000 to a nonprofit organization whose mission is to serve the unemployed and underemployed persons in the AA. The grants supported a program that provides financial literacy education targeted to LMI individuals.
- A \$2,000 grant to a nonprofit organization comprised of financial institutions whose mission is to assist organizations that help foster financial literacy, financial education and homeownership needs of LMI individuals residing in AA. The grant supported financial literacy workshops to the low- and very low-income individuals residing in the AA.

Statewide

In addition to the CD investments that benefited the bank's AAs, SSB made five investments totaling \$257,000 outside the AA but within the state of AL. One current period investment totaling \$240,000 was to a minority depository institution (MDI) for economic development and four grants totaling \$17,000 to nonprofit organizations that serve LMI individuals residing in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Birmingham-Hoover MSA and the Auburn-Opelika MSA was stronger than the bank's overall performance under the Investment Test in the full-scope AA. Stronger performance was due to higher levels of investments as a percentage of allocated tier 1 capital. The bank's performance under the Investment Test in the Daphne-Fairhope-Foley MSA and AL Non-MSA were weaker than the bank's overall performance under the Investment Test in the full-scope area. Weaker performance was due to a smaller percentage of CD investments and grants compared to allocated tier 1 capital. Performance in limited scope AAs had a minimal impact on the bank's overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in AL is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Huntsville MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Full Scope											
Huntsville MSA	29.8	2	22.2	0	0	0	100.0	14.8	15.5	30.3	38.7
Limited Scope											
Auburn-Opelika MSA	24.5	3	33.3	0	33.3	0	66.7	3.6	20.2	46.3	21.4
Birmingham-Hoover MSA	26.5	1	11.1	0	0	0	100.0	9.7	25.6	28.7	34.1
Daphne-Fairhope-Foley MSA	14.8	2	22.2	0	0	100.0	0	0.0	17.6	58.0	23.7
AL Non-MSA	4.4	1	11.1	0	100.0	0	0	0.0	20.1	79.9	0.0

*Remaining percentages represent geographies where income information was not available

Huntsville MSA

The bank has two branches in the AA, with none located in LMI geographies. The percentage of branches located in low-income geographies was significantly below the percentage of the population residing in these geographies and the percentage of branches in moderate-income geographies was also significantly below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain retail ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has two ATMs in the AA, located at the branches above; neither ATM is deposit-taking.

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened or closed in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Conclusions for Area Receiving a Full Scope Review

Huntsville MSA

The bank provided an excellent level of CD services in the Huntsville MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 21 different CD organizations totaling 393 hours during the evaluation period. SSB staff served on 10 boards and committees for organizations that provide community services targeted to LMI individuals. Of the 393 total hours, 172 hours were in a leadership role as a board or committee member.

Examples of some of these services:

- An employee provided 103 service hours of financial education through a revolving 12-week first-time homebuyer course for LMI individuals.
- An employee provided 80 service hours as a board member of a community organization that meets the needs of the LMI families by providing emergency food, toiletries, baby products, and financial assistance.
- An employee provided 59 service hours as a board member to an organization that provides financial education classes to LMI individuals focused on budgeting and debt reduction.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited scope reviews, the bank's performance under the Service Test in the limited scope AAs of Birmingham-Hoover MSA and Daphne-Fairhope-Foley MSA is consistent with the performance in the full-scope AA. The bank's performance in the Auburn-Opelika MSA and AL Non-MSA is

stronger than the full-scope AA performance due to each of these AAs having one branch in a moderate-income geography that exceeds the percentage of the population residing in these geographies. Performance in the limited-scope AAs had a minimal impact on the overall Service Test rating.

State Rating

State of FL

CRA rating for the State of FL: Outstanding

The Lending Test is rated: Outstanding

The Investment Test is rated: Outstanding

The Service Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibits a good geographic distribution of loans in its AAs.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB had an excellent level of qualified CD investments and grants.
- SSB branches, supported with ADS offered by the bank, were readily accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Institution's Operations in FL

SSB has 11 AAs within the state of FL. These AAs include the Jacksonville CSA, Gainesville MSA, Miami-Port St. Lucie-Fort Lauderdale CSA, North Port-Sarasota-Bradenton MSA, Ocala MSA, Orlando-Lakeland-Deltona CSA, Palm Bay-Melbourne-Titusville MSA, Pensacola-Ferry Pass-Brent MSA, Sebring-Avon Park MSA, Tampa-St. Petersburg-Clearwater MSA, and FL Non-MSA. SSB's Jacksonville CSA is comprised of the whole counties of Duval, St. Johns, Putnam, and Clay; the Gainesville MSA is comprised of the whole county of Alachua; the Miami-Port St. Lucie-Fort Lauderdale CSA is comprised of the whole counties of Broward, Martin, St. Lucie, Indian River, Miami-Dade, Monroe, and Palm Beach; the North Port-Sarasota-Bradenton MSA is comprised of the whole counties of Manatee and Sarasota; the Ocala MSA is comprised of the whole county of Marion; the Orlando-Lakeland-Deltona CSA is comprised of the whole counties of Flagler, Lake, Orange, Osceola, Seminole, Sumter, Polk, and Volusia; the Palm Bay-Melbourne-Titusville MSA is comprised of the whole county of Brevard; the Pensacola-Ferry Pass-Brent MSA is comprised of the whole counties of Escambia and Santa Rosa; the Sebring-Avon Park MSA is comprised of the whole county of Highlands; the Tampa-St. Petersburg-Clearwater MSA is comprised of the whole counties of Hillsborough, Pasco, and Pinellas; and the FL Non-MSA is comprised of the whole counties of Hendry and Okeechobee.

In this evaluation, the Orlando-Lakeland-Deltona CSA and Miami-Port St. Lucie-Fort Lauderdale CSA will receive full-scope reviews.

Based on the FDIC Market Share data as of June 30, 2023, SSB had a 1.7 percent deposit market share in the state of FL and is ranked 14th out of 188 financial institutions doing business in the state. The deposits account for 37.6 percent of the bank's total deposits. Primary competitors include Bank of America, NA, which ranked 1st in deposit market share (20.3 percent) with 447 offices, Wells Fargo Bank, NA, which ranked 2nd in deposit market share (11.5 percent) with 504 offices, and Truist Bank, which ranked 3rd in deposit market share (9.6 percent) with 452 offices. These competitors have deposits totaling \$344.4 billion, representing 41.3 percent total deposit market share.

See appendix A for a listing of all bank AAs.

Miami-Port St. Lucie-Fort Lauderdale CSA

The following tables provide a summary of the demographics, including housing and business information for the Miami-Port St. Lucie-Fort Lauderdale CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami-Port St Lucie-Fort Lauderdale CSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,362	5.9	26.9	30.2	34.0	2.9
Population by Geography	6,519,359	5.5	27.8	33.2	33.2	0.4
Housing Units by Geography	2,830,485	5.2	26.3	32.6	35.7	0.3
Owner-Occupied Units by Geography	1,434,256	2.4	21.7	35.1	40.6	0.1
Occupied Rental Units by Geography	869,371	9.8	35.6	30.9	23.2	0.4
Vacant Units by Geography	526,858	5.0	23.1	28.2	43.1	0.5
Businesses by Geography	1,798,011	4.1	21.7	29.4	43.7	1.1
Farms by Geography	25,530	4.7	24.8	32.2	38.0	0.4
Family Distribution by Income Level	1,494,049	22.7	17.1	17.9	42.3	0.0
Household Distribution by Income Level	2,303,627	24.9	15.7	16.7	42.8	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Sunrise, FL		\$61,809	Median Housing Value			\$226,402
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$49,264	Median Gross Rent			\$1,182
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$56,570	Families Below Poverty Level			13.1%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA		\$58,448				
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		\$65,914				
Median Family Income Non-MSAs - FL		\$46,899				

Source: 2015 ACS and 2021 D&B Data

Due to rounding, totals may not equal 100.0%

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Miami-Port St Lucie-Fort Lauderdale CSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,682	5.1	25.3	31.1	34.5	4.1
Population by Geography	6,868,652	4.5	27.1	32.7	34.3	1.5
Housing Units by Geography	2,908,076	4.5	26.2	31.9	36.1	1.4
Owner-Occupied Units by Geography	1,508,428	2.6	21.1	33.5	41.7	1.1
Occupied Rental Units by Geography	941,462	7.6	36.5	31.6	22.6	1.7
Vacant Units by Geography	458,186	4.0	22.0	26.9	45.3	1.8
Businesses by Geography	2,432,186	2.9	22.0	29.8	42.7	2.6
Farms by Geography	32,363	3.9	24.5	31.2	39.0	1.4
Family Distribution by Income Level	1,597,785	21.9	17.7	18.2	42.1	0.0
Household Distribution by Income Level	2,449,890	24.4	16.0	16.9	42.7	0.0
Median Family Income MSA - 22744 Fort Lauderdale-Pompano Beach- Sunrise, FL		\$73,430	Median Housing Value			\$318,638
Median Family Income MSA - 33124 Miami-Miami Beach-Kendall, FL		\$60,666	Median Gross Rent			\$1,435
Median Family Income MSA - 38940 Port St. Lucie, FL MSA		\$68,546	Families Below Poverty Level			10.2%
Median Family Income MSA - 42680 Sebastian-Vero Beach, FL MSA		\$72,001				
Median Family Income MSA - 48424 West Palm Beach-Boca Raton-Boynton Beach, FL		\$79,785				
Median Family Income Non-MSAs - FL		\$53,858				

Source: 2020 U.S. Census and 2023 D&B Data
Due to rounding, totals may not equal 100.0%
(*) The NA category consists of geographies that have not been assigned an income classification.

The Miami-Port Lucie-Fort Lauderdale CSA includes the Miami-Fort Lauderdale-West Palm Beach MSA, Port St. Lucie MSA, Sebastian-Vero Corridor MSA, Okeechobee Non-MSA, and Key West Non-MSA. The Miami-Fort Lauderdale-West Palm Beach MSA includes the Fort Lauderdale-Pompano Beach-Sunrise MD, and the West Palm Beach-Boca Raton-Delray Beach MD. Both the Okeechobee Non-MSA (Okeechobee County) and Key West Non-MSA (Monroe County) both have one branch.

The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 1,682 CTs of which 85 are low-income, 425 are moderate-income, 523 are middle-income, 580 are upper-income, and 69 have not been assigned an income classification. The percentage of households living below the poverty level is 10.2%. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 7.5 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

During the evaluation period the OCC completed four community contacts and hosted a community group listening session in the AA. The following needs were identified within the AA:

- Affordable Housing.
- Small business lending to nontraditional small business sectors that are most responsive to community needs including eldercare facilities, childcare facilities, and early learning centers.
- Grants to fill the development gap for affordable homebuilding.

Miami-Miami Beach-Kendall MSA (Miami MD)

The Miami-Miami Beach-Kendall MSA consists of Dade County.

According to the U.S. BLS, the Miami-Miami Beach-Kendall MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 6.9 percent compared to 2.4 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of FL which was 3.1 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the February 2024 Moody's Analytics report, the AA strengths are strong ties to Latin America, luxury status attracts international capital, world's second-busiest cruise port, and a well-developed shipping and distribution infrastructure. The leading industries by comparative employment and income include professional and business services, education and health services, and retail trade. Major employers include Publix Super Markets, Baptist Health South FL, and American Airlines.

One method of assessing housing affordability in the Miami-Miami Beach-Kendall MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers as supported in the MSA and MD discussions below. The 2023 FFIEC AMFI in the AA is \$74,700. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$37,350 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$173,940 mortgage with a payment of \$934 per month. A moderate-income borrower making \$59,760 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$278,305 mortgage with a payment of \$1,494 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

Port St. Lucie MSA (Port St. Lucie MSA)

The Port St. Lucie MSA consists of Martin and St. Lucie counties.

According to the U.S. BLS, the Port St. Lucie MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 5.5 percent compared to 3.4 percent in December 2023. The unemployment rate in the AA was higher than the overall rate for the state of FL which was 3.1 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are desirable climate and quality of life, strong and improving migration, large port can handle oceangoing vessels, and well above-average long-term growth prospects. The leading industries by comparative employment and income include education and health services, professional and business services, and retail trade. Major employers include Cleveland Clinic Martin Health, Indian River State College, and Lawnwood Regional Medical Center & Heart Institute.

One method of assessing housing affordability in the Port St. Lucie MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC adjusted AMFI in the AA is \$84,800. According to Realtor.com data, the median housing value in the AA is \$324,990 and \$459,945 in January 2021 and December 2023, respectively, reflecting a 41.5 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$42,400 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$197,459 mortgage with a payment of \$1,060 per month. A moderate-income borrower making \$67,840 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$315,934 mortgage with a payment of \$1,696 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

Fort Lauderdale-Pompano Beach-Sunrise MSA (Fort Lauderdale MD)

The Fort Lauderdale-Pompano Beach-Sunrise MSA consist of Broward County.

According to the U.S. BLS, the Fort Lauderdale-Pompano Beach-Sunrise MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 6.9 percent compared to 2.4 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of FL which was 3.1 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are strong ties to international trade via Latin America, spillover from Miami tourism and trade, and attractive tourist destination. The leading industries by comparative employment and income include professional and business services, education and health services, and retail trade. Major employers include Nova Southeastern University, First Service Residential, and HEICO.

One method of assessing housing affordability in the Fort Lauderdale-Pompano Beach-Sunrise MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC adjusted AMFI in the AA is \$88,500. According to Realtor.com data, the median housing value in the AA is \$400,000 and \$579,900 in January 2021 and December 2023, respectively, reflecting a 45.0 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$44,250 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$206,074 mortgage with a payment of \$1,106 per month. A moderate-income borrower making \$70,800 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$329,718 mortgage with a payment of \$1,770 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

Sebastian-Vero Beach MSA (Sebastian MSA)

The Sabastian-Vero Beach MSA consists of Indian River MSA.

According to the U.S. BLS, the Sebastian-Vero Beach MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 5.5 percent compared to 3.7 percent in December 2023. The unemployment rate in the AA was higher than the overall rate for the state of FL which was 3.1 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody’s Analytics report, the AA strengths are high standard of living, premier health services and beaches that attract wealthy retirees, population growth above average, and high per capita income. The leading industries by comparative employment and income include education and health services, retail trade, and leisure and hospitality services. Major employers include Cleveland Clinic Indian River Hospital, Publix Super Markets Inc., and Piper Aircraft Inc.

One method of assessing housing affordability in the Sebastian-Vero Beach MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC adjusted AMFI in the AA is \$79,200. According to Realtor.com data, the median housing value in the AA is \$344,700 and \$475,000 in January 2021 and December 2023, respectively, reflecting a 37.8 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners’ insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$39,600 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$184,419 mortgage with a payment of \$990 per month. A moderate-income borrower making \$63,360 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$295,070 mortgage with a payment of \$1,584 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

Orlando-Lakeland-Deltona CSA

The following tables provide a summary of the demographics, including housing and business information for the Orlando-Lakeland-Deltona CSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Orlando-Lakeland-Deltona CSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	698	3.7	26.2	43.1	25.8	1.1
Population by Geography	3,617,495	2.4	25.2	45.1	27.2	0.3
Housing Units by Geography	1,612,382	2.4	24.7	47.0	25.9	0.0
Owner-Occupied Units by Geography	851,672	1.0	18.8	49.2	31.1	0.0
Occupied Rental Units by Geography	453,046	4.9	35.2	41.1	18.8	0.0
Vacant Units by Geography	307,664	2.4	25.5	49.9	22.1	0.0
Businesses by Geography	686,063	2.0	24.3	40.8	32.8	0.0
Farms by Geography	17,510	1.5	23.0	48.3	27.1	0.1

Family Distribution by Income Level	867,647	20.7	18.4	20.1	40.8	0.0
Household Distribution by Income Level	1,304,718	22.7	17.0	18.7	41.6	0.0
Median Family Income MSA - 19660 Deltona-Daytona Beach-Ormond Beach, FL MSA		\$52,220	Median Housing Value			\$151,243
Median Family Income MSA - 29460 Lakeland-Winter Haven, FL MSA		\$50,986	Median Gross Rent			\$1,012
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$57,304	Families Below Poverty Level			12.2%
Median Family Income MSA - 45540 The Villages, FL MSA		\$60,099				
<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: Orlando-Lakeland-Deltona CSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	846	3.3	25.7	42.6	26.6	1.9
Population by Geography	4,197,095	3.0	24.1	42.7	29.1	1.1
Housing Units by Geography	1,742,714	2.7	24.4	44.3	27.7	0.8
Owner-Occupied Units by Geography	963,632	1.3	19.6	46.0	32.7	0.4
Occupied Rental Units by Geography	494,006	5.2	33.3	40.1	20.0	1.5
Vacant Units by Geography	285,076	3.3	25.3	46.1	24.4	0.9
Businesses by Geography	931,038	2.3	24.7	38.5	33.6	0.9
Farms by Geography	22,336	1.9	23.4	45.9	28.2	0.6
Family Distribution by Income Level	977,782	20.5	18.5	20.0	41.0	0.0
Household Distribution by Income Level	1,457,638	22.5	17.2	18.8	41.5	0.0
Median Family Income MSA - 19660 Deltona-Daytona Beach-Ormond Beach, FL MSA		\$65,794	Median Housing Value			\$221,078
Median Family Income MSA - 29460 Lakeland-Winter Haven, FL MSA		\$59,623	Median Gross Rent			\$1,228
Median Family Income MSA - 36740 Orlando-Kissimmee-Sanford, FL MSA		\$70,774	Families Below Poverty Level			9.5%
Median Family Income MSA - 45540 The Villages, FL MSA		\$72,792				
<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>						

The Orlando-Lakeland-Deltona CSA includes all of Flagler, Volusia, Lake, Orange, Osceola, Seminole, Sumter, and Polk counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 846 CTs of which 28 are low-income, 217 are moderate-income, 360 are middle-income, 225 are upper-income, and 16 have not been assigned an income classification. The percentage of households living below the poverty level

is 9.5 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 11.3 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Orlando-Lakeland-Deltona CSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 6.1 percent compared to 3.1 percent in December 2023. The unemployment rate in the AA was same as the overall rate for the state of FL, which was 3.1 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the February 2024 Moody's Analytics report, the AA strengths are natural and institutional tourism advantages, strong demographics due to in-migration, ample job opportunities in services, and plentiful land for development. The leading industries by comparative employment and income include leisure and hospitality services, professional and business services, and education and health services. Major employers include Walt Disney World Resort, Advent Health, and Universal Studios FL.

One method of assessing housing affordability in the Orlando-Lakeland-Deltona CSA is to compare the average adjusted median family income to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AAA is \$85,700. According to Realtor.com data, the median housing value in the AA is \$315,990 and \$438,990 in January 2021 and December 2023, respectively, reflecting a 38.9 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$42,850 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$199,554 mortgage with a payment of \$1,071 per month. A moderate-income borrower making \$68,560 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$319,287 mortgage with a payment of \$1,714 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted four community contacts working in the AA. The contacts were from an EDC, an Economic Partnership, a Development Council, and a Chamber of Commerce. The following needs were identified within the AA:

- Improved infrastructure in areas with LMI housing.
- Redevelopment of older housing.
- Financing for small businesses.

Scope of Evaluation in FL

For the state of FL, the Orlando-Lakeland-Deltona CSA, and Miami-Port St. Lucie-Fort Lauderdale CSA were selected for analysis using full-scope procedures. These two AAs represent 64.7 percent of

the rating area deposits, 55.4 percent of rating area offices, and 53.9 percent of rating area loans. These two AAs also represent 24.3 percent of the bank's total deposits, 20.3 percent of the bank's total offices, and 18.8 percentage of total bank loans. These factors indicate the bank has a large presence in the AA.

We completed limited-scope reviews on the Jacksonville CSA, Gainesville MSA, North Port-Sarasota-Bradenton MSA, Ocala MSA, Palm Bay-Melbourne-Titusville MSA, Pensacola-Ferry Pass-Brent MSA, Sebring-Avon Park MSA, Tampa-St. Petersburg-Clearwater MSA, and FL Non-MSA.

Ratings are primarily based on results of the full-scope areas. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FL LENDING TEST

The bank's performance under the Lending Test in FL is rated Outstanding when taking into consideration the positive impact of CD lending.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami-Port St. Lucie-Fort Lauderdale CSA is excellent when taking into consideration the positive impact of CD lending and the bank's performance in the Orlando-Lakeland-Deltona CSA is excellent.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope:							
Miami-Port St. Lucie-Fort Lauderdale CSA	2,484	2,067	7	37	4,595	21.5	25.0
Orlando-Lakeland-Deltona CSA	4,403	2,440	14	46	6,903	32.4	39.7
Limited Scope:							
Jacksonville CSA	1,127	960	3	19	2,109	9.9	9.3
Gainesville MSA	202	187	1	1	391	1.8	2.2
North Port-Sarasota-Bradenton MSA	1,764	362	0	7	2,133	10.00	4.9
Ocala MSA	438	344	4	7	793	3.7	4.3
Palm Bay-Melbourne-Titusville MSA	237	161	0	8	406	1.9	1.1
Pensacola-Ferry Pass-Brent MSA	271	129	0	1	401	1.9	1.6
Sebring-Avon Park MSA	311	100	1	3	415	1.9	2.1

Tampa-St. Petersburg-Clearwater MSA	1,868	975	2	23	2,868	13.4	7.9
FL Non-MSA	217	93	7	2	319	1.5	1.9

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope:							
Miami-Port St. Lucie-Fort Lauderdale CSA	906,936	392	2	102,655	1,009,986	21.8	25.0
Orlando-Lakeland-Deltona CSA	1,074,104	455	3	112,212	1,186,775	25.6	39.7
Limited Scope:							
Jacksonville CSA	372,204	182	1	34,277	406,663	8.8	9.3
Gainesville MSA	106,327	37	1	2,967	109,531	2.4	2.2
North Port-Sarasota-Bradenton MSA	692,707	77	0	12,408	705,192	15.2	4.9
Ocala MSA	92,362	55	0	12,012	104,429	2.3	4.3
Palm Bay-Melbourne-Titusville MSA	169,457	34	0	13,046	182,537	3.9	1.1
Pensacola-Ferry Pass-Brent MSA	88,964	20	0	3,377	92,362	2.0	1.6
Sebring-Avon Park MSA	49,378	15	0	2,497	51,890	1.1	2.1
Tampa-St. Petersburg-Clearwater MSA	698,931	206	0	54,002	753,140	16.2	7.9
FL Non-MSA	35,673	11	1	750	36,434	0.8	1.9

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Miami-Port St. Lucie-Fort Lauderdale CSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 17th among 88 deposit banks with a market share of 0.96 percent placing SSB in the top nineteenth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 52nd out of 1,214 mortgage lenders with a market share of 0.4 percent, placing the bank in the fifth percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share. The HMDA lending market share is far more competitive with 1,214 lenders versus only 88 deposit taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share. This is due to the significantly smaller number of depository banks in the AA and the bank's percentile ranking and is considered excellent performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 39th out of 295 small business lenders with 0.1 percent market share, placing it in the fourteenth percentile of small business lenders in the Miami-Port St. Lucie-Fort Lauderdale CSA. The bank's small business lending market share is weaker than the deposit market share in the Miami-Port St. Lucie-Fort Lauderdale CSA. The top five small business lending competitors are five nationwide lenders.

Orlando-Lakeland-Deltona CSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 5th among 55 deposit banks with a market share of 5.3 percent placing SSB in the top ninth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 27th out of 1,186 mortgage lenders with a market share of 1.0 percent, placing the bank in the third percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share. The HMDA lending market share is far more competitive with 1,186 lenders versus only 55 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share. This is due to the smaller number of depository banks in the AA and the bank's percentile ranking and is considered excellent performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 19th out of 228 small business lenders with 0.5 percent market share, placing it in the ninth percentile of small business lenders in the AA. The bank's small business lending market share is weaker than the deposit market share in the Orlando-Lakeland-Deltona CSA. The small business lending market share is far more competitive with 228 lenders versus only 55 deposit-taking banks. The bank's market share ranking for small business lending, relative to the number of small business lenders in the MSA, is consistent with its deposit market share. This is due to the number of depository banks in the AA and the bank's percentile ranking and is considered good performance given the number of competitors in the market. The top five small business lending competitors are five nationwide lenders.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Miami-Port St. Lucie-Fort Lauderdale CSA2021

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and well below the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and below the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was near to the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Orlando-Lakeland-Deltona CSA2021

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans well below the percentage of owner-occupied housing units in low-income geographies and below the aggregate. The proportion of loans was near to the percentage of owner-occupied housing units in moderate-income geographies and exceeded the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was excellent. The proportion of loans was near to the percentage of owner-occupied housing units in low-income geographies and was equal to the aggregate. The proportion of loans exceeded the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Small Loans to Businesses

Refer to Table Q in the state of FL section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

Miami-Port St. Lucie-Fort Lauderdale CSA2021

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

Orlando-Lakeland-Deltona CSA2021

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The

proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the institution.

Home Mortgage Loans

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

Miami-Port St. Lucie-Fort Lauderdale CSA

2021

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and near to the aggregate. The proportion of loans was well below to the percentage of moderate-income families and near to the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was significantly below the percentage of low-income families and near to the aggregate. The proportion of loans was near to the percentage of moderate-income families and exceeded the aggregate.

Orlando-Lakeland-Deltona CSA

2021

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and exceeded the aggregate. The proportion of loans was near to the percentage of moderate-income families and exceeded the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and exceeded the aggregate. The proportion of loans was near to the percentage of moderate-income families and exceeded the aggregate.

Small Loans to Businesses

Refer to Table R in the state of FL section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

Miami-Port St. Lucie-Fort Lauderdale CSA**2021**

When determining the conclusion in this AA, we considered the fact that 74.7 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was poor. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 79.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and below the aggregate.

Orlando-Lakeland-Deltona CSA**2021**

When determining the conclusion in this AA, we considered the fact that 75.1 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 78.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was adequate. The proportion of loans was well below the percentage of small businesses and below the aggregate.

Community Development Lending

The bank is a leader in making CD loans. CD loans had a positive impact in the overall Lending Test rating.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Miami-Port St. Lucie-Fort Lauderdale CSA

The bank is a leader in making CD loans in the AA. SSB originated 37 CD loans totaling \$102.7 million which represents 24.7 percent of allocated tier 1 capital. The bank's CD loans in the Miami-Port St. Lucie-Fort Lauderdale CSA had a positive impact on lending performance in the AA. CD loans exhibited an excellent level of responsiveness to the credit and community needs in the AA. Loans primarily supported affordable housing, community service, and economic development.

Examples of CD loans originated include:

- A \$14 million loan to purchase and improve multiple affordable rental housing units for LMI individuals and families.
- A \$12 million loan to a housing development organization for an income-restricted 105-unit apartment complex.
- A \$2 million loan to a non-profit healthcare clinic to purchase the property that the organization currently leases. The clinic provides services based on income and family size to the local underserved population.

Orlando-Lakeland-Deltona CSA

The bank is a leader in making CD loans in the AA. SSB originated 46 CD loans totaling \$112.2 million in the Orlando-Lakeland-Deltona CSA representing 17.0 percent of allocated tier 1 capital. The bank's CD lending in the AA had a positive impact on lending performance in the AA. CD loans exhibited good responsiveness to the credit and community needs in the AA. CD loans primarily supported economic development and community service.

Examples of CD loans originated include:

- A \$12 million loan to build a retail strip center anchored by a national grocery store located in a middle-income CT. The property is adjacent to a moderate-income CT and the area is considered a food desert. The retail center will provide permanent jobs.
- A \$4 million loan to a not-for-profit charter school to build a two-story building located in a middle-income CT whereby over 50 percent of the charter school students receive free or reduced cost lunch.
- A \$3.9 million short-term loan renewal to fund costs associated with the construction of a non-profit skilled nursing facility located in a low-income geography primarily serving LMI residents.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve state of FL credit needs to both consumers and small business owners. Refer to the “Description of the Institution” section for additional details regarding mortgage loan programs.

Mortgage Loan Programs

During the evaluation period, SSB originated mortgage loans through the following programs:

- Buyers Advantage – Originated 1,087 loans totaling \$274 million.
- FHA – Originated 406 loans totaling \$113 million.
- VA – Originated 219 loans totaling \$87 million.
- Community Advantage – Originated 109 loans totaling \$30 million.
- USDA – Originated 52 loans totaling \$10 million.
- HomeReady – Originated 49 loans totaling \$8 million.
- Home Possible – Originated 35 loans totaling \$7 million.
- Opportunity Advantage – Originated 66 loans totaling \$821,000.
- FHFC Hometown Heroes – Originated 50 loans totaling \$787,000.
- Federal Housing Finance Agency (FHFA) Assistance SHIP – Originated 56 loans totaling \$533,000.
- FHLB – Originated six loans totaling \$58,000 through one of the FHLB lending programs.

Small Business Programs

During the evaluation period, SSB originated small business loans through the following programs:

- Business Lending Express – Originated 2,153 loans totaling \$241.5 million.
- SBA (7a) – Originated 134 loans totaling \$25.9 million.

Partnerships

SSB participates in the Florida Housing Finance Corporation’s lending program that covers the entire state of FL. The program provides closing costs and/or down payment assistance for qualified LMI borrowers and includes a forgivable second lien that can be up to four percent of the loan amount. Unless indicated, the bank did not track the volume of originations during the evaluation period.

SSB participates with several local HFA to help LMI families such as:

- HFA of Hillsborough County program provides up to \$15,000 in closing and/or down payment assistance in Hillsborough and Brevard Counties, up to \$20,000 in Clay County, \$10,000 in

Duval County, and \$5,000 in the city of Tampa. Each county determines qualified household income limits. During the evaluation period, SSB originated two loans totaling \$50,000.

- HFA of Manatee County program provides a Key to Homeownership Grant Program where borrowers can obtain non-repayable grants of three, four, or five percent for down payment assistance. Household income limits are at or below 80 percent adjusted median income of \$78,000. SSB originated one \$10,000 loan during the evaluation period.
- HFA of Lee County program provides Own a Home Opportunity Grant Program that covers Lee, Charlotte, Collier, DeSoto, Palm Beach, and Sarasota Counties. Borrowers can obtain non-repayable grants of three, four, or five percent for down payment assistance. Each county determines household income limits. During the evaluation period, SSB originated one loan totaling \$9,422.

