



PUBLIC DISCLOSURE

April 29, 2024

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

First National Bank of Pulaski
Charter Number 14619

206 South First Street
Pulaski, TN 38478

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: Outstanding.

The community development test is rated: Satisfactory.

Our lending test and community development test ratings are based on the combination of the State of Tennessee and State of Alabama ratings, with equal weight placed on performance in each state. The major factors that support these ratings include:

- The Lending Test rating is based on the First National Bank of Pulaski's (FNB or bank) reasonable loan-to-deposit (LTD) ratio, a substantial majority of lending occurring within the assessment areas (AAs), and excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The Community Development (CD) Test rating is based on satisfactory responsiveness to the CD needs in each AA through CD loans, qualified investments, 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 reasonable.

FNB's average LTD ratio for the twelve quarters beginning March 31, 2021, and ending December 31, 2023, was 66.4 percent. During the evaluation period, the bank's LTD ratio ranged from a quarterly low average of 61.2 percent to a high average of 73.2 percent. FNB's average LTD ratio is reasonable when compared to four similarly situated banks. The average LTD ratio of similarly situated banks over the evaluation period was 73.1 percent, with a quarterly low average of 57.9 percent and a quarterly high average of 83.1 percent. The LTD ratios are calculated on a bank-wide basis.

Lending in Assessment Area

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

The bank originated and purchased 81.6 percent of its total loans inside the bank's AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Home Mortgage	929	78.5	254	21.5	1,183	219,298	73.9	77,401	26.1	296,699
Small Business	1,237	84.1	234	15.9	1,471	121,841	74.9	40,882	25.1	162,723
Total	2,166	81.6	488	18.4	2,654	341,139	74.3	118,283	25.7	459,422

Description of Institution

FNB is an interstate bank headquartered in Pulaski Tennessee and wholly owned by First Pulaski National Corporation, a one-bank holding company. In April 2023, FNB opened a branch in northern Alabama, for a total of 13 branches. The bank operates eight branches in Tennessee and five branches in Alabama, and a total of 22 automated teller machines (ATMs). Through these branches the bank offers traditional deposit and loan products. Other services offered include on-line and mobile banking. FNB's primary lending focus is business loans, including commercial real estate and commercial and industrial loans, and residential mortgage loans. The bank also offers a full range of lending products to meet the credit needs of both consumer and business customers. The bank offers investment products and services through Raymond James Financial Services, Inc.

The bank has delineated three assessment areas. One assessment area, the Non-MSA TN AA, is located in Tennessee, and includes all of Giles, Lincoln, and Marshall Counties. The bank has eight branches and 12 ATMs in this AA. The other two AAs, the Huntsville AL MSA AA and Non-MSA Cullman AA, are located in Alabama. The Huntsville AL MSA AA includes all of Limestone and Madison Counties. The Non-MSA Cullman AA includes all of Cullman County. Within these two AAs in Alabama, the bank operates five branches and ten ATMs.

On December 31, 2023, the bank reported total assets of \$1.3 billion and tier 1 capital of \$139.5 million. Total loans were \$895.4 million, representing 67.2 percent of total assets. The table below reflects the composition of the bank's loan portfolio:

Loan Category	Total Loans of December 31, 2023	
	Dollar (\$) (in 000's)	Percent (%) of Total Loans
Residential Mortgage Loans	290,470	32.4
Commercial Real Estate Loans	295,065	33.0
Construction & Land Development Loans	163,815	18.3
Farmland and Agriculture Loans	59,524	6.7
Commercial Non-Real Estate Loans	43,708	4.9
Obligations of State and Local Government & All Other Loans	16,354	1.8
Consumer Loans	26,422	2.9
Total Loans	895,358	100.00

Source: December 31, 2023, Report of Condition

There are no legal, financial, or other factors that impede the bank's ability to help meet the credit needs of the AAs. The bank received a "Satisfactory" rating on their previous CRA performance examination dated March 8, 2021.

