



**PUBLIC DISCLOSURE**

June 3, 2024

**COMMUNITY REINVESTMENT ACT  
PERFORMANCE EVALUATION**

The First National Bank of Middle Tennessee  
**Charter Number 2221**

200 East Main Street  
McMinnville, TN 37110

Office of the Comptroller of the Currency

320 Seven Springs Way, Suite 310  
Brentwood, TN 37027

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

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## Overall CRA Rating

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

**The lending test is rated: Satisfactory.**

**The community development test is rated: Satisfactory.**

The major factors that support this rating include:

- The Lending Test rating is based on The First National Bank of Middle TN's (FNB or bank) more than reasonable loan-to-deposit (LTD) ratio, majority of lending occurring inside the assessment areas (AAs), a reasonable geographic distribution of loans, and a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on the bank's adequate responsiveness to CD needs in each AA through CD lending, qualified investment, and services.

### Loan-to-Deposit Ratio

Considering the bank's size, financial condition, and credit needs of the AAs, the bank's LTD ratio is more than reasonable.

The bank's quarterly average LTD ratio for the twelve quarters beginning March 31, 2021, was 89.2 percent, with a quarterly high of 93.9 percent and a quarterly low of 83.8 percent. We compared the bank's LTD ratio to nine similarly situated banks in the AAs. The quarterly average LTD ratio for banks in this peer group was 81.1 percent with a high average ratio of 100.8 percent and a low average ratio of 51.8 percent. The LTD ratios are calculated on a bank-wide basis.

### Lending in Assessment Area

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

The bank originated and purchased 59.0 percent of its total loans inside its 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 that may be considered under the other performance criteria.

| <b>Lending Inside and Outside of the Assessment Area</b> |                 |             |            |             |              |                                 |             |                |             |                   |
|--|-----------------|-------------|------------|-------------|--------------|---------------------------------|-------------|----------------|-------------|-------------------|
| Loan Category  | Number of Loans |             |            |             | Total<br>#   | Dollar Amount of Loans \$(000s) |             |                |             | Total<br>\$(000s) |
|  | Inside          |             | Outside    |             |              | Inside                          |             | Outside        |             |                   |
|  | #               | %           | #          | %           |              | \$                              | %           | \$             | %           |                   |
| Home Mortgage  | 1,322           | 58.6        | 935        | 41.4        | 2,257        | 381,446                         | 55.8        | 301,977        | 44.2        | 683,423           |
| Small Business   | 45              | 75.0        | 15         | 25.0        | 60           | 13,355                          | 73.0        | 4,940          | 27.0        | 18,295            |
| <b>Total</b>   | <b>1,367</b>    | <b>59.0</b> | <b>950</b> | <b>41.0</b> | <b>2,317</b> | <b>394,801</b>                  | <b>56.3</b> | <b>306,917</b> | <b>43.7</b> | <b>701,718</b>    |

## Description of Institution

FNB is an independent, intrastate bank that opened for business in 1874. The bank is a wholly owned subsidiary of First McMinnville Corporation, a one-bank holding company. Waterstone Title and Escrow is a wholly owned subsidiary of FNB. The bank does not have any affiliates with lending products. There have not been any material changes in the bank's corporate structure including merger or acquisition activities since the previous CRA evaluation dated March 15, 2021, when the bank received a "Satisfactory" rating. There are no legal or financial impediments to FNB's ability to meet the credit needs of its AAs, including retail and CD loans, qualified investments, and CD service needs. The bank offers a full range of loan and deposit services.

The holding company, bank, and subsidiary are in McMinnville, Tennessee, approximately 75 miles southeast of Nashville, Tennessee. The bank operates ten full-service offices in Tennessee. The bank has five branches, including the main office, in Warren County, two branches in Rutherford County, two branches in Davidson County, and one branch in Bedford County. FNB did not close any branch offices during this evaluation period, but did open one new branch in Davidson County, in 2021. The Bank has two AAs, the Nashville Metropolitan Statistical Area (MSA) AA and the Tennessee Non-MSA AA. The Nashville MSA AA includes all census tracts (CTs) in Rutherford and Davidson Counties. The Tennessee Non-MSA AA includes all CTs in Warren and Bedford Counties.

FNB provides a range of traditional deposit and loan products. Branches are located in accessible areas, with no significant geographical barriers. Lobby hours and drive-up hours are set to meet customer needs. The Main Office and all bank branches have automated teller machines (ATMs) that disburse cash. Customers have 24-hour access to their accounts through telephone, internet, and mobile banking for account information and transactions between FNB accounts. Internet and mobile banking customers may use bill-pay and e-statement services. The bank offers account access through bank-issued debit cards allowing point-of-sale or ATM transactions.

FNB's primary lending products are commercial loans, including commercial real estate and commercial and industrial loans, at \$254.4 million or 36.8 percent of total loans, and residential mortgage loans at \$321.1 million or 46.4 percent of total loans. As of December 31, 2023, FNB had total assets and total loans of \$866.3 million and \$692.0 million, respectively. Total loans represent 79.9 percent of total assets. Tier 1 capital was \$88.6 million.