SSB partners with multiple local Habitat for Humanity programs that provide low or zero interest loans and down payment assistance. All Habitat for Humanity locations offer the bank's Buyer's Advantage mortgage loan product or a product that is most appropriate for the customer. Additionally, this program can be used with down payment assistance from FHLB Atlanta or the bank's Opportunity Advantage Loan Fund. The bank expanded this program by partnering with Greater Orange County-Osceola Habitat and the Humanity Hillsborough. During the evaluation period, SSB originated 17 loans totaling \$2.3 million.

CCTCP – SSB participates annually in the FL CCTCP. CCTCP is designed to encourage FL businesses to donate to eligible CD and housing projects for low-income persons. Habitat for Humanity is an approved Sponsor, and their projects are approved "housing for low-income or very low-income households." The program puts dollars back into the coffers of Habitat and the ability to build another home. During the evaluation period, SSB partnered with Habitat Marion and Hillsborough for total contributions of 258,500; and Habitat Pensacola for total contributions of \$201,000.

FHFA Assistance State Housing Initiative Program (SHIP) - SSB partners with the FL Housing Finance Corporation - SHIP of FL to offer down payment assistance programs to LMI borrowers. Bank approved areas for local SHIP programs are Broward County, Fort Pierce, City of Gainesville, Gilchrist County, Manatee County (excludes City of Bradenton), Martin County, Monroe County, Okeechobee County, Orange County, Escambia County/City of Pensacola, Santa Rosa County, Seminole County, and City of Winter Haven. In addition to down payment and closing cost assistance, other uses of SHIP funds include emergency repairs, new construction, rehabilitation, construction and gap financing, mortgage buy-downs, and acquisition of property for affordable housing.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Tampa-St. Petersburg-Clearwater MSA is consistent the bank's overall performance under the Lending Test in the full-scope areas. Performance in the FL Non-MSA, Gainesville MSA, Jacksonville CSA, North Port-Sarasota-Bradenton MSA, Ocala MSA, Palm Bay-Melbourne-Titusville MSA, Pensacola-Ferry Pass-Brent MSA, Sebring-Avon Park MSA are weaker than the performance in the state. The weaker performance is due to weaker geographic and borrower lending distribution. Performance in the limited-scope AAs had a neutral impact on the overall Lending Test rating.

Refer to Tables O through R in the state of FL section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in FL is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Orlando-Lakeland-Deltona CSA is excellent and, in the Miami-Port St Lucie-Fort Lauderdale CSA is good.

The bank has an excellent level of qualified CD investment and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses of innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Scope:										
Miami-Port St. Lucie-Fort Lauderdale CSA	17	9,661	194	8,706	211	32.5	18,367	11.6	0	0
Orlando-Lakeland-Deltona CSA	10	6,229	164	82,683	174	26.8	88,912	56.1	0	0
Limited Scope:										
Jacksonville CSA	4	4,725	48	14,072	52	8.0	18,797	11.9	0	0
Gainesville MSA	0	0	17	8,039	17	2.6	8,039	5.1	0	0
North Port-Sarasota-Bradenton MSA	3	1,883	23	3,589	26	4.0	5,472	3.5	0	0
Ocala MSA	1	1,020	39	287	40	6.2	1,307	0.8	0	0
Palm Bay-Melbourne-Titusville MSA	3	526	17	4,957	20	3.1	5,483	3.5	0	0
Pensacola-Ferry Pass-Brent MSA	0	0	20	1,127	20	3.1	1,127	0.7	0	0
Sebring-Avon Park MSA	1	7,064	7	101	8	1.2	7,165	4.5	0	0
Tampa-St. Petersburg-Clearwater MSA	1	123	66	3,681	67	10.3	3,804	2.4	0	0
FL Non-MSA	0	0	14	49	14	2.2	49	0.03	0	0
Total	40	31,231	609	127,291	649	100.0	158,522	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

Miami-Port St Lucie-Fort Lauderdale CSA

SSB made 211 investments and donations totaling \$18.4 million. Total investments and donations are equivalent to 4.4 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments include 12 qualified investments totaling \$8.3 million and 182 grants totaling \$422,000. Additionally, the AA benefited from the ongoing impact of 17 prior period

investments with outstanding balances of \$9.7 million. The 182 grants were provided to 84 nonprofit organizations who provide services to LMI residents in the AA.

Examples of qualified investments in this AA include:

- A \$2 million investment in a multi-family development that provide 160 affordable housing units in a moderate-income CT and FEMA designated disaster area.
- A \$245,000 investment to provide capital to a bank to benefit small businesses in underserved markets.
- A \$33,500 grant to an organization whose mission is to provide educational workshops and resources to LMI individuals and families. The mission is also to provide, critical food distribution needs for LMI.

Orlando-Lakeland-Deltona CSA

SSB made 174 investments and donations totaling \$88.9 million. Total investments and donations are equivalent to 13.4 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments include six qualified investments totaling \$81.5 million and 158 grants totaling \$1.2 million. Additionally, the AA benefited from the ongoing impact of ten prior period investments with outstanding balances of \$6.2 million. The bank also provided 158 grants to 76 nonprofit organizations who provide services to LMI residents in the AA.

Examples of qualified investments in this AA include:

- A \$30 million investment to support a 240- unit affordable housing complex that is 100 percent occupied by LMI individual.
- Four grants totaling \$92,000 to an organization that partners with local business leaders and residents to end the ongoing cycle of poverty through neighborhood revitalization.
- A \$64,900 grant to an organization to provide for housing partnership programs for the homeless matching savings program for LMI individuals and assistance with creating the only CDFI in Winter Haven.

Broader Statewide

In addition to the CD investments that benefited the bank's AAs, the bank made four investments and grants totaling \$12.6 million that include one qualified investment totaling \$12.6 million and three grants totaling \$20,000. The investments are outside of the bank's delineated AAs and within the state of FL.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Jacksonville CSA, Gainesville MSA, North Port-Sarasota-Bradenton MSA, Palm Bay-Melbourne-Titusville MSA, and Sebring-Avon Park MSA are consistent with overall Outstanding performance of the full-scope

review. The bank's performance under the Investment Test in the Ocala MSA, Miami-Port St. Lucie-Fort Lauderdale CSA, Pensacola-Ferry Pass-Brent MSA, Tampa-St. Petersburg-Clearwater MSA, and FL Non-MSA were weaker than the bank's overall performance under the Investment Test in the full-scope AAs. Weaker performance was due to a smaller percentage of CD investments and grants compared to allocated tier 1 capital. Performance in limited scope AAs had a minimal impact on the bank's overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in FL is rated Outstanding.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami-Port St. Lucie-Fort Lauderdale CSA and the Orlando-Lakeland-Deltona CSA is excellent.

Retail Banking Services

Service delivery systems are readily accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Full Scope											
Miami-Port St. Lucie-Fort Lauderdale CSA	25.0	21	22.8	14.3	19.1	33.3	33.3	4.5	27.1	32.7	34.3
Orlando-Lakeland-Deltona CSA	39.7	30	32.6	3.4	43.3	43.3	10.0	3.0	24.1	42.7	29.1
Limited Scope											
Gainesville MSA	2.2	2	2.2	0	50.0	0	50.0	6.8	18.5	29.2	38.1
Jacksonville CSA	9.3	10	10.9	0	20.0	40.0	40.4	5.0	26.2	39.7	28.5
North Port-Sarasota-Bradenton MSA	4.9	7	7.6	0	14.2	42.9	42.9	2.2	22.3	43.6	31.6
Ocala MSA	4.3	4	4.3	0	25.0	75.0	0	1.4	19.4	58.3	20.0
Palm Bay-Melbourne-Titusville MSA	1.1	1	1.1	0	0	0	100.0	2.6	21.4	45.0	30.5
Pensacola-Ferry Pass-Brent MSA	1.6	2	2.2	0	50.0	50.0	0	3.8	22.1	43.2	30.9
Sebring-Avon Park MSA	2.1	3	3.3	0	33.3	66.7	0	0.0	31.5	56.7	11.8
Tampa-St. Petersburg-Clearwater MSA	7.9	11	12.0	0	27.3	63.6	9.1	3.9	25.3	36.6	33.3
FL Non-MSA	1.9	1	1.1	0	0	0	100.0	0.0	33.0	50.6	15.7

*Remaining percentages represent geographies where income information was not available

Miami-Port St. Lucie-Fort Lauderdale CSA

The bank has 21 branches in the AA, with three located in low-income geographies and four located in moderate-income geographies. The percentage of branches located in low-income geographies exceeds the percentage of the population residing in these geographies, while the percentage of branches in moderate-income geographies was below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has 24 ATMs in the AA, of which 21 are deposit-taking, including branches in LMI geographies. Some branches have two ATMs—one walk-up and one drive-up; and one ATM is a standalone located at a golf course. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Orlando-Lakeland-Deltona CSA

The bank has 30 branches in the AA, with one located in low-income geographies and 13 located in moderate-income geographies. The percentage of branches located in low-income geographies exceeds the percentage of the population residing in these geographies and the percentage of branches located in moderate-income geographies also exceeds the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Full Scope						
Miami-Port St. Lucie-Fort Lauderdale CSA	0	2	0	-1	-1	0
Orlando-Lakeland-Deltona CSA	0	3	0	-2	-1	0
Limited Scope						
Gainesville MSA	0	2	0	0	-2	0
Jacksonville CSA	1	3	-1	0	0	-1
North Port-Sarasota-Bradenton MSA	0	1	0	0	-1	0
Ocala MSA	0	1	-1	0	0	0
Palm Bay-Melbourne-Titusville MSA	0	1	0	0	-1	0
Pensacola-Ferry Pass-Brent MSA	0	1	0	0	-1	0
Sebring-Avon Park MSA	0	1	0	0	-1	0
Tampa-St. Petersburg-Clearwater MSA	1	2	0	0	-2	+1
FL Non-MSA	0	2	0	0	0	-2

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has 37 ATMs in the AA, of which 29 are deposit-taking. ATMs are located at branches, including LMI geographies, and standalone ATMs

at retail locations. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Miami-Port St. Lucie-Fort Lauderdale CSA

To the extent changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branch openings during the evaluation period and two branch closings, one located in a moderate-income geography, and one located in a middle-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Orlando-Lakeland-Deltona CSA

To the extent changes have been made, the bank's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. There were no branch openings during the evaluation period and three branch closings, two located in moderate-income geographies and one located in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Conclusions for Area Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Miami-Port St. Lucie-Fort Lauderdale CSA and Orlando-Lakeland-Deltona CSA is excellent.

Miami-Port St. Lucie-Fort Lauderdale CSA

The bank provided an excellent level of CD services in the Miami-Port St. Lucie-Fort Lauderdale CSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 36 different CD organizations totaling 548 hours during the evaluation period. SSB staff served on boards or committees for 21 organizations that provide community services targeted to LMI individuals. Of the 548 total hours, 423 hours were in a leadership role as a board or committee member.

Examples of these services:

- An employee provided 46 service hours as a board member for an organization whose goal is to meet the needs of LMI families in the AA.

- An employee provided 33 service hours on the board of an organization servicing youth and families in HUD approved low-income housing. Bank services also included teaching financial literacy courses for adults and youth.
- Two employees provided 12 service hours of financial education to middle school students at a school where 60 percent of students qualify for free or reduced lunch.

Orlando-Lakeland-Deltona CSA

The bank provided an excellent level of CD services in the Orlando-Lakeland-Deltona CSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 65 different CD organizations totaling 2,131 hours during the evaluation period. SSB staff served on 47 boards or committees for organizations that provide community services targeted to LMI individuals. Of the 2,131 total hours, 691 hours were in a leadership role as a board or committee member.

Examples of these services:

- Nine employees provided 67 service hours of financial education to high school students completing a summer internship program. The interns attended high schools whereby over 51 percent of students qualified for free or reduced lunch.
- An employee provided 47 service hours as a board member for an organization that provides community services to persons with disabilities whereby 95 percent of the participants are considered LMI.
- An employee provided 41 service hours on the loan review committee of a CDFI that provides financing to small businesses in the AA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Service Test in the following limited scope AAs is weaker than the performance in the full-scope AAs: Gainesville MSA, Jacksonville CSA, North Port-Sarasota-Bradenton MSA, Ocala MSA, Palm Bay-Melbourne-Titusville MSA, Pensacola-Ferry Pass-Brent MSA, and Tampa-St. Petersburg-Clearwater MSA. There are no branches in low-income geographies in these AAs, which is below the percentage of the population in those geographies. However, it was noted that the population in each of these low-income geographies is small, i.e., less than four percent. The percentage of branches in moderate-income geographies were below or exceeded the percentage of the population in those geographies. The bank's performance under the Service Test in the limited scope AAs of Sebring-Avon Park MSA and FL Non-MSA is consistent with the performance in the full-scope AAs. CD services in the limited-scope AAs is consistent with the full-scope AAs, except for the Sebring-Avon Park MSA where CD services are weaker than the performance in the full-scope AAs. Performance in the limited-scope AAs had a minimal impact on the overall Service Test rating.

State Rating

State of GA

CRA rating for the State of GA: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Low Satisfactory

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibits a good geographic distribution of loans in its AA.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB had a good level of qualified CD investments and grants.
- SSB's branch and ADS were reasonably accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in GA

SSB has six AAs within the state of GA. These AAs include the Athens-Clark County MSA, Atlanta-Sandy Springs-Alpharetta MSA, Gainesville MSA, Macon-Bibb MSA, Savannah MSA, and GA Non-MSA. SSB's Athens-Clark County MSA is comprised of the whole county of Clarke; the Atlanta-Sandy Springs-Alpharetta, GA MSA is comprised of the whole counties of Barrow, Carroll, Cherokee, Cobb, Coweta, Dekalb, and Fulton; the Gainesville MSA is comprised of the whole county of Hall; the Macon-Bibb MSA is comprised of the whole county of Bibb; the Savannah MSA is comprised of the whole counties of Bryan and Chatham; and the GA Non-MSA is comprised of the whole counties of Fannin, Gilmer, Habersham, Hart, Jackson, Rabun, Stephens, Towns, Troup, Union, and White.

In this evaluation, the Atlanta-Sandy Springs-Alpharetta MSA and Savannah MSA will receive a full-scope review.

Based on the FDIC State Market Share data as of June 30, 2023, SSB had a 2.4 percent deposit market share in the state of GA and is ranked ninth out of 194 financial institutions doing business in the state. The deposits account for 19.0 percent of the bank's total deposits. Primary competitors include Truist Bank which ranked first in deposit market share (18.9 percent) with 214 offices, Bank of America, NA

which ranked second in deposit market share (15.9 percent) with 136 offices, and Wells Fargo Bank, NA which ranked third in deposit market share (14.0 percent) with 198 offices. These competitors have deposits totaling \$166.9 billion, representing 48.9 percent of total deposit market share.

See appendix A for a listing of all bank AAs.

Atlanta-Sandy Springs-Alpharetta MSA

The following tables provide a summary of the demographics, including housing and business information for the Atlanta-Sandy springs-Alpharetta MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta-Sandy Springs-Alpharetta MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	550	14.2	23.8	22.2	38.5	1.3
Population by Geography	2,963,334	9.8	24.4	25.1	40.2	0.5
Housing Units by Geography	1,249,353	10.8	24.8	24.1	40.2	0.2
Owner-Occupied Units by Geography	655,781	4.2	18.9	26.8	50.0	0.0
Occupied Rental Units by Geography	451,732	17.4	31.0	21.3	29.8	0.5
Vacant Units by Geography	141,840	20.1	31.6	20.2	27.8	0.2
Businesses by Geography	604,487	7.4	21.4	22.6	47.9	0.7
Farms by Geography	8,625	5.8	20.8	28.8	44.4	0.2
Family Distribution by Income Level	687,799	22.7	15.5	16.6	45.1	0.0
Household Distribution by Income Level	1,107,513	24.2	15.9	16.6	43.3	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		\$67,322	Median Housing Value			\$208,942
			Median Gross Rent			\$1,007
			Families Below Poverty Level			12.0%

*Source: 2015 ACS and 2021 D&B Data
Due to rounding, totals may not equal 100.0%
(* The NA category consists of geographies that have not been assigned an income classification.*

Table A – Demographic Information of the Assessment Area						
Assessment Area: Atlanta-Sandy Springs-Alpharetta MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	845	9.3	19.3	24.7	41.3	5.3
Population by Geography	3,212,672	7.6	20.4	26.8	41.4	3.6
Housing Units by Geography	1,321,657	8.4	20.3	26.2	41.3	3.9
Owner-Occupied Units by Geography	729,227	3.6	15.8	28.7	50.0	1.9
Occupied Rental Units by Geography	478,250	14.0	26.2	23.5	29.8	6.5
Vacant Units by Geography	114,180	15.3	24.4	21.3	33.7	5.3

Businesses by Geography	847,075	6.0	18.6	23.3	47.5	4.6
Farms by Geography	11,926	5.0	19.6	31.3	41.6	2.5
Family Distribution by Income Level	743,053	21.0	15.4	18.3	45.3	0.0
Household Distribution by Income Level	1,207,477	23.8	15.5	17.1	43.6	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA	\$84,791	Median Housing Value				\$282,149
		Median Gross Rent				\$1,248
		Families Below Poverty Level				8.2%
<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>						

The Atlanta-Sandy Springs-Alpharetta MSA includes all of Barrow, Carroll, Cherokee, Cobb, Coweta, Dekalb, and Fulton counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 845 CTs of which 79 are low-income, 163 are moderate-income, 209 are middle-income, 349 are upper-income, and 45 have not been assigned an income classification. The percentage of households living below the poverty level is 8.2 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 8.1 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Atlanta-Sandy Springs-Alpharetta MSA in the AA was consistent with the overall rate for the state of GA which was 3.2 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the February 2024 Moody's Analytics report, the AA strengths are diverse economy, distribution and cultural center, business friendly environment, large talent pool, and healthy net migration. The leading industries by comparative employment and income include professional and business services, education and health services, and government. Major employers include Delta Air Lines Inc, Emory University & Emory Healthcare, and The Home Depot Inc.

One method of assessing housing affordability in the Atlanta-Sandy Springs-Alpharetta MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$102,900. According to Realtor.com data, the median housing value in the AA is \$352,000 and \$415,000 in January 2021 and December 2023, respectively, reflecting a 17.9 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$51,450 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$239,605 mortgage with a payment of \$1,286 per month. A moderate-income borrower making \$82,320 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$383,368 mortgage with a payment of \$2,058 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted community contacts working in the AA. The contacts were from an Economic Development Association, a Development Authority, and a Housing Authority. The following needs were identified within the AA:

- Start-up and general business financing.
- Financial literacy programs.
- Financial assistance for down payments and to offset the high cost of rent for LMI.

Savannah MSA

The following tables provide a summary of the demographics, including housing and business information for the Savannah MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Savannah MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	79	12.7	35.4	24.1	22.8	5.1
Population by Geography	312,441	9.1	28.3	30.3	32.3	0.0
Housing Units by Geography	134,553	8.9	28.5	30.3	32.4	0.0
Owner-Occupied Units by Geography	65,134	4.9	20.5	33.6	41.0	0.0
Occupied Rental Units by Geography	51,219	12.4	37.9	26.8	22.8	0.0
Vacant Units by Geography	18,200	12.9	30.4	28.4	28.3	0.1
Businesses by Geography	43,455	7.9	22.7	31.9	37.2	0.2
Farms by Geography	791	4.6	21.1	36.4	37.9	0.0
Family Distribution by Income Level	73,225	24.1	16.5	20.1	39.3	0.0
Household Distribution by Income Level	116,353	26.1	16.2	17.4	40.4	0.0
Median Family Income MSA - 42340 Savannah, GA MSA		\$61,754	Median Housing Value			\$188,129
			Median Gross Rent			\$965
			Families Below Poverty Level			13.8%
<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: Savannah MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	97	9.3	33.0	25.8	24.7	7.2
Population by Geography	340,029	8.8	30.4	31.1	26.9	2.8
Housing Units by Geography	141,012	8.9	31.6	29.5	28.2	1.9
Owner-Occupied Units by Geography	70,599	4.9	24.8	32.4	36.0	1.9

Occupied Rental Units by Geography	52,772	13.0	41.1	27.2	17.2	1.5
Vacant Units by Geography	17,641	12.4	30.4	24.5	29.9	2.8
Businesses by Geography	60,534	11.2	29.7	28.7	27.9	2.5
Farms by Geography	1,085	6.2	29.2	29.5	33.5	1.6
Family Distribution by Income Level	77,362	23.3	17.8	18.7	40.2	0.0
Household Distribution by Income Level	123,371	23.9	16.9	17.3	41.9	0.0
Median Family Income MSA - 42340 Savannah, GA MSA		\$75,128	Median Housing Value			\$230,593
			Median Gross Rent			\$1,117
			Families Below Poverty Level			10.0%
<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>						

The Savannah MSA includes all of Bryan and Chatham counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 97 CTs of which nine are low-income, 32 are moderate-income, 25 are middle-income, 24 are upper-income, and seven have not been assigned an income classification. The percentage of households living below the poverty level is 10.0 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

The bank made 2.2 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Savannah, GA MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 4.5 percent compared to 3.0 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of GA which was 3.2 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are one of the largest cargo ports in the U.S., attractive tourist destination, strong population growth, and low business costs. The leading industries by comparative employment and income include education and health services, professional and business services, and leisure and hospitality services. Major employers include Gulfstream Aerospace Corporation, St. Joseph's/Candler, and Ft. Stewart/Hunter Army Airfield.

One method of assessing housing affordability in the Savannah MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$91,500. According to Realtor.com data, the median housing value in the AA is \$305,000 and \$420,700 in January 2021 and December 2023, respectively, reflecting a 37.9 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$45,750 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$213,060 mortgage with a payment of \$1,144 per month. A moderate-income borrower making \$73,200 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$340,895 mortgage with a payment of \$1,830 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted a community contact working in the AA. The contact was from a local housing service organization. The following needs were identified within the AA:

- Financing assistance with affordable housing development and property redevelopment/rehab.
- Access to capital, not just lines of LOC, for community-based organizations that are engaged in affordable housing, homeless shelters and childcare services.
- Provide equity qualified investments to CDFIs.

Scope of Evaluation in GA

For the state of GA, the Atlanta-Sandy Springs-Alpharetta MSA and Savannah MSA were selected for analysis using full-scope procedures. The Atlanta-Sandy Springs-Alpharetta MSA was selected because it has the largest percentage of deposits (61.7 percent) and loans (59.0 percent) within the state. Additionally, with the acquisition of Atlantic Capital Bancshares, Inc, two additional branches were added to the AA. The Savannah MSA was selected for analysis because the AA has not previously been reviewed.

We completed limited-scope reviews on the Athens-Clark County MSA, Gainesville MSA, Macon-Bibb MSA and GA Non-MSA.

Ratings are primarily based on results of the full-scope areas. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GA

LENDING TEST

The bank’s performance under the Lending Test in GA is rated High Satisfactory when taking into consideration the positive impact of CD lending.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank’s performance in the Atlanta-Sandy Springs-Alpharetta, GA MSA and Savannah MSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Athens-Clark County MSA	50	52	0	4	106	1.3	1.0

Atlanta-Sandy Springs-Alpharetta, GA MSA	3,248	1,642	2	37	4,929	58.9	61.7
Gainesville, MSA	135	106	3	3	247	2.9	2.3
Macon-Bibb MSA	77	30	0	0	107	1.3	0.2
Savannah MSA	634	693	2	12	1,341	16.0	11.9
GA Non-MSA	1,036	580	20	8	1,644	19.6	23.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Athens-Clark County MSA	17,424	11	0	4,799	22,234	1.1	1.0
Atlanta-Sandy Springs-Alpharetta, GA MSA	1,349,073	429	0	63,582	1,413,084	67.5	61.7
Gainesville, MSA	103,525	18	1	4,403	107,947	5.2	2.3
Macon-Bibb MSA	19,683	5	0	0	19,688	0.9	0.2
Savannah MSA	255,966	163	0	18,239	274,369	13.1	11.9
GA Non-MSA	222,725	67	3	32,336	255,131	12.2	23.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Atlanta-Sandy Springs-Alpharetta MSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 8th among 60 depository institutions with a market share of 2.4 percent placing SSB in the top thirteenth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 31st out of 846 mortgage lenders with a market share of 0.9 percent placing the bank in the fourth percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share; however, the HMDA lending market share is far more competitive with 846 lenders versus only 60 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share. This is due to the smaller number of depository banks in the AA and the bank's percentile ranking but is considered good performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 20th out of 218 small business lenders with 0.4 percent market share, placing it in the tenth percentile of small business lenders in the AA. The bank's small business lending market share is weaker than the deposit market share in the Atlanta-Sandy Springs-Alpharetta MSA. The small business lending market is far more competitive with 218 lenders versus only 60 deposit-taking banks. The bank's market share ranking for small business lending, relative to the number of small business lenders in the MSA, is also weaker than its deposit market share. This is due to the number of depository banks in the AA and the bank's percentile ranking but is considered good performance given the number of competitors in the market. The top five small business lending competitors are five nationwide lenders.

Savannah MSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 4th among 24 deposit banks with a market share of 8.7 percent placing SSB in the top seventeenth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 18th out of 480 mortgage lenders with a market share of 1.6 percent placing the bank in the fourth percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share; however, the HMDA lending market share is far more competitive with 480 lenders versus only 24 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is weaker than its deposit market share. This is due to the number of depository banks in the AA and the bank's percentile ranking but is considered adequate performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 13th out of 90 small business lenders with 1.8 percent market share, placing it in the fourteenth percentile of small business lenders in the AA. The bank's small business lending market share is weaker than the deposit market share in the Savannah MSA. The top five small business lending competitors are five nationwide lenders.

Distribution of Loans by Income Level of the Geography

The bank exhibits a good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Atlanta-Sandy Springs-Alpharetta MSA2021

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and near to the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans exceeded the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Savannah MSA2021

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and well below the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and exceeded the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and was below the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and below the aggregate.

Small Loans to Businesses

Refer to Table Q in the state of GA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

Atlanta-Sandy Springs-Alpharetta MSA2021

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was near to the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was somewhat near to the percentage of businesses in moderate-income geographies and near to the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans was near to the percentage of businesses in low-income geographies and exceeded the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

Savannah MSA2021

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was well below the percentage of businesses in moderate-income geographies and below the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The

proportion of loans was near to the percentage of businesses in moderate-income geographies and exceeded the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. We did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

Atlanta-Sandy Springs-Alpharetta MSA

2021

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and below the aggregate. The proportion of loans was near to the percentage of moderate-income families and near to the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of low-income families and well below the aggregate. The proportion of loans was below the percentage of moderate-income families and the aggregate.

Savannah MSA

2021

The borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of low-income families and near to the aggregate. The proportion of loans was significantly below to the percentage of moderate-income families and well below the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and near to the aggregate. The proportion of loans was well below the percentage of moderate-income families and below the aggregate.

Small Loans to Businesses

Refer to Table R in the state of GA of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

Atlanta-Sandy Springs-Alpharetta MSA2021

The borrower distribution of the bank's loans to small businesses by revenue was very poor. The proportion of loans was well below the percentage of small businesses.

When determining the conclusion in this AA, we considered the fact that 66.9 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was poor. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 70.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was well below the percentage of small businesses and the aggregate.

Savannah MSA2021

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and well below the aggregate.

When determining the conclusion in this AA, we considered the fact that 43.9 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 49.5 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was well below the percentage of small businesses and the aggregate.

Community Development Lending

The bank is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Atlanta-Sandy Springs-Alpharetta MSA

The bank made a relatively high level of CD loans in the AA. The bank's CD loans in the AA had a positive impact on lending performance in the AA. SSB's CD lending performance had a positive impact in the AA. The bank originated 37 CD loans for \$63.6 million in the Atlanta-Sandy Springs-Alpharetta MSA representing 12 percent of allocated tier 1 capital. CD loans exhibited good responsiveness to the credit and community needs in the AA. CD loans primarily supported community services and economic development.

Examples of CD loans originated during the evaluation period include:

- An \$11 million LOC renewal to a non-profit for real estate improvements. The organization provides free home-delivered meals and nutrition services to clients from marginalized communities and those living at or below the federal poverty level.
- A \$2.9 million SBA loan to purchase and renovate a warehouse in a moderate-income CT for an existing wholesale business to permanently occupy. The business has approximately 45 employees of which 98 percent earn wages below 80 percent AMI.
- A \$1.4 million loan to a non-profit healthcare facility in a moderate-income CT to develop a new women's clinic. The organization provides affordable and accessible healthcare to rural areas and offers a sliding fee scale based on income or Medicaid.

Savannah MSA

The bank is a leader in making CD loans in the AA. The bank's CD lending in the AA had a positive impact on lending performance in the AA. The bank originated 12 CD loans totaling \$18.2 million in the MSA representing 18.2 percent of allocated tier 1 capital. CD loans exhibited an excellent level of responsiveness to the credit and community needs in the AA, with loans primarily supporting community services and economic development.

Examples of CD loans originated during the evaluation period include:

- A \$4.6 million loan renewal of an SBA loan to expand an existing business which will create 13-17 new permanent LMI jobs.
- A \$2 million loan to a non-profit emergency services provider in Chatham County. Over 50 percent of county residents live in LMI CTs.
- A \$25,000 LOC renewal to the local Boys and Girls Club for working capital. Funds will

primarily support after-school and summer programs.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve the state of GA credit needs of both consumers and small business owners. Refer to the “Description of the Bank” section for additional details regarding mortgage loan programs.

Mortgage Loan Programs

During the evaluation period, SSB originated mortgage loans through the following programs:

- Buyers Advantage – Originated 639 loans totaling \$174 million.
- FHA – Originated 327 loans totaling \$88 million.
- VA – Originated 244 loans totaling \$87 million.
- Community Advantage – Originated 134 loans totaling \$34 million.
- HomeReady – Originated 61 loans totaling \$13 million.
- USDA – Originated 22 loans totaling \$4 million.
- Home Possible – Originated 18 loans totaling \$4 million.
- Opportunity Advantage – Originated 54 loans totaling \$675,000.
- FHLB – Originated three loans totaling \$28,000 through one of the FHLB lending programs.

Small Business Programs

During the evaluation period, SSB originated small business loans through the following programs:

- Business Lending Express – Originated 889 loans totaling \$83.6 million.
- SBA (7a) – Originated 47 loans totaling \$7.7 million.

