



PUBLIC DISCLOSURE

October 27, 2025

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

First National Bank of Tennessee
Charter Number: 15550

214 East Main Street
Livingston, TN 38570

Office of the Comptroller of the Currency

320 Seven Springs Way, Suite 310
Brentwood, TN 37027

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

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Overall CRA Rating

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

The lending test is rated: Outstanding.

The community development test is rated: Outstanding.

The major factors that support this rating include:

- The Lending Test rating is based on First National Bank of Tennessee’s (FNBOTN, bank) reasonable loan-to-deposit (LTD) ratio, a substantial majority of lending occurring within the bank’s assessment area (AA), and an excellent distribution of home mortgage and small business loans to borrowers and geographic areas of varying income levels and sizes.
- The Community Development (CD) Test rating is based on the bank’s excellent responsiveness to the CD needs within its AA through CD loans, qualified investments, and services.

Loan-to-Deposit Ratio

Considering the bank’s size, financial condition, and credit needs of AA, the bank’s LTD ratio was reasonable.

FNBOTN’s average LTD ratio for the twelve quarters beginning January 1, 2022, and ending December 31, 2024, was 53.99 percent. The LTD ratio is calculated on a bank-wide basis. During the evaluation period, the bank’s LTD ratio ranged from a quarterly high of 60.70 percent to a low of 43.32 percent. FNBOTN’s LTD ratio is reasonable when compared to six similarly situated banks. The average LTD ratio of similarly situated banks over the evaluation period was 68.67 percent with a high average of 82.54 percent and a low average of 57.19 percent.

Lending in Assessment Area

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

The bank originated and purchased 85.56 percent of its total loans inside the bank’s AA during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	82	91.11	8	8.89	90	14,376	89.12	1,755	10.88	16,132
Small Business	72	80.00	18	20.00	90	6,729	68.68	3,068	31.32	9,797
Total	154	85.56	26	14.44	180	21,105	81.40	4,823	18.60	25,928

*Source: 1/1/2022 - 12/31/2024 Bank Data.
Due to rounding, totals may not equal 100.0%*

Description of Institution

FNBOTN is headquartered in Livingston, Tennessee. FNBOTN operates seven branch locations within middle Tennessee. These branches operate during standard business hours, with some branches providing limited operating hours on Saturdays. FNBOTN's two main offices are located in Livingston, with other branch locations in Cookeville, Algood, Crossville, Fairfield Glade, and Sparta. Branches offer lobby, drive-up, and automated teller machine (ATM) options. The bank has an additional stand-alone ATM in Cookeville. There have been no branch openings or closures since the last CRA evaluation in 2022. There are no legal, financial, or other factors impeding FNBOTN's ability to meet the credit needs of the AA. The most recent CRA Performance Evaluation was dated August 1, 2022, and rated the bank's CRA performance as Outstanding.

FNBOTN's primary business strategy is to serve commercial and consumer customers within its AA. The bank offers traditional banking products and services to these customers. As of December 31, 2024, the bank reported tier 1 capital of \$142 million and total assets of \$1.3 billion. Total loans make up 54.0 percent of total assets. The loan portfolio consists of 50.8 percent business loans, 33.7 percent mortgage loans, 8.4 percent multifamily loans, 3.7 percent consumer loans, and 3.4 percent farm and agriculture loans.

The bank has one designated AA consisting of a non-Metropolitan Statistical Area (MSA) comprised of Cumberland, Overton, Putnam, and White counties, collectively referred to as the non-MSA TN AA. Within this AA, there were 49 census tracts (CTs) during the evaluation period. Of these 49 census tracts, there were no low-income CTs and 6 moderate-income CTs. None of the four counties in the AA were listed as distressed or underserved.