FNB's business strategy includes continued marketing of commercial credit to small businesses through products, staff, and locations. The bank is actively involved in all types of commercial real estate development and construction lending. Small business loans are available for new business startups and

for the expansion of existing businesses. FNB also supports the purchase and long-term financing of residential home loans through its conventional secondary market home mortgage department, Tennessee Housing Development Association (THDA), and rural housing guaranteed home mortgage programs, as well Veterans Administration (VA) and Federal Housing Administration (FHA) loan programs that provide lending to low- and moderate-income (LMI) individuals.

## **Scope of the Evaluation**

### **Evaluation Period/Products Evaluated**

The evaluation period for this examination is January 1, 2021, to December 31, 2023. We completed a review of the bank's CRA performance in its AAs using the Intermediate Small Bank CRA procedures, which include the Lending Test and CD Test. In evaluating the Bank's lending performance, we reviewed one-to-four family mortgage loans subject to filing under the Home Mortgage Disclosure Act (HMDA) and loans to small businesses, the bank's primary lending products. As our analysis of one-to-four family mortgage loans included the full population of originated or purchased HMDA-reportable loans, and this loan type makes up the majority of the bank's loan portfolio, home mortgage loans received a greater weighting in our analysis. Lending performance for business loans is based on a sample of loans originated or purchased, not the full population of data, and is considered in context. For the CD test, we evaluated all loans, investments, and services that met the regulatory definition of CD activities.

For the 2021 Geographic and Borrower Distribution analyses, FNB's loan originations are compared to the 2015 American Community Survey (ACS) Census data and aggregate HMDA and CRA data. For the 2022 and 2023 Geographic and Borrower Distribution analyses, FNB's loan originations are compared to the 2020 United States (US) Census data and aggregate HMDA and CRA data.

### **Selection of Areas for Full-Scope Review**

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

### **Ratings**

The bank's overall rating is based on its performance in the State of Tennessee. Given the bank's significant loan and deposit activity in each AA, we placed equal weight on performance in the Nashville MSA and Tennessee Non-MSA AAs. We evaluated performance in the bank's two primary lending products, home mortgage loans and small business loans. We placed more weight on home mortgage lending performance, as this is the bank's largest product and our analysis included the full population of HMDA-reportable loans in our evaluation period.

The state ratings are based on performance in all bank AAs. Refer to the “Scope” section under the State of Tennessee Rating section for details regarding how the areas were weighted in arriving at the respective ratings.

## **Discriminatory or Other Illegal Credit Practices Review**

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

The OCC has not identified that this institution 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 Tennessee<sup>1</sup>:** Satisfactory

**The Lending Test is rated:** Satisfactory

**The Community Development Test is rated:** Satisfactory

The major factors that support this rating include:

- The bank exhibited a reasonable geographic distribution of loans in the state.
- The bank exhibited a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank's performance under the Community Development Test is satisfactory.

### Description of Institution's Operations in Tennessee

FNB operates only in Tennessee. The information provided in the "Description of Institution" section of this Performance Evaluation describes the institution's operations in Tennessee.

FNB has six branch locations in the Tennessee Non-MSA AA, five in Warren County, including the main office, and one in Bedford County. The bank held the largest market share in Warren County, at 39.3 percent as of June 30, 2023, when compared to seven other financial institutions. FNB's presence in Bedford County is more limited as evidenced by a deposit market share of 0.8 percent as of the same date. The bank holds the smallest market share when compared to seven other financial institutions in the county. FNB faces competition in the AA from community, regional, and large banks.

FNB has four branches in the Nashville MSA AA, with two in Davidson County and two in Rutherford County. FNB ranks 22<sup>nd</sup> out of 34 financial institutions operating in Davidson County, with 0.3 percent of the total market share. In Rutherford County, FNB ranks 10<sup>th</sup> out of 23 financial institutions, with 1.3 percent market share. In both counties, FNB faces significant competition from large and regional banks.

We contacted two community members from the bank's AAs as part of this examination. One contact's organization works to facilitate community development in the Tennessee Non-MSA AA. The contact stated there is a need for affordable housing. The other community contact represented a non-profit in the Nashville MSA AA that provides community services, including free financial counseling. This contact also noted the need for affordable housing.

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<sup>1</sup> This rating reflects performance within the state.