Scope of the Evaluation

Evaluation Period/Products Evaluated

The evaluation period is January 1, 2021, through December 31, 2023. This Performance Evaluation (PE) assessed the bank's performance under the Lending Test and the CD Test using Intermediate Small Bank CRA 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 loan products. Consumer lending and farm lending did not constitute a substantial lending activity during the review period; therefore, these loan products were not considered in the lending performance evaluation. To evaluate performance under the CD test, we assessed the bank's record of responsiveness to the needs of its AA through qualified loans, investments, and services. We conducted a data integrity review prior to this PE and concluded that the bank's Home Mortgage Disclosure Act (HMDA) data was reliable.

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 metropolitan statistical area (MSA), multistate metropolitan statistical area (MMSA), or combined statistical area (CSA) are combined and evaluated as a single AA. Similarly, bank delineated non-MSA AAs within the same state are combined and evaluated as a single area. These combined AAs may be evaluated as full- or limited-scope. Refer to the "Scope" section under each State Rating for details regarding how full-scope AAs were selected. Refer to appendix A, Scope of Examination, for a list of full- and limited-scope AAs.

The state of Tennessee has one assessment area, the Non-MSA TN AA, so it was selected for a full-scope review. The state of Alabama has two assessment areas, the Huntsville AL MSA and Non-MSA Cullman AAs. We selected the Huntsville AL MSA AA for a full-scope review. Due to the short time of the bank's presence in the Non-MSA Cullman AL AA, since April 2023, we selected this AA for a limited-scope review.

Ratings

The bank's overall rating is a blend of the state ratings for Tennessee and Alabama. We placed equal weight on performance in each state, and each of the bank's primary loan products: small business loans and home mortgage loans.

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

Discriminatory or Other Illegal Credit Practices Review

Pursuant to 12 CFR 25.28(c) or 195.28(c), respectively, 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 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 Tennessee¹: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibited an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank demonstrated adequate responsiveness to CD needs in the AA through CD loans, qualified investments, and services.

Description of Institution's Operations in Tennessee

FNB operates eight offices, including the bank's main office, in the state of Tennessee. Within Tennessee, five branches are in Giles County, including three in the city of Pulaski, and one each in the city of Ardmore and the city of Lynnville. Two branches are in adjacent Lincoln County, within the city of Fayetteville. One additional branch is located in adjacent Marshall County, within the city of Lewisburg.

The Non-MSA TN AA consists of 24 census tracts (CTs), with no low-income CTs. Marshall County had one moderate-income CT in 2021, but this changed to a moderate-income CT in 2022. No other moderate-income CTs are located in the Non-MSA TN AA. Giles, Lincoln, and Marshall counties are considered rural and non-metropolitan. As of the 2020 Census, Giles County has a population of approximately 30,000 while Lincoln and Marshall Counties have populations of approximately 35,000 and 34,000, respectively.

The primary employers for this AA include County Boards of Education, Frito Lay, Magneti Marelli (Auto Parts Manufacturing), Goodman Company (Heating/Air Manufacturing), Calsonic Kansei (Auto Parts Manufacturing), and Walker Die Casting (Aluminum Die Manufacturing).

As of June 30, 2023, 13 financial institutions with 31 offices controlled \$2.6 billion in deposits within the Non-MSA TN AA represented by Giles, Lincoln, and Marshall Counties. Of the local competitor banks, FNB controlled the largest market share in the AA at \$803 million or 30.7 percent of total deposits.

Independent competitor banks with a notable market share of deposits include Bank of Frankewing and the Bank of Lincoln County with 13.1 percent and 6.4 percent of total deposits, respectively. Large

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.

and regional banks, including Regions Bank, Truist Bank, First Horizon Bank, and US Bank, N.A., held a lower market share with total deposits ranging from 2.0 percent to 3.8 percent.

Two community contacts were obtained from organizations that participate in the economic and community development of the three counties within the AA. Each of the contacts noted that affordable housing was a community need.