Competition in the AA includes various other community and larger regional and national banks. As of June 30, 2024, FNBOTN holds 18.99 percent of market share deposits, which is second out of twenty institutions in in the AA.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2022, through December 31, 2024. This Performance Evaluation (PE) assessed the bank's performance under the Lending Test and the CD Test using Intermediate Small Bank (ISB) procedures. To evaluate performance under the Lending Test, we reviewed one-to-four family home mortgage loans and loans to small businesses, as these represent the bank's primary lending products. Our analysis is based on a sample of loans originated or purchased, not the full population of data, and is considered in context. Consumer lending and farm lending did not constitute substantial lending activity during the review period; therefore, these loan products were not considered in the lending performance evaluation. We placed more weight on the bank's distribution of loans by income level of the borrowers and less weight on the bank's geographic distribution of loans as the AA has no low-income CTs and a low number of moderate-income CTs. We also placed more weight on the bank's small business loan performance as this represents the largest percentage of the bank's lending activity. To evaluate performance under the CD Test, we assessed the bank's record of responsiveness to the AA needs through qualified loans, investments, and services.

Selection of Areas for Full-Scope Review

In each state where the bank has an office, one or more of AAs within that state was selected for a full-scope review. For purposes of this evaluation, bank delineated AAs located within the same MSA, multistate metropolitan statistical area (MMSA), or combined statistical area (CSA), if applicable are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the “Scope” section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

Ratings

The bank’s overall rating is a blend of the state ratings, and where applicable, multistate ratings.

The MMSA rating and state ratings in rating areas with a single AA are based on performance in that AA. The MMSA and state ratings in rating areas with multiple AAs are based on the weighted-average conclusions in those AAs. 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.

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) (March 29, 2024) 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 AA by an affiliate whose loans have been considered as part of the bank’s lending performance. As part of this evaluation process, the OCC consults with other federal agencies with responsibility for compliance with the relevant laws and regulations, including the U.S. Department of Justice, the U.S. Department of Housing and Urban Development, and the Consumer Financial Protection Bureau, as applicable.

The OCC has not identified that this institution has engaged in discriminatory or other illegal credit practices that require consideration in this evaluation.

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

State Rating

State of Tennessee

CRA rating for the State of Tennessee¹: Outstanding

The Lending Test is rated: Outstanding

The Community Development Test is rated: Outstanding

The major factors that support this rating include:

- The bank exhibited an excellent distribution of loans to moderate-income CTs and to individuals of different income levels and businesses of different sizes.
- The bank demonstrated excellent responsiveness to CD needs in the AA.
- The bank did not receive any complaints regarding its CRA performance during the evaluation period.

Description of Institution's Operations in Tennessee

FNBOTN operates only in Tennessee. The information provided in the "Description of Institution" section of this PE describes the bank's operations in Tennessee.

We obtained feedback from multiple contacts with local nonprofit organizations. Common responses indicated the AA needs include opportunities for affordable housing, financial literacy programs, affordable childcare programs, and workforce development.

The following table depicts the demographic information for the full-scope AA in Tennessee.

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

Tennessee non-Metropolitan Statistical Area (non-MSA)

Assessment Area(s) – 2024 Tennessee non-Metropolitan Statistical Area (non-MSA)						
						2022-2024
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	49	0.00	12.24	75.51	12.24	0.00
Population by Geography	190,861	0.00	13.60	74.58	11.82	0.00
Housing Units by Geography	87,346	0.00	12.60	75.01	12.39	0.00
Owner-Occupied Housing by Geography	55,461	0.00	7.39	79.44	13.17	0.00
Occupied Rental Units by Geography	21,893	0.00	25.73	62.04	12.24	0.00
Vacant Units by Geography	9,992	0.00	12.79	78.80	8.41	0.00
Businesses by Geography	5,612	0.00	20.65	64.72	14.63	0.00
Farms by Geography	280	0.00	12.50	78.57	8.93	0.00
Family Distribution by Income Level	50,987	18.50	18.94	21.07	41.49	0.00
Household Distribution by Income Level	77,354	23.71	16.17	17.79	42.34	0.00
Unemployment rate (%)	5.54	0.00	15.13	3.83	5.01	0.00
Households Below Poverty Level (%)	15.97	0.00	29.02	14.14	13.83	0.00
Median Family Income (Non-MSAs - TN)		\$55,998			Median Housing Value	\$147,200
Median Family Income (Non-MSAs - TN) for 2024		\$69,100			Median Gross Rent	\$713
					Families Below Poverty Level	10.68
FFIEC File - 2020 Census FFIEC File – 2024 Census 2024 Dun & Bradstreet SBSF Demographics Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification						

Scope of Evaluation in Tennessee

The bank’s only AA in Tennessee, the non-MSA TN AA, received a full-scope review.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

LENDING TEST

The bank’s performance under the Lending Test in Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s lending performance in the state of Tennessee was excellent.