## Nashville MSA AA

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                       |                              |                          |                         |                       |
|--|----------|-----------------------|------------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2021 Nashville MSA AA</b>  |          |                       |                              |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b>   | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 210      | 14.3                  | 27.1                         | 34.8                     | 21.9                    | 1.9                   |
| Population by Geography  | 941,064  | 10.8                  | 27.0                         | 38.8                     | 22.9                    | 0.4                   |
| Housing Units by Geography   | 398,098  | 11.0                  | 27.2                         | 38.0                     | 23.7                    | 0.0                   |
| Owner-Occupied Units by Geography  | 209,737  | 5.6                   | 19.8                         | 44.2                     | 30.4                    | 0.0                   |
| Occupied Rental Units by Geography   | 155,135  | 17.2                  | 36.7                         | 31.1                     | 15.1                    | 0.0                   |
| Vacant Units by Geography  | 33,226   | 16.6                  | 29.9                         | 31.7                     | 21.8                    | 0.0                   |
| Businesses by Geography  | 111,524  | 11.3                  | 23.3                         | 30.9                     | 33.2                    | 1.3                   |
| Farms by Geography   | 1,910    | 7.5                   | 20.3                         | 42.9                     | 28.6                    | 0.7                   |
| Family Distribution by Income Level  | 216,892  | 23.3                  | 18.4                         | 20.4                     | 37.9                    | 0.0                   |
| Household Distribution by Income Level   | 364,872  | 24.7                  | 17.8                         | 18.8                     | 38.7                    | 0.0                   |
| Median Family Income MSA - 34980<br>Nashville-Davidson--Murfreesboro--<br>Franklin, TN MSA               |          | \$66,441              | Median Housing Value         |                          |                         | \$192,058             |
|  |          |                       | Median Gross Rent            |                          |                         | \$890                 |
|  |          |                       | Families Below Poverty Level |                          |                         | 12.0%                 |
| <i>Source: 2015 ACS and 2021 D&amp;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> |          |                       |                              |                          |                         |                       |

| <b>Table A – Demographic Information of the Assessment Area</b>                            |           |                       |                            |                          |                         |                       |
|--|-----------|-----------------------|----------------------------|--------------------------|-------------------------|-----------------------|
| <b>Assessment Area: 2022-2023 Nashville MSA AA</b>   |           |                       |                            |                          |                         |                       |
| <b>Demographic Characteristics</b>   | <b>#</b>  | <b>Low<br/>% of #</b> | <b>Moderate<br/>% of #</b> | <b>Middle<br/>% of #</b> | <b>Upper<br/>% of #</b> | <b>NA*<br/>% of #</b> |
| Geographies (Census Tracts)  | 238       | 7.6                   | 27.3                       | 38.7                     | 22.7                    | 3.8                   |
| Population by Geography  | 1,057,370 | 6.4                   | 25.7                       | 42.1                     | 24.2                    | 1.6                   |
| Housing Units by Geography   | 441,810   | 6.7                   | 26.5                       | 40.6                     | 24.8                    | 1.4                   |
| Owner-Occupied Units by Geography  | 232,564   | 3.0                   | 20.1                       | 46.4                     | 29.6                    | 0.8                   |
| Occupied Rental Units by Geography   | 171,876   | 11.4                  | 34.9                       | 34.2                     | 17.5                    | 2.0                   |
| Vacant Units by Geography  | 37,370    | 7.9                   | 27.7                       | 33.6                     | 28.8                    | 2.1                   |
| Businesses by Geography  | 151,923   | 5.4                   | 26.3                       | 31.9                     | 32.4                    | 4.0                   |
| Farms by Geography   | 2,546     | 3.9                   | 21.2                       | 41.4                     | 31.4                    | 2.1                   |
| Family Distribution by Income Level  | 237,775   | 22.6                  | 18.9                       | 21.7                     | 36.8                    | 0.0                   |
| Household Distribution by Income Level   | 404,440   | 23.7                  | 18.6                       | 19.5                     | 38.2                    | 0.0                   |
| Median Family Income MSA - 34980<br>Nashville-Davidson--Murfreesboro--<br>Franklin, TN MSA |           | \$83,085              | Median Housing Value       |                          |                         | \$283,699             |
|  |           |                       | Median Gross Rent          |                          |                         | \$1,175               |



|  |                              |      |
|--|------------------------------|------|
|  | Families Below Poverty Level | 9.2% |
| <i>Source: 2020 U.S. Census and 2023 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |                              |      |

Tennessee Non-MSA AA

| <b>Table A – Demographic Information of the Assessment Area</b>  |          |                   |                              |                      |                     |                   |
|--|----------|-------------------|------------------------------|----------------------|---------------------|-------------------|
| <b>Assessment Area: 2021 Tennessee Non-MSA AA</b>  |          |                   |                              |                      |                     |                   |
| <b>Demographic Characteristics</b>   | <b>#</b> | <b>Low % of #</b> | <b>Moderate % of #</b>       | <b>Middle % of #</b> | <b>Upper % of #</b> | <b>NA* % of #</b> |
| Geographies (Census Tracts)  | 18       | 0.0               | 22.2                         | 50.0                 | 27.8                | 0.0               |
| Population by Geography  | 86,001   | 0.0               | 26.7                         | 52.8                 | 20.5                | 0.0               |
| Housing Units by Geography   | 36,344   | 0.0               | 27.2                         | 52.1                 | 20.8                | 0.0               |
| Owner-Occupied Units by Geography  | 22,205   | 0.0               | 20.3                         | 55.5                 | 24.2                | 0.0               |
| Occupied Rental Units by Geography   | 10,177   | 0.0               | 38.3                         | 47.3                 | 14.4                | 0.0               |
| Vacant Units by Geography  | 3,962    | 0.0               | 36.8                         | 45.2                 | 18.0                | 0.0               |
| Businesses by Geography  | 5,317    | 0.0               | 33.3                         | 49.4                 | 17.3                | 0.0               |
| Farms by Geography   | 394      | 0.0               | 12.2                         | 60.9                 | 26.9                | 0.0               |
| Family Distribution by Income Level  | 22,612   | 20.0              | 18.4                         | 19.6                 | 42.0                | 0.0               |
| Household Distribution by Income Level   | 32,382   | 21.9              | 16.9                         | 16.5                 | 44.6                | 0.0               |
| Median Family Income Non-MSAs - TN   |          | \$46,066          | Median Housing Value         |                      |                     | \$106,761         |
|  |          |                   | Median Gross Rent            |                      |                     | \$634             |
|  |          |                   | Families Below Poverty Level |                      |                     | 14.5%             |
| <i>Source: 2015 ACS and 2021 D&amp;B Data</i><br><i>Due to rounding, totals may not equal 100.0%</i><br><i>(*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                   |                              |                      |                     |                   |