Partnerships

- SSB participate with the DeKalb County Workforce Enhancement (WE) Program which provides a down payment grant of up to three percent to qualified FHA, VA, or Federal Home Loan Mortgage Corporation HFA Advantage borrowers purchasing a home in the county. During the evaluation period, SSB originated one loan totaling \$6,123.
- GA Housing Finance Authority Economic Development Financing – SSB participates in a State Small Business Credit Initiative program to originate small business loans. During the evaluation period, SSB participated in the granting of 22 loans totaling \$1.8 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Athens-Clark County MSA, GA Non-MSA, and Gainesville MSA is consistent with the bank's overall performance under the Lending Test in the full-scope areas. The bank's performance under the Lending Test in the Macon-Bibb MSA is weaker than the performance in the state. The weaker performance is due to weaker geographic and borrower lending distribution. Performance in the limited-scope AAs had a positive impact on the overall Lending Test rating.

Refer to Tables O through R in the state of GA of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in GA is rated Low Satisfactory. Performance in limited-scope AAs had a negative impact on the bank's overall Investment Test rating.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlanta-Sandy Springs-Alpharetta MSA is adequate and Savannah MSA is good.

The bank has a significant level of qualified CD investments and grants, occasionally in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits good responsiveness to credit and community economic development needs. The institution occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope										
Atlanta-Sandy Springs-Alpharetta MSA	2	2,283	198	5,550	200	48.2	7,833	33.4	0	0
Savannah MSA	0	0	70	5,654	70	16.9	5,654	24.1	0	0
Limited-Scope										
Athens-Clarke MSA	0	0	11	239	11	2.7	239	1.0	0	0
GA-Non-MSA	1	1,020	122	4,107	123	29.6	5,127	21.9	0	0
Gainesville MSA	1	195	7	4,243	8	1.9	4,438	19.0	0	0
Macon-Bibb MSA	1	136	2	2	3	0.7	138	0.6	0	0
Total	5	3,634	410	19,795	415	100.0	23,429	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

Atlanta-Sandy Springs-Alpharetta MSA

SSB made 200 investments and donations totaling \$7.8 million. Total investments and donations are equivalent to 1.5 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments include two qualified investments totaling \$4.7 million and 196 grants totaling \$810,000. Additionally, the AA benefited from the ongoing impact of two prior period investments with outstanding balances of \$2.3 million. Grants were provided to 102 non-profit organizations who provide services to small businesses and LMI residents in the AA.

Examples of qualified investments include:

- A \$4.5 million CMBS secured by an affordable housing 109-unit apartment complex located in a low-income geography where 100 percent of the units are rented to LMI tenants residing in the AA.
- A \$249,000 investment in an MDI operating in the AA.
- Six grants totaling \$10,000 to a nonprofit organization whose mission is to serve the homeless or individuals in danger of homelessness with temporary housing and food services as well as providing the tools and resources needed to become self-sufficient.

Savannah MSA

SSB made 70 investments and donations totaling \$5.7 million. Total investments and donations are equivalent to 5.7 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments include one investment totaling \$5.5 million and 69 grants totaling \$154,000. The grants were provided to 30 non-profit organizations who provide services to LMI residents in the AA.

Examples of qualified investments include:

- A \$5.5 million Fannie Mae CMBS secured by a multi-family 144-unit apartment complex located in a low-income geography where 80 percent of the units are rented to LMI tenants residing in the AA.
- Four grants totaling \$63,250 to a nonprofit organization whose mission is to provide financial literacy education, work readiness and entrepreneurship for underserved youth residing in the AA.
- Three grants totaling \$3,000 to a nonprofit organization whose mission is to provide knowledge and skills through financial education and other programs to improve the lives of LMI individuals and communities residing in the AA.

Statewide

In addition to the CD investments that benefited the bank's AAs, SSB made 21 current period investments and grants totaling \$582,000 that include one current period investment totaling \$255,000 to an MDI for economic development and 20 grants totaling \$327,000 to non-profits providing services targeted to LMI persons residing in the AA. The bank also continues to hold one prior period MBS investment totaling \$2.1 million. The investments are outside of the bank's delineated AAs but within the state of GA.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Gainesville MSA and Macon-Bibb MSA are stronger than the bank's overall performance under the Investment Test full scope AAs. Stronger performance was due to higher levels of investments and grants as a percentage of allocated tier 1 capital. The bank's performance under the Investment Test for Athens-Clark County MSA and the GA Non-MSA are weaker than the bank's overall performance under the Investment Test in the full-scope AAs. Weaker performance was due to a smaller percentage of CD investments and grants compared to allocated tier 1 capital. Performance in limited scope AAs had a negative impact on the bank's overall Investment Test rating given the Athens-Clark County MSA and the GA Non-MSA represents 24 percent of total state deposits.

SERVICE TEST

The bank's performance under the Service Test in GA is rated Low Satisfactory. More weight was given to the Atlanta-Sandy Springs-Alpharetta, GA MSA as this AA represents 61.7 percent of state deposits and 59.0 percent of state loans. Also, the Macon-Bibb MSA is not included in the Service Test analysis. During the evaluation period, the bank briefly converted a loan production office (LPO), located in a middle-income CT, into a deposit taking facility. Thereafter, the deposit taking facility was closed on September 1, 2022, and returned to an LPO.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Atlanta-Sandy Springs-Alpharetta MSA is adequate. The bank's performance in the Savannah MSA is good.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the institution's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits		Branches				Population				
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Full Scope											
Atlanta-Sandy Springs-Alpharetta, MSA	61.7	13	37.1	0	15.4	23.1	61.5	7.6	20.4	26.8	41.4
Savannah MSA	1.0	5	14.3	20.0	20.0	20.0	40.0	8.8	30.4	31.1	26.9
Limited Scope											
Athens-Clark County MSA	11.9	1	2.9	0	0	0	100.0	18.6	29.1	27.1	25.2
Gainesville, MSA	2.3	1	2.9	100.0	0	0	0	7.4	12.1	51.7	26.1
GA Non-MSA	23.0	15	42.9	0	6.7	53.3	40.0	18.6	29.1	27.1	25.2

*Remaining percentages represent geographies where income information was not available

Atlanta-Sandy Springs-Alpharetta MSA

The bank has 13 branches in the AA, with none located in low-income geographies and two located in moderate-income geographies. The percentage of branches located in low-income geographies was significantly below the percentage of the population residing in these geographies, while the percentage of branches in moderate-income geographies was below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has 14 ATMs in the AA, of which 13 are deposit-taking, including those in LMI geographies. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Savannah MSA

The bank has five branches in the AA, with one located in low-income geography and one located in a moderate-income geography. The percentage of branches located in low-income geographies exceeds the percentage of the population residing in these geographies, while the percentage of branches in moderate-income areas was below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has nine ATMs in the AA, of which eight are deposit-taking. ATMs are located at branches, including LMI geographies, and standalone ATMs at retail locations. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Full Scope						
Atlanta-Sandy Springs-Alpharetta, GA MSA	1	4	0	0	-1	-2
Savannah MSA	0	0	0	0	0	0
Limited Scope						
Athens-Clark County MSA	0	1	0	0	0	-1
Gainesville, MSA	0	0	0	0	0	0
GA Non-MSA	0	2	0	-1	-1	0

Atlanta-Sandy Springs-Alpharetta MSA

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its deliver systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, there was one branch opened in an upper-income geography, three branch closures in middle-income geographies, one branch conversion to a loan production office in a middle-income geography, and one branch closure in a geography with no income category.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Savannah MSA

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its deliver systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened or closed in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services in the Atlanta-Sandy Springs-Alpharetta MSA, and the Savannah MSA.

Conclusions for Areas Receiving Full-Scope ReviewsAtlanta-Sandy Springs-Alpharetta MSA

The bank provided an excellent level of CD services in the Atlanta-Sandy Springs-Alpharetta MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 36 different CD organizations totaling 1,060 hours during the evaluation period. SSB staff served on 23 boards or committees for organizations that provide community services targeted to LMI individuals. Of the 1,060 total hours, 511 hours were in a leadership role as a board or committee member.

Examples of these services:

- Forty-three employees provided 300 services hours of financial education to middle school students who attend schools where 95 percent of students qualify for free or reduced lunch.
- One employee provided 32 service hours as a board member of an organization that provides affordable housing for LMI families. The employee also helped facilitate a discussion on affordable housing between the organization and state legislatures.

- One employee provided 28 service hours on the board of directors of a nonprofit organization that provides a home for youth who have been abused, neglected, and/or abandoned by their caregivers. The organization provides basic needs, educational courses and support, life skills education, and enrichment opportunities that promote youth development.

Savannah MSA

The bank provided an excellent level of CD services in the Savannah MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 15 different CD organizations totaling 620 hours during the evaluation period. SSB staff served on 12 boards or committees for organizations that provide community services targeted to LMI individuals. Of the 620 total hours, 382 hours were in a leadership role as a board or committee member.

Examples of these services:

- Nine employees provided 64 hours of financial education to middle school students who attend schools where 90 percent of students qualify for free or reduced lunch.
- One employee provided 43 service hours as a board member for an organization that supports small business development.
- One employee provided 13 service hours as a board member of an organization serving preschool and daycare-age children who are 100 percent LMI.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the Service Test in the Gainesville, MSA is consistent with performance in the full-scope AAs. The bank's performance under the Service Test in the Athens-Clark County MSA and GA Non-MSA is weaker than the performance in the full-scope AAs as there are no branches located in low-income geographies in these AAs, and one branch located in a moderate-income geography in the GA Non-MSA, which is well below the percent of the population in those geographies. CD services in the limited-scope AAs is consistent with the full-scope AAs, except for the GA Non-MSA where the performance was weaker, and the level of CD services was adequate. Performance in the limited-scope AAs had a minimal impact on the overall Service Test rating.

State Rating

State of NC

CRA rating for the State of NC: Satisfactory

The Lending Test is rated: High Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibits a poor geographic distribution of loans in its AA.
- The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB has an excellent level of qualified CD investments and grants.
- SSB's branch and ADS were reasonably accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community.
- SSB provides a relative high level of CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in NC

SSB has two AAs within the state of NC. These AAs include the Raleigh-Durham-Cary MSA and Wilmington MSA. SSB's Raleigh-Durham-Cary MSA is comprised of the whole county of Wake, and the Wilmington MSA is comprised of the whole counties of New Hanover and Pender.

In this evaluation, the Wilmington MSA will receive a full-scope review.

Based on the FDIC State Market Share data as of June 30, 2023, SSB had a 0.3 percent deposit market share in the state of NC and is ranked 19th out of 88 financial institutions doing business in the state. The deposits account for 1.0 percent of the bank's total deposits. Primary competitors include Bank of America, NA which ranked first in deposit market share (41.3 percent) with 112 offices, Truist Bank which ranked second in deposit market share (19.5 percent) with 285 offices, and First-Citizens Bank & Trust Company which ranked third in deposit market share (11.0 percent) with 207 offices. These competitors have deposits totaling \$434.9 billion, representing 71.8 percent of total deposit market share.

See appendix A for a listing of all bank AAs.

Wilmington MSA

The following tables provide a summary of the demographics, including housing and business information for the Wilmington MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Wilmington MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	61	14.8	18.0	29.5	32.8	4.9
Population by Geography	268,257	13.2	17.0	40.1	29.7	0.0
Housing Units by Geography	131,212	12.6	15.5	37.6	34.3	0.0
Owner-Occupied Units by Geography	66,128	4.9	14.4	44.4	36.3	0.0
Occupied Rental Units by Geography	42,405	25.8	18.8	34.0	21.5	0.0
Vacant Units by Geography	22,679	10.6	12.3	24.5	52.6	0.0
Businesses by Geography	34,119	12.2	11.1	34.9	41.6	0.3
Farms by Geography	927	8.3	22.9	38.5	30.2	0.1
Family Distribution by Income Level	65,424	22.7	17.6	18.4	41.3	0.0
Household Distribution by Income Level	108,533	25.1	15.5	17.5	41.9	0.0
Median Family Income MSA - 48900 Wilmington, NC MSA		\$64,357	Median Housing Value			\$222,834
			Median Gross Rent			\$917
			Families Below Poverty Level			11.7%
<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: Wilmington MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	71	5.6	31.0	32.4	25.4	5.6
Population by Geography	285,905	3.6	27.2	37.8	29.4	1.9
Housing Units by Geography	142,686	4.5	27.6	38.0	29.3	0.7
Owner-Occupied Units by Geography	75,602	1.8	24.3	38.4	34.9	0.7
Occupied Rental Units by Geography	45,208	9.3	37.6	34.3	18.1	0.8
Vacant Units by Geography	21,876	3.7	18.4	44.6	32.9	0.4
Businesses by Geography	51,335	3.5	26.1	30.1	39.4	0.9
Farms by Geography	1,304	1.8	36.6	32.1	28.6	0.8
Family Distribution by Income Level	69,214	22.2	17.4	19.6	40.8	0.0
Household Distribution by Income Level	120,810	25.1	15.3	17.3	42.3	0.0
Median Family Income MSA - 48900 Wilmington, NC MSA		\$78,711	Median Housing Value			\$264,677

	Median Gross Rent	\$1,044
	Families Below Poverty Level	8.5%
<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>		

The Wilmington MSA includes all of New Hanover and Pender counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 71 CTs of which four are low-income, 22 are moderate-income, 23 are middle-income, 18 are upper-income, and four have not been assigned an income classification. The percentage of households living below the poverty level is 8.5 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 1.5 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Wilmington, NC MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 4.5 percent compared to 3.2 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of NC, which was 3.6 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are coastal location that draws retirees and tourists, favorable migration trends and above-average population growth, low cost of doing business, and well-educated workforce. The leading industries by comparative employment and income include education and health services, leisure and hospitality services, and professional and business services. Major employers include PPD Inc., Novant Health New Hanover Regional, Walmart Inc General Electric Co., and University of NC Wilmington.

One method of assessing housing affordability in the Wilmington MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$99,600. According to Realtor.com data, the median housing value in the AA is \$379,900 and \$505,000 in January 2021 and December 2023, respectively, reflecting a 32.9 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$49,800 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$231,921 mortgage with a payment of \$1,245 per month. A moderate-income borrower making \$79,680 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$371,073 mortgage with a payment of \$1,992 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted a community contact working in the AA. The contact was from a CDC. The following needs were identified within the AA:

- Housing counseling.
- Foreclosure prevention programs.

- Affordable housing to assist LMI.

Scope of Evaluation in NC

For the state of NC, the Wilmington MSA was selected for analysis using full-scope procedures because it has the largest percentage of deposits (82.3 percent), branch offices (60.0 percent) and loans (69.3 percent) within the state. We completed a limited-scope review on the Raleigh-Durham-Cary MSA.

Ratings are primarily based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NC

LENDING TEST

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

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Wilmington MSA is adequate.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope							
Wilmington MSA	261	645	2	3	911	69.3	82.3
Limited Scope							
Raleigh-Durham-Cary MSA	232	170	0	1	403	30.7	17.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope							
Wilmington MSA	132,185	70	**	5	-132,260	-65.9	82.3
Limited Scope							
Raleigh-Durham-Cary MSA	68,454	38	0	10	- 68,502	-34.1	17.7

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

** Total Small Farm loans totaled \$394.

Wilmington MSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 10th among 20 deposit banks with a market share of 1.7 percent placing SSB in the top fiftieth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 37th out of 474 mortgage lenders with a market share of 0.7 percent placing the bank in the eighth percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share; however, the HMDA lending market share is far more competitive with 474 lenders versus only 20 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share.

According to the 2022 Peer Small Business data, the bank ranked 15th out of 93 small business lenders with 1.5 percent market share, placing it in the sixteenth percentile of small business lenders in the Wilmington MSA. The bank's small business lending market share is slightly weaker than the deposit market share in the Wilmington MSA. The small business lending market share is far more competitive with 93 lenders versus only 20 deposit-taking banks. The bank's market share ranking for small business lending, relative to the number of small business lenders in the MSA, is greater than its deposit market share. This is due to the number of depository banks in the AA and the bank's percentile ranking and is considered good performance given the number of competitors in the market. The top five small business lending competitors are three nationwide lenders, one regional bank, and one credit card bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

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

2021

The geographic distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Small Loans to Businesses

Refer to Table Q in the state of NC section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

2021

The geographic distribution of the bank's small loans to businesses was adequate. The proportion of loans was below the percentage of businesses in low-income geographies and near to the aggregate. The proportion of loans was well below the percentage of businesses in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was adequate. The proportion of loans was significantly below the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits an adequate distribution of loans among individuals of different income levels and businesses of different sizes.

Home Mortgage Loans

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

2021

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and exceeded the aggregate. The proportion of loans was well below to the percentage of moderate-income families and below the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and exceeded the aggregate. The proportion of loans was near to the percentage of moderate-income families and the aggregate.

Small Loans to Businesses

Refer to Table R in the state of NC section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

2021

When determining the conclusion in this AA, we considered the fact that 29 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was poor. Consideration of the bank's PPP lending had a neutral effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 31.3 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and well below the aggregate.

Community Development Lending

The institution is a leader in making CD loans.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Wilmington MSA

The bank is a leader in making CD loans in the AA. SSB originated three loans totaling \$5.4 million which represents 15.2 percent of allocated tier 1 capital. The bank's CD lending had a positive impact on the lending test conclusion. CD loans exhibited good responsiveness to the credit and community needs in the AA. The loans primarily supported community services and economic development.

CD loans originated include:

- A \$3.9 million loan to build a new national retail store located in a moderate-income CT that primarily sells motor vehicles and supplies for farming. The business will create and retain permanent jobs.
- A \$1.5 million loan to a nonprofit organization to install a new roof and heating, ventilation, and air conditioning system. The organization provides after-school programs and employs LMI individuals whereby 58 percent of households in the county earn less than the HUD AA designated low-income of \$68,150.
- A \$50,000 LOC to a non-profit organization to provide working capital while waiting for Medicaid payments. The organization provides multiple services to individuals with autism and their families such as acquiring and maintaining employment and developing effective work habits.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve the state of NC credit needs to both consumers and small business owners. Refer to the “Description of the Bank” section for additional details regarding mortgage loan programs.

Mortgage Loan Programs

During the evaluation period, SSB originated mortgage loans through the following programs:

- Buyers Advantage – Originated 92 loans totaling \$25 million.
- VA – Originated 29 loans totaling \$10 million.
- Community Advantage – Originated 24 loans totaling \$7 million.
- FHA – Originated 22 loans totaling \$7 million.
- HomeReady – Originated eight loans totaling \$2 million.
- Home Possible – Originated five loans totaling \$965,000.
- USDA – Originated two loans totaling \$355,000.
- Opportunity Advantage – Originated 10 loans totaling \$125,000.
- NCHFA – Originated eight loans totaling \$120,000.
- FHLB – Originated one loan totaling \$13,000 through a FHLB lending program.

Small Business Programs

During the evaluation period, SSB originated small business loans through the following programs:

- Business Lending Express – Originated 889 loans totaling \$83.6 million.
- SBA (7a) – Originated 47 loans totaling \$7.7 million.

Partnerships

City of Concord DPA – The bank participates with the City of Concord on a downpayment assistance program. The first-time homebuyer program provides down payment and closing cost assistances up to \$10,000 to eligible home buyers. Eligible home buyers are individuals or filers that meet income limits set by HUD and are first time home buyers or have not owned a home within three years. Assistance, available to borrowers with income up to 80 percent AMI, is provided through a second mortgage in the form of a five-year forgivable loan with zero percent interest, up to \$10,000, which can be used for DPA. During the evaluation period, SSB originated one loan totaling \$10,000.

NCHFA - The bank participates with the NCHFA to offer the NC Home Advantage Conventional FHA Preferred Program. This involves a thirty-year fixed interest rate mortgage loan made in conjunction with a three percent down payment assistance loan secured by a second mortgage for the purchase of the

borrower's primary residence in NC. The minimum credit score for the borrower is 640. SSB is required to originate the first mortgage loan with NCHFA which has income limits based on county location and number of household members. If these criteria are met, the NCHFA makes down payment assistance funds available that will work with the bank's Buyers Advantage lending program. NCHFA also provides loan programs, with down payment assistance that can be up to five percent, while the conventional loan down payment as a percent. During the evaluation period, the bank originated nine loans totaling \$2 million with total down payment assistance of \$120,000.

NC Rural Economic Development Center – SSB participates in a SSBCI to originate small business loans. During the evaluation period, SSB participated in the granting of 27 loans totaling \$2.5 million.

NC Charlotte Robmart LLC - SSB participates in a SSBCI to originate small business loans. During the evaluation period, SSB participated in granting one loan totaling \$2.3 million.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Lending Test in the Raleigh-Durham-Cary MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. The weaker performance is due to weaker geographic and borrower lending distribution. Performance in the limited-scope AA had a neutral impact on the overall Lending Test rating.

Refer to Tables O through R in the state of NC section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in NC is rated Outstanding. Performance in the limited scope AA had a positive impact on the bank's overall Investment Test rating.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Wilmington MSA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full-Scope:										
Wilmington	0	0	34	3,252	34	52.3	3,252	35.6	0	0
Limited-Scope:										
Raleigh-Durham-Cary MSA	0	0	31	5,894	31	47.7	5,894	64.4	0	0
Total	0	0	65	9,146	65	100.0	9,146	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

Wilmington MSA

SSB made 34 investments and donations totaling \$3.3 million. Total investments and donations are equivalent to 9.1 percent of allocated tier 1 capital. There were no prior period investments or unfunded investment commitments.

Current period investments include one investment totaling approximately \$3.2 million and 33 grants totaling \$80,000. Grants were provided to 13 nonprofit organizations, primarily community-based nonprofit service organizations who provide services to small businesses and LMI residents in the AA.

Examples of qualified investments include:

- A \$3.2 million CMBS investment secured by a multi-family 144-unit apartment complex located in a low-income geography where 100 percent of the units are rented to LMI tenants residing in the AA.
- Six grants totaling \$15,500 to a non-profit organization who serves as an incubator and meeting space for other local nonprofit organizations to collaborate and address the needs of the AA in the areas of safe and affordable housing, health care, education, employment, and family support.
- Five grants totaling \$7,500 to support a community-based nonprofit service organization who mission is to serve homeless veterans and other homeless persons in the AA with food, shelter, healthcare, and other services geared towards LMI persons.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Investment Test in the Raleigh-Durham-Cary MSA is consistent with the bank's overall Outstanding performance under the Investment Test in the full-scope area.

SERVICE TEST

The bank's performance under the Service Test in NC is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Wilmington MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Full Scope											
Wilmington MSA	82.3	3	60.0	0	0	0	100.0	3.6	27.2	37.8	29.4
Limited Scope											
Raleigh-Durham-Cary MSA	17.7	2	40.0	0	50.0	0	50.0	6.1	16.5	35.3	40.1

Wilmington MSA

The bank has three branches in the AA, with none located in low-income geographies and none located in moderate-income geographies. The percentage of branches located in low-income geographies was significantly below the percentage of the population residing in these geographies, while the percentage of branches in moderate-income geographies was significantly below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has three ATMs in the AA, all of which are deposit-taking. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Wilmington MSA

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its deliver systems, particularly in low-and moderate-income geographies and/or to low-and moderate-income individuals. There were no branches opened or closed in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank provides a relatively high level of CD services.

Conclusions for Area Receiving a Full-Scope Review

Wilmington MSA

The bank provided a relatively high level of CD services in the Wilmington MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported a good number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to six different CD organizations totaling 75 hours during the evaluation period. SSB staff served on four boards or committees for organizations that provide community services targeted to LMI individuals. Of the 75 total hours, 61 hours were in a leadership role as a board or committee member.

Examples of these services:

- One employee provided 39 service hours as a board member of an organization whose mission is to fund a homeless shelter serving 100 percent LMI individuals.
- Seven employees provided 12 service hours of financial education to LMI students in an after-school program at schools where majority of students qualified for free or reduced lunch.
- One employee provided 11 hours as a board member of an organization that provides permanent, affordable housing and supportive services to homeless individuals, including case management, transportation, and life skills training.

Conclusions for Area Receiving a Limited-Scope Review

Based on a limited-scope review, the bank's performance under the Service Test in the Raleigh-Durham-Cary MSA is stronger with performance in the full-scope AA; the bank has one branch in a moderate-income geography which exceeds the percentage of the population residing in these geographies. CD services in the limited-scope AA is consistent with the full-scope AA. Performance in the limited-scope AAs had a minimal impact on the overall Service Test rating.

State Rating

State of SC

CRA rating for the State of SC: Satisfactory

The Lending Test is rated: Outstanding

The Investment Test is rated: Needs to Improve

The Service Test is rated: High Satisfactory

The major factors that support this rating include:

- The bank exhibits good geographic distribution of loans in its AAs.
- The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were responsive in addressing community economic development and credit needs. SSB had a poor level of qualified CD investments and grants.
- SSB's branch and ADS were accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in SC

SSB has eight AAs within the state of SC. These AAs include the Charleston-North Charleston MSA, Columbia-Orangeburg-Newberry CSA, Florence MSA, Greenville-Anderson MSA, Hilton Head Island-Bluffton MSA, Spartanburg MSA, Sumter MSA, and SC Non-MSA. SSB's Charleston-North Charleston MSA is comprised of the whole counties of Berkeley, Charleston, and Dorchester; the Columbia-Orangeburg-Newberry CSA is comprised of the whole counties of Fairfield, Lexington, Newberry, Orangeburg, Richland, and Saluda; the Florence MSA is comprised of the whole counties of Darlington and Florence; the Greenville-Anderson MSA is comprised of the whole counties of Anderson, Greenville, Greenwood, Laurens, Pickens, Oconee, and Union; the Hilton-Head Island-Bluffton MSA is comprised of the whole counties of Beaufort and Jasper; the Spartanburg MSA is comprised of the whole county of Spartanburg; the Sumter MSA is comprised of the whole county of Sumter; and the SC Non-MSA is comprised of the whole counties of Abbeville, Bamberg, Colleton, and Georgetown. - SSB left Fairfield County on August 30, 2022.

In this evaluation, the Charleston-North Charleston MSA, Greenville-Anderson MSA and Hilton-Head Island-Bluffton MSA will receive full-scope reviews.

Based on the FDIC Market Share data as of June 30, 2023, SSB had an 8.5 percent deposit market share in the state of SC and is ranked 5th out of 76 financial institutions doing business in the state. The deposits account for 24.6 percent of the bank's total deposits. Primary competitors include Wells Fargo Bank, NA, which ranked 1st in deposit market share (15.5 percent) with 108 offices, Bank of America, NA, which ranked 2nd in deposit market share (14.8 percent) with 67 offices, and Truist Bank, which ranked 3rd in deposit market share (11.7 percent) with 98 offices. These competitors have deposits totaling \$52.3 billion, representing 41.9 percent total deposit market share.

See appendix A for a listing of all of SSB's AAs.

Charleston-North Charleston MSA

The following tables provide a summary of the demographics, including housing and business information for the Charleston-North Charleston MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charleston-North Charleston MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	156	9.0	22.4	37.8	28.2	2.6
Population by Geography	712,232	6.7	21.4	41.9	29.2	0.8
Housing Units by Geography	309,113	6.7	21.2	40.2	31.1	0.8
Owner-Occupied Units by Geography	173,999	3.3	19.1	42.4	34.9	0.3
Occupied Rental Units by Geography	94,905	12.5	24.4	40.5	21.3	1.4
Vacant Units by Geography	40,209	8.1	22.9	29.9	37.5	1.7
Businesses by Geography	60,837	7.6	18.6	34.6	37.6	1.5
Farms by Geography	1,486	3.4	18.8	44.9	32.4	0.5
Family Distribution by Income Level	173,525	22.6	16.7	19.9	40.8	0.0
Household Distribution by Income Level	268,904	24.5	15.7	17.6	42.2	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$65,558	Median Housing Value			\$241,873
			Median Gross Rent			\$1,021
			Families Below Poverty Level			11.4%
<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: Charleston-North Charleston MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	178	7.3	27.0	31.5	31.5	2.8
Population by Geography	799,636	6.0	25.0	33.8	34.3	0.9
Housing Units by Geography	339,240	6.4	26.0	31.8	34.3	1.5
Owner-Occupied Units by Geography	200,413	4.6	22.8	33.6	38.4	0.6

Occupied Rental Units by Geography	99,534	9.4	33.9	31.4	23.9	1.4
Vacant Units by Geography	39,293	8.4	22.9	23.5	39.2	6.0
Businesses by Geography	152,151	6.7	22.7	28.1	41.4	1.2
Farms by Geography	3,281	6.1	27.2	33.2	32.9	0.6
Family Distribution by Income Level	189,753	22.1	17.2	20.1	40.6	0.0
Household Distribution by Income Level	299,947	24.0	16.1	17.9	42.0	0.0
Median Family Income MSA - 16700 Charleston-North Charleston, SC MSA		\$82,122	Median Housing Value			\$313,553
			Median Gross Rent			\$1,233
			Families Below Poverty Level			8.2%
<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>						

The Charleston-North Charleston MSA includes all of Berkeley, Charleston, and Dorchester counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 178 CTs of which 13 are low-income, 48 are moderate-income, 56 are middle-income, 56 are upper-income, and five have not been assigned an income classification. The percentage of households living below the poverty level is 8.2 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 8.3 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Charleston-North Charleston MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 4.1 percent compared to 2.5 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of SC, which was 3.0 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are a highly diverse economy with a modern port, strong demographics, robust net migration, and aerospace products and parts manufacturing hub serving Boeing's production line. The leading industries by comparative employment and income include government, professional and business services, and leisure and hospitality services. Major employers include Joint Base Charleston, Medical University of SC, and Roper St. Frances Healthcare.

One method of assessing housing affordability in the Charleston-North Charleston MSA is to compare the average adjusted median family income to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$101,300. According to Realtor.com data, the median housing value in the AA is \$524,000 and \$500,000 in January 2021 and December 2023, respectively, reflecting a 4.6 percent decrease. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making

\$50,650 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$235,879 mortgage with a payment of \$1,266 per month. A moderate-income borrower making \$81,040 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$377,407 mortgage with a payment of \$2,026 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted a community contact working in the AA. The contact was from the City of Charleston. The following needs were identified within the AA:

- Improving affordable housing options.
- Improving capacity of area housing and community service providers.
- Financial counseling in LMI populations.