Distribution of Loans by Income Level of the Geography

The bank exhibited excellent geographic distribution of loans in the state.

Home Mortgage Loans

Refer to Table 7 in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s home mortgage loan originations and purchases.

In 2022-2024, the bank originated 2.22 percent of home mortgage loans in moderate-income CTs, which is in-line with the percentage of owner-occupied housing units (7.39 percent) and the peer aggregate lending level (7.70 percent). There were no low-income CTs in the AA during the evaluation period.

Small Loans to Businesses

Refer to Table 9 in the state of Tennessee section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's originations and purchases of small loans to businesses.

In 2022-2024, the bank originated 16.67 percent of small business loans in moderate-income CTs. This is in-line with the percentage of businesses located within moderate-income CTs (20.65 percent), and exceeds the peer aggregate lending level (13.90). There were no low-income CTs in the AA during the evaluation period.

Lending Gap Analysis

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

Distribution of Loans by Income Level of the Borrower

The bank exhibited an excellent distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the bank.

Home Mortgage Loans

Refer to Table 8 in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In 2022-2024, the bank originated 6.67 percent of home mortgage loans to low-income borrowers. This is below the percentage of low-income families in the AA (18.50 percent) but exceeds the peer aggregate lending level (5.19 percent). The bank originated 17.78 percent of home mortgage loans to moderate-income borrowers. This is slightly below the overall percentage of moderate-income families in the AA (18.94 percent) but exceeds the peer aggregate lending level (14.32 percent).

Small Loans to Businesses

Refer to Table 10 in the state of Tennessee section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

In 2022-2024, the bank originated 93.33 percent of small business loans to businesses with annual revenues less than or equal to \$1 million, which significantly exceeds the percentage of businesses in this category (78.40 percent) and the peer aggregate lending level (63.31 percent).

Responses to Complaints

FNBOTN did not receive any CRA-related complaints during the evaluation period of 2022 to 2024.

COMMUNITY DEVELOPMENT TEST

The bank's performance under the CD Test in the state of Tennessee is rated Outstanding.

Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibited excellent responsiveness to CD needs in the state through CD loans, qualified investments, and CD services, as appropriate, considering the bank’s capacity and the need and availability of such opportunities for community development in the bank’s AA.

Number and Amount of Community Development Loans

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

Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Non-MSA Tennessee AA	6	100.0	35,881	100.0

FNBOTN was responsive to borrowing needs through originating CD loans. During the three-year evaluation period, the bank originated six CD loans totaling \$35.9 million. The CD loans represent 25.3 percent of the Bank’s tier 1 capital as of December 31, 2024. The bank funded most of this loan volume through two certified Community Development Financial Institutions (CDFIs), which downstream the funds to borrowers for a variety of purposes including the revitalization and stabilization low- to moderate-income (LMI) geographies.

The following are examples of CD loans the bank originated or purchased in this AA:

- Line of credit to an organization dedicated to urban planning and affordable housing
- Loan to a CDFI to revitalize and stabilize LMI geographies.

Number and Amount of Qualified Investments

Assessment Area	Prior Period*		Current Period		Total				Unfunded Commitments**	
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$	#	\$(000's)
Non-MSA Tennessee AA	1	106	72	48	73	100.0	154	100.0	0	0
Total	1	106	72	48	73	100.0	154	100.0	0	0

FNBOTN made 72 current period grants totaling \$44,245, and \$4,250 of in-kind grant donations. As of December 31, 2024, the bank also had one prior period investment with an outstanding balance of \$106,445. The combined prior and current dollar volume represented less than one percent of the bank’s total tier 1 capital.

The following are examples of qualified investments in the AA:

- Donation to organization that provides affordable housing assistance.
- Investment with an organization that provides workforce development and community advocacy within the bank's AA.

Extent to Which the Bank Provides Community Development Services

FNBOTN was effective and responsive in addressing CD needs by providing 350 hours of CD services to 27 service organizations. The purpose of these service organizations included revitalization and/or stabilization, economic development, affordable housing, and community services. Senior bank personnel served on the Board of Directors for 18 of the organizations and bank employees provided specialized services, such as lending and/or financial expertise, to the remaining organizations.