| <b>Table A – Demographic Information of the Assessment Area</b> |          |                   |                        |                      |                     |                   |
|---|----------|-------------------|------------------------|----------------------|---------------------|-------------------|
| <b>Assessment Area: 2022-2023 Tennessee Non-MSA AA</b>          |          |                   |                        |                      |                     |                   |
| <b>Demographic Characteristics</b>                              | <b>#</b> | <b>Low % of #</b> | <b>Moderate % of #</b> | <b>Middle % of #</b> | <b>Upper % of #</b> | <b>NA* % of #</b> |
| Geographies (Census Tracts)                                     | 20       | 0.0               | 10.0                   | 70.0                 | 20.0                | 0.0               |
| Population by Geography   | 91,190   | 0.0               | 14.2                   | 67.2                 | 18.5                | 0.0               |
| Housing Units by Geography                                      | 37,363   | 0.0               | 13.1                   | 69.1                 | 17.9                | 0.0               |
| Owner-Occupied Units by Geography                               | 23,328   | 0.0               | 10.7                   | 66.0                 | 23.3                | 0.0               |
| Occupied Rental Units by Geography                              | 9,677    | 0.0               | 20.6                   | 72.0                 | 7.4                 | 0.0               |
| Vacant Units by Geography                                       | 4,358    | 0.0               | 8.7                    | 79.0                 | 12.3                | 0.0               |
| Businesses by Geography   | 6,232    | 0.0               | 19.7                   | 62.9                 | 17.4                | 0.0               |
| Farms by Geography  | 474      | 0.0               | 5.9                    | 68.4                 | 25.7                | 0.0               |
| Family Distribution by Income Level                             | 22,997   | 18.0              | 18.5                   | 21.4                 | 42.2                | 0.0               |
| Household Distribution by Income Level                          | 33,005   | 20.1              | 14.9                   | 19.8                 | 45.2                | 0.0               |

|  |          |                              |           |
|--|----------|------------------------------|-----------|
| Median Family Income Non-MSAs - TN   | \$56,418 | Median Housing Value         | \$147,193 |
|  |          | Median Gross Rent            | \$708     |
|  |          | Families Below Poverty Level | 13.2%     |
| <i>Source: 2020 U.S. Census and 2023 D&amp;B Data<br/> Due to rounding, totals may not equal 100.0%<br/> (*) The NA category consists of geographies that have not been assigned an income classification.</i> |          |                              |           |

## Scope of Evaluation in Tennessee

The state rating for Tennessee is based on full-scope reviews of the Nashville MSA and Tennessee Non-MSA AAs. We selected both AAs for full-scope reviews due to the significant lending and deposit activity in each AA. We placed equal weight on the bank's performance in each AA, but placed more weight on home mortgage lending performance, as this loan type makes up the majority of the bank's loan portfolio.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TENNESSEE

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's lending performance in the state of Tennessee is reasonable.

### Distribution of Loans by Income Level of the Geography

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

#### *Home Mortgage Loans*

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

#### Tennessee Non-MSA AA

The distribution of home mortgage loans to geographies of different income levels in this AA is excellent. The percentage of the bank's loans in moderate-income CTs exceeded or equaled both the percentage of owner-occupied housing units and aggregate peer lending levels in the 2021 and 2022-2023 timeframes. There are no low-income CTs in this AA.

#### Nashville MSA AA

The distribution of home mortgage loans to geographies of different income levels in this AA is reasonable. In 2021, the bank's percentage of loans in low-income CTs was below the percentage of owner-occupied housing units as well as the aggregate peer lending levels. The percentage of loans in moderate-income CTs was in-line with the percentage of owner-occupied housing units and exceeded

peer lending levels. In 2022-2023, the percentage of loans in low-income CTs was in-line with the percentage of owner-occupied units but below aggregate peer levels. In moderate-income CTs, the percentage of the bank's loans were below the percentage of owner-occupied housing units and peer aggregate levels.

### ***Small Loans to Businesses***

Refer to Table Q in 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.

#### Tennessee Non-MSA AA

The distribution of small loans to businesses in geographies of different income levels in this AA is excellent. The percentage of the bank's loans in moderate-income CTs exceeded the percentage of businesses and aggregate peer levels in 2021 and significantly exceeded both comparators in 2022-2023. There are no low-income CTs in this AA.