Non-MSA TN AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 Non MSA TN AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	23	0.0	4.3	73.9	21.7	0.0
Population by Geography	93,658	0.0	4.9	69.4	25.7	0.0
Housing Units by Geography	42,392	0.0	4.3	71.0	24.7	0.0
Owner-Occupied Units by Geography	26,874	0.0	2.2	69.8	28.0	0.0
Occupied Rental Units by Geography	10,035	0.0	11.0	73.1	16.0	0.0
Vacant Units by Geography	5,483	0.0	2.6	73.3	24.1	0.0
Businesses by Geography	5,680	0.0	4.1	73.2	22.7	0.0
Farms by Geography	500	0.0	0.4	69.6	30.0	0.0
Family Distribution by Income Level	25,434	17.4	17.2	21.1	44.3	0.0
Household Distribution by Income Level	36,909	19.6	15.4	18.9	46.2	0.0
Median Family Income MSA – Non-MSA-TN		\$46,066	Median Housing Value			\$110,730
			Median Gross Rent			\$616
			Families Below Poverty Level			12.5%
<i>Source: 2020 ACS Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022-2023 Non MSA TN AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	24	0.0	0.0	58.3	41.7	0.0
Population by Geography	99,983	0.0	0.0	61.3	38.7	0.0
Housing Units by Geography	43,555	0.0	0.0	61.7	38.3	0.0
Owner-Occupied Units by Geography	27,923	0.0	0.0	56.7	43.3	0.0
Occupied Rental Units by Geography	10,001	0.0	0.0	74.7	25.3	0.0
Vacant Units by Geography	5,631	0.0	0.0	63.7	36.3	0.0
Businesses by Geography	6,815	0.0	0.0	65.8	34.2	0.0
Farms by Geography	615	0.0	0.0	58.2	41.8	0.0
Family Distribution by Income Level	25,984	15.6	16.5	19.2	48.8	0.0
Household Distribution by Income Level	37,924	19.0	14.2	17.5	49.3	0.0
Median Family Income Non-MSAs - TN		\$56,418	Median Housing Value			\$146,494
			Median Gross Rent			\$741
			Families Below Poverty Level			10.7%
<i>Source: 2020 U.S. Census and 2023 D&B Data Due to rounding, totals may not equal 100.0% (*) The NA category consists of geographies that have not been assigned an income classification.</i>						

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 TN Non-MSA AA Receiving a Full-Scope Review

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

Distribution of Loans by Income Level of the Geography

We did not analyze the geographic distribution of the bank's lending as part of this evaluation. The analysis would not be meaningful, as there are no low-income CTs for the evaluation period and only one moderate-income CT, for one of the three years evaluated.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 P for the Non-MSA TN AA in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

In 2021, the bank's level of home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA but significantly exceeded the peer aggregate lending levels. The bank's lending to moderate-income borrowers exceeded the demographic comparator and significantly exceeded peer lending levels.

In 2022-2023, the bank's level of home mortgage loans to low-income borrowers was below the percentage of low-income families in the AA but exceeded peer aggregate lending levels. The bank's lending to moderate-income borrowers was slightly below the percentage of families in the AA and peer aggregate lending levels.

Small Loans to Businesses

Refer to Table R for the Non-MSA TN AA 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.

In 2021, the bank's lending of small loans to businesses with annual gross revenues less than \$1 million exceeded the percentage of businesses in this category and significantly exceeded aggregate peer lending to small businesses.

In 2022-2023, the bank's lending of small loans to businesses with annual gross revenues less than \$1 million was slightly below the percentage of businesses in this category. Aggregate peer lending performance data was not available so we based our conclusion on the demographic comparison.

Responses to Complaints

FNB did not have any consumer complaints relating to the bank's CRA performance in the Non-MSA TN AA during this evaluation period.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for Non-MSA TN AA Receiving a Full-Scope Review

Based on a full-scope review, the bank exhibits adequate responsiveness to community development needs in the state through community development loans, qualified investments, and community development services, as appropriate, considering the bank's capacity and the need and availability of such opportunities for community development in the bank's assessment area(s).