Greenville-Anderson MSA

The following tables provide a summary of the demographics, including housing and business information for the Greenville-Anderson MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Greenville-Anderson MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	302	7.3	24.2	42.4	26.2	0.0
Population by Geography	1,316,716	4.9	21.4	43.4	30.3	0.0
Housing Units by Geography	575,129	5.3	22.0	43.9	28.9	0.0
Owner-Occupied Units by Geography	344,634	2.7	18.0	45.7	33.6	0.0
Occupied Rental Units by Geography	157,880	9.9	28.7	40.3	21.1	0.0
Vacant Units by Geography	72,615	7.6	26.3	42.7	23.3	0.0
Businesses by Geography	87,550	4.8	17.9	39.9	37.3	0.0
Farms by Geography	2,614	2.1	17.4	49.4	31.1	0.0
Family Distribution by Income Level	341,920	22.2	17.1	18.7	42.0	0.0
Household Distribution by Income Level	502,514	24.4	15.8	16.8	43.0	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA		\$58,097	Median Housing Value			\$134,646
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$53,959	Median Gross Rent			\$722
Median Family Income Non-MSAs - SC		\$44,609	Families Below Poverty Level			13.1%
<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: Greenville-Anderson MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	366	5.2	22.7	44.5	26.2	1.4
Population by Geography	1,431,394	4.0	18.9	45.5	30.7	0.9
Housing Units by Geography	608,454	4.2	20.0	45.9	29.1	0.9
Owner-Occupied Units by Geography	377,479	2.5	15.9	48.1	32.9	0.5
Occupied Rental Units by Geography	164,161	7.7	27.3	40.9	22.4	1.7
Vacant Units by Geography	66,814	4.9	24.6	46.0	23.7	0.9
Businesses by Geography	183,526	3.4	16.5	39.9	39.1	1.1
Farms by Geography	5,371	2.5	17.1	48.7	31.0	0.7
Family Distribution by Income Level	361,491	20.4	17.9	20.2	41.5	0.0
Household Distribution by Income Level	541,640	23.6	16.3	17.6	42.5	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA		\$71,958	Median Housing Value			\$171,437
Median Family Income MSA - 43900 Spartanburg, SC MSA		\$65,214	Median Gross Rent			\$862
			Families Below Poverty Level			9.7%
<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>						

The Greenville-Anderson MSA includes all of Anderson, Greenville, Greenwood, Laurens, Pickens, Oconee, Spartanburg, and Union counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 366 CTs of which 19 are low-income, 83 are moderate-income, 163 are middle-income, 96 are upper-income, and five have not been assigned an income classification. The percentage of households living below the poverty level is 9.7 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 10.3 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Greenville-Anderson MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 3.8 percent compared to 2.8 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of SC, which was 3.0 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, AA strengths are low unionization rate and business costs which encourage investment, Clemson University helps stabilize employment and draw investors, and expanding population and improving educational attainment. The leading industries by comparative employment and income include professional and business services, government, and

manufacturing. Major employers include Prisma Health, Michelin North America, Clemson University, and Milliken & Company.

One method of assessing housing affordability in the Greenville-Anderson MSA is to compare the average adjusted median family income to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$84,000. According to Realtor.com data, the median housing value in the AA is \$274,445 and \$359,000 in January 2021 and December 2023, respectively, reflecting a 30.8 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$42,000 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$195,596 mortgage with a payment of \$1,050 per month. A moderate-income borrower making \$67,200 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$312,953 mortgage with a payment of \$1,680 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted two community contacts working in the AA. The contacts were from a nonprofit family and children's charity and an Area Development organization. The following needs were identified within the AA:

- Construction of more affordable and workforce housing.
- Affordable small business financing.
- Marketing of financing opportunities for small businesses.

Hilton Head Island-Bluffton MSA

The following tables provide a summary of the demographics, including housing and business information for the Hilton Head Island-Bluffton MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Hilton Head Island-Bluffton MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	46	0.0	32.6	34.8	28.3	4.3
Population by Geography	197,969	0.0	36.4	43.6	20.0	0.0
Housing Units by Geography	104,587	0.0	29.6	40.5	29.8	0.0
Owner-Occupied Units by Geography	52,635	0.0	27.1	45.1	27.8	0.0
Occupied Rental Units by Geography	22,435	0.0	42.1	43.2	14.7	0.0
Vacant Units by Geography	29,517	0.0	24.7	30.4	45.0	0.0
Businesses by Geography	18,343	0.0	25.6	48.2	26.2	0.0
Farms by Geography	536	0.0	36.4	46.6	17.0	0.0
Family Distribution by Income Level	51,146	20.1	19.5	20.0	40.4	0.0

Household Distribution by Income Level	75,070	22.3	17.5	18.3	41.9	0.0
Median Family Income MSA - 25940 Hilton Head Island-Bluffton, SC MSA		\$63,345	Median Housing Value			\$292,927
			Median Gross Rent			\$1,026
			Families Below Poverty Level			9.7%
<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: Hilton Head Island-Bluffton MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	50	4.0	22.0	36.0	32.0	6.0
Population by Geography	215,908	3.6	22.1	50.0	23.4	0.9
Housing Units by Geography	113,293	3.1	18.3	44.5	34.0	0.0
Owner-Occupied Units by Geography	63,418	3.1	17.6	49.5	29.9	0.0
Occupied Rental Units by Geography	21,537	4.6	30.9	50.1	14.4	0.0
Vacant Units by Geography	28,338	2.1	10.4	29.2	58.3	0.0
Businesses by Geography	39,522	4.1	14.4	48.1	33.3	0.1
Farms by Geography	1,023	6.2	21.4	52.2	20.2	0.0
Family Distribution by Income Level	57,952	21.0	17.6	20.8	40.6	0.0
Household Distribution by Income Level	84,955	23.2	16.9	18.4	41.5	0.0
Median Family Income MSA - 25940 Hilton Head Island-Bluffton, SC MSA		\$79,770	Median Housing Value			\$335,941
			Median Gross Rent			\$1,270
			Families Below Poverty Level			7.3%
<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>						

The Hilton-Head Island-Bluffton MSA includes all of Beaufort and Jasper counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 50 CTs of which two are low-income, 11 are moderate-income, 18 are middle-income, 16 are upper-income, and three have not been assigned an income classification. The percentage of households living below the poverty level is 7.3 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

The bank made 3.9 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Hilton Head Island-Bluffton MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 3.7 percent compared to 2.8 percent in December 2023. The unemployment rate in the AA was lower than the overall rate for the state of SC,

which was 3.0 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are popular tourist destination, favorable migration trends, low cost of doing business, and high economic vitality. The leading industries by comparative employment and income include leisure and hospitality services, retail trade, and government. Major employers include Coastal Banking Co. Inc./CBC National Bank, EviCore Healthcare, BFG-Hilton Head, and Tico Manufacturing.

One method of assessing housing affordability in the Hilton Head Island-Bluffton MSA is to compare the average adjusted median family income to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$103,300. According to Realtor.com data, the median housing value in the AA is \$435,000 and \$571,908 in January 2021 and December 2023, respectively, reflecting a 31.5 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$51,650 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$240,536 mortgage with a payment of \$1,291 per month. A moderate-income borrower making \$82,640 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$384,858 mortgage with a payment of \$2,066 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted a community contact working in the AA. The contact was from an EDC. The following needs were identified within the AA:

- Small business financing.
- Loan products for LMI population.
- Retirement housing.

Scope of Evaluation in SC

For the state of SC, the Charleston-North Charleston MSA, Greenville-Anderson MSA, and Hilton-Head Island-Bluffton MSA were selected for analysis using full-scope procedures. The Charleston-North Charleston MSA and Greenville-Anderson MSAs were selected because these two AAs represent 56.2 percent of the rating area deposits, 52.1 percent of rating area offices, and 60.5 percent of rating area loans. These two AAs also represent 13.8 percent of the bank's total deposits, 14.5 percent of the bank's total offices, and 18.6 percentage of total bank loans. These factors indicate the bank is important to the AA. The Hilton-Head Island-Bluffton MSA was selected for analysis because the AA has not previously been reviewed.

We completed limited-scope reviews on the Columbia-Orangeburg-Newberry CSA, Florence MSA, Spartanburg MSA, Sumter MSA, and SC Non-MSA.

Ratings are primarily based on results of the full-scope areas. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SC

LENDING TEST

The bank's performance under the Lending Test in SC is rated Outstanding when taking into consideration the positive impact of CD lending and negative impact of performance in the limited-scope AAs.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Charleston-North Charleston MSA and Hilton Head Island-Bluffton MSA is excellent. Based on a full-scope review, the bank's performance in the Greenville-Anderson MSA is good.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs.

Number of Loans*							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope							
Charleston-North Charleston MSA	3,449	1,543	8	29	5,029	26.7	30.9
Greenville-Anderson MSA	3,941	2,314	9	20	6,284	33.4	25.3
Hilton Head Island-Bluffton MSA	1,444	886	0	9	2,339	12.4	11.2
Limited Scope							
Columbia-Orangeburg-Newberry CSA	1,565	1,577	72	45	3,259	17.3	17.1
Florence MSA	273	222	8	4	507	2.7	6.0
Sumter MSA	25	71	2	5	103	0.5	0.7
Spartanburg MSA	367	181	0	3	551	2.9	1.1
SC Non-MSA	442	295	13	16	766	4.1	7.6

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans* (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Full Scope							
Charleston-North Charleston MSA	1,530,578	244	2	47,280	1,578,104	35.8	30.9
Greenville-Anderson MSA	1,297,833	436	2	83,548	1,381,819	31.4	25.3
Hilton Head Island-Bluffton MSA	628,149	125	0	28,640	656,914	14.9	11.2
Limited Scope							

Columbia-Orangeburg-Newberry CSA	377,088	224	8	74,460	451,780	10.3	17.1
Florence MSA	46,789	24	1	8,694	55,508	1.3	6.0
Sumter MSA	3,889	5	0	6,744	10,639	0.2	0.7
Spartanburg MSA	120,720	41	0	8,816	129,577	2.9	1.1
SC Non-MSA	120,780	37	3	19,970	140,790	3.2	7.6

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Charleston-North Charleston MSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked third among 35 deposit banks with a market share of 13.3 percent placing SSB in the top ninth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 3rd out of 633 mortgage lenders with a market share of 3.0 percent, placing the bank in the first percentile of all mortgage lenders in the AA. The bank's HMDA market share is consistent with their deposit market share. The HMDA lending market share is far more competitive with 633 lenders versus only 35 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, stronger than its deposit market share.

According to the 2022 Peer Small Business data, the bank ranked 16th out of 127 small business lenders with 1.2 percent market share, placing it in the thirteenth percentile of small business lenders in the Charleston-North Charleston MSA. The bank's small business lending market share is weaker than the deposit market share in the Charleston-North Charleston MSA. The top five small business lending competitors are four nationwide lenders and one credit card bank.

Greenville-Anderson MSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 7th among 41 deposit banks with a market share of 6.4 percent placing SSB in the top seventeenth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 4th out of 668 mortgage lenders with a market share of 2.6 percent, placing the bank in the first percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share. The HMDA lending market share is far more competitive with 668 lenders versus only 41 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share. This is due to the smaller number of depository banks in the AA and the bank's percentile ranking and is considered excellent performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 12th out of 141 small business lenders with 1.8 percent market share, placing it in the ninth percentile of small business lenders in the AA. The bank's small business lending market share is weaker than the deposit market share in the Greenville-Anderson MSA. The small business lending market share is more competitive with 141 lenders versus only 41 deposit taking banks. The bank's market share ranking for small business lending, relative to the number of small business lenders in the MSA, is greater than its deposit market share. This is due to the

number of depository banks in the AA and the bank's percentile ranking and is considered good performance given the number of competitors in the market. The top five small business lending competitors are four nationwide lenders and once credit card bank.

Hilton Head Island-Bluffton MSA

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 3rd among 20 deposit banks with a market share of 14.2 percent placing SSB in the top fifteenth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 3rd out of 535 mortgage lenders with a market share of 5.0 percent, placing the bank in the first percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share. The HMDA lending market share is far more competitive with 535 lenders versus only 20 deposit-taking banks. The bank's market share ranking for home mortgage lending, relative to the number of mortgage lenders in the AA, is stronger than its deposit market share. This is due to the smaller number of depository banks in the AA and the bank's percentile ranking and is considered excellent performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 11th out of 92 small business lenders with 2.7 percent market share, placing it in the twelfth percentile of small business lenders in the AA. The bank's small business lending market share is weaker than the deposit market share in the Hilton Head Island-Bluffton MSA. The small business lending market share is more competitive with 92 lenders versus only 20 deposit-taking banks. The bank's market share ranking for small business lending, relative to the number of small business lenders in the AA, is greater than its deposit market share. This is due to the number of depository banks in the AA and the bank's percentile ranking and is considered good performance given the number of competitors in the market. The top five small business lending competitors are four nationwide lenders and once credit card bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits good geographic distribution of loans in its AAs.

Home Mortgage Loans

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

Charleston-North Charleston MSA

2021

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and equal to the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and below the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and exceeded the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Greenville-Anderson MSA2021

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans was well below the percentage of owner-occupied housing units in low-income geographies and below the aggregate. The proportion of loans was well below the percentage of owner-occupied housing units in moderate-income geographies and below the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was adequate. The proportion of loans below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Hilton Head Island-Bluffton MSA2021

The geographic distribution of the bank's home mortgage lending was good. There were no low-income geographies in the AA. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and exceeded the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was good. The proportion of loans was below the percentage of owner-occupied housing units in low-income geographies and exceeded the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and exceeded the aggregate.

Small Loans to Businesses

Refer to Table Q in the state of SC section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

Charleston-North Charleston MSA2021

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The

proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was below the percentage of businesses in low-income geographies and near to the aggregate. The proportion of loans was near to the percentage of businesses in moderate-income geographies and exceeded the aggregate.

Greenville-Anderson MSA

2021

The geographic distribution of the bank's small loans to businesses was good -. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was below the percentage of businesses in moderate-income geographies and near to the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was good . The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was below the percentage of businesses in moderate-income geographies and near to the aggregate.

Hilton Head Island-Bluffton MSA

2021

The geographic distribution of the bank's small loans to businesses was excellent. There were no Low-income geographies in the AA. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was excellent. The proportion of loans exceeded the percentage of businesses in low-income geographies and the aggregate. The proportion of loans exceeded the percentage of businesses in moderate-income geographies and the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a good distribution of loans among individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

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

Charleston-North Charleston MSA

2021

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was significantly below the percentage of low-income families and exceeded the aggregate. The proportion of loans was near to the percentage of moderate-income families and the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and exceeded the aggregate. The proportion of loans was near to the percentage of moderate-income families and the aggregate.

Greenville-Anderson MSA

2021

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and below the aggregate. The proportion of loans was below the percentage of moderate-income families and the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and near to the aggregate. The proportion of loans was near to the percentage of moderate-income families and below the aggregate.

Hilton Head Island-Bluffton MSA

2021

The borrower distribution of the bank's home mortgage lending was adequate. The proportion of loans was significantly below the percentage of low-income families and exceeded the aggregate. The proportion of loans was well below to the percentage of moderate-income families and near to the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was good. The proportion of loans was well below the percentage of low-income families and near to the aggregate. The proportion of loans was near to the percentage of moderate-income families and below the aggregate.

Small Loans to Businesses

Refer to Table R in the state of SC section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination of small loans to businesses.

Charleston-North Charleston MSA2021

When determining the conclusion in this AA, we considered the fact that 68.0 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 71.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and below the aggregate.

Greenville-Anderson MSA2021

When determining the conclusion in this AA, we considered the fact that 35 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 52.4 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and below the aggregate.

Hilton Head Island-Bluffton MSA2021

When determining the conclusion in this AA, we considered the fact that 44.9 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 50.8 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and below the aggregate.

Community Development Lending

The bank is a leader in making CD loans. CD lending had a positive impact on the lending test conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Charleston-North Charleston MSA

The bank is a leader in making CD loans in the AA. SSB originated 29 loans totaling \$47.3 million, which represents 14.1 percent of allocated tier 1 capital. The bank's CD lending in the AA had a positive impact on the lending test conclusion in the AA. CD loan originations exhibited excellent responsiveness to the credit and community needs in the AA. The loans primarily supported affordable housing, community services, and economic development within the AA.

CD loans originated include:

- A \$4.1 million loan for a General Obligation Improvement and Refund Bond to a school located in a moderate-income CT where 100 percent of students are LMI. All schools in the district have 100 percent enrollment in the free and reduced lunch program.

- A \$1.9 million loan for improvements to a 48-unit, multi-family affordable housing complex located in a moderate-income CT.
- A \$1.6 million SBA loan to purchase and renovate a child-care facility located in a moderate-income CT and FEMA disaster area. The loan allows the borrower to expand the business by retaining and/or creating 26 permanent jobs.

Greenville-Anderson MSA

The bank is a leader in making CD loans in the AA. SSB originated 20 loans totaling \$83.5 million which represents 30.4 percent of allocated tier 1 capital. The bank's CD lending in the AA had a positive impact on the lending test conclusion in the AA. CD loan originations exhibited excellent responsiveness to the credit and community needs in the AA. The loans primarily supported affordable housing, community services, and economic development within the AA.

CD loans originated include:

- An \$8 million loan renewal to an agency that provides management services to veterans. The facility is located in a moderate-income CT, SC Opportunity Zone, and FEMA disaster area.
- A \$2.4 million loan to renovate a 56-unit affordable housing complex located in a low-income CT with below market rental rates.
- A \$2.2 million SBA loan to purchase an existing cabinetry and millwork business located in a moderate-income CT. The loan allows continued employment of 15 employees.

Hilton Head-Island-Bluffton MSA

The bank is a leader in making CD loans in the AA. SSB originated nine loans totaling \$28.6 million which represents 23.4 percent of allocated tier 1 capital. The bank's CD lending in the AA had a positive impact on the lending test conclusion in the AA. CD loan originations exhibited excellent responsiveness to the credit and community needs in the AA. The loans supported affordable housing, community services, and economic development within the AA.

CD loans originated include:

- A \$5.4 million loan to build an eight-bed hospice facility located in a moderate-income CT and state designated Promise Zone, which will create permanent jobs.
- A \$5 million loan renewal for operating capital to a small, family-owned tomato farming and canning business located in a FEMA disaster area. This business supports other local farms by purchasing their over ripe produce.
- A \$4.7 million loan to purchase a 56-unit multi-family affordable housing complex located in a moderate-income CT. Rent restrictions for 46 units is 50 percent below AMI and below 60 percent AMI for 10 units.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve the state of SC credit needs to both consumers and small business owners. Refer to the “Description of the Bank” section for additional details regarding mortgage loan programs.

Mortgage Loan Programs

During the evaluation period, SSB originated mortgage loans through the following programs:

- Buyers Advantage – Originated 593 loans totaling \$114 million.
- VA – Originated 195 loans totaling \$64 million.
- FHA – Originated 197 loans totaling \$47 million.
- Community Advantage – Originated 57 loans totaling \$12 million.
- HomeReady – Originated 49 loans totaling \$9 million.
- Home Possible – Originated 11 loans totaling \$3 million.
- Opportunity Advantage – Originated 65 loans totaling \$813,000.
- FHLB – Originated one loan totaling \$8,000 through a FHLB lending program.
- USDA – Originated 29 loans totaling \$6,000.

Small Business Programs

During the evaluation period, SSB originated small business loans through the following programs:

- Business Lending Express – Originated 1,777 loans totaling \$150.5 million.
- SBA (7a) – Originated 17 loans totaling \$2.9 million.

Partnerships

SC Housing Palmetto Home Advantage – SSB participates in the Palmetto Home Advantage program. The program offers Conventional, FHA, VA, and USDA loan options for first-time, move-up, and repeat buyers with no first-time home buyer requirements for new and existing homes across all 46 counties in SC. All program options require a minimum 640 credit score, have no sale price limits, and follow all applicable insurer guidelines with a borrower income limit of \$127,200. Income limit is not dependent on family size and is not based on total household income. The program offers forgivable down payment assistance of zero percent, three percent, or four percent of the loan amount with a zero monthly payment. Conventional financing options up to 97 percent LTV on one-unit properties and up to 95 percent LTV on two-unit properties with no sales price limits and follows all applicable insurer guidelines for Fannie Mae’s HFA Preferred and Freddie Mac’s HFA Advantage programs. DPA is

available and forgivable with a zero percent interest rate and 10-year term. Different interest rates apply based on the DPA option. During the evaluation period, SSB originated seven loans totaling \$58,000.

Business Development Corporation (BDC) of SC – SSB has several relationships with this organization whose mission is to provide financing for small businesses unable to obtain traditional bank loans and assist in creating new jobs for local citizens. Highlights of this relationship during the evaluation period include:

- Lead Lender: Served as the lead lender on a \$27.5 million member LOC participation extended to BDC of SC by BDC's 36 Member Banks at a below-market rate unsecured line priced at prime minus one-half percent.
- Working Capital LOC: SSB maintained an unsecured LOC extended to BDC in the amount of \$4 million at a below-market rate of prime minus one-quarter percent.
- Member LOC for BDC Loan Programs: SSB was a participant in the Member LOC extended to BDC in the amount of \$1.5 million at prime minus one-half percent.
- Loan Referrals:
 - SSBCI - a nearly \$10 billion program to support small businesses and entrepreneurship in communities across the U.S. by providing capital and technical assistance to promote small business stability, growth, and success. SSBCI represent a transformation investment in American Small Businesses and is expected to catalyze up to \$10 of private investment for every \$1 of SSBCI Capital Program funding to increase access to capital small businesses and entrepreneurs, including those in underserved communities. The program was reauthorized and expanded under the American Rescue Plan Act. The SSBCI Capital Program provides funds to states for jurisdictions to create programs that offer funding to small businesses and entrepreneurs through equity/venture capital, loan participation, loan guarantee, collateral support, and capital access programs. During the evaluation period, SSB referred 23 loans totaling \$5.7 million to a business development corporation for consideration in the SSBCIC loan program.
 - SBA 504 Loan Program – a SBA program that provides long-term, fixed rate financing for major fixed assets that promote business growth and job creation. During the evaluation period, SSB referred two loans with project financing totaling \$4.1 million to a CDC for consideration in the SBA 504 loan program.
 - SBA 7(a) Loan Program – a SBA, primarily business loan, program that provides loan guaranties to lenders that provide financial help to small businesses with special requirements. During the evaluation period, SSB referred two loans totaling \$522,000 for this SBA program.

In addition to the above small business loans, during the evaluation period, SSB participated in the granting of 20 small business loans totaling \$3.0 million.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Florence MSA is consistent with the overall performance in the state under the Lending Test. Performance in the Columbia-Orangeburg-Newberry CSA, Spartanburg MSA, Sumter MSA and SC Non-MSA were weaker than the overall performance in the state. The weaker performance is due to weaker geographic and borrower lending distribution. Performance in the limited-scope AAs had a negative impact on the overall Lending Test rating.

Refer to Tables O through R in the state of SC section of appendix D for the facts and data that support these conclusions.

INVESTMENT TEST

The bank's performance under the Investment Test in SC is rated Needs to Improve.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Greenville-Anderson MSA is adequate and the bank's performance in the Charleston -North Charleston MSA and Hilton Head Island-Bluffton MSA is poor.

The bank has a poor level of qualified CD investments and grants, but not in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits adequate responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
	Full-Scope									
Charleston-North Charleston MSA	0	0	97	1,520	97	26.9	1,520	11.7	0	0
Greenville-Anderson MSA	1	2,048	63	1,796	64	17.8	3,844	29.4	0	0
Hilton Head Island-Bluffton MSA	0	0	24	483	24	6.7	483	3.7	0	0
Limited-Scope										
Columbia-Orangeburg-Newberry CSA	0	0	99	3,621	99	27.5	3,621	27.7	0	0
Florence MSA	0	0	13	2,430	13	3.6	2,430	18.6	0	0
SC Non-MSA	0	0	45	86	45	12.5	86	0.7	0	0
Spartanburg MSA	0	0	12	996	12	3.3	996	7.6	0	0
Sumter MSA	0	0	6	78	6	1.7	78	0.6	0	0
Total	1	2,048	359	11,010	360	100.0	13,058	100.0	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

Charleston-North Charleston MSA

SSB made 97 current period investments and donations totaling \$1.5 million. Total investments and donations are equivalent to 0.5 percent of allocated tier 1 capital. There were no prior period investments or unfunded investment commitments.

Current period investments consisted of three investments totaling \$1.1 million and 94 grants totaling \$439,000. The grants were provided to 45 nonprofit organizations who provide services to LMI and small businesses in the AA.

Examples of qualified investments include:

- Three current period investments totaling \$1.1 million consisting of a pool of MBS whereby the underlying mortgage loans were to LMI borrowers residing in the AA.
- Six grants totaling \$80,000 to a nonprofit community economic development organization whose mission is to serve low-wealth communities with economic opportunities by providing access to affordable housing, capital for small business and minority-owned businesses and workforce development training.
- Six grants totaling \$11,250 to two community-based affordable housing nonprofit organizations in the AA whose mission is to provide affordable housing and financial literacy education targeted to LMI individuals residing in the AA.

Greenville-Anderson MSA

SSB made 64 investments and donations totaling \$3.8 million. Total investments and donations are equivalent to 1.4 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments include two investments totaling \$1.6 million and 61 grants totaling \$208,000. Additionally, the AA benefited from the ongoing impact of one prior period investment with an outstanding balance of \$2.0 million. Grants were provided to 33 nonprofit organizations who provide services to LMI and small businesses in the AA.

Examples of qualified investments include:

- Two current period investments totaling \$1.6 million consisting of an MBS pool whereby the underlying mortgage loans were to LMI individuals residing in the AA.
- Five grants totaling \$32,000 to support a CDFI whose mission is to provide affordable financial products and services to promote economic growth in underserved neighborhoods and communities through affordable housing and homeownership assistance and loans for minority and small businesses to create and retain jobs for LMI individuals.
- Three grants totaling \$4,000 to support a nonprofit community service organization whose mission is to serve low-income and uninsured residents in the AA with free medical, dental, vision and mental health services.

Hilton Head Island-Bluffton MSA

SSB made 24 investments and donations totaling \$483,000. Total investments and donations are equivalent to 0.4 percent of allocated tier 1 capital. There were no prior period investments or unfunded investment commitments.

Current period investments include three qualified investments totaling \$442,000 and 21 grants totaling \$41,000.

SSB had 24 qualified investments totaling \$483,000 with current period investments totaling \$442,000 and grants totaling \$41,000 which is equivalent to 0.40 percent of allocated tier 1 capital. There were no prior period or unfunded investment commitments at the end of the evaluation period. Grants were made to nine nonprofit organizations who provide services to LMI residents of the AA.

Examples of qualified investments include:

- Three investments totaling \$442,000 consisting of an MBS pool whereby the underlying mortgage loans were to LMI individuals residing in the AA.
- Five grants totaling \$15,500 to two nonprofits organizations operating in the AA in separate counties whose mission is to provide after school and summer camp programs for at-risk youth.
- Six grants totaling \$11,000 to support a nonprofit organization's legal assistance program targeted to low-income individuals and families residing in the AA. Services offered include legal matters relative to family law, housing protections, and future planning documents.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Florence MSA and the Spartanburg MSA was stronger than the bank's overall performance under the Investment Test in the full-scope AAs. Stronger performance was due to higher levels of investments as a percentage of allocated tier 1 capital. The bank's performance in the Columbia-Orangeburg-Newberry CSA, and Sumter MSA was consistent with the bank's overall performance under the Investment Test in the full-scope AAs. The bank's performance in the SC Non-MSA was weaker than the bank's overall performance under the Investment Test. Weaker performance was due to a smaller percentage of CD investments and grants compared to allocated tier 1 capital. Performance in limited scope AAs had a neutral impact on the bank's overall Investment Test rating.

SERVICE TEST

The bank's performance under the Service Test in SC is rated High Satisfactory.

Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Charleston-North Charleston MSA is good; the bank's performance in the Greenville-Anderson MSA is adequate; and the bank's performance in the Hilton-Head Island-Bluffton MSA is good.

Retail Banking Services

Service delivery systems are accessible to geographies and individuals of different income levels in the bank's AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits			Branches				Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography*			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Full Scope											
Charleston-North Charleston MSA	30.9	18	26.1	5.6	27.8	33.3	33.3	6.0	25.0	33.8	34.3
Greenville-Anderson MSA	25.3	12	17.4	0	8.3	41.7	50.0	4.0	18.9	45.5	30.7
Hilton Head Island-Bluffton MSA	11.2	8	11.6	0	37.5	37.5	25.0	3.6	22.1	50.0	23.4
Limited Scope											
Columbia-Orangeburg CSA	17.1	6	10.1	0	33.3	16.7	50.0	3.6	21.9	41.5	30.2
Florence MSA	6.0	5	7.2	0	20.00	80.0	0	2.3	23.7	44.0	29.9
Sumter MSA	0.7	1	1.4	0	0	0	100.0	3.6	20.0	56.1	20.2
SC Non-MSA	7.6	1	1.4	0	100.0	0	0	0.0	19.6	57.8	20.3
Spartanburg MSA	1.1	17	24.6	5.9	11.8	52.9	29.4	6.0	25.0	33.8	34.3

*Remaining percentages represent geographies where income information was not available

Charleston-North Charleston MSA

The bank has 18 branches in the AA, with one located in a low-income geography and five located in moderate-income geographies. The percentage of branches located in low-income geographies is near to the percentage of the population residing in these geographies, the percentage of branches located in moderate-income areas exceeds the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has 24 ATMs in the AA, of which 21 are deposit-taking. ATMs are located at branches, including LMI geographies, and standalone ATMs at retail locations. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Greenville-Anderson MSA

The bank has 12 branches in the AA, with none in low-income geographies and one in a moderate-income geography. The percentage of branches located in low-income geographies was below the percentage of the population residing in these geographies, the percentage of branches in moderate-income areas was also below the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has 12 ATMs in the AA, of which four are deposit-taking. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Hilton-Head Island-Bluffton MSA

The bank has eight branches in the AA, with none located in low-income geographies and three located in moderate-income geographies. The percentage of branches located in low-income geographies was below the percentage of the population residing in these geographies, while the percentage of branches located in moderate-income areas exceeds the percentage of the population residing in these geographies.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

The bank complements its traditional service delivery methods in the AA with certain ADS, such as deposit-taking ATMs, mobile banking, and online banking. The bank has nine ATMs in the AA, of which eight are deposit-taking. No weight was placed on these ADS, as no data was available to determine the impact on, or usage by, LMI individuals.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upper
Full Scope						
Charleston-North Charleston MSA	0	2	0	0	-1	-1
Greenville-Anderson MSA	0	0	0	0	0	0
Hilton-Head Island-Bluffton MSA	0	0	0	0	0	0
Limited Scope						
Columbia- Orangeburg CSA	0	1	-1	0	0	0
Florence MSA	0	0	0	0	0	0
Sumter MSA	0	0	0	0	0	0
SC Non-MSA	0	1	0	0	-1	0
Spartanburg MSA	0	0	0	0	0	0

Charleston-North Charleston MSA

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its deliver systems, particularly in LMI geographies and/or LMI individuals. There were two branches closed during the evaluation period, one in a middle-income geography and one in an upper-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Greenville-Anderson MSA

There were no branches opened or closed in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Hilton-Head Island-Bluffton MSA

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its deliver systems, particularly in LMI geographies and/or to LMI individuals. There were no branches opened or closed in the AA during the evaluation period.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Conclusions for Areas Receiving Full-Scope Reviews

Charleston-North Charleston MSA

The bank provided an excellent level of CD services in the Charleston-North Charleston MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 21 different CD organizations totaling 229 hours over the evaluation period. SSB staff served on 14 boards or committees for organizations that provide community services targeted to LMI individuals. Of the 229 total hours, 175 hours were in a leadership role as a board or committee member.