#### Nashville MSA AA

The distribution of small loans to businesses in geographies of different income levels in this AA is reasonable. In 2021, the bank's percentage of loans in low-income CTs significantly exceeds the percentage of businesses and aggregate peer lending levels. The bank's percentage of loans in moderate-income CTs is slightly below the percentage of businesses and aggregate peer levels. In 2022-2023, the bank made no loans in low-income CTs, which is below the percentage of businesses and peer lending levels in those areas. Overall lending opportunities were notably small in low-income CTs for 2022-2023. In moderate-income CTs, the bank's percentage of loans significantly exceeded the percentage of businesses and aggregate peer lending levels.

### ***Lending Gap Analysis***

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

### **Distribution of Loans by Income Level of the Borrower**

Given the product lines offered by the bank, the bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes.

### ***Home Mortgage Loans***

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

#### Tennessee Non-MSA AA

The distribution of home mortgage loans to individuals of different income levels in this AA is reasonable. The bank's lending in 2021 and 2022-2023 was comparable. For each year, the bank's percentage of loans to low-income borrowers was below the percentage of families, but exceeded aggregate peer lending levels. The bank's percentage of loans to moderate-income borrowers exceeded the percentage of families and aggregate per lending levels.

Nashville MSA AA

The distribution of home mortgage loans to individuals of different income levels in this AA is reasonable. In 2021, the bank's lending to low-income borrowers was below the percentage of families but exceeded aggregate lending levels. The bank's lending to moderate-income borrowers exceeded the percentage of families and aggregate lending levels. In 2022-2023, the bank's lending to low-income borrowers was below the percentage of families and aggregate lending levels. The bank's lending to moderate-income borrowers exceeded both the percentage of families and aggregate peer lending levels.

***Small Loans to Businesses***

Refer to Table R in 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.

Tennessee Non-MSA AA

The distribution of small loans to businesses of different sizes is poor. In 2021, the bank's percentage of small loans to businesses with gross revenues equal to or less than \$1 million was significantly below the percentage of businesses but slightly below the aggregate lending level. In 2022-2023, the bank's lending to businesses with gross revenues less than \$1 million was significantly below the percentage of businesses and aggregate lending levels. However, the bank originates a significant number of small dollar loans to businesses based on other factors, where business revenue is not available. In our sample, ten percent of loans in 2021 and 27.5 percent of loans in 2022-2023, were small loans made to businesses with revenues not available. These loans benefitted businesses in the AA by financing business real estate investments and providing lower cost cash-secured funding.

Nashville MSA AA

The distribution of small loans to businesses of different sizes is poor. In 2021, the bank's percentage of small loans to businesses with gross revenues less than \$1 million was lower than the percentage of businesses but significantly exceeded peer lending levels. In 2022-2023, the bank's lending of small loans to businesses with revenues less than \$1 million was significantly lower than the percentage of businesses and aggregate lending levels. However, the bank originates a significant number of small dollar loans to businesses based on other factors, where business revenue is not available. In our sample, 20.0 percent of loans in 2021, and 10.0 percent of loans in 2022-2023, were small loans made to business with revenues not available. These loans benefitted businesses in the AA by primarily financing business real estate investments.

**Responses to Complaints**

FNB received no CRA-related complaints during the evaluation period.

**COMMUNITY DEVELOPMENT TEST**

The bank's performance under the Community Development Test in the state of Tennessee is rated Satisfactory.

## Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank exhibits adequate 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 CD in the bank's AAs.

### 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.

| <i>Community Development Loans</i> |       |              |           |               |
|------------------------------------|-------|--------------|-----------|---------------|
| Assessment Area                    | Total |              |           |               |
|                                    | #     | % of Total # | \$(000's) | % of Total \$ |
| Tennessee Non-MSA AA               | 26    | 32.1         | 29,830    | 33.3          |
| Nashville MSA AA                   | 53    | 65.4         | 33,535    | 37.4          |
| State-Wide                         | 2     | 2.5          | 26,310    | 29.3          |
| Totals                             | 81    | 100.0        | 89,675    | 100.0         |

#### Tennessee Non-MSA AA

The level of CD lending in the Tennessee Non-MSA AA demonstrates excellent responsiveness. In the Tennessee Non-MSA AA, the bank originated or refinanced 26 loans for \$29.8 million. These loans included 15 loans for \$3.2 million that provided affordable housing financing, six economic development loans totaling \$5 million, and five community service loans totaling \$21.6 million.

#### Nashville MSA AA

The level of CD lending in the Nashville MSA AA demonstrates excellent responsiveness. During the evaluation period, FNB originated or refinanced 53 loans totaling \$33.5 million. These loans included 42 loans totaling \$23.3 million for affordable housing financing, three economic development loans totaling \$6 million, and eight community service loans totaling \$4.2 million.

#### State-wide

The state-wide community development loans include various Tennessee Housing Development Authority (THDA) loans to LMI individuals for home loans. These loans provide needed funds to finance home purchases for individuals in the counties surrounding the bank's AAs. The bank made these loans after meeting the community development home loan needs of their AAs.