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 \$
Non-MSA TN AA	3	100.0	1,500	100.0

The CD loans were primarily for community services and affordable housing. The bank granted three CD loans totaling \$1.5 million during the examination review period. Two loans totaling \$500 thousand provided funding to low- to moderate-income (LMI) individuals for utility bill assistance. The third loan for \$1 million was to finance a trailer park that provided affordable housing to LMI individuals.

Number and Amount of Qualified Investments

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

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 TN AA	3	2,201	1	272	4	80.0	2,473	82.5	0	0
State-wide TN	0	0	1	525	1	20.0	525	17.5	0	0
Totals	3	2,201	2	797	5	100.0	2,998	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 current period investments listed above includes an investment, collateralized by loans to LMI individuals secured by single family dwellings. The state-wide investments was a Tennessee Housing Development Agency bond which is secured by LMI borrower loans.

Extent to Which the Bank Provides Community Development Services

FNB's record of providing CD services is excellent. During the evaluation period, bank personnel contributed 1,598 hours related to CD concerning community services, economic development, and affordable housing. Board members actively support recruiting, expansion, and promoting new and existing industries in FNB's Non-MSA TN AA. Several of the bank's officers, some directors, and other personnel are members of civic clubs and community boards serving the bank's Non-MSA TN AA and its people. Individually, FNB employees have been involved in civic organizations which assist and support LMI individuals and children of LMI families. Employees assist with various area charities, schools, and other organizations which assist LMI individuals and children of LMI families with issues such as literacy, income, and food through programs at local schools, libraries, churches, and other civic organizations. It has been the bank's practice to have a Bank Student Advisory Board at each county high school. Board members are seniors and include students from LMI families. Students receive formal presentations at the bank's main office on financial planning, investment options, account operations, how to protect credit, business opportunities, and financial security. Individual financial and business counseling is available for each student as needed.

FNB has an array of alternative delivery systems which benefit LMI individuals. Within the bank's Non-MSA TN AA , there are eight full-service branches with drive-up facilities and ATMs, which are available via auto and pedestrian means. Branches provide at least 40 hours of teller service weekly. Lobby hours and drive-up hours are set to meet customer needs. ATMs that disburse cash and take deposits are located at each branch office. Additionally, there are several free-standing ATMs that disburse cash only. The bank offers internet and telephone banking, and MasterCard debit cards that can be used to access customer accounts at point of sale or ATM locations. Additionally, Visa and MasterCard credit cards are offered by the bank through a third-party. Investment, brokerage, and insurance services are also available through third-party providers.

State Rating

State of Alabama

CRA rating for state of Alabama: Satisfactory

The Lending Test is rated: Outstanding

The Community Development Test is rated: Satisfactory

The major factors that support this rating include:

- The bank exhibits excellent geographic distribution of home mortgage loans and small loans to businesses within the AAs.
- The bank exhibited an excellent distribution of loans to individuals of different income levels and businesses of different sizes.
- The bank demonstrated adequate responsiveness to CD needs in the AAs through CD loans, qualified investments, and services.

Description of Institution's Operations in Alabama

FNB operates five branches and 10 ATMs in the state of Alabama. The bank has two AAs in Alabama, the Huntsville AL MSA AA and the Non-MSA Cullman AA. The Huntsville AL MSA includes Madison and Limestone Counties and the bank operates two branches in each county. Madison County is the largest county, with a population of approximately 400 thousand. Limestone County has a population of approximately 111 thousand. The Huntsville AL MSA AA had 80 CTs in 2021 and 118 CTs in 2022-2023. A significant number of LMI census tracts are present in this AA. Top employers include the United States Army/Redstone Arsenal, Huntsville Hospital, NASA/Marshall Space Flight Center, Boeing, and Huntsville City Schools. The Non-MSA Cullman AA is made up of the entirety of Cullman County, where FNB operates one branch, newly opened in April 2023. Cullman County has a population of approximately 91 thousand. The AA had 22 CTs in 2023, with no low-income CTs and one moderate-income CT. Top employers include Cullman County Schools, Cullman Regional Hospital, Walmart Distribution Center, and automotive part manufacturing serving Mercedes, Nissan, and Honda.