Examples of these services:

- An employee provided 36 service hours on the board and committees of an organization committed to improving the quality of life for LMI families by advancing community economic development within their state.
- Three employees provided 27 service hours of financial education to youth at a school where 100 percent of students qualify for free or reduced lunch.
- One employee provided 11 service hours on the board and fundraising committee of a venture capital CDFI that invests in and supports small businesses.

Greenville-Anderson MSA

The bank provided an excellent level of CD services in the Greenville-Anderson MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to 11 different CD organizations totaling 177 hours during the evaluation period. SSB staff served on nine boards or committees of organizations that provide community services targeted to LMI individuals. Of the 177 total hours, 93 hours were in a leadership role as a board or committee member.

Examples of these services:

- Eight employees provide 82 service hours to support a financial literacy program for students enrolled in an early college program. The organization works to support students at 32 schools in the state, where 61 percent of students live in poverty. The organization helps students graduate and succeed in life.
- One employee provided 65 service hours as the fundraising chair of an organization that provides home repairs to senior citizens, sends LMI children to camp and provides scholarships to local high school students.
- One employee provided five service hours on the board of an organization that promotes sustainable CD within distressed communities in the state.

Hilton-Head Island-Bluffton MSA

The bank provided an excellent level of CD services in the Hilton-Head Island-Bluffton MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to nine different CD organizations totaling 88 hours during the evaluation period. SSB staff served on nine boards or committees of organizations that provide community services targeted to LMI individuals. Of the 88 total hours, 70 hours were in a leadership role as a board or committee member.

Examples of these services:

- One employee provided 18 service hours of technical assistance by serving as a program facilitator and mentor to start-up, minority-owned small businesses, and entrepreneurs, a majority of which were negatively impacted by the COVID pandemic.
- One employee provided 11 service hours on an affordable housing committee that is tasked with assisting and advising the town council on the establishment of affordable housing criteria for town-sponsored affordable housing development projects and initiatives as well as defining the town's affordable housing goals, guidelines, and policies, and funding mechanisms.

- One employee provided eight service hours as a board member to an organization that provides scholarships to LMI students in the community.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the following limited scope AAs is weaker than the performance in the full-scope AAs: Columbia-Orangeburg-Newberry CSA, Florence MSA, Sumter MSA, Spartanburg MSA, and SC Non-MSA. There are no branches located in low-income geographies in these AAs, which is below the percent of the population in those geographies. However, it was noted that the population in each of these low-income geographies is small, at less than four percent. CD services in the limited-scope AAs is consistent with the full-scope AAs, except for the SC Non-MSA, where CD services are weaker than the performance in the full-scope AAs. Performance in the limited scope AAs had a neutral impact on the overall Service Test rating.

State Rating

State of VA

CRA rating for the State of VA: Satisfactory

The Lending Test is rated: Low Satisfactory

The Investment Test is rated: Outstanding

The Service Test is rated: Low Satisfactory

The major factors that support this rating include:

- The bank exhibits poor geographic distribution of loans in its AA.
- The bank exhibits poor distribution of loans among individuals of different income levels and businesses of different sizes.
- The bank is a leader in originating CD loans which had a positive impact on the bank's overall lending test rating.
- Qualified investments were effective and responsive in addressing community economic development and credit needs. SSB had an excellent level of qualified CD investments and grants.
- SSB's branch distribution, supported with ADS were reasonably accessible to geographies and individuals of different incomes and responsive in helping SSB provide services across the community.
- SSB is a leader in providing CD services, consistent with its capacity and expertise to conduct these activities. CD services were effective and responsive in addressing community needs.

Description of Bank's Operations in VA

SSB has one AA within the state of VA. The AA includes the Richmond MSA. The Richmond MSA is comprised of the whole counties of Chesterfield, Hanover, Henrico, and Richmond City.

In this evaluation, the Richmond MSA will receive a full-scope review.

Based on the FDIC Market Share data as of June 30, 2023, SSB had a 0.2 percent deposit market share in the state of VA and is ranked 50th out of 113 financial institutions doing business in the state. The deposits account for 0.6 percent of the bank's total deposits. Primary competitors include Capital One, NA, which ranked 1st in deposit market share (18.4 percent) with 26 offices, Truist Bank, which ranked 2nd in deposit market share (16.8 percent) with 265 offices, and Bank of America, NA, which ranked 3rd in deposit market share (15.3 percent) with 104 offices. These competitors have deposits totaling \$153.2 billion, representing 50.5 percent total deposit market share.

See appendix A for a listing of all SSB AAs.

Richmond MSA

The following tables provide a summary of the demographics, including housing and business information for the Richmond MSA.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Richmond MSA (2021)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	224	12.5	21.9	33.0	31.7	0.9
Population by Geography	962,115	9.2	20.7	34.7	35.1	0.4
Housing Units by Geography	398,579	9.7	21.7	34.7	33.8	0.1
Owner-Occupied Units by Geography	234,715	4.5	15.8	38.1	41.5	0.0
Occupied Rental Units by Geography	131,358	17.4	30.5	29.8	22.2	0.2
Vacant Units by Geography	32,506	16.0	28.3	29.8	25.5	0.4
Businesses by Geography	126,019	6.7	21.3	31.9	39.8	0.3
Farms by Geography	2,613	3.4	15.5	38.9	42.1	0.0
Family Distribution by Income Level	232,178	20.1	17.4	19.9	42.7	0.0
Household Distribution by Income Level	366,073	22.7	16.4	18.1	42.8	0.0
Median Family Income MSA - 40060 Richmond, VA MSA		\$75,183	Median Housing Value			\$228,571
			Median Gross Rent			\$1,001
			Families Below Poverty Level			8.4%
<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: Richmond MSA (2022-2023)						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	260	9.2	23.5	35.0	30.4	1.9
Population by Geography	1,035,526	7.2	19.9	38.3	33.6	1.1
Housing Units by Geography	413,640	7.6	20.8	39.4	31.2	1.1
Owner-Occupied Units by Geography	253,358	3.3	14.7	43.4	38.1	0.5
Occupied Rental Units by Geography	134,537	14.9	31.0	32.4	19.8	2.0
Vacant Units by Geography	25,745	11.3	27.9	36.5	22.4	1.9
Businesses by Geography	177,983	5.7	17.9	38.1	36.6	1.6
Farms by Geography	3,555	3.3	14.8	41.7	39.4	0.8
Family Distribution by Income Level	244,398	19.9	17.9	20.3	41.8	0.0
Household Distribution by Income Level	387,895	22.9	16.7	17.3	43.0	0.0
Median Family Income MSA - 40060 Richmond, VA MSA		\$91,165	Median Housing Value			\$268,001

	Median Gross Rent	\$1,167
	Families Below Poverty Level	6.5%
<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>		

The Richmond MSA includes all of Chesterfield, Hanover, Henrico, and Richmond City counties. The AA meets the requirements of the regulation and does not arbitrarily exclude LMI geographies. According to 2020 U.S. Census data, the AA consists of 260 CTs of which 24 are low-income, 61 are moderate-income, 91 are middle-income, 79 are upper-income, and five have not been assigned an income classification. The percentage of households living below the poverty level is 6.5 percent. Strong competition for financial services exists within SSB's AA, which includes nationwide and regional institutions.

By number of loans, the bank made 1.2 percent of its loan originations in the AA compared to total bank loans during the evaluation period.

According to the U.S. BLS, the Richmond, VA MSA unemployment rate declined throughout the evaluation period. In January 2021, the rate was 4.4 percent compared to 3.2 percent in December 2023. The unemployment rate in the AA was higher than the overall rate for the state of VA, which was 3.0 percent at the end of the evaluation period. The national unemployment rate was 6.4 percent in January 2021 and 3.7 percent in December 2023.

According to the December 2023 Moody's Analytics report, the AA strengths are above-average per capita income, lower business costs and higher housing affordability than Washington, DC attract firms and households to the metro area, and stable, positive net migration. The leading industries by comparative employment and income include professional and business services, government, and education and health services. Major employers include VCU Health System, Capital One Financial Corp., and HCA VA Health System.

One method of assessing housing affordability in the Richmond MSA is to compare the average AMFI to median housing value. The AA is a high-cost area, limiting access to affordable home ownership among LMI borrowers. The 2023 FFIEC AMFI in the AA is \$109,100. According to Realtor.com data, the median housing value in the AA is \$365,000 and \$429,999 in January 2021 and December 2023, respectively, reflecting a 17.8 percent increase. Assuming a 30-year mortgage with a five percent interest rate and not accounting for down payment, homeowners' insurance, real estate taxes, or any additional monthly expenses, a low-income borrower making \$54,550 per year (or less than 50 percent of the 2023 FFIEC AMFI in the AA) could afford a \$254,042 mortgage with a payment of \$1,364 per month. A moderate-income borrower making \$87,280 per year (or less than 80 percent of the 2023 FFIEC AMFI in the AA) could afford a \$406,466 mortgage with a payment of \$2,182 per month. This illustrates that LMI borrowers would be challenged to qualify for a mortgage loan in the AA.

During the evaluation period, the OCC conducted three community contacts working in the AA. The contacts were from a public charity, a community organization, and a listening session. The following needs were identified within the AA:

- Construction and development of affordable housing loans.
- Affordable housing repair or rehabilitation loans.

- Workforce development.

Scope of Evaluation in VA

The Richmond MSA was selected for analysis using full-scope procedures because it is the only AA in the rating area. The AA represents all the bank's deposits, branches, and lending activities in the rating area.

The rating is based on results of the full-scope area. Please see appendix A for more information.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VA

LENDING TEST

The bank's performance under the Lending Test in VA is rated Low Satisfactory when taking into consideration the positive impact of CD lending.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Richmond MSA is poor.

Lending Activity

Lending levels reflect adequate responsiveness to AA credit needs.

Number of Loans							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Richmond MSA	191	540	0	3	734	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

Dollar Volume of Loans (000s)							
Assessment Area	Home Mortgage	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Richmond MSA	57,272	140	0	7,554	64,966	100.0	100.0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

According to the FDIC Deposit Market Share data as of June 30, 2023, the bank ranked 12th among 25 deposit banks with a market share of 1.2 percent placing SSB in the top forty-eighth percentile.

Based on 2022 Peer Mortgage Data, SSB ranked 75th out of 576 mortgage lenders with a market share of 0.2 percent, placing the bank in the thirteenth percentile of all mortgage lenders in the AA. The bank's HMDA market share is weaker than their deposit market share. The bank's market share ranking for

home mortgage lending, relative to the number of mortgage lenders in the AA, is greater than its deposit market share. This is due to the smaller number of depository banks in the AA and the bank's percentile ranking but is considered adequate performance given the number of competitors in the market.

According to the 2022 Peer Small Business data, the bank ranked 17th out of 135 small business lenders with 0.6 percent market share, placing it in the thirteenth percentile of small business lenders in the AA. The bank's small business lending market share is stronger than the deposit market share in the Richmond MSA. The top five small business lending competitors are five nationwide lenders and once credit card bank.

Distribution of Loans by Income Level of the Geography

The bank exhibits a poor geographic distribution of loans in its AA.

Home Mortgage Loans

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

2021

The geographic distribution of the bank's home mortgage lending was poor. The proportion of loans significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

2022-2023

The geographic distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of owner-occupied housing units in low-income geographies and the aggregate. The proportion of loans was significantly below the percentage of owner-occupied housing units in moderate-income geographies and the aggregate.

Small Loans to Businesses

Refer to Table Q in the state of VA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations of small loans to businesses.

2021

The geographic distribution of the bank's small loans to businesses was good. The proportion of loans was below the percentage of businesses in low-income geographies and near to the aggregate. The proportion of loans was below the percentage of businesses in moderate-income geographies and near to the aggregate.

2022-2023

The geographic distribution of the bank's small loans to businesses was adequate. The proportion of loans was well below the percentage of businesses in low-income geographies and the aggregate. The proportion of loans was below the percentage of businesses in moderate-income geographies and well below the aggregate.

Lending Gap Analysis

The OCC evaluated the lending distribution in the AA to determine if any unexplained, conspicuous gaps existed. We reviewed summary reports, maps, and analyzed SSB's home mortgage and small business lending activity over the evaluation period to identify any gaps in the geographic distribution of loans. Examiners did not identify any unexplained conspicuous gaps.

Distribution of Loans by Income Level of the Borrower

The bank exhibits a poor distribution of loans among individuals of different income levels and businesses given the product lines offered by the bank.

Home Mortgage Loans

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

2021

The borrower distribution of the bank's home mortgage lending was very poor. The proportion of loans was significantly below the percentage of low-income families and below the aggregate. The proportion of loans was significantly below to the percentage of moderate-income families and the aggregate.

2022-2023

The borrower distribution of the bank's home mortgage lending was poor. The proportion of loans was significantly below the percentage of low-income families and the aggregate. The proportion of loans was below to the percentage of moderate-income families and significantly below the aggregate.

Small Loans to Businesses

Refer to Table R in the state of VA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's origination and purchase of small loans to businesses.

2021

When determining the conclusion in this AA, we considered the fact that 41.7 percent of the bank's small loans to businesses were PPP loans that did not have revenue information. Based on the data in the tables and considering the performance context factors discussed above, the overall borrower distribution of small loans to businesses was adequate. Consideration of the bank's PPP lending had a positive effect on our assessment of the bank's Distribution of Loans by Income Level of the Borrower.

The bank did not collect or consider the gross annual revenues in the underwriting of 49.2 percent of its small loans to businesses. Based on those businesses with known revenues, the bank's percentage of small loans to those with revenues of \$1 million or less was significantly below the percentage of businesses in that revenue range and well below the overall distribution of small loans to businesses.

2022-2023

The borrower distribution of the bank's loans to small businesses by revenue was poor. The proportion of loans was significantly below the percentage of small businesses and well below the aggregate.

Community Development Lending

The institution is a leader in making CD loans. The bank's CD loans had a positive impact on the bank's overall lending conclusion.

The Lending Activity Tables, shown above, set forth the information and data used to evaluate the institution's level of CD lending. These tables include all CD loans, including multifamily loans that also qualify as CD loans.

Richmond MSA

The bank is a leader in making CD loans in the AA. SSB originated three loans totaling \$7.6 million and representing 27.3 percent of allocated tier 1 capital. The bank's CD lending in the AA had a positive impact on the lending test conclusion in the AA. CD loans originated exhibited excellent responsiveness to the credit and community needs in the AA. The loans supported affordable housing, community services, and revitalization and stabilization.

CD loans originated include:

- A \$5 million loan to a non-profit private school located in a low-income CT to build a new gym and expand the parking lot. In addition to financial assistance and scholarships, the school offers tuition on a sliding scale based on household size and income.
- A \$1.8 million LOC renewal to a nonprofit organization located in a federal opportunity zone and a low-income CT for renovation and construction of two residential duplex properties and an adjacent parking lot.
- A \$804,000 loan renewal on a 15-unit multifamily, affordable housing complex located in a moderate-income area and opportunity zone that is 100 percent occupied and rents are below HUD Fair Market.

Product Innovation and Flexibility

The bank makes extensive use of innovative and/or flexible lending practices to serve the state of VA credit needs to both consumers and small business owners. Refer to the "Description of the Bank" section for additional details regarding mortgage loan programs.

Mortgage Loan Programs

During the evaluation period, SSB originated mortgage loans through the following programs:

- Buyers Advantage – Originated 27 loans totaling \$11 million.
- VA – Originated five loans totaling \$2 million.
- FHA – Originated two loans totaling \$455,000.
- USDA – Originated one loan totaling \$261,000.
- HomeReady – Originated one loan totaling \$120,000.

Small Business Programs

During the evaluation period, SSB originated small business loans through the following programs:

- Business Lending Express – Originated 86 loans totaling \$12 million.
- SBA (7a) – Originated 14 loans totaling \$2.7 million.

INVESTMENT TEST

The bank’s performance under the Investment Test in VA is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Richmond MSA is excellent.

The bank has an excellent level of qualified CD investment and grants, often in a leadership position, particularly those that are not routinely provided by private investors.

The bank exhibits excellent responsiveness to credit and community economic development needs. The bank occasionally uses innovative and/or complex investments to support CD initiatives.

Qualified Investments										
Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Full Scope										
Richmond MSA	2	4,200	38	4,323	40	100.00	8,523	100.00	0	0

*The tables present the data for all assessment areas. The narrative below addresses performance in full-scope areas only.

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

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

Richmond MSA

SSB made 40 investments and donations totaling \$5.7 million. Additionally, the AA benefited from the ongoing impact of two prior period investments with outstanding balances of \$4.2 million. Total

investments and donations are equivalent to 20.5 percent of allocated tier 1 capital. There were no unfunded investment commitments.

Current period investments include two qualified investments totaling \$4.2 million and 36 grants totaling \$123,000. Grants were provided to 21 nonprofit organizations who provide services LMI residents in the AA.

Examples of qualified investments include:

- A \$3.2 million investment in a CMBS HUD Bond to support a 41-unit affordable housing complex that is 100 percent occupied by LMI individuals.
- Two grants totaling \$20,000 to an organization that supports a technical assistance provider for small businesses whereby funds will support the deployment of the Economic Equity Fund to women and minority owned businesses.
- A \$10,000 grant to an organization to support early learning for LMI children. The bank partnered with the organization to enroll children in pre-school program.

Broader Statewide

In addition to the CD investments that benefited the bank’s AA, the bank made eleven current period investments and grants totaling \$10.5 million. The investments included two qualified investments totaling \$10.4 million and nine grants totaling \$107,000. The investments are outside of the bank’s delineated AA in the state of VA.

SERVICE TEST

The bank’s performance under the Service Test in VA is rated Low Satisfactory.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Richmond MSA is adequate.

Retail Banking Services

Service delivery systems are reasonably accessible to geographies and individuals of different income levels in the bank’s AA.

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upper	Low	Mod	Mid	Upper
Richmond MSA	100	6	100	0	0	33.3	66.7	7.2	19.9	38.3	33.6

*Remaining percentages represent geographies where income information was not available

Richmond MSA

The bank has six branches in the AA, with none located in low-income geographies and none located in moderate-income geographies. The percentage of branches located in low-income geographies was significantly below the percentage of the population residing in these geographies, while the percentage of branches in moderate-income geographies was significantly below the percentage of the population residing in these geographies.

In the AA, SSB has three branches located in middle-income and upper-income geographies where LMI geographies are in proximity of three miles or less, with 14 percent of deposit accountholders residing in these LMI geographies. Some consideration was given to this proximity, in the determination of branch usage by LMI individuals.

The OCC considered internal data provided by SSB indicating the extent to which MUI branches are being used by customers residing in nearby LMI geographies. MUI branch usage data had a positive impact on the evaluation of the accessibility of service delivery systems.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings		Net change in Location of Branches (+ or -)			
	# of Branch Openings	# of Branch Closings	Low	Mod	Mid	Upper
Richmond MSA	0	1	0	0	-1	0

To the extent changes have been made, the bank's opening and closing of branches has not adversely affected the accessibility of its deliver systems, particularly in LMI geographies and/or to LMI individuals. During the evaluation period, there were no branches opened and one branch closed in a middle-income geography.

Services, including where appropriate, business hours, do not vary in a way that inconveniences its AA, particularly LMI geographies and individuals. All branches operate during similar banking hours.

Community Development Services

The bank is a leader in providing CD services.

Conclusions for Area Receiving Full-Scope Review

The bank provided an excellent level of CD services in the Richmond MSA. CD services were effective and responsive in helping the bank address community needs. The bank conducted or supported an excellent number of CD services, consistent with its capacity and expertise to conduct specific activities.

SSB employees from various lines of business provided technical assistance to six different CD organizations totaling 134 hours during the evaluation period. SSB staff served on five boards or committees that provide community services targeted to LMI individuals. Of the 134 total hours, 116 hours were in a leadership role as a board or committee member.

Examples of these services:

- Two employees provided 39 service hours as board and committee members of an organization serving LMI youth and families, with a program initiative for homeless and affordable housing.
- One employee provided 32 service hours as a board member to an organization that funds over 50 local nonprofits serving LMI individuals with a focus on basic needs, financial well-being, education, and the elderly.

An employee provided 25 service hours as a board and committee member to an organization that provides housing, financial counseling, and workforce development to LMI members of the community.

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:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage and small business. Community development loans, qualified investments, community development services.	
Affiliate(s)	Affiliate Relationship	Products Reviewed
None		
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSAs		
Augusta-Richmond GA-SC MMSA	Full Scope	Counties of Columbia and Richmond in GA and Aiken in SC
Charlotte-Concord-Gastonia NC-SC MMSA	Full Scope	Counties of Gaston, Iredell, Mecklenburg, Rowan and Union in NC and York in SC
Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA	Full Scope	Counties of Brunswick in NC and Horry in SC
State of Alabama		
Auburn-Opelika MSA	Limited Scope	County of Lee
Birmingham-Hoover MSA	Limited Scope	Counties of Jefferson
Daphne-Fairhope-Foley MSA	Limited Scope	County of Baldwin
Huntsville MSA	Full Scope	County of Madison
AL Non-MSA	Limited Scope	County of Chambers
State of Florida		
Gainesville MSA	Limited Scope	County of Alachua
Jacksonville CSA	Limited Scope	Counties of Clay, Duval, Putnam, and St. Johns
Miami-Port St. Lucie-Fort Lauderdale CSA	Full Scope	Counties of Broward, Martin, Indian River, Miami-Dade, Monroe, Palm Beach, and St. Lucie
North Port-Sarasota-Bradenton-MSA	Limited Scope	Counties of Manatee and Sarasota
Ocala MSA	Limited Scope	County of Marion
Orlando-Lakeland-Deltona CSA	Full Scope	Counties of Flagler, Lake, Orange, Osceola, Polk Seminole, Sumter, and Volusia
Palm Bay-Melbourne-Titusville MSA	Limited Scope	County of Brevard
Pensacola-Ferry Pass-Brent MSA	Limited Scope	Counties of Escambia and Santa Rosa
Sebring-Avon Park MSA	Limited Scope	County of Highlands
Tampa-St. Petersburg-Clearwater MSA	Limited Scope	Counties of Hillsborough, Pasco, and Pinellas
FL Non-MSA	Limited Scope	Counties of Hendry and Okeechobee
State of Georgia		
Athens-Clarke County MSA	Limited Scope	County of Clarke
Atlanta-Sandy Springs-Alpharetta MSA	Full Scope	Counties of Barrow, Carroll, Cherokee, Cobb, Coweta, Dekalb, and Fulton
Gainesville MSA	Limited Scope	County of Hall
Macon-Bibb MSA	Limited Scope	County of Bibb

Savannah MSA	Full Scope	Counties of Bryan and Chatham
GA Non-MSA	Limited scope	Counties of Fannin, Gilmer, Habersham, Hart, Jackson, Rabun, Stephens, Towns, Troup, Union, and White
State of North Carolina		
Raleigh-Durham-Cary MSA	Limited Scope	County of Wake
Wilmington MSA	Full Scope	Counties of New Hanover and Pender
State of South Carolina		
Charleston-North Charleston MSA	Full Scope	Counties of Berkeley, Charleston, and Dorchester
Columbia-Orangeburg-Newberry CSA	Limited Scope	Counties of Fairfield, Lexington, Newberry, Richland, Saluda, and Orangeburg
Florence MSA	Limited Scope	Counties of Darlington and Florence
Greenville-Anderson MSA	Full Scope	Counties of Anderson, Greenville, Greenwood, Laurens, Pickens, Oconee, Spartanburg, and Union
Hilton-Head Island-Bluffton MSA	Full Scope	Counties of Beaufort and Jasper
Spartanburg MSA	Limited Scope	County of Spartanburg
Sumter MSA	Limited Scope	County of Sumter
SC Non-MSA	Limited Scope	Counties of Abbeville, Bamberg, Colleton, and Georgetown
State of Virginia		
Richmond MSA	Full Scope	Counties of Chesterfield, Hanover, Henrico, and Richmond City

Appendix B: Summary of MMSA and State Ratings

RATINGS SouthState Bank, N.A.				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
MMSA or State:				
Augusta-Richmond GA-SC MMSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Charlotte-Concord-Gastonia NC-SC MMSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Myrtle Beach-Conway-North Myrtle Beach NC-SC MMSA	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Alabama	High Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Georgia	High Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
North Carolina	High Satisfactory	Outstanding	Low Satisfactory	Satisfactory
South Carolina	Outstanding	Needs to Improve	High Satisfactory	Satisfactory
Virginia	Low Satisfactory	Outstanding	Low Satisfactory	Satisfactory

(*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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 (MD): 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 (MSA): 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.

MMSA (state): Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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 loans are treated the same 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.

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 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. 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.

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.