## 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) |
| Nashville MSA AA      | 2             | 800       | 40             | 1,028     | 42    | 42.0         | 1,828     | 72.2          | 0                      | 0         |
| Tennessee Non-MSA AA  | 2             | 660       | 56             | 43        | 58    | 58.0         | 703       | 27.8          | 0                      | 0         |
| Total                 | 4             | 1,460     | 96             | 1,071     | 100   | 100.0        | 2,531     | 100.0         | 0                      | 0         |

\* 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.

The Qualified Investment Table, shown above, sets forth the information and data used to evaluate the bank's level of qualified CD investments. These tables include all CD investment, including prior period investments that remain outstanding as of the examination date.

### Tennessee Non-MSA AA

The level of qualified investments in the Tennessee Non-MSA AA demonstrates adequate responsiveness. In the current evaluation period, the bank made 56 donations totaling \$43 thousand to programs that provide affordable housing or create benefits for LMI families in the AA. Prior period investments include a Bedford County sewer and water revenue bond.

### Nashville MSA AA

The level of qualified investments in the Nashville MSA AA demonstrates adequate responsiveness. In the current evaluation period, the bank made 40 new investments and donations, including \$28 thousand in donations and a \$1 million Tennessee State University revenue bond.

Prior period investments include the bank's investment into a down payment program created by a Community Development Financial Institution (CDFI) organization. The program is specifically available to the bank's low-income homebuyers and assists them in obtaining safe and affordable housing in both bank AAs. Additionally, the bank holds a Tennessee State University general obligation bond.

## Extent to Which the Bank Provides Community Development Services

FNB's record of providing community development services within the Tennessee Non-MSA AA and the Nashville MSA AA reflects adequate responsiveness to the CD needs of the AA.

In both AAs, bank personnel are actively involved in civic clubs and community boards. As board members, employees provide technical assistance related to financial services for community organizations. Other examples of CD services provided in the AAs include financial literacy training provided to school age children, outreach to realtors and mortgage professionals about housing products for LMI families, and volunteering in various organizations that support small businesses and promote economic development.

## Appendix A: Scope of Examination

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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”.

|   |   |                                  |
|---|---|----------------------------------|
| <b>Time Period Reviewed:</b>                            | 01/01/2021 to 12/31/2023  |                                  |
| <b>Bank Products Reviewed:</b>                          | Home mortgage, small business, community development loans, qualified investments, and community development services |                                  |
| <b>Affiliate(s)</b>                                     | <b>Affiliate Relationship</b>   | <b>Products Reviewed</b>         |
| N/A   | N/A   |                                  |
| <b>List of Assessment Areas and Type of Examination</b> |   |                                  |
| <b>Rating and Assessment Areas</b>                      | <b>Type of Exam</b>   | <b>Other Information</b>         |
| <b>MMSA(s)</b>  |   |                                  |
| N/A   | N/A   | N/A                              |
| <b>State of Tennessee</b>                               |   |                                  |
| Tennessee Non-MSA                                       | Full-scope  | Warren and Bedford Counties      |
| Nashville MSA   | Full-scope  | Davidson and Rutherford Counties |

## Appendix B: Summary of MMSA and State Ratings

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| RATINGS                                     |                      |                |                                      |
|---|----------------------|----------------|--------------------------------------|
| First National Bank of Middle Tennessee     |                      |                |                                      |
| Overall Bank:                               | Lending Test Rating* | CD Test Rating | Overall Bank/State/Multistate Rating |
| The First National Bank of Middle Tennessee | Satisfactory         | Satisfactory   | Satisfactory                         |
| MMSA or State:                              |                      |                |                                      |
| State of Tennessee                          | Satisfactory         | Satisfactory   | Satisfactory                         |

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



## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

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

**Table 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  |
| Nashville MSA    | 585                       | 168,904        | 72.8         | 71,600         | 5.6                               | 4.4          | 7.8        | 19.8                              | 19.8         | 17.3        | 44.2                              | 52.5         | 44.6        | 30.4                              | 23.2         | 30.3        | 0.0                               | 0.0          | 0.0        |
| TN Non-MSA       | 219                       | 44,831         | 27.2         | 3,850          | 0.0                               | 0.0          | 0.0        | 20.3                              | 20.5         | 17.1        | 55.5                              | 54.3         | 61.5        | 24.2                              | 25.1         | 21.4        | 0.0                               | 0.0          | 0.0        |
| <b>Total</b>     | <b>804</b>                | <b>213,735</b> | <b>100.0</b> | <b>75,450</b>  | <b>5.1</b>                        | <b>3.2</b>   | <b>7.4</b> | <b>19.8</b>                       | <b>20.0</b>  | <b>17.3</b> | <b>45.3</b>                       | <b>53.0</b>  | <b>45.5</b> | <b>29.8</b>                       | <b>23.8</b>  | <b>29.8</b> | <b>0.0</b>                        | <b>0.0</b>   | <b>0.0</b> |