Examples of employees' participation include the following:

- A bank employee provided 51 service hours as a board member of a non-profit organization that assists LMI individuals by constructing affordable housing in the AA.
- Eight bank employees provided 163 service hours on financial education to LMI students and individuals related to finance, banking products, and budgeting.

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 MSA(s) and non-MSA(s) 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:	01/01/22 to 12/31/24	
Bank Products Reviewed:	Home mortgage, small business loans, community development loans, qualified investments, community development services	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A	N/A	N/A
List of Assessment Areas and Type of Examination		
Rating and Assessment Areas	Type of Exam	Other Information
MMSA(s)		
None	None	
Tennessee		
Tennessee non-Metropolitan Statistical Area (non-MSA)	Full-scope	Counties of Cumberland, Overton, Putnam, and White

Appendix B: Summary of MMSA and State Ratings

RATINGS			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank of Tennessee	Outstanding	Outstanding	Outstanding
MMSA or State:			
Tennessee	Outstanding	Outstanding	Outstanding

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

Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

Community Development (CD): Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the 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 low- and moderate-income 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): Loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, other secured consumer loans, and other unsecured consumer loans.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multistate Metropolitan Statistical Area (MMSA): 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.

Prior Period Investments: Investments made in a previous evaluation period that are outstanding as of the end of the evaluation period.

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

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

Unfunded Commitments: Legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

A separate set of tables is provided for each state. All multistate metropolitan statistical areas, if applicable, are presented in one set of tables. References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to appendix A: Scope of the Examination). For purposes of reviewing the Lending Test tables, the following are applicable: (1) purchased are treated as originations; and (2) “aggregate” is the percentage of the aggregate number of reportable loans originated and purchased by all HMDA or CRA-reporting lenders in the MMSA/AA. 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 7. 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 8. 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/AA. The table also presents aggregate peer data for the years the data is available.
- Table 9. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** – Compares 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 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 AA.
- Table 10. 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 11. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** – Compares 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 to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s AA.
- Table 12. 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 \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to: (1) the percentage distribution of farms with revenues of greater than \$1 million; and, (2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.
- Table 13. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.
- Table 14. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/AA.

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.

Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total Number	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
2024 Tennessee non-Metropolitan Statistical Area (non-MSA)	90	15,632	100.00	13,929	--	--	--	7.39	2.22	7.70	79.44	86.67	79.52	13.17	11.11	12.78	--	--	--
Total	90	15,632	100.00	13,929	--	--	--	7.39	2.22	7.70	79.44	86.67	79.52	13.17	11.11	12.78	--	--	--

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank 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 Number	Overall Market	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate	% Families	% Bank Loans	% Aggregate
2024 Tennessee non-Metropolitan Statistical Area (non-MSA)	90	15,632	100.00	13,929	18.50	6.67	5.19	18.94	17.78	14.32	21.07	17.78	22.08	41.49	57.78	41.24	--	--	17.17
Total	90	15,632	100.00	13,929	18.50	6.67	5.19	18.94	17.78	14.32	21.07	17.78	22.08	41.49	57.78	41.24	--	--	17.17

*Source: FFIEC File - 2020, 2024 Census; 1/1/2022 - 12/31/2024 Bank Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

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

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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Aggregate
2024 Tennessee non-Metropolitan Statistical Area (non-MSA)	90	8,492	100.00	6,157	--	--	--	20.65	16.67	13.90	64.72	75.56	73.23	14.63	7.78	12.86	--	--	--
Total	90.00	8,492	100.00	6,157	--	--	--	20.65	16.67	13.90	64.72	75.56	73.23	14.63	7.78	12.86	--	--	--

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 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 Number	Overall Market	% Businesses	% Bank Loans	% Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
2024 Tennessee non-Metropolitan Statistical Area (non-MSA)	90	8,492	100.00	6,157	78.40	93.33	63.31	10.35	6.67	11.24	--
Total	90	8,492	100.00	6,157	78.40	93.33	63.31	10.35	6.67	11.24	--

*Source: FFIEC File - 2020 Census; 1/1/2022 - 12/31/2024 Bank Data, 2024 Dunn & Bradstreet SBSF Demographics, 2024 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

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