Multistate Metropolitan Statistical Area

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	
Augusta-Richmond GA-SC MMSA	752	214,334,784	26.8	28,779	4.3	2.3	1.6	20.6	8.8	11.2	39.0	33.8	38.6	36.1	55.2	48.6	0.0	0.0	0.0	
Charlotte-Concord-Gastonia NC-SC MMSA	1,313	540,590,112	46.8	146,052	3.3	2.2	2.8	17.3	11.6	13.8	36.1	29.6	31.1	43.2	56.7	52.3	0.0	0.0	0.1	
Myrtle Beach-Conway-North Myrtle Beach-NC-SC MMSA	741	210,198,149	26.4	46,555	0.4	0.1	0.4	16.1	7.2	11.1	64.9	63.6	63.9	18.4	29.0	24.6	0.2	0.1	0.1	
Total	2,806	965,123,046	100.0	221,386	3.0	1.7	2.1	17.7	9.7	12.9	41.7	39.7	39.0	37.6	49.0	46.0	0.0	0.0	0.1	

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																				2022-2023
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	
Augusta-Richmond	1,172	313,443,133	30.1	18,048	4.3	2.5	2.6	17.1	14.1	12.1	42.9	33.7	44.1	34.8	48.2	40.2	1.0	1.5	1.0	

GA-SC MMSA																				
Charlotte-Concord-Gastonia NC-SC MMSA	1,810	749,783,315	46.5	90,885	2.1	1.7	2.3	24.3	12.2	21.1	34.9	30.9	34.1	38.3	54.8	41.9	0.4	0.6	0.6	
Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA	912	248,826,397	23.4	30,386	1.7	0.3	1.2	12.8	8.4	10.6	61.6	63.6	59.1	23.9	27.6	29.1	0.0	0.0	0.0	
Total	3,894	1,312,052,844	100.0	139,319	2.4	1.6	2.1	21.0	11.9	17.7	41.1	39.4	40.8	35.1	46.4	38.9	0.4	0.7	0.5	

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 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
Augusta-Richmond GA-SC MMSA	752	214,334,784	26.8	28,779	23.4	5.2	4.3	15.8	15.0	13.5	18.1	20.3	19.7	42.7	56.0	34.7	0.0	3.5	27.8
Charlotte-Concord-Gastonia NC-SC MMSA	1,313	540,590,112	46.8	146,052	22.0	4.3	4.5	16.4	9.1	14.0	18.5	12.9	18.8	43.1	71.5	47.2	0.0	2.3	15.6
Myrtle Beach-Conway-North Myrtle Beach-NC-SC MMSA	741	210,198,149	26.4	46,555	20.1	4.5	4.3	18.4	12.7	14.1	21.3	17.5	18.8	40.3	60.7	46.3	0.0	4.6	16.4
Total	2,806	965,123,046	100.0	221,386	22.0	4.6	4.4	16.6	11.6	13.9	18.9	16.1	18.9	42.6	64.5	45.4	0.0	3.2	17.4

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 **2022-2023**

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
Augusta-Richmond GA-SC MMSA	1,172	313,443,133	30.1	18,048	22.2	5.3	4.7	16.0	20.6	15.5	19.8	19.0	22.4	42.1	53.5	37.4	0.0	1.6	20.0
Charlotte-Concord-Gastonia NC-SC MMSA	1,810	749,783,315	46.5	90,885	21.1	5.0	6.9	17.7	10.7	17.6	19.4	15.6	21.3	41.8	66.6	41.7	0.0	2.2	12.4
Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA	912	248,826,397	23.4	30,386	19.4	8.1	5.4	18.4	13.4	15.3	21.9	19.5	20.6	40.2	56.3	44.0	0.0	2.7	14.6
Total	3,894	1,312,052,844	100.0	139,319	21.0	5.8	6.3	17.5	14.3	16.8	19.9	17.5	21.3	41.6	60.2	41.7	0.0	2.1	13.9

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Augusta-Richmond GA-SC MMSA	652	69,103	28.3	10,019	7.9	7.8	6.2	18.8	12.6	16.6	32.7	33.6	34.5	40.6	46.0	42.6	0.0	0.0	0.1
Charlotte-Concord-Gastonia NC-SC MMSA	1,381	206,812	60.0	70,371	7.2	5.9	7.1	17.0	25.7	16.7	28.1	28.6	28.9	47.0	38.7	46.7	0.7	1.0	0.5

Myrtle Beach-Conway-North Myrtle Beach-NC-SC MMSA	267	24,987	11.6	15,353	3.7	3.4	4.1	15.8	14.2	14.5	57.6	64.8	60.9	22.4	17.2	20.1	0.5	0.4	0.4
Total	2,300	300,902	100.0	95,743	6.9	6.2	6.5	17.1	20.7	16.4	32.4	34.2	34.6	43.0	38.3	42.0	0.6	0.7	0.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2022-2023

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Augusta-Richmond GA-SC MMSA	482	75,310	24.1	10,585	7.3	9.8	5.8	16.7	14.7	14.6	40.6	40.9	41.2	30.1	32.2	33.9	5.4	2.5	4.6
Charlotte-Concord-Gastonia NC-SC MMSA	1,311	281,527	65.6	72,703	4.5	5.2	4.2	24.4	20.7	23.5	28.1	43.6	30.1	41.0	28.6	40.7	2.0	1.9	1.6
Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA	207	31,064	10.4	16,110	5.7	6.8	5.1	15.8	15.0	14.5	53.8	65.7	58.1	24.7	12.6	22.3	0.0	0.0	0.0
Total	2,000	387,901	100.0	99,398	5.0	6.5	4.5	22.2	18.7	21.1	33.4	45.2	35.8	37.3	27.8	37.0	2.1	1.9	1.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Augusta-Richmond GA-SC MMSA	652	69,103	28.3	10,019	88.5	25.0	44.6	2.8	17.6	8.7	57.4	
Charlotte-Concord-Gastonia NC -SC MMSA	1,381	206,812	60.0	70,371	88.6	18.1	47.2	3.5	32.3	7.9	49.6	
Myrtle Beach-Conway-North Myrtle Beach-NC-SC MMSA	267	24,987	11.6	15,353	87.4	19.5	47.1	3.4	26.2	9.2	54.3	
Total	2,300	300,902	100.0	95,743	88.5	20.2	46.9	3.4	27.4	8.2	52.3	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Augusta-Richmond GA-SC MMSA	482	75,310	24.1	10,585	91.8	45.9	52.1	1.8	42.9	6.4	11.2	
Charlotte-Concord-Gastonia NC -SC MMSA	1,311	281,527	65.6	72,703	92.1	30.7	52.7	2.2	62.1	5.7	7.2	
Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA	207	31,064	10.4	16,110	92.8	28.0	49.5	1.6	68.1	5.6	3.9	
Total	2,000	387,901	100.0	99,398	92.2	34.1	52.1	2.0	58.1	5.8	7.8	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Augusta-Richmond GA-SC MMSA	10	657	83.3	98	5.3	0.0	0.0	19.6	40.0	26.5	39.3	50.0	52.0	35.8	10.0	21.4	0.0	0.0	0.0
Charlotte-Concord-Gastonia NC-SC MMSA	2	216	16.7	306	4.9	0.0	1.6	15.8	0.0	12.7	42.6	50.0	58.8	36.4	50.0	26.8	0.2	0.0	0.0
Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA	0	0	0.0	127	0.9	0.0	1.6	24.1	0.0	25.2	60.4	0.0	66.9	14.0	0.0	3.9	0.5	0.0	2.4
Total	12	873	100.0	531	4.3	0.0	1.3	17.9	33.3	18.3	45.0	50.0	59.5	32.6	16.7	20.3	0.2	0.0	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Augusta-Richmond GA-SC MMSA	13	1,074	72.2	104	5.0	7.7	1.9	21.3	69.2	40.4	42.7	23.1	41.3	28.9	0.0	16.3	2.0	0.0	0.0
Charlotte-Concord-Gastonia NC-SC MMSA	2	536	11.1	381	2.8	0.0	0.8	26.3	0.0	31.5	38.9	100.0	50.4	31.2	0.0	17.3	0.7	0.0	0.0
Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA	3	732	16.7	124	2.9	0.0	0.8	15.0	0.0	20.2	64.9	100.0	72.6	17.1	0.0	6.5	0.0	0.0	0.0

Total	18	2,342	100.0	609	3.2	5.6	1.0	23.5	50.0	30.7	44.1	44.4	53.4	28.4	0.0	14.9	0.8	0.0	0.0
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Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Augusta-Richmond GA-SC MMSA	10	657	83.3	98	98.6	80.0	37.8	0.8	10.0	0.6	10.0
Charlotte-Concord-Gastonia NC-SC MMSA	2	216	16.7	306	96.4	50.0	53.3	2.2	0.0	1.5	50.0
Myrtle Beach-Conway-North Myrtle Beach-NC-SC MMSA	0	0	0	127	97.8	0	55.1	1.4	0	0.9	0
Total	12	873	100.0	531	97.0	75.0	50.8	1.8	8.3	1.2	16.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Augusta-Richmond GA-SC MMSA	13	1,074	72.2	104	98.7	61.5	65.4	0.6	0.0	0.8	38.5
Charlotte-Concord-Gastonia NC-SC MMSA	2	536	11.1	381	97.5	50.0	51.7	1.3	0.0	1.2	50.0
Myrtle Beach-Conway-North Myrtle Beach NC-SC MSA	3	732	16.7	124	98.2	66.7	61.3	0.8	33.3	0.9	0.0
Total	18	2,342	100.0	609	97.8	61.1	56.0	1.1	5.6	1.1	33.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Alabama

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
AL Non-MSA	21	2,122,921	2.1	748	0.0	0.0	0.0	2.9	0.0	0.5	84.1	90.5	86.5	13.0	9.5	13.0	0.0	0.0	0.0
Auburn-Opelika MSA	161	52,198,814	16.3	8,897	1.8	0.6	0.3	12.5	9.3	13.4	70.9	57.1	69.9	14.3	31.1	15.5	0.5	1.9	0.9
Birmingham-Hoover MSA	155	60,351,637	15.7	30,435	8.8	1.3	2.9	23.0	5.8	13.4	30.7	12.3	29.1	37.4	80.6	54.6	0.1	0.0	0.0
Daphne-Fairhope-Foley MSA	349	138,754,708	35.3	19,211	0.0	0.0	0.0	14.9	26.9	15.7	65.0	49.6	57.4	20.1	23.5	26.9	0.0	0.0	0.0
Huntsville MSA	304	118,425,591	30.7	27,946	5.1	1.3	2.9	18.3	14.5	12.3	33.0	36.5	36.2	43.6	47.7	48.6	0.0	0.0	0.0
Total	990	371,853,671	100.0	87,237	5.6	0.7	2.0	19.0	16.4	13.5	41.7	41.8	42.3	33.6	40.8	42.2	0.1	0.3	0.1

*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%*

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
AL Non-MSA	50	4,329,197	3.8	605	0.0	0.0	0.0	23.1	24.0	25.8	76.9	76.0	74.2	0.0	0.0	0.0	0.0	0.0	0.0

Auburn-Opelika MSA	274	78,419,257	21.1	5,764	2.3	0.4	1.6	21.3	14.2	20.0	48.4	37.6	48.1	25.2	46.4	28.2	2.8	1.5	2.2
Birmingham-Hoover MSA	242	56,621,308	18.6	19,002	6.7	5.4	3.7	24.2	20.7	17.7	31.0	33.5	32.4	37.0	39.7	46.0	1.1	0.8	0.3
Daphne-Fairhope-Foley MSA	427	193,558,203	32.8	12,647	0.0	0.0	0.0	17.4	4.9	13.9	59.4	58.1	53.8	22.5	21.5	28.5	0.7	15.5	3.8
Huntsville MSA	308	268,496,056	23.7	17,711	7.6	2.3	6.1	14.7	9.1	13.6	32.1	30.8	36.9	45.6	57.8	43.4	0.1	0.0	0.1
Total	1,301	601,424,021	100.0	55,729	5.2	1.6	3.3	20.1	11.5	15.9	39.0	43.4	40.7	34.8	37.9	38.8	0.9	5.5	1.2

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 **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
AL Non-MSA	21	2,122,921	2.1	748	22.1	9.5	4.9	16.8	33.3	18.9	18.7	14.3	20.7	42.3	42.9	36.8	0.0	0.0	18.7
Auburn-Opelika MSA	161	52,198,814	16.3	8,897	24.8	4.3	5.6	15.2	18.6	17.6	18.6	16.8	21.2	41.4	56.5	36.0	0.0	3.7	19.6
Birmingham-Hoover MSA	155	60,351,637	15.7	30,435	26.3	3.2	6.1	15.9	7.1	16.2	17.4	6.5	18.8	40.4	78.7	40.5	0.0	4.5	18.4
Daphne-Fairhope-Foley MSA	349	138,754,708	35.3	19,211	20.6	1.4	5.3	17.7	2.9	14.5	20.9	10.6	19.2	40.9	80.2	42.1	0.0	4.9	18.9
Huntsville MSA	304	118,425,591	30.7	27,946	22.9	2.6	6.0	16.0	10.2	14.1	17.4	12.2	18.2	43.8	67.1	37.6	0.0	7.9	24.2
Total	990	371,853,671	100.0	87,237	24.4	2.7	5.8	16.1	9.0	15.3	18.1	11.5	19.0	41.5	71.3	39.4	0.0	5.5	20.5

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 **2022-2023**

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
AL Non-MSA	50	4,329,197	3.8	605	20.6	14.0	7.3	21.0	26.0	22.5	19.7	30.0	23.5	38.6	28.0	28.1	0.0	2.0	18.7
Auburn-Opelika MSA	274	78,419,257	21.1	5,764	23.5	3.7	7.9	15.5	11.3	20.0	19.7	17.5	23.0	41.2	60.6	33.7	0.0	6.9	15.5
Birmingham-Hoover MSA	242	56,621,308	18.6	19,002	24.8	19.0	9.1	17.4	26.4	20.4	17.7	14.9	19.1	40.1	36.0	37.3	0.0	3.7	14.1
Daphne-Fairhope-Foley MSA	427	193,558,203	32.8	12,647	19.6	2.1	6.1	19.1	5.4	17.1	21.1	9.1	20.0	40.2	78.0	41.6	0.0	5.4	15.1
Huntsville MSA	308	268,496,056	23.7	17,711	23.0	2.3	7.1	15.4	6.5	16.6	18.4	14.9	21.4	43.1	73.1	38.0	0.0	3.2	16.9
Total	1,301	601,424,021	100.0	55,729	23.3	6.1	7.7	17.0	11.6	18.4	18.7	14.1	20.5	41.0	63.4	38.0	0.0	4.8	15.4

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
AL Non-MSA	15	275	3.1	474	0.0	0.0	0.0	4.6	13.3	3.8	79.2	80.0	82.5	16.2	6.7	13.7	0.0	0.0	0.0
Auburn-Opelika MSA	107	10,746	21.8	3,506	1.5	1.9	0.7	32.3	41.1	28.6	53.4	41.1	57.0	11.6	15.9	13.0	1.1	0.0	0.7
Birmingham-Hoover MSA	128	24,475	26.1	17,704	10.8	7.8	10.2	25.5	19.5	22.4	22.7	13.3	21.9	39.0	57.0	44.2	2.0	2.3	1.3

Daphne-Fairhope-Foley MSA	80	8,879	16.3	7,888	0.0	0.0	0.0	19.2	15.0	16.8	59.6	63.8	57.5	21.2	21.3	25.7	0.0	0.0	0.0
Huntsville MSA	160	29,544	32.7	8,309	12.4	18.8	14.0	21.6	10.6	19.1	28.7	28.1	29.1	37.3	42.5	37.8	0.0	0.0	0.0
Total	490	73,919	100.0	37,881	8.4	8.6	7.9	23.7	20.4	20.8	33.9	34.5	34.9	32.9	35.9	35.7	1.0	0.6	0.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
AL Non-MSA	4	840	0.6	407	0.0	0.0	0.0	21.4	25.0	20.4	78.6	75.0	79.6	0.0	0.0	0.0	0.0	0.0	0.0
Auburn-Opelika MSA	156	32,417	22.2	3,273	2.1	1.9	1.3	20.0	19.9	20.4	42.6	43.6	43.1	27.0	31.4	28.2	8.3	3.2	7.0
Birmingham-Hoover MSA	158	48,507	22.4	15,131	10.7	13.3	10.0	19.1	12.7	18.0	21.8	15.8	21.4	46.2	57.6	49.2	2.2	0.6	1.3
Daphne-Fairhope-Foley MSA	125	24,334	17.8	7,509	0.0	0.0	0.0	14.2	12.8	13.9	56.4	58.4	53.7	27.4	27.2	30.7	2.0	1.6	1.8
Huntsville MSA	261	62,471	37.1	8,284	16.0	7.7	15.3	15.3	8.0	14.1	23.5	18.4	24.9	42.3	65.5	43.3	2.9	0.4	2.4
Total	704	168,569	100.0	34,604	9.4	6.3	8.2	17.5	12.6	16.4	30.4	30.8	32.0	40.0	49.0	41.2	2.8	1.3	2.2

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
AL Non-MSA	15	275	3.1	474	83.8	6.7	43.0	4.1	0.0	12.1	93.3
Auburn-Opelika MSA	107	10,746	21.8	3,506	84.0	18.7	39.8	4.1	11.2	11.9	70.1
Birmingham-Hoover MSA	128	24,475	26.1	17,704	82.6	9.4	40.7	5.9	28.1	11.6	62.5
Daphne-Fairhope-Foley MSA	80	8,879	16.3	7,888	86.5	22.5	41.3	3.8	10.0	9.7	67.5
Huntsville MSA	160	29,544	32.7	8,309	83.8	26.3	44.5	4.6	23.8	11.6	50.0
Total	490	73,919	100.0	37,881	83.7	19.0	41.6	5.0	19.2	11.3	61.8

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
AL Non-MSA	4	840	0.6	407	87.2	75.0	51.1	2.8	0.0	10.0	25.0
Auburn-Opelika MSA	156	32,417	22.2	3,273	89.0	46.2	48.2	2.3	33.3	8.7	20.5
Birmingham-Hoover MSA	158	48,507	22.4	15,131	88.5	30.4	43.3	3.3	60.8	8.1	8.9
Daphne-Fairhope-Foley MSA	125	24,334	17.8	7,509	90.0	53.6	45.4	2.4	32.8	7.6	13.6
Huntsville MSA	261	62,471	37.1	8,284	88.9	38.7	46.3	2.7	43.7	8.4	17.6
Total	704	168,569	100.0	34,604	88.9	41.3	45.0	2.9	43.0	8.2	15.6

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
AL Non-MSA	0	0	0.0	16	0.0	0.0	0.0	2.6	0.0	0.0	89.7	0.0	87.5	7.7	0.0	12.5	0.0	0.0	0.0
Auburn-Opelika MSA	1	77	33.3	39	1.1	0.0	0.0	18.6	0.0	7.7	66.4	100.0	82.1	13.9	0.0	10.3	0.0	0.0	0.0
Birmingham-Hoover MSA	0	0	0.0	39	6.3	0.0	5.1	18.6	0.0	10.3	24.4	0.0	12.8	49.6	0.0	71.8	1.1	0.0	0.0
Daphne-Fairhope-Foley MSA	0	0	0.0	92	0.0	0.0	0.0	19.6	0.0	28.3	62.2	0.0	44.6	18.2	0.0	27.2	0.0	0.0	0.0
Huntsville MSA	2	500	66.7	88	7.7	0.0	4.5	20.1	0.0	34.1	37.0	100.0	45.5	35.2	0.0	15.9	0.0	0.0	0.0
Total	3	577	100.0	274	4.5	0.0	2.2	18.8	0.0	23.0	42.9	100.0	48.2	33.3	0.0	26.6	0.4	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
AL Non-MSA	0	0	0.0	18	0.0	0.0	0.0	31.6	0.0	50.0	68.4	0.0	50.0	0.0	0.0	0.0	0.0	0.0	0.0
Auburn-Opelika MSA	0	0	0.0	31	3.0	0.0	0.0	21.6	0.0	25.8	42.0	0.0	58.1	28.9	0.0	12.9	4.5	0.0	3.2
Birmingham-Hoover MSA	2	100	40.0	30	6.6	0.0	3.3	17.1	0.0	6.7	28.9	0.0	16.7	46.4	100.0	73.3	1.1	0.0	0.0
Daphne-Fairhope-Foley MSA	0	0	0.0	102	0.0	0.0	0.0	17.8	0.0	18.6	61.1	0.0	65.7	20.2	0.0	15.7	0.9	0.0	0.0
Huntsville MSA	3	377	60.0	70	10.0	0.0	0.0	16.6	0.0	20.0	34.5	66.7	51.4	37.9	33.3	28.6	1.0	0.0	0.0

Total	5	477	100.0	251	5.6	0.0	0.4	17.9	0.0	20.7	40.0	40.0	53.8	35.1	60.0	24.7	1.4	0.0	0.4
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Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
AL Non-MSA	0	0	0	16	100.0	0	0.0	0.0	0	0.0	0
Auburn-Opelika MSA	1	77	33.3	39	94.3	0.0	51.3	2.1	0.0	3.6	100.0
Birmingham-Hoover MSA	0	0	0	39	95.1	0	53.8	3.0	0	1.9	0
Daphne-Fairhope-Foley MSA	0	0	0	92	94.8	0	35.9	2.8	0	2.4	0
Huntsville MSA	2	500	66.7	88	96.0	50.0	42.0	2.3	0.0	1.6	50.0
Total	3	577	100.0	274	95.3	33.3	40.5	2.6	0.0	2.0	66.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
AL Non-MSA	0	0	0	18	99.1	0	22.2	0.0	0	0.9	0
Auburn-Opelika MSA	0	0	0	31	94.2	0	64.5	1.7	0	4.1	0
Birmingham-Hoover MSA	2	100	40.0	30	96.1	50.0	50.0	1.8	0.0	2.2	50.0
Daphne-Fairhope-Foley MSA	0	0	0	102	95.5	0	40.2	1.3	0	3.2	0
Huntsville MSA	3	377	60.0	70	96.3	33.3	42.9	1.3	0.0	2.4	66.7
Total	5	477	100.0	251	95.9	40.0	43.8	1.5	0.0	2.6	60.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

State of Florida

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
FL Non-MSA	102	16,550,502	1.8	2,406	0.0	0.0	0.0	24.6	25.5	15.2	47.7	48.0	59.5	27.7	26.5	25.4	0.0	0.0	0.0
Gainesville FL MSA	65	23,522,649	1.1	10,855	2.4	3.1	2.6	14.9	9.2	9.8	37.5	36.9	38.6	44.6	49.2	47.9	0.6	1.5	1.0
Jacksonville CSA	479	132,990,798	8.4	97,461	3.7	2.1	1.8	20.6	19.2	14.4	39.7	43.0	37.3	36.0	35.7	46.5	0.0	0.0	0.0
Miami-Port St Lucie-Fort Lauderdale CSA	1,142	371,249,106	20.1	310,485	2.4	1.1	1.9	21.7	11.8	17.5	35.1	38.5	35.8	40.6	48.5	44.5	0.1	0.0	0.3
North Port-Sarasota-Bradenton MSA	898	335,878,723	15.8	59,444	1.0	0.3	0.4	18.3	13.8	12.7	50.7	39.6	44.2	29.9	46.2	42.7	0.0	0.0	0.0
Ocala MSA	152	32,645,666	2.7	21,434	0.6	1.3	0.1	14.5	13.2	10.8	69.6	64.5	70.6	15.3	21.1	18.5	0.0	0.0	0.0
Orlando-Lakeland-Deltona CSA	1,677	386,314,285	29.6	246,273	1.0	0.5	0.7	18.8	17.7	15.3	49.2	51.9	49.9	31.1	29.9	34.1	0.0	0.0	0.0
Palm Bay-Melbourne-Titusville MSA	90	29,494,373	1.6	40,168	1.6	1.1	1.0	21.1	20.0	20.4	43.5	26.7	42.5	33.8	52.2	36.0	0.0	0.0	0.0
Pensacola-Ferry Pass-Brent MSA	137	39,446,474	2.4	31,843	1.6	0.0	0.4	15.2	4.4	9.0	54.7	29.9	50.9	28.5	65.7	39.7	0.0	0.0	0.0
Sebring-Avon Park MSA	126	16,305,759	2.2	4,763	0.0	0.0	0.0	4.5	4.8	2.9	76.6	74.6	73.8	18.9	20.6	23.3	0.0	0.0	0.0

Tampa-St Petersburg-Clearwater MSA	805	272,608,359	14.2	177,031	2.1	2.2	2.0	20.2	20.1	16.0	38.2	40.0	35.6	39.4	37.5	46.4	0.1	0.1	0.1
Total	5,673	1,657,006,693	100.0	1,002,163	2.0	1.0	1.4	20.0	15.7	15.7	42.0	44.5	41.6	36.0	38.7	41.2	0.1	0.0	0.1

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 **2022-2023**

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
FL Non-MSA	115	19,122,119	1.5	2,063	0.0	0.0	0.0	31.0	18.3	50.4	50.8	37.4	34.5	17.4	44.3	14.9	0.7	0.0	0.2
Gainesville FL MSA	137	82,803,829	1.8	7,388	4.4	3.7	2.7	14.6	12.4	15.2	28.2	27.7	26.5	51.8	53.3	53.8	0.9	2.9	1.8
Jacksonville CSA	648	239,212,695	8.5	65,234	3.4	0.6	2.5	21.6	23.6	19.3	40.2	40.4	44.4	34.4	35.2	33.4	0.4	0.2	0.4
Miami-Port St Lucie-Fort Lauderdale CSA	1,342	535,687,312	17.5	194,699	2.6	1.3	2.2	21.1	19.4	19.7	33.5	32.6	34.9	41.7	45.8	42.1	1.1	1.0	1.1
North Port-Sarasota-Bradenton MSA	866	356,828,250	11.3	37,397	1.2	1.0	0.5	18.1	14.2	14.9	46.7	44.6	41.9	33.8	39.6	42.0	0.2	0.6	0.7
Ocala MSA	286	59,715,851	3.7	16,685	0.3	1.4	0.3	16.7	14.7	11.4	61.7	55.2	70.2	20.3	26.9	17.5	1.1	1.7	0.6
Orlando-Lakeland-Deltona CSA	2,726	687,790,141	35.6	158,683	1.3	1.1	1.1	19.6	23.6	17.2	46.0	44.5	47.4	32.7	30.3	33.9	0.4	0.4	0.4
Palm Bay-Melbourne-Titusville MSA	147	139,962,701	1.9	27,026	0.8	0.0	0.9	18.4	19.7	19.4	45.6	40.1	45.6	34.6	39.5	33.5	0.5	0.7	0.6

Pensacola-Ferry Pass-Brent MSA	134	49,518,042	1.8	22,212	2.8	0.0	1.5	19.6	4.5	17.8	40.9	38.1	40.9	36.7	57.5	39.8	0.0	0.0	0.0
Sebring-Avon Park MSA	185	33,072,094	2.4	3,311	0.0	0.0	0.0	21.0	16.2	22.7	66.5	71.9	62.6	12.5	11.9	14.7	0.0	0.0	0.0
Tampa-St Petersburg-Clearwater MSA	1,063	426,322,685	13.9	113,865	1.6	1.8	1.7	23.1	27.1	20.9	37.7	35.7	35.9	37.2	34.6	41.0	0.5	0.8	0.5
Total	7,649	2,630,035,717	100.0	648,563	2.0	1.2	1.6	20.7	21.1	18.8	40.0	41.3	41.1	36.7	35.8	37.9	0.6	0.6	0.7

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%

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
FL Non-MSA	102	16,550,502	1.8	2,406	26.0	3.9	2.5	17.2	21.6	12.8	20.1	18.6	23.5	36.7	53.9	41.9	0.0	2.0	19.4
Gainesville FL MSA	65	23,522,649	1.1	10,855	23.4	4.6	4.1	15.4	12.3	13.1	18.2	9.2	20.0	43.0	60.0	47.5	0.0	13.8	15.3
Jacksonville CSA	479	132,990,798	8.4	97,461	22.2	4.2	4.5	17.2	19.8	13.9	19.9	15.9	19.4	40.7	54.1	39.5	0.0	6.1	22.7
Miami-Port St Lucie-Fort Lauderdale CSA	1,142	371,249,106	20.1	310,485	22.7	2.3	2.6	17.1	9.8	10.4	17.9	15.1	18.3	42.3	66.8	50.7	0.0	6.0	18.0
North Port-Sarasota-Bradenton MSA	898	335,878,723	15.8	59,444	19.4	3.9	4.8	19.1	15.6	14.8	21.0	18.3	20.2	40.5	56.8	46.0	0.0	5.5	14.2
Ocala MSA	152	32,645,666	2.7	21,434	19.3	2.0	3.8	19.5	12.5	14.8	21.6	15.8	21.6	39.7	60.5	39.1	0.0	9.2	20.8
Orlando-Lakeland-Deltona CSA	1,677	386,314,285	29.6	246,273	20.7	5.4	3.8	18.4	16.8	13.9	20.1	19.7	20.9	40.8	51.4	41.5	0.0	6.8	19.9

Palm Bay-Melbourne-Titusville MSA	90	29,494,373	1.6	40,168	20.2	3.3	6.7	18.6	16.7	17.1	20.6	16.7	20.0	40.6	57.8	35.9	0.0	5.6	20.3
Pensacola-Ferry Pass-Brent MSA	137	39,446,474	2.4	31,843	18.6	1.5	4.6	19.1	10.9	14.9	22.7	9.5	19.8	39.7	73.7	33.3	0.0	4.4	27.4
Sebring-Avon Park MSA	126	16,305,759	2.2	4,763	16.6	5.6	3.7	20.3	18.3	13.2	21.6	23.8	20.9	41.4	45.2	41.0	0.0	7.1	21.2
Tampa-St Petersburg-Clearwater MSA	805	272,608,359	14.2	177,031	21.3	5.2	4.4	17.6	18.0	14.6	18.8	20.6	19.9	42.3	50.4	43.0	0.0	5.7	18.2
Total	5,673	1,657,006,693	100.0	1,002,163	21.5	4.1	3.8	17.7	15.4	13.2	19.2	17.9	19.7	41.6	56.3	44.2	0.0	6.2	19.2

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 2022-2023

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
FL Non-MSA	115	19,122,119	1.5	2,063	24.4	0.9	2.0	20.3	16.5	12.7	17.6	23.5	22.3	37.7	53.9	41.4	0.0	5.2	21.6
Gainesville FL MSA	137	82,803,829	1.8	7,388	18.6	4.4	4.9	16.5	8.8	16.1	18.9	15.3	20.6	46.0	60.6	41.4	0.0	10.9	16.9
Jacksonville CSA	648	239,212,695	8.5	65,234	21.6	5.2	5.8	18.4	16.8	16.0	19.8	21.3	21.7	40.2	49.4	38.0	0.0	7.3	18.5
Miami-Port St Lucie-Fort Lauderdale CSA	1,342	535,687,312	17.5	194,699	21.9	3.0	3.4	17.7	11.2	10.1	18.2	15.6	17.6	42.1	64.6	51.3	0.0	5.7	17.7
North Port-Sarasota-Bradenton MSA	866	356,828,249	11.3	37,397	18.8	3.9	5.7	19.6	15.8	15.1	20.4	22.5	20.8	41.2	53.0	45.0	0.0	4.7	13.3
Ocala MSA	286	59,715,851	3.7	16,685	18.0	6.6	5.2	19.8	14.0	16.7	22.1	24.5	23.5	40.2	47.6	37.4	0.0	7.3	17.1

Orlando-Lakeland-Deltona CSA	2,726	687,790,141	35.6	158,683	20.5	4.7	3.9	18.5	16.7	13.3	20.0	25.7	22.5	41.0	48.2	43.0	0.0	4.7	17.2
Palm Bay-Melbourne-Titusville MSA	147	139,962,701	1.9	27,026	20.0	3.4	6.5	18.5	17.7	16.0	20.2	19.7	22.1	41.3	50.3	38.4	0.0	8.8	17.0
Pensacola-Ferry Pass-Brent MSA	134	49,518,042	1.8	22,212	20.5	4.5	5.1	18.5	9.0	15.9	20.6	11.2	22.6	40.4	73.9	36.5	0.0	1.5	20.0
Sebring-Avon Park MSA	185	33,072,094	2.4	3,311	19.8	9.7	6.3	18.6	24.9	17.3	22.8	22.2	22.4	38.8	38.9	34.9	0.0	4.3	19.0
Tampa-St Petersburg-Clearwater MSA	1,063	426,322,685	13.9	113,865	20.8	5.2	5.0	17.9	16.8	14.5	19.1	23.5	21.2	42.2	49.9	44.1	0.0	4.6	15.2
Total	7,649	2,630,035,717	100.0	648,563	21.0	4.5	4.4	18.2	15.5	13.3	19.3	22.2	20.6	41.6	52.5	44.7	0.0	5.3	17.0

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%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FL Non-MSA	54	4,939	1.3	1,595	0.0	0.0	0.0	22.2	20.4	24.8	41.9	40.7	42.3	35.9	38.9	32.9	0.0	0.0	0.0
Gainesville FL MSA	104	16,854	2.5	6,639	7.1	13.5	7.7	17.4	14.4	16.0	35.3	34.6	34.8	39.1	36.5	40.8	1.1	1.0	0.7
Jacksonville CSA	544	75,469	13.1	45,724	4.7	5.1	4.7	22.2	26.3	21.7	33.6	30.3	32.3	39.5	38.2	41.3	0.0	0.0	0.0
Miami-Port St Lucie-Fort Lauderdale CSA	1,080	154,533	26.1	423,861	4.1	7.6	4.3	21.7	26.7	22.9	29.4	28.6	29.5	43.7	36.7	42.2	1.1	0.5	1.1