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%

FIRST NATIONAL BANK OF MIDDLE TN (10000002221) excluded from Aggregate

| <b>Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography</b> |                           |                |              |                |                                   |              |            |                                   |              |             |                                   |              |             |                                   |              |             |                                   |              |            | <b>2022-23</b> |  |
|---|---------------------------|----------------|--------------|----------------|-----------------------------------|--------------|------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|-------------|-----------------------------------|--------------|------------|----------------|--|
| 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  |                |  |
| Nashville MSA   | 322                       | 124,885        | 62.2         | 42,776         | 3.0                               | 2.8          | 4.0        | 20.1                              | 14.6         | 18.2        | 46.4                              | 58.7         | 46.1        | 29.6                              | 22.4         | 30.3        | 0.8                               | 1.6          | 1.4        |                |  |
| TN Non-MSA  | 196                       | 42,826         | 37.8         | 2,909          | 0.0                               | 0.0          | 0.0        | 10.7                              | 16.3         | 16.3        | 66.0                              | 70.9         | 61.1        | 23.3                              | 12.8         | 22.7        | 0.0                               | 0.0          | 0.0        |                |  |
| <b>Total</b>  | <b>518</b>                | <b>167,711</b> | <b>100.0</b> | <b>45,685</b>  | <b>2.8</b>                        | <b>1.7</b>   | <b>3.7</b> | <b>19.3</b>                       | <b>15.3</b>  | <b>18.1</b> | <b>48.2</b>                       | <b>63.3</b>  | <b>47.1</b> | <b>29.0</b>                       | <b>18.7</b>  | <b>29.8</b> | <b>0.7</b>                        | <b>1.0</b>   | <b>1.3</b> |                |  |

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%

FIRST NATIONAL BANK OF MIDDLE TN (10000002221) excluded from Aggregate

| <b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b> |                           |                |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              | <b>2021</b> |  |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|-------------|--|
| 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   |  |
| Nashville MSA  | 585                       | 168,904        | 72.8         | 71,600         | 23.3                 | 7.2          | 5.6        | 18.4                      | 27.2         | 18.2        | 20.4                    | 26.5         | 19.9        | 37.9                   | 34.7         | 36.9        | 0.0                            | 4.4          | 19.4        |  |
| TN Non-MSA   | 219                       | 44,831         | 27.2         | 3,850          | 20.0                 | 2.7          | 2.6        | 18.4                      | 19.2         | 13.7        | 19.6                    | 23.7         | 22.7        | 42.0                   | 49.8         | 37.4        | 0.0                            | 4.6          | 23.6        |  |
| <b>Total</b>   | <b>804</b>                | <b>213,735</b> | <b>100.0</b> | <b>75,450</b>  | <b>23.0</b>          | <b>6.0</b>   | <b>5.4</b> | <b>18.4</b>               | <b>25.0</b>  | <b>17.9</b> | <b>20.3</b>             | <b>25.7</b>  | <b>20.1</b> | <b>38.3</b>            | <b>38.8</b>  | <b>36.9</b> | <b>0.0</b>                     | <b>4.5</b>   | <b>19.6</b> |  |

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%

FIRST NATIONAL BANK OF MIDDLE TN (1000002221) excluded from Aggregate

| <b>Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower</b> |                           |                |              |                |                      |              |            |                           |              |             |                         |              |             |                        |              |             |                                |              | <b>2022-23</b> |  |
|--|---------------------------|----------------|--------------|----------------|----------------------|--------------|------------|---------------------------|--------------|-------------|-------------------------|--------------|-------------|------------------------|--------------|-------------|--------------------------------|--------------|----------------|--|
| 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      |  |
| Nashville MSA  | 322                       | 124,885        | 62.2         | 42,776         | 22.6                 | 5.3          | 7.2        | 18.9                      | 20.5         | 19.6        | 21.7                    | 27.6         | 20.9        | 36.8                   | 34.8         | 36.0        | 0.0                            | 11.8         | 16.2           |  |
| TN Non-MSA   | 196                       | 42,826         | 37.8         | 2,909          | 18.0                 | 7.7          | 4.7        | 18.5                      | 22.4         | 17.8        | 21.4                    | 28.6         | 24.1        | 42.2                   | 38.8         | 35.4        | 0.0                            | 2.6          | 18.0           |  |
| <b>Total</b>   | <b>518</b>                | <b>167,711</b> | <b>100.0</b> | <b>45,685</b>  | <b>22.2</b>          | <b>6.2</b>   | <b>7.0</b> | <b>18.8</b>               | <b>21.2</b>  | <b>19.5</b> | <b>21.7</b>             | <b>28.0</b>  | <b>21.1</b> | <b>37.3</b>            | <b>36.3</b>  | <b>36.0</b> | <b>0.0</b>                     | <b>8.3</b>   | <b>16.4</b>    |  |