North Port-Sarasota-Bradenton MSA	228	38,398	5.5	31,452	1.4	1.3	1.2	19.6	23.7	17.6	43.6	36.8	42.8	35.4	38.2	38.4	0.0	0.0	0.0
Ocala MSA	166	18,946	4.0	9,210	1.8	3.0	1.7	16.6	13.9	16.2	63.4	64.5	65.9	18.2	18.7	16.2	0.0	0.0	0.0
Orlando-Lakeland-Deltona CSA	1,240	171,330	30.0	140,979	2.0	4.0	2.1	24.3	28.2	23.6	40.8	42.2	40.8	32.8	25.6	33.5	0.0	0.0	0.0
Palm Bay-Melbourne-Titusville MSA	95	15,831	2.3	16,731	2.7	5.3	2.4	23.2	17.9	23.5	39.0	36.8	38.4	35.0	40.0	35.7	0.1	0.0	0.0
Pensacola-Ferry Pass-Brent MSA	49	5,966	1.2	11,796	2.3	6.1	2.3	19.5	26.5	18.9	50.9	44.9	49.8	27.3	22.4	29.0	0.0	0.0	0.0
Sebring-Avon Park MSA	51	5,076	1.2	1,905	0.0	0.0	0.0	7.8	19.6	9.7	75.2	66.7	72.5	16.6	13.7	17.1	0.5	0.0	0.7
Tampa-St Petersburg-Clearwater MSA	527	85,034	12.7	107,176	4.3	6.1	4.7	19.7	20.9	19.6	33.1	37.0	33.6	42.6	36.1	41.9	0.3	0.0	0.2
Total	4,138	592,376	100.0	797,068	3.6	5.4	3.8	21.7	25.0	22.1	34.2	37.0	33.8	39.9	32.5	39.7	0.6	0.1	0.6

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
FL Non-MSA	39	5,645	1.1	1,701	0.0	0.0	0.0	37.1	35.9	39.0	43.7	33.3	42.9	17.8	30.8	17.3	1.4	0.0	0.8
Gainesville FL MSA	83	19,968	2.3	6,672	4.7	10.8	4.2	18.3	18.1	18.3	29.8	25.3	29.2	44.0	44.6	45.9	3.2	1.2	2.4
Jacksonville CSA	416	106,844	11.3	46,049	4.8	3.1	4.6	23.2	20.0	20.0	38.5	43.3	39.0	31.7	32.2	34.9	1.8	1.4	1.6

Miami-Port St Lucie- Fort Lauderdale CSA	987	237,409	26.8	399,801	2.9	6.1	2.9	22.0	23.7	21.5	29.8	32.7	30.3	42.7	36.1	43.0	2.6	1.4	2.4
North Port- Sarasota- Bradenton MSA	134	39,009	3.6	31,284	1.3	1.5	1.0	15.9	15.7	14.7	46.0	50.7	45.0	36.5	32.1	39.0	0.3	0.0	0.3
Ocala MSA	178	35,852	4.8	9,672	1.3	0.6	1.1	19.5	19.7	20.1	56.6	51.7	57.5	21.9	26.4	20.1	0.8	1.7	1.0
Orlando- Lakeland- Deltona CSA	1,200	284,142	32.6	145,469	2.3	5.3	1.9	24.7	32.3	23.6	38.5	36.2	38.6	33.6	25.8	35.0	0.9	0.5	1.0
Palm Bay- Melbourne- Titusville MSA	66	18,492	1.8	16,348	2.8	6.1	2.7	20.5	16.7	20.2	41.3	31.8	40.2	34.9	42.4	36.5	0.5	3.0	0.5
Pensacola- Ferry Pass- Brent MSA	80	14,113	2.2	11,826	3.7	1.3	3.6	22.4	20.0	22.1	36.4	51.3	34.2	37.5	27.5	40.1	0.0	0.0	0.0
Sebring- Avon Park MSA	49	10,054	1.3	2,029	0.0	0.0	0.0	29.6	32.7	30.0	57.5	36.7	56.8	12.4	30.6	12.4	0.4	0.0	0.8
Tampa-St Petersburg- Clearwater MSA	448	121,072	12.2	105,415	3.1	4.7	3.2	20.4	23.2	21.0	32.3	41.3	33.3	42.3	27.2	40.6	1.9	3.6	1.9
Total	3,680	892,600	100.0	776,266	2.9	4.7	2.7	22.1	25.4	21.5	33.8	37.9	34.0	39.3	30.6	39.9	1.9	1.3	1.8

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FL Non-MSA	54	4,939	1.3	1,595	90.6	5.6	42.9	2.3	7.4	7.1	87.0
Gainesville FL MSA	104	16,854	2.5	6,639	90.4	11.5	43.9	2.5	12.5	7.1	76.0

Jacksonville CSA	544	75,469	13.1	45,724	92.1	7.4	43.3	2.2	10.3	5.6	82.4
Miami-Port St Lucie-Fort Lauderdale CSA	1,080	154,533	26.1	423,861	94.3	9.2	42.9	1.9	11.5	3.8	79.4
North Port-Sarasota-Bradenton MSA	228	38,398	5.5	31,452	93.1	6.1	50.1	2.1	5.3	4.8	88.6
Ocala MSA	166	18,946	4.0	9,210	92.6	12.7	46.9	2.1	14.5	5.3	72.9
Orlando-Lakeland-Deltona CSA	1,240	171,330	30.0	140,979	93.3	12.1	46.0	1.9	9.7	4.9	78.2
Palm Bay-Melbourne-Titusville MSA	95	15,831	2.3	16,731	92.1	6.3	47.5	2.2	9.5	5.7	84.2
Pensacola-Ferry Pass-Brent MSA	49	5,966	1.2	11,796	92.0	12.2	44.4	2.1	14.3	5.9	73.5
Sebring-Avon Park MSA	51	5,076	1.2	1,905	93.1	9.8	50.0	1.9	5.9	5.1	84.3
Tampa-St Petersburg-Clearwater MSA	527	85,034	12.7	107,176	92.9	12.7	46.5	2.2	12.1	4.9	75.1
Total	4,138	592,376	100.0	797,068	93.5	10.2	44.4	2.0	10.5	4.5	79.2

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
FL Non-MSA	39	5,645	1.1	1,701	91.7	56.4	54.1	1.5	35.9	6.7	7.7
Gainesville FL MSA	83	19,968	2.3	6,672	91.2	36.1	48.5	1.9	56.6	6.9	7.2
Jacksonville CSA	416	106,844	11.3	46,049	92.9	32.9	50.8	1.6	52.6	5.5	14.4
Miami-Port St Lucie-Fort Lauderdale CSA	987	237,409	26.8	399,801	94.5	43.1	52.4	1.4	50.3	4.1	6.7
North Port-Sarasota-Bradenton MSA	134	39,009	3.6	31,284	93.5	41.0	53.9	1.6	50.0	4.9	9.0
Ocala MSA	178	35,852	4.8	9,672	93.1	47.8	51.3	1.5	42.7	5.4	9.6
Orlando-Lakeland-Deltona CSA	1,200	284,142	32.6	145,469	93.7	40.3	53.1	1.4	51.9	5.0	7.8
Palm Bay-Melbourne-Titusville MSA	66	18,492	1.8	16,348	92.7	43.9	54.3	1.7	48.5	5.6	7.6
Pensacola-Ferry Pass-Brent MSA	80	14,113	2.2	11,826	92.6	38.8	48.7	1.5	58.8	5.9	2.5

Sebring-Avon Park MSA	49	10,054	1.3	2,029	93.3	55.1	54.4	1.4	30.6	5.3	14.3
Tampa-St Petersburg-Clearwater MSA	448	121,072	12.2	105,415	93.6	41.7	52.1	1.6	48.9	4.8	9.4
Total	3,680	892,600	100.0	776,266	93.9	41.1	52.4	1.5	50.4	4.6	8.5

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FL Non-MSA	1	115	10.0	57	0.0	0.0	0.0	16.4	0.0	14.0	60.4	100.0	59.6	23.2	0.0	26.3	0.0	0.0	0.0
Gainesville FL MSA	1	500	10.0	70	3.9	0.0	0.0	13.7	0.0	22.9	49.4	100.0	51.4	32.7	0.0	25.7	0.3	0.0	0.0
Jacksonville CSA	3	601	30.0	134	3.9	0.0	0.7	22.8	0.0	23.1	41.5	100.0	49.3	31.8	0.0	26.9	0.0	0.0	0.0
Miami-Port St Lucie-Fort Lauderdale CSA	1	500	10.0	1,072	4.7	0.0	2.5	24.8	0.0	12.2	32.2	100.0	31.8	38.0	0.0	53.4	0.4	0.0	0.1
North Port-Sarasota-Bradenton MSA	0	0	0.0	114	2.3	0.0	0.0	20.2	0.0	9.6	44.1	0.0	34.2	33.3	0.0	56.1	0.0	0.0	0.0
Ocala MSA	2	353	20.0	151	1.0	0.0	0.7	17.8	0.0	14.6	67.7	100.0	72.2	13.5	0.0	12.6	0.0	0.0	0.0
Orlando-Lakeland-Deltona CSA	2	331	20.0	513	1.5	0.0	0.4	23.0	0.0	16.2	48.3	50.0	51.3	27.1	50.0	32.0	0.1	0.0	0.2
Palm Bay-Melbourne-Titusville MSA	0	0	0.0	54	3.6	0.0	0.0	25.5	0.0	16.7	42.8	0.0	50.0	28.1	0.0	33.3	0.0	0.0	0.0
Pensacola-Ferry Pass-Brent MSA	0	0	0.0	73	1.9	0.0	0.0	14.6	0.0	5.5	59.9	0.0	80.8	23.6	0.0	13.7	0.0	0.0	0.0
Sebring-Avon Park MSA	0	0	0.0	49	0.0	0.0	0.0	3.9	0.0	4.1	72.7	0.0	73.5	22.5	0.0	22.4	0.9	0.0	0.0

Tampa-St Petersburg-Clearwater MSA	0	0	0.0	266	3.4	0.0	2.3	22.9	0.0	19.2	37.6	0.0	36.1	36.0	0.0	42.5	0.1	0.0	0.0
Total	10	2,400	100.0	2,553	3.2	0.0	1.4	22.6	0.0	14.4	41.7	90.0	43.3	32.3	10.0	40.7	0.2	0.0	0.1

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
FL Non-MSA	6	880	20.7	67	0.0	0.0	0.0	33.2	33.3	22.4	40.6	50.0	44.8	23.1	16.7	31.3	3.1	0.0	1.5
Gainesville FL MSA	0	0	0.0	72	4.9	0.0	1.4	18.4	0.0	19.4	27.8	0.0	33.3	48.2	0.0	44.4	0.7	0.0	1.4
Jacksonville CSA	0	0	0.0	164	4.3	0.0	3.7	25.4	0.0	19.5	42.8	0.0	48.2	26.2	0.0	25.6	1.3	0.0	3.0
Miami-Port St Lucie-Fort Lauderdale CSA	6	1,790	20.7	1,077	3.9	0.0	2.2	24.5	0.0	12.8	31.2	16.7	29.4	39.0	83.3	54.6	1.4	0.0	0.9
North Port-Sarasota-Bradenton MSA	0	0	0.0	104	2.0	0.0	0.0	21.3	0.0	1.0	45.0	0.0	42.3	31.3	0.0	56.7	0.4	0.0	0.0
Ocala MSA	2	81	6.9	151	0.9	0.0	0.0	24.0	0.0	19.2	47.1	50.0	40.4	26.5	50.0	40.4	1.4	0.0	0.0
Orlando-Lakeland-Deltona CSA	12	2,730	41.4	509	1.9	0.0	0.4	23.4	16.7	18.3	45.9	50.0	47.3	28.2	33.3	32.6	0.6	0.0	1.4
Palm Bay-Melbourne-Titusville MSA	0	0	0.0	50	2.7	0.0	4.0	24.4	0.0	10.0	41.4	0.0	30.0	29.9	0.0	56.0	1.6	0.0	0.0
Pensacola-Ferry Pass-Brent MSA	0	0	0.0	83	2.9	0.0	0.0	20.2	0.0	7.2	45.7	0.0	71.1	31.1	0.0	21.7	0.0	0.0	0.0

Sebring-Avon Park MSA	1	300	3.4	40	0.0	0.0	0.0	27.8	100.0	22.5	55.9	0.0	57.5	15.4	0.0	20.0	0.8	0.0	0.0
Tampa-St Petersburg-Clearwater MSA	2	412	6.9	316	2.8	0.0	0.9	26.3	50.0	20.9	37.3	0.0	44.0	32.9	50.0	33.5	0.6	0.0	0.6
Total	29	6,193	100.0	2,633	2.9	0.0	1.4	24.3	20.7	15.5	39.0	37.9	39.2	32.8	41.4	42.9	1.0	0.0	1.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= IMM			Farms with Revenues > IMM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FL Non-MSA	1	115	10.0	57	92.8	100.0	57.9	5.1	0.0	2.1	0.0
Gainesville FL MSA	1	500	10.0	70	96.6	0.0	58.6	1.9	100.0	1.5	0.0
Jacksonville CSA	3	601	30.0	134	97.8	66.7	55.2	1.2	0.0	1.0	33.3
Miami-Port St Lucie-Fort Lauderdale CSA	1	500	10.0	1,072	97.4	0.0	67.4	1.6	100.0	1.0	0.0
North Port-Sarasota-Bradenton MSA	0	0	0	114	97.2	0	65.8	1.7	0	1.1	0
Ocala MSA	2	353	20.0	151	98.3	50.0	68.9	1.1	0.0	0.6	50.0
Orlando-Lakeland-Deltona CSA	2	331	20.0	513	97.3	50.0	65.3	1.6	0.0	1.1	50.0
Palm Bay-Melbourne-Titusville MSA	0	0	0	54	98.4	0	63.0	1.0	0	0.6	0
Pensacola-Ferry Pass-Brent MSA	0	0	0	73	98.8	0	41.1	0.5	0	0.7	0
Sebring-Avon Park MSA	0	0	0	49	93.5	0	51.0	4.6	0	2.0	0
Tampa-St Petersburg-Clearwater MSA	0	0	0	266	97.5	0	60.9	1.5	0	1.1	0
Total	10	2,400	100.0	2,553	97.4	50.0	64.1	1.5	20.0	1.0	30.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
FL Non-MSA	6	880	20.7	67	93.3	66.7	62.7	3.8	33.3	2.9	0.0
Gainesville FL MSA	0	0	0	72	96.9	0	66.7	1.3	0	1.8	0
Jacksonville CSA	0	0	0	164	97.4	0	59.8	0.9	0	1.7	0
Miami-Port St Lucie-Fort Lauderdale CSA	6	1,790	20.7	1,077	97.4	66.7	75.0	1.2	0.0	1.4	33.3
North Port-Sarasota-Bradenton MSA	0	0	0	104	97.2	0	74.0	1.3	0	1.5	0
Ocala MSA	2	81	6.9	151	97.4	50.0	64.9	0.9	0.0	1.7	50.0
Orlando-Lakeland-Deltona CSA	12	2,730	41.4	509	96.9	33.3	65.6	1.2	25.0	1.9	41.7
Palm Bay-Melbourne-Titusville MSA	0	0	0	50	97.8	0	72.0	0.7	0	1.5	0
Pensacola-Ferry Pass-Brent MSA	0	0	0	83	98.2	0	42.2	0.4	0	1.4	0
Sebring-Avon Park MSA	1	300	3.4	40	93.6	100.0	55.0	3.5	0.0	2.9	0.0
Tampa-St Petersburg-Clearwater MSA	2	412	6.9	316	97.1	100.0	64.2	1.1	0.0	1.7	0.0
Total	29	6,193	100.0	2,633	97.2	55.2	68.4	1.2	17.2	1.6	27.6

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

State of Georgia

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	
Athens-Clarke County MSA	24	8,785,121	1.0	4,817	14.0	16.7	11.5	10.5	0.0	10.3	46.4	33.3	50.6	29.1	50.0	27.6	0.0	0.0	0.0	
Atlanta-Sandy Springs-Alpharetta MSA	1,624	630,798,125	65.4	203,252	4.2	6.9	4.5	18.9	14.8	17.4	26.8	17.8	26.0	50.0	60.5	52.0	0.0	0.0	0.1	
GA Non-MSA	422	92,694,842	17.0	23,539	0.0	0.0	0.0	5.8	4.0	3.0	52.7	56.2	48.5	41.5	39.8	48.4	0.0	0.0	0.0	
Gainesville GA MSA	58	15,757,560	2.3	12,422	1.2	0.0	0.5	12.4	6.9	11.0	44.6	46.6	41.3	41.8	46.6	47.2	0.0	0.0	0.0	
Macon-Bibb MSA	59	15,915,549	2.4	4,503	14.9	3.4	4.0	15.7	6.8	8.9	13.2	13.6	12.8	56.2	76.3	74.3	0.0	0.0	0.0	
Savannah MSA	297	119,090,380	12.0	19,500	4.9	1.3	2.3	20.5	14.8	14.1	33.6	23.9	29.7	41.0	59.9	54.0	0.0	0.0	0.0	
Total	2,484	883,041,577	100.0	268,033	4.2	4.9	3.8	17.1	12.4	15.4	30.7	25.8	29.2	47.9	56.9	51.6	0.0	0.0	0.1	

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 **2022-2023**

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
Athens-Clarke County MSA	26	8,638,745	1.0	2,739	9.7	7.7	9.9	22.3	19.2	19.9	38.2	26.9	40.3	29.8	46.2	29.9	0.0	0.0	0.0
Atlanta-Sandy Springs-Alpharetta MSA	1,624	718,274,758	60.2	116,635	3.6	5.9	4.4	15.8	13.4	17.2	28.7	18.4	29.8	50.0	59.1	46.1	1.9	3.4	2.5
GA Non-MSA	614	130,029,951	22.8	15,802	0.0	0.0	0.0	3.1	1.6	1.9	55.2	56.0	50.9	41.0	41.9	46.5	0.7	0.5	0.8
Gainesville GA MSA	77	87,767,631	2.9	7,289	2.0	1.3	1.1	9.3	14.3	7.8	52.2	48.1	53.8	33.7	23.4	35.5	2.7	13.0	1.9
Macon-Bibb MSA	18	3,767,298	0.7	3,490	13.7	5.6	9.3	14.3	11.1	12.4	26.0	27.8	29.7	44.0	44.4	47.5	2.1	11.1	1.2
Savannah MSA	337	136,875,842	12.5	12,024	4.9	3.0	4.0	24.8	13.7	19.7	32.4	19.9	36.2	36.0	62.0	37.9	1.9	1.5	2.1
Total	2,696	1,085,354,224	100.0	157,979	3.7	4.0	4.0	14.9	10.8	15.4	32.9	28.1	33.7	46.7	54.3	44.8	1.8	2.8	2.2

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 **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
Athens-Clarke County MSA	24	8,785,121	1.0	4,817	32.2	0.0	5.7	14.3	4.2	16.6	16.7	25.0	20.4	36.7	62.5	40.6	0.0	8.3	16.7
Atlanta-Sandy Springs-Alpharetta MSA	1,624	630,798,125	65.4	203,252	22.7	3.2	5.4	15.5	14.2	14.4	16.6	20.0	18.3	45.1	60.9	43.2	0.0	1.8	18.7
GA Non-MSA	422	92,694,842	17.0	23,539	17.8	2.6	1.8	16.5	8.3	8.0	19.0	20.6	17.2	46.7	64.9	54.0	0.0	3.6	18.9
Gainesville GA MSA	58	15,757,560	2.3	12,422	20.6	6.9	5.7	18.0	20.7	17.8	20.3	27.6	21.1	41.0	39.7	35.9	0.0	5.2	19.5
Macon-Bibb MSA	59	15,915,549	2.4	4,503	29.4	5.1	3.6	14.1	18.6	14.5	16.0	13.6	19.1	40.5	59.3	39.8	0.0	3.4	23.0
Savannah MSA	297	119,090,380	12.0	19,500	24.1	4.0	4.4	16.5	8.1	15.6	20.1	16.2	19.9	39.3	69.4	33.5	0.0	2.4	26.5
Total	2,484	883,041,577	100.0	268,033	22.7	3.3	5.0	15.7	12.6	14.2	17.3	19.7	18.5	44.3	62.1	43.0	0.0	2.3	19.4

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 **2022-2023**

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
Athens-Clarke County MSA	26	8,638,745	1.0	2,739	29.8	3.8	6.6	16.4	15.4	17.3	15.9	26.9	21.1	37.9	50.0	37.5	0.0	3.8	17.6
Atlanta-Sandy Springs-Alpharetta MSA	1,624	718,274,758	60.2	116,635	21.0	2.0	5.9	15.4	11.7	16.2	18.3	16.9	19.5	45.3	66.2	40.5	0.0	3.1	17.8
GA Non-MSA	614	130,029,951	22.8	15,802	16.8	3.3	3.2	15.8	11.4	9.7	19.0	20.8	18.2	48.5	61.1	52.3	0.0	3.4	16.6
Gainesville GA MSA	77	87,767,631	2.9	7,289	20.3	3.9	5.9	18.5	13.0	18.3	20.1	19.5	22.3	41.0	58.4	35.5	0.0	5.2	17.9
Macon-Bibb MSA	18	3,767,298	0.7	3,490	28.9	5.6	5.4	15.9	11.1	16.6	17.0	27.8	21.9	38.2	50.0	33.5	0.0	5.6	22.5
Savannah MSA	337	136,875,842	12.5	12,024	23.3	3.3	3.8	17.8	11.0	15.5	18.7	13.1	22.2	40.2	70.0	39.0	0.0	2.7	19.4
Total	2,696	1,085,354,224	100.0	157,979	21.2	2.6	5.5	15.8	11.6	15.7	18.4	17.6	19.8	44.6	65.0	41.1	0.0	3.2	17.9

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%

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Athens-Clarke County MSA	24	3,230	1.5	2,869	17.8	20.8	16.4	10.1	8.3	12.8	42.0	41.7	44.7	28.5	25.0	25.7	1.7	4.2	0.5
Atlanta-Sandy Springs-Alpharetta MSA	720	128,227	46.3	142,319	7.4	6.3	6.7	21.4	19.9	20.6	22.6	19.3	23.1	47.9	53.9	49.2	0.7	0.7	0.5
GA Non-MSA	348	25,865	22.4	9,288	0.0	0.0	0.0	8.9	7.5	9.0	52.7	57.8	50.6	38.4	34.8	40.5	0.0	0.0	0.0
Gainesville GA MSA	67	9,284	4.3	5,466	8.8	13.4	7.9	16.5	23.9	17.0	41.5	50.7	42.1	33.2	11.9	33.1	0.0	0.0	0.0
Macon-Bibb MSA	17	2,149	1.1	4,048	18.2	0.0	16.1	15.9	0.0	16.0	21.0	41.2	22.5	44.9	58.8	45.5	0.0	0.0	0.0
Savannah MSA	378	69,035	24.3	10,563	7.9	10.1	7.7	22.7	14.6	21.3	31.9	43.4	32.3	37.2	32.0	38.6	0.2	0.0	0.1
Total	1,554	237,790	100.0	174,553	7.6	6.2	6.8	20.4	15.6	19.6	25.4	35.7	26.0	46.0	42.1	47.1	0.6	0.4	0.4

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Athens-Clarke County MSA	28	7,880	1.8	2,757	11.5	0.0	11.4	24.1	57.1	25.5	30.0	39.3	30.7	34.4	3.6	32.5	0.0	0.0	0.0
Atlanta-Sandy Springs-Alpharetta MSA	922	300,484	59.5	135,216	6.0	5.5	5.1	18.6	20.9	17.3	23.3	23.5	23.9	47.5	46.1	49.7	4.6	3.9	4.0
GA Non-MSA	232	41,018	15.0	9,223	0.0	0.0	0.0	5.5	5.2	4.6	54.4	52.2	52.6	39.6	42.7	42.2	0.5	0.0	0.7
Gainesville GA MSA	39	8,887	2.5	5,526	9.3	2.6	8.2	11.6	10.3	9.9	50.0	82.1	53.6	25.5	5.1	25.5	3.6	0.0	2.8
Macon-Bibb MSA	13	3,350	0.8	3,521	13.7	7.7	9.9	19.5	15.4	17.2	18.3	0.0	18.7	37.6	23.1	43.1	10.8	53.8	11.1
Savannah MSA	315	94,142	20.3	10,112	11.2	13.0	10.9	29.7	28.3	28.0	28.7	26.0	29.1	27.9	30.8	29.5	2.5	1.9	2.5
Total	1,549	455,761	100.0	166,355	6.4	6.1	5.5	18.6	20.4	17.2	25.8	29.9	26.8	44.9	40.5	46.8	4.3	3.2	3.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Athens-Clarke County MSA	24	3,230	1.5	2,869	86.9	37.5	46.6	3.1	25.0	9.9	37.5
Atlanta-Sandy Springs-Alpharetta MSA	720	128,227	46.3	142,319	92.7	11.4	41.8	2.3	18.2	5.0	70.4
GA Non-MSA	348	25,865	22.4	9,288	89.6	29.0	43.7	2.7	9.8	7.7	61.2
Gainesville GA MSA	67	9,284	4.3	5,466	89.8	23.9	45.3	3.7	22.4	6.5	53.7
Macon-Bibb MSA	17	2,149	1.1	4,048	87.4	0.0	37.9	3.5	5.9	9.1	94.1
Savannah MSA	378	69,035	24.3	10,563	89.1	15.9	41.6	3.0	34.7	7.9	49.5
Total	1,554	237,790	100.0	174,553	92.0	17.2	42.0	2.4	20.5	5.5	62.3

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Athens-Clarke County MSA	28	7,880	1.8	2,757	89.5	17.9	46.6	2.3	71.4	8.2	10.7
Atlanta-Sandy Springs-Alpharetta MSA	922	300,484	59.5	135,216	94.4	32.5	47.8	1.6	55.0	4.0	12.5
GA Non-MSA	232	41,018	15.0	9,223	91.9	54.7	50.7	2.0	37.5	6.1	7.8
Gainesville GA MSA	39	8,887	2.5	5,526	92.0	41.0	48.6	2.7	53.8	5.3	5.1
Macon-Bibb MSA	13	3,350	0.8	3,521	90.4	30.8	49.1	2.4	46.2	7.2	23.1
Savannah MSA	315	94,142	20.3	10,112	91.7	24.8	48.0	2.1	67.3	6.2	7.9
Total	1,549	455,761	100.0	166,355	93.9	34.2	48.0	1.7	55.1	4.4	10.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Athens-Clarke County MSA	0	0	0.0	12	15.9	0.0	8.3	12.7	0.0	8.3	43.9	0.0	66.7	26.4	0.0	16.7	1.0	0.0	0.0
Atlanta-Sandy Springs-Alpharetta MSA	0	0	0.0	245	5.8	0.0	1.2	20.8	0.0	20.8	28.8	0.0	30.2	44.4	0.0	47.8	0.2	0.0	0.0
GA Non-MSA	10	1,865	83.3	192	0.0	0.0	0.0	5.4	0.0	4.2	52.5	70.0	52.1	42.0	30.0	43.8	0.0	0.0	0.0
Gainesville GA MSA	2	360	16.7	43	4.3	0.0	0.0	15.8	0.0	11.6	43.7	100.0	72.1	36.2	0.0	16.3	0.0	0.0	0.0
Macon-Bibb MSA	0	0	0.0	23	10.1	0.0	0.0	12.9	0.0	4.3	16.5	0.0	4.3	60.5	0.0	91.3	0.0	0.0	0.0
Savannah MSA	0	0	0.0	37	4.6	0.0	0.0	21.1	0.0	16.2	36.4	0.0	32.4	37.9	0.0	51.4	0.0	0.0	0.0
Total	12	2,225	100.0	552	5.3	0.0	0.7	18.1	0.0	13.0	33.2	75.0	40.9	43.2	25.0	45.3	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Athens-Clarke County MSA	0	0	0.0	14	10.8	0.0	7.1	24.5	0.0	21.4	39.3	0.0	64.3	25.4	0.0	7.1	0.0	0.0	0.0

Atlanta-Sandy Springs-Alpharetta MSA	2	480	13.3	282	5.0	50.0	2.8	19.6	0.0	16.3	31.3	0.0	29.1	41.6	50.0	49.6	2.5	0.0	2.1
GA Non-MSA	10	1,197	66.7	225	0.0	0.0	0.0	2.5	0.0	0.0	58.4	50.0	65.3	38.1	40.0	33.3	1.0	10.0	1.3
Gainesville GA MSA	1	225	6.7	30	5.0	0.0	0.0	11.1	0.0	10.0	55.5	0.0	66.7	26.0	100.0	23.3	2.4	0.0	0.0
Macon-Bibb MSA	0	0	0.0	16	10.2	0.0	0.0	13.6	0.0	0.0	23.6	0.0	25.0	47.6	0.0	68.8	4.9	0.0	6.3
Savannah MSA	2	314	13.3	37	6.2	0.0	5.4	29.2	50.0	21.6	29.5	0.0	43.2	33.5	50.0	29.7	1.6	0.0	0.0
Total	15	2,216	100.0	604	4.8	6.7	1.8	17.4	6.7	9.9	36.1	33.3	46.0	39.5	46.7	40.6	2.2	6.7	1.7

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2021**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Athens-Clarke County MSA	0	0	0	12	96.8	0	33.3	1.0	0	2.2	0
Atlanta-Sandy Springs-Alpharetta MSA	0	0	0	245	97.0	0	66.9	1.5	0	1.5	0
GA Non-MSA	10	1,865	83.3	192	98.1	60.0	51.0	0.8	0.0	1.1	40.0
Gainesville GA MSA	2	360	16.7	43	97.5	50.0	67.4	1.7	0.0	0.8	50.0
Macon-Bibb MSA	0	0	0	23	97.5	0	43.5	0.3	0	2.2	0
Savannah MSA	0	0	0	37	97.3	0	62.2	1.6	0	1.0	0
Total	12	2,225	100.0	552	97.2	58.3	59.4	1.4	0.0	1.4	41.7

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues **2022-2023**

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Athens-Clarke County MSA	0	0	0	14	97.1	0	57.1	1.2	0	1.7	0
Atlanta-Sandy Springs-Alpharetta MSA	2	480	13.3	282	97.7	0.0	67.0	1.0	0.0	1.3	100.0
GA Non-MSA	10	1,197	66.7	225	98.5	80.0	67.6	0.6	10.0	0.9	10.0
Gainesville GA MSA	1	225	6.7	30	98.1	0.0	66.7	1.3	100.0	0.6	0.0
Macon-Bibb MSA	0	0	0	16	98.2	-0	68.8	0.2	0	1.6	0
Savannah MSA	2	314	13.3	37	98.0	100.0	78.4	1.1	0.0	0.9	0.0
Total	15	2,216	100.0	604	97.8	66.7	67.7	1.0	13.3	1.2	20.0