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%

FIRST NATIONAL BANK OF MIDDLE TN (1000002221) excluded from Aggregate



| <b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b> |                                 |               |              |                |                   |              |             |                        |              |             |                      |              |             |                     |              |             |                             |              |            | <b>2021</b> |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|-------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|-------------|
| 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  |             |
| Nashville MSA   | 20                              | 5,225         | 50.0         | 32,552         | 11.3              | 20.0         | 12.0        | 23.3                   | 20.0         | 23.9        | 30.9                 | 50.0         | 30.9        | 33.2                | 10.0         | 31.7        | 1.3                         | 0.0          | 1.6        |             |
| TN Non-MSA  | 20                              | 5,342         | 50.0         | 1,264          | 0.0               | 0.0          | 0.0         | 33.3                   | 35.0         | 26.1        | 49.4                 | 35.0         | 54.8        | 17.3                | 30.0         | 18.6        | 0.0                         | 0.0          | 0.6        |             |
| <b>Total</b>  | <b>40</b>                       | <b>10,567</b> | <b>100.0</b> | <b>33,816</b>  | <b>10.8</b>       | <b>10.0</b>  | <b>11.5</b> | <b>23.7</b>            | <b>27.5</b>  | <b>24.0</b> | <b>31.8</b>          | <b>42.5</b>  | <b>31.8</b> | <b>32.5</b>         | <b>20.0</b>  | <b>31.2</b> | <b>1.2</b>                  | <b>0.0</b>   | <b>1.5</b> |             |

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%

FIRST NATIONAL BANK OF MIDDLE TN (10000002221) excluded from Aggregate

| <b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b> |                                 |               |              |                |                   |              |            |                        |              |             |                      |              |             |                     |              |             |                             |              |            | <b>2022-23</b> |
|---|---------------------------------|---------------|--------------|----------------|-------------------|--------------|------------|------------------------|--------------|-------------|----------------------|--------------|-------------|---------------------|--------------|-------------|-----------------------------|--------------|------------|----------------|
| 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  |                |
| Nashville MSA   | 40                              | 13,615        | 50.0         | 29,879         | 5.4               | 0.0          | 4.8        | 26.3                   | 42.5         | 26.2        | 31.9                 | 40.0         | 33.0        | 32.4                | 15.0         | 31.9        | 4.0                         | 2.5          | 4.1        |                |
| TN Non-MSA  | 40                              | 8,625         | 50.0         | 1,293          | 0.0               | 0.0          | 0.0        | 19.7                   | 30.0         | 17.1        | 62.9                 | 67.5         | 62.1        | 17.4                | 2.5          | 19.9        | 0.0                         | 0.0          | 0.9        |                |
| <b>Total</b>  | <b>80</b>                       | <b>22,240</b> | <b>100.0</b> | <b>31,172</b>  | <b>5.2</b>        | <b>0.0</b>   | <b>4.6</b> | <b>26.0</b>            | <b>36.2</b>  | <b>25.8</b> | <b>33.1</b>          | <b>53.7</b>  | <b>34.2</b> | <b>31.8</b>         | <b>8.7</b>   | <b>31.4</b> | <b>3.8</b>                  | <b>1.3</b>   | <b>3.9</b> |                |

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%

FIRST NATIONAL BANK OF MIDDLE TN (10000002221) excluded from Aggregate

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b> |                                 |               |              |                |                                 |              |             |                                |              |  | <b>2021</b>  |  |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|--------------|--|
| 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 |  |
| Nashville MSA  | 20                              | 5,225         | 50.0         | 32,552         | 87.8                            | 60.0         | 47.3        | 3.7                            | 20.0         | 8.5                                    | 20.0         |  |
| TN Non-MSA   | 20                              | 5,342         | 50.0         | 1,264          | 83.9                            | 55.0         | 60.0        | 4.6                            | 35.0         | 11.4                                   | 10.0         |  |
| <b>Total</b>   | <b>40</b>                       | <b>10,567</b> | <b>100.0</b> | <b>33,816</b>  | <b>87.6</b>                     | <b>52.5</b>  | <b>47.8</b> | <b>3.8</b>                     | <b>25.0</b>  | <b>8.6</b>                             | <b>22.5</b>  |  |

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%

FIRST NATIONAL BANK OF MIDDLE TN (10000002221) excluded from Aggregate

| <b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b> |                                 |               |              |                |                                 |              |             |                                |              |  | <b>2022-23</b> |  |
|--|---------------------------------|---------------|--------------|----------------|---------------------------------|--------------|-------------|--------------------------------|--------------|--|----------------|--|
| 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   |  |
| Nashville MSA  | 40                              | 13,615        | 50.0         | 29,879         | 90.8                            | 27.5         | 49.8        | 2.7                            | 62.5         | 6.5                                    | 10.0           |  |
| TN Non-MSA   | 40                              | 8,625         | 50.0         | 1,293          | 86.2                            | 37.5         | 63.2        | 3.8                            | 35.0         | 10.0                                   | 27.5           |  |
| <b>Total</b>   | <b>80</b>                       | <b>22,240</b> | <b>100.0</b> | <b>31,172</b>  | <b>90.6</b>                     | <b>32.5</b>  | <b>50.3</b> | <b>2.8</b>                     | <b>47.5</b>  | <b>6.7</b>                             | <b>20.0</b>    |  |

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%

FIRST NATIONAL BANK OF MIDDLE TN (10000002221) excluded from Aggregate