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

State of North Carolina

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
Raleigh-Durham-Cary MSA	90	20,767,883	44.8	89,508	2.1	1.1	2.1	19.2	7.8	16.1	34.3	32.2	32.9	44.5	58.9	48.9	0.0	0.0	0.0
Wilmington MSA	111	34,305,520	55.2	22,969	4.9	1.8	4.4	14.4	3.6	7.8	44.4	45.9	47.1	36.3	48.6	40.7	0.0	0.0	0.0
Total	201	55,073,403	100.0	112,477	2.7	1.5	2.6	18.1	5.5	14.4	36.5	39.8	35.8	42.7	53.2	47.2	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%*

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
Raleigh-Durham-Cary MSA	142	47,686,313	48.6	49,652	3.0	0.7	2.9	14.8	6.3	15.4	36.2	21.8	39.8	44.7	71.1	40.6	1.3	0.0	1.4
Wilmington MSA	150	97,879,568	51.4	13,465	1.8	0.7	1.5	24.3	8.7	20.6	38.4	36.0	43.3	34.9	53.3	34.1	0.7	1.3	0.6
Total	292	145,565,881	100.0	63,117	2.7	0.7	2.6	16.9	7.5	16.5	36.7	29.1	40.5	42.5	62.0	39.2	1.2	0.7	1.2

*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 **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
Raleigh-Durham-Cary MSA	90	20,767,883	44.8	89,508	19.9	4.4	5.5	16.2	8.9	14.9	18.8	17.8	20.5	45.1	63.3	45.0	0.0	5.6	14.1
Wilmington MSA	111	34,305,520	55.2	22,969	22.7	4.5	4.0	17.6	9.9	14.0	18.4	12.6	18.0	41.3	72.1	46.4	0.0	0.9	17.7
Total	201	55,073,403	100.0	112,477	20.5	4.5	5.2	16.5	9.5	14.7	18.7	14.9	20.0	44.3	68.2	45.3	0.0	3.0	14.8

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 **2022-2023**

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
Raleigh-Durham-Cary MSA	142	47,686,313	48.6	49,652	19.5	1.4	6.7	15.7	9.9	16.2	20.4	14.1	23.5	44.4	71.8	43.0	0.0	2.8	10.5
Wilmington MSA	150	97,879,568	51.4	13,465	22.2	7.3	5.9	17.4	14.7	15.4	19.6	12.0	19.4	40.8	61.3	45.9	0.0	4.7	13.3
Total	292	145,565,881	100.0	63,117	20.0	4.5	6.6	16.1	12.3	16.1	20.2	13.0	22.6	43.7	66.4	43.7	0.0	3.8	11.1

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Raleigh-Durham-Cary MSA	85	12,956	21.5	38,149	3.9	8.2	3.8	19.7	4.7	19.3	32.0	31.8	32.8	44.2	55.3	44.0	0.2	0.0	0.1
Wilmington MSA	310	30,790	78.5	11,214	12.2	10.3	11.4	11.1	5.8	11.3	34.9	64.2	38.6	41.6	19.7	38.5	0.3	0.0	0.2
Total	395	43,746	100.0	49,363	5.6	9.9	5.6	18.0	5.6	17.5	32.6	57.2	34.1	43.7	27.3	42.8	0.2	0.0	0.1

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Raleigh-Durham-Cary MSA	85	24,568	20.2	36,408	4.9	0.0	4.7	15.9	20.0	15.7	34.7	36.5	34.1	43.2	43.5	44.0	1.2	0.0	1.6
Wilmington MSA	335	39,700	79.8	10,962	3.5	1.2	3.6	26.1	75.5	29.9	30.1	8.1	31.8	39.4	15.2	34.2	0.9	0.0	0.5
Total	420	64,268	100.0	47,370	4.6	1.0	4.4	17.9	64.3	19.0	33.8	13.8	33.6	42.5	21.0	41.7	1.1	0.0	1.3

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Raleigh-Durham-Cary MSA	85	12,956	21.5	38,149	89.3	12.9	46.9	3.1	18.8	7.7	68.2	
Wilmington MSA	310	30,790	78.5	11,214	88.7	15.2	47.1	3.3	53.5	8.0	31.3	
Total	395	43,746	100.0	49,363	89.2	14.7	46.9	3.1	46.1	7.7	39.2	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Raleigh-Durham-Cary MSA	85	24,568	20.2	36,408	92.4	32.9	51.2	1.9	62.4	5.7	4.7	
Wilmington MSA	335	39,700	79.8	10,962	91.7	20.3	54.0	2.2	77.0	6.1	2.7	
Total	420	64,268	100.0	47,370	92.3	22.9	51.8	2.0	74.0	5.8	3.1	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2021**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Raleigh-Durham-Cary MSA	0	0	0.0	123	3.0	0.0	0.0	18.3	0.0	16.3	40.8	0.0	43.9	37.9	0.0	39.8	0.0	0.0	0.0
Wilmington MSA	1	345	100.0	105	8.3	100.0	12.4	22.9	0.0	45.7	38.5	0.0	21.9	30.2	0.0	20.0	0.1	0.0	0.0
Total	1	345	100.0	228	4.3	100.0	5.7	19.4	0.0	29.8	40.2	0.0	33.8	36.0	0.0	30.7	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography **2022-2023**

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Raleigh-Durham-Cary MSA	0	0	0.0	121	4.2	0.0	1.7	14.6	0.0	17.4	39.9	0.0	33.9	39.6	0.0	45.5	1.7	0.0	1.7
Wilmington MSA	1	49	100.0	85	1.8	0.0	1.2	36.6	0.0	51.8	32.1	100.0	30.6	28.6	0.0	16.5	0.8	0.0	0.0
Total	1	49	100.0	206	3.6	0.0	1.5	19.8	0.0	31.6	38.1	100.0	32.5	36.9	0.0	33.5	1.5	0.0	1.0

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Raleigh-Durham-Cary MSA	-0	-0	-0	123	95.5	-0	58.5	2.5	-0	2.1	-0
Wilmington MSA	1	345	100.0	105	95.8	0.0	47.6	2.4	100.0	1.8	0.0
Total	1	345	100.0	228	95.5	0.0	53.5	2.4	100.0	2.0	0.0
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Raleigh-Durham-Cary MSA	0	0	0	121	96.7	0	57.0	1.6	0	1.7	0
Wilmington MSA	1	49	100.0	85	97.2	100.0	44.7	1.3	0.0	1.5	0.0
Total	1	49	100.0	206	96.8	100.0	51.9	1.5	0.0	1.6	0.0
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

State of South Carolina

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
Charleston-North Charleston MSA	1,434	608,627,219	29.6	64,640	3.3	2.3	2.3	19.1	8.2	11.1	42.4	33.2	45.0	34.9	55.9	41.2	0.3	0.3	0.4
Columbia-Orangeburg-Newberry CSA	670	166,317,185	13.8	44,878	2.6	1.6	1.6	20.8	11.6	12.0	37.9	28.8	31.2	38.7	57.9	55.2	0.0	0.0	0.0
Florence MSA	105	14,648,280	2.2	6,357	1.3	1.0	0.3	16.5	6.7	9.6	51.9	45.7	44.2	30.3	46.7	45.8	0.0	0.0	0.0
Greenville-Anderson MSA	1,689	495,400,399	34.9	76,088	2.7	1.5	2.1	18.0	9.2	12.2	45.7	37.7	41.7	33.6	51.6	44.0	0.0	0.0	0.0
Hilton-Head Island-Bluffton MSA	643	247,620,873	13.3	18,601	0.0	0.0	0.0	27.1	20.5	18.4	45.1	51.5	52.3	27.8	28.0	29.3	0.0	0.0	0.0
SC Non-MSA	171	44,986,634	3.5	5,720	0.0	0.0	0.0	4.7	3.5	1.3	73.4	43.3	45.4	21.9	53.2	53.3	0.0	0.0	0.0
Spartanburg MSA	122	35,558,753	2.5	18,312	2.3	0.0	1.1	15.6	3.3	9.3	47.1	28.7	42.7	35.1	68.0	46.9	0.0	0.0	0.0
Sumter MSA	11	1,700,428	0.2	4,186	0.0	0.0	0.0	15.4	0.0	5.6	49.9	36.4	41.9	34.6	63.6	52.5	0.0	0.0	0.0
Total	4,723	1,579,301,017	100.0	220,470	2.3	1.5	1.7	18.6	10.5	11.9	45.0	37.3	41.6	34.0	50.6	44.7	0.1	0.1	0.1

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 **2022-2023**

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
Charleston-North Charleston MSA	2,015	921,951,214	31.4	37,711	4.6	3.1	2.6	22.8	11.5	17.2	33.6	30.5	35.4	38.4	53.9	44.0	0.6	1.0	0.7
Columbia-Orangeburg-Newberry CSA	895	210,770,588	14.0	28,258	2.0	0.7	1.2	18.3	13.4	13.1	44.2	37.9	43.3	34.8	47.9	41.6	0.7	0.1	0.8
Florence MSA	168	32,140,901	2.6	4,268	1.2	0.6	0.3	22.0	10.1	13.8	44.7	44.6	44.2	32.0	44.6	41.7	0.0	0.0	0.0
Greenville-Anderson MSA	2,252	802,433,200	35.1	49,599	2.5	1.8	2.2	15.9	11.6	14.4	48.1	37.3	45.3	32.9	48.8	37.3	0.5	0.5	0.8
Hilton-Head Island-Bluffton MSA	801	380,528,466	12.5	10,751	3.1	2.4	1.6	17.6	11.7	11.0	49.5	57.7	52.9	29.9	28.2	34.6	0.0	0.0	0.0
SC Non-MSA	271	75,793,219	4.2	3,675	0.0	0.0	0.0	19.2	10.0	12.8	53.9	47.2	47.7	24.3	41.3	38.5	2.6	1.5	1.0
Spartanburg MSA	245	85,161,435	3.8	12,729	2.3	3.3	1.6	10.1	9.0	9.7	59.6	46.9	55.4	27.5	40.0	33.1	0.5	0.8	0.2
Sumter MSA	14	2,188,962	0.2	2,952	1.5	0.0	0.5	15.7	7.1	8.6	59.1	42.9	60.0	23.7	50.0	30.9	0.0	0.0	0.0
Total	6,416	2,425,806,550	100.0	137,214	2.6	2.0	1.9	18.4	11.7	14.5	44.7	38.4	43.1	33.6	47.3	39.8	0.6	0.6	0.7

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%

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
Charleston-North Charleston MSA	1,434	608,627,219	29.6	64,640	22.6	5.6	5.2	16.7	14.6	16.5	19.9	16.3	19.7	40.8	58.9	37.6	0.0	4.5	21.1
Columbia-Orangeburg-Newberry CSA	670	166,317,185	13.8	44,878	22.6	4.0	5.2	16.4	11.5	16.6	19.1	16.4	19.5	41.9	63.7	35.3	0.0	4.3	23.4
Florence MSA	105	14,648,280	2.2	6,357	23.5	3.8	4.7	16.2	22.9	15.7	19.9	25.7	19.2	40.4	47.6	37.6	0.0	0.0	22.7
Greenville-Anderson MSA	1,689	495,400,399	34.9	76,088	22.2	3.6	6.1	17.1	13.8	18.3	18.7	15.3	20.8	42.0	64.1	36.4	0.0	3.1	18.4
Hilton-Head Island-Bluffton MSA	643	247,620,873	13.3	18,601	20.1	3.0	2.7	19.5	10.6	10.9	20.0	18.4	17.7	40.4	63.1	52.1	0.0	5.0	16.6
SC Non-MSA	171	44,986,634	3.5	5,720	20.3	4.7	2.2	16.8	7.6	8.0	18.2	18.7	14.8	44.8	67.8	58.9	0.0	1.2	16.2
Spartanburg MSA	122	35,558,753	2.5	18,312	21.0	1.6	6.4	17.4	12.3	21.5	18.9	14.8	22.1	42.7	67.2	30.3	0.0	4.1	19.7
Sumter MSA	11	1,700,428	0.2	4,186	20.1	0.0	2.2	19.8	27.3	11.6	19.3	18.2	20.6	40.7	54.5	35.8	0.0	0.0	29.8
Total	4,723	1,579,301,017	100.0	220,470	22.2	4.2	5.2	17.0	13.3	16.3	19.2	16.6	19.7	41.7	62.1	38.4	0.0	3.8	20.3

*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 **2022-2023**

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
Charleston-North Charleston MSA	2,015	921,951,214	30.3	37,711	22.1	6.5	6.2	17.2	15.7	17.9	20.1	16.4	19.6	40.6	58.0	34.8	0.0	3.5	21.5
Columbia-Orangeburg-Newberry CSA	895	210,770,588	13.4	28,258	22.4	6.1	7.5	16.9	16.8	20.1	18.9	17.8	22.3	41.7	54.4	32.2	0.0	4.9	17.8
Florence MSA	168	32,140,901	2.5	4,268	23.5	9.5	5.4	16.7	15.5	17.6	18.8	26.2	22.1	41.0	45.2	34.9	0.0	3.6	20.0
Greenville-Anderson MSA	2,252	802,433,200	33.8	49,599	20.4	5.8	6.8	17.9	14.2	19.3	20.2	16.2	22.7	41.5	60.3	36.3	0.0	3.6	14.8
Hilton-Head Island-Bluffton MSA	801	380,528,466	12.0	10,751	21.0	5.0	5.4	17.6	13.2	16.1	20.8	18.5	19.5	40.6	59.3	46.6	0.0	4.0	12.4
SC Non-MSA	271	75,793,219	4.1	3,675	19.8	4.4	2.6	17.4	7.7	10.7	18.3	18.8	17.1	44.5	66.1	53.9	0.0	3.0	15.7
Spartanburg MSA	245	85,161,435	3.7	12,729	20.1	8.6	6.4	18.2	20.0	21.0	20.8	19.6	25.1	40.9	49.4	32.0	0.0	2.4	15.5
Sumter MSA	14	2,188,962	0.2	2,952	22.0	0.0	3.8	17.9	14.3	15.2	20.0	42.9	25.6	40.2	35.7	34.5	0.0	7.1	20.9
Total	6,416	2,425,806,550	100.0	137,214	21.4	6.0	6.4	17.4	14.7	18.5	19.8	17.2	21.4	41.4	58.4	36.2	0.0	3.8	17.4

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Charleston-North Charleston MSA	973	118,640	24.9	25,339	7.6	8.1	7.0	18.6	19.8	16.0	34.6	29.0	34.0	37.6	40.8	41.3	1.5	2.3	1.7
Columbia-Orangeburg-Newberry CSA	822	96,285	21.1	19,877	8.2	5.4	5.9	21.7	19.2	19.4	33.9	36.3	34.2	35.5	38.8	40.3	0.6	0.4	0.2
Florence MSA	126	12,287	3.2	3,280	3.6	0.8	2.5	24.3	22.2	18.9	40.3	35.7	44.6	31.7	41.3	34.0	0.1	0.0	0.0
Greenville-Anderson MSA	1,213	185,993	31.1	32,441	4.8	4.9	4.3	17.9	14.2	15.4	39.9	37.2	39.9	37.3	43.7	40.4	0.0	0.0	0.0
Hilton-Head Island-Bluffton MSA	559	64,654	14.3	7,138	0.0	0.0	0.0	25.6	37.9	26.2	48.2	40.4	46.2	26.2	21.6	27.6	0.0	0.0	0.0
SC Non-MSA	166	13,789	4.3	2,843	0.0	0.0	0.0	3.4	6.6	2.9	62.9	65.1	54.2	33.8	28.3	42.9	0.0	0.0	0.0
Spartanburg MSA	84	16,449	2.2	7,527	2.4	1.2	1.8	20.8	25.0	17.2	40.2	27.4	42.4	36.7	46.4	38.7	0.0	0.0	0.0
Sumter MSA	45	3,656	1.2	1,776	0.0	0.0	0.0	34.7	55.6	35.8	40.9	26.7	40.8	24.5	17.8	23.4	0.0	0.0	0.0
Total	3,904	495,304	100.0	92,694	5.6	4.7	4.8	19.7	20.5	17.4	38.7	36.4	38.2	35.5	37.8	39.2	0.5	0.6	0.5

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charleston-North Charleston MSA	570	125,043	19.0	24,675	6.7	4.6	5.4	22.7	20.7	19.4	28.1	28.4	30.2	41.4	44.7	43.2	1.2	1.6	1.8	
Columbia-Orangeburg-Newberry CSA	755	127,616	25.1	20,145	3.4	2.1	2.5	22.7	27.3	20.1	38.8	42.4	41.7	33.7	27.4	34.5	1.5	0.8	1.1	
Florence MSA	96	11,848	3.2	3,271	2.1	0.0	1.1	19.1	11.5	17.3	45.4	54.2	47.7	33.4	34.4	33.9	0.1	0.0	0.1	
Greenville-Anderson MSA	1,101	250,344	36.7	32,170	3.4	4.9	3.2	16.5	13.7	15.5	39.9	36.2	42.1	39.1	43.5	38.1	1.1	1.6	1.1	
Hilton-Head Island-Bluffton MSA	327	60,401	10.9	6,621	4.1	10.1	5.6	14.4	18.7	14.0	48.1	45.3	49.1	33.3	26.0	31.3	0.1	0.0	0.0	
SC Non-MSA	129	23,419	4.3	2,863	0.0	0.0	0.0	15.6	10.9	13.8	50.3	68.2	49.4	32.4	20.2	35.1	1.8	0.8	1.6	
Spartanburg MSA	97	24,629	3.2	7,306	2.8	0.0	3.1	14.1	14.4	11.8	50.4	44.3	53.0	31.7	41.2	31.3	0.9	0.0	0.8	
Sumter MSA	26	1,391	0.9	1,575	2.3	0.0	1.7	30.4	73.1	33.8	48.4	23.1	46.0	18.9	3.8	18.5	0.0	0.0	0.0	
Total	3,004	600,062	100.0	91,320	4.2	4.3	3.6	19.9	19.3	17.8	37.8	39.1	39.8	37.1	36.2	37.6	1.1	1.1	1.2	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charleston-North Charleston MSA	973	118,640	24.9	25,339	85.5	13.5	45.2	4.2	14.7	10.4	71.8
Columbia-Orangeburg-Newberry CSA	822	96,285	21.1	19,877	83.4	25.4	47.3	4.5	29.6	12.1	45.0
Florence MSA	126	12,287	3.2	3,280	81.5	23.8	43.6	4.9	12.7	13.6	63.5
Greenville-Anderson MSA	1,213	185,993	31.1	32,441	83.2	21.5	47.7	5.0	26.1	11.8	52.4
Hilton-Head Island-Bluffton MSA	559	64,654	14.3	7,138	87.0	24.2	44.6	4.1	25.0	8.9	50.8
SC Non-MSA	166	13,789	4.3	2,843	83.3	25.3	45.3	4.1	11.4	12.6	63.3
Spartanburg MSA	84	16,449	2.2	7,527	82.4	16.7	46.0	5.4	33.3	12.2	50.0
Sumter MSA	45	3,656	1.2	1,776	84.1	13.3	44.4	3.8	35.6	12.0	51.1
Total	3,904	495,304	100.0	92,694	84.0	20.9	46.4	4.6	22.9	11.4	56.3
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston-North Charleston MSA	570	125,043	19.0	24,675	93.2	40.4	49.8	1.6	51.1	5.2	8.6	
Columbia-Orangeburg-Newberry CSA	755	127,616	25.1	20,145	92.1	42.0	52.7	1.8	46.6	6.1	11.4	
Florence MSA	96	11,848	3.2	3,271	89.8	63.5	54.3	2.4	22.9	7.8	13.5	
Greenville-Anderson MSA	1,101	250,344	36.7	32,170	91.1	40.5	52.9	2.3	49.9	6.5	9.6	
Hilton-Head Island-Bluffton MSA	327	60,401	10.9	6,621	93.3	35.5	49.7	1.8	57.8	4.9	6.7	
SC Non-MSA	129	23,419	4.3	2,863	91.0	47.3	52.5	1.9	45.7	7.1	7.0	
Spartanburg MSA	97	24,629	3.2	7,306	90.7	22.7	51.8	2.6	62.9	6.8	14.4	
Sumter MSA	26	1,391	0.9	1,575	90.7	26.9	51.6	2.0	69.2	7.2	3.8	
Total	3,004	600,062	100.0	91,320	92.0	41.2	51.8	2.0	49.3	6.0	9.5	

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Charleston-North Charleston MSA	2	356	4.3	90	3.4	0.0	1.1	18.8	0.0	15.6	44.9	100.0	46.7	32.4	0.0	36.7	0.5	0.0	0.0
Columbia-Orangeburg-Newberry CSA	28	2,874	59.6	290	2.2	0.0	0.3	21.1	28.6	22.4	42.7	42.9	54.8	33.9	28.6	22.4	0.1	0.0	0.0
Florence MSA	4	526	8.5	108	0.2	0.0	1.9	15.8	0.0	13.9	57.3	25.0	52.8	26.7	75.0	31.5	0.0	0.0	0.0
Greenville-Anderson MSA	5	666	10.6	249	2.1	0.0	0.8	17.4	0.0	21.7	49.4	40.0	53.4	31.1	60.0	24.1	0.0	0.0	0.0
Hilton-Head Island-Bluffton MSA	0	0	0.0	31	0.0	0.0	0.0	36.4	0.0	41.9	46.6	0.0	45.2	17.0	0.0	12.9	0.0	0.0	0.0
SC Non-MSA	8	1,568	17.0	102	0.0	0.0	0.0	3.5	25.0	3.9	73.9	75.0	86.3	22.5	0.0	9.8	0.0	0.0	0.0
Spartanburg MSA	0	0	0.0	45	1.1	0.0	0.0	16.1	0.0	24.4	45.8	0.0	53.3	37.1	0.0	22.2	0.0	0.0	0.0
Sumter MSA	0	0	0.0	38	0.0	0.0	0.0	13.9	0.0	10.5	68.8	0.0	76.3	17.3	0.0	13.2	0.0	0.0	0.0
Total	47	5,990	100.0	908	2.0	0.0	0.7	19.0	21.3	18.6	49.0	48.9	57.5	29.9	29.8	23.2	0.1	0.0	0.0

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023		
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate		
Charleston-North Charleston MSA	6	1,169	9.2	88	6.1	0.0	8.0	27.2	100.0	33.0	33.2	0.0	30.7	32.9	0.0	28.4	0.6	0.0	0.0		
Columbia-Orangeburg-Newberry CSA	44	5,490	67.7	269	1.7	0.0	0.0	19.4	20.5	24.5	47.8	72.7	54.6	30.4	6.8	20.4	0.6	0.0	0.4		
Florence MSA	4	726	6.2	103	1.0	0.0	0.0	25.7	0.0	27.2	46.7	75.0	62.1	26.6	25.0	10.7	0.0	0.0	0.0		
Greenville-Anderson MSA	4	834	6.2	234	2.5	0.0	0.9	17.1	0.0	17.5	48.7	50.0	47.4	31.0	50.0	32.9	0.7	0.0	1.3		
Hilton-Head Island-Bluffton MSA	0	0	0.0	33	6.2	0.0	9.1	21.4	0.0	45.5	52.2	0.0	30.3	20.2	0.0	15.2	0.0	0.0	0.0		
SC Non-MSA	5	1,149	7.7	113	0.0	0.0	0.0	17.8	0.0	23.0	58.5	100.0	62.8	19.4	0.0	7.1	4.3	0.0	7.1		
Spartanburg MSA	0	0	0.0	43	2.4	0.0	0.0	9.4	0.0	7.0	60.0	0.0	62.8	27.9	0.0	27.9	0.3	0.0	2.3		
Sumter MSA	2	291	3.1	34	0.2	0.0	0.0	19.6	0.0	20.6	55.8	100.0	70.6	24.4	0.0	8.8	0.0	0.0	0.0		
Total	65	9,659	100.0	874	3.1	0.0	1.4	20.6	23.1	24.3	46.0	67.7	51.9	29.6	9.2	21.1	0.7	0.0	1.4		

Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Charleston-North Charleston MSA	2	356	4.3	90	94.0	100.0	56.7	3.2	0.0	2.8	0.0
Columbia-Orangeburg-Newberry CSA	28	2,874	59.6	290	96.3	67.9	46.2	2.3	10.7	1.4	21.4
Florence MSA	4	526	8.5	108	98.0	50.0	35.2	1.0	0.0	1.0	50.0
Greenville-Anderson MSA	5	666	10.6	249	97.2	0.0	47.4	1.2	40.0	1.5	60.0
Hilton-Head Island-Bluffton MSA	0	0	0	31	93.8	0	80.6	3.9	0	2.2	0
SC Non-MSA	8	1,568	17.0	102	96.2	75.0	44.1	3.0	0.0	0.8	25.0
Spartanburg MSA	0	0	0	45	96.5	0	35.6	1.6	0	1.9	0
Sumter MSA	0	0	0	38	98.7	0	34.2	0.8	0	0.4	0
Total	47	5,990	100.0	908	96.2	61.7	46.7	2.2	10.6	1.7	27.7
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>											

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023	
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans	
Charleston-North Charleston MSA	6	1,169	9.2	88	96.7	50.0	63.6	1.4	0.0	1.8	50.0	
Columbia-Orangeburg-Newberry CSA	44	5,490	67.7	269	97.6	65.9	50.9	1.1	9.1	1.3	25.0	
Florence MSA	4	726	6.2	103	98.2	75.0	37.9	0.5	25.0	1.3	0.0	
Greenville-Anderson MSA	4	834	6.2	234	98.0	50.0	56.4	0.5	0.0	1.4	50.0	
Hilton-Head Island-Bluffton MSA	0	0	0	33	96.8	0	69.7	1.8	0	1.5	0	
SC Non-MSA	5	1,149	7.7	113	98.0	60.0	38.9	1.5	0.0	0.5	40.0	
Spartanburg MSA	0	0	0	43	97.6	0	58.1	0.6	0	1.8	0	
Sumter MSA	2	291	3.1	34	98.1	50.0	38.2	0.5	50.0	1.4	0.0	
Total	65	9,659	100.0	874	97.6	63.1	50.8	1.0	9.2	1.4	27.7	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												

State of Virginia

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
Richmond MSA	69	21,849,972	100.0	75,871	4.5	1.4	4.1	15.8	11.6	13.8	38.1	26.1	34.8	41.5	60.9	47.3	0.0	0.0	0.0
Total	69	21,849,972	100.0	75,871	4.5	1.4	4.1	15.8	11.6	13.8	38.1	26.1	34.8	41.5	60.9	47.3	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																			2022-2023
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
Richmond MSA	122	35,442,010	100.0	38,928	3.3	1.6	3.8	14.7	5.7	17.6	43.4	31.1	40.4	38.1	60.7	37.8	0.5	0.8	0.4
Total	122	35,442,010	100.0	38,928	3.3	1.6	3.8	14.7	5.7	17.6	43.4	31.1	40.4	38.1	60.7	37.8	0.5	0.8	0.4

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																			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	
Richmond MSA	69	21,849,972	100.0	75,871	20.1	4.3	6.8	17.4	5.8	19.0	19.9	8.7	20.6	42.7	72.5	34.8	0.0	8.7	18.8	
Total	69	21,849,972	100.0	75,871	20.1	4.3	6.8	17.4	5.8	19.0	19.9	8.7	20.6	42.7	72.5	34.8	0.0	8.7	18.8	

*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																			2022-2023	
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	
Richmond MSA	122	35,442,010	100.0	38,928	19.9	2.5	9.0	17.9	9.8	21.4	20.3	12.3	21.4	41.8	63.9	31.7	0.0	11.5	16.5	
Total	122	35,442,010	100.0	38,928	19.9	2.5	9.0	17.9	9.8	21.4	20.3	12.3	21.4	41.8	63.9	31.7	0.0	11.5	16.5	

*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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Richmond MSA	266	61,621	100.0	28,461	6.7	4.9	5.4	21.3	18.0	19.3	31.9	30.8	32.8	39.8	46.2	42.3	0.3	0.0	0.2	
Total	266	61,621	100.0	28,461	6.7	4.9	5.4	21.3	18.0	19.3	31.9	30.8	32.8	39.8	46.2	42.3	0.3	0.0	0.2	

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2022-2023	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Richmond MSA	274	78,295	100.0	26,506	5.7	2.9	4.5	17.9	11.7	17.1	38.1	51.1	39.8	36.6	33.6	37.3	1.6	0.7	1.2	
Total	274	78,295	100.0	26,506	5.7	2.9	4.5	17.9	11.7	17.1	38.1	51.1	39.8	36.6	33.6	37.3	1.6	0.7	1.2	

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Richmond MSA	266	61,621	100.0	28,461	89.1	20.3	49.2	3.2	30.5	7.7	49.2
Total	266	61,621	100.0	28,461	89.1	20.3	49.2	3.2	30.5	7.7	49.2

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Richmond MSA	274	78,295	100.0	26,506	92.3	21.9	51.4	2.2	69.3	5.5	8.8
Total	274	78,295	100.0	26,506	92.3	21.9	51.4	2.2	69.3	5.5	8.8

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2021
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Richmond MSA	0	0	0.0	127	3.4	0.0	0.0	15.5	0.0	6.3	38.9	0.0	48.0	42.1	0.0	45.7	0.0	0.0	0.0
Total	0	0	0.0	127	3.4	0.0	0.0	15.5	0.0	6.3	38.9	0.0	48.0	42.1	0.0	45.7	0.0	0.0	0.0

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table S - Assessment Area Distribution of Loans to Farms by Income Category of the Geography																			2022-2023
Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Richmond MSA	0	0	0.0	97	3.3	0.0	2.1	14.8	0.0	6.2	41.7	0.0	48.5	39.4	0.0	43.3	0.8	0.0	0.0
Total	0	0	0.0	97	3.3	0.0	2.1	14.8	0.0	6.2	41.7	0.0	48.5	39.4	0.0	43.3	0.8	0.0	0.0

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2021
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Richmond MSA	0	0	0	127	96.7	0	56.7	1.6	0	1.6	0
Total	0	0	0	127	96.7	0	56.7	1.6	0	1.6	0

*Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Table T: Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2022-2023
Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Richmond MSA	0	0	0	97	97.5	0	53.6	1.0	0	1.4	0
Total	0	0	0	97	97.5	0	53.6	1.0	0	1.4	0

*Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; 2022 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*