As of June 30, 2023, 35 financial institutions with 115 offices controlled \$11.1 billion in deposits within the Huntsville AL MSA AA. Of the local competitor banks, FNB controlled the 10th largest market share at \$376.8 million or 3.4 percent of total deposits. Large banks controlled the majority of the market share with Regions Bank, Synovus Bank, and Wells Fargo Bank N.A., with 23.1 percent, 8.2 percent, and 6.2 percent of total deposits, respectively.

As of June 30, 2023, 13 financial institutions with 32 offices held \$2.3 billion in deposits within Cullman County. Of the local competitor banks, FNB controlled the 12th largest market share at \$21.8 million or 0.9 percent. Banks with the largest market share percentages, ranging from 15.3 to 12.9 percent, include Traditions Bank, Southpoint Bank, Regions Bank, Peoples Bank of Alabama and Cullman Savings Bank.

Three community contacts were obtained from organizations that participate in the economic and community development of the three counties within the AA. Each of the contacts noted that affordable housing was a community need.

Huntsville AL MSA AA

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2021 Huntsville AL MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	89	13.5	32.6	29.2	24.7	0.0
Population by Geography	435,243	8.6	26.7	32.4	32.4	0.0
Housing Units by Geography	188,077	10.0	27.8	32.5	29.7	0.0
Owner-Occupied Units by Geography	117,889	4.0	24.5	33.8	37.7	0.0
Occupied Rental Units by Geography	52,091	20.4	34.3	30.0	15.3	0.0
Vacant Units by Geography	18,097	18.7	30.9	31.2	19.2	0.0
Businesses by Geography	32,363	10.4	25.4	30.0	34.2	0.0
Farms by Geography	1,107	5.6	27.2	37.9	29.3	0.0
Family Distribution by Income Level	112,844	23.8	16.9	17.3	41.9	0.0
Household Distribution by Income Level	169,980	25.2	15.8	15.9	43.0	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		\$72,576	Median Housing Value			\$160,520
			Median Gross Rent			\$772
			Families Below Poverty Level			10.3%
<i>Source: 2015 ACS and 2021 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

Table A – Demographic Information of the Assessment Area						
Assessment Area: 2022-2023 Huntsville AL MSA AA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	118	12.7	22.9	29.7	33.9	0.8
Population by Geography	491,723	11.7	19.0	32.5	36.3	0.5
Housing Units by Geography	200,378	12.8	19.9	32.3	34.2	0.7
Owner-Occupied Units by Geography	127,786	6.1	17.4	35.0	41.4	0.1
Occupied Rental Units by Geography	56,567	26.1	24.1	27.3	20.5	2.0
Vacant Units by Geography	16,025	19.7	25.0	29.2	25.5	0.7
Businesses by Geography	52,274	13.6	17.4	26.2	40.4	2.4
Farms by Geography	1,700	7.5	19.1	39.4	33.3	0.8
Family Distribution by Income Level	119,257	23.1	16.3	19.5	41.1	0.0
Household Distribution by Income Level	184,353	25.7	15.5	16.1	42.8	0.0
			Median Gross Rent			\$881

		Families Below Poverty Level	8.5%
Median Family Income MSA - 26620 Huntsville, AL MSA	\$85,279	Median Housing Value	\$187,628
<i>Source: 2020 U.S. Census and 2023 D&B Data</i> <i>Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>			

Scope of Evaluation in Alabama

The Huntsville AL MSA AA received a full-scope review. As a result of the limited time of operations in Cullman County, this AA received a limited scope review. Refer to the table in Appendix A for a list of all AAs under review. Both the Lending Test and CD Test ratings were analyzed to arrive at the overall state rating. Conclusions regarding the bank's lending performance in the Huntsville AL MSA AA are based on home mortgage and business loans originated or purchased in 2021-2023. The CD Test includes a review of loans, investments, grants, and donations made in the bank's AA that meet the definition of CD, as well as CD services provided in the bank's AA.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

LENDING TEST

The bank's performance under the Lending Test in Alabama is rated Outstanding.

Conclusions for Huntsville AL MSA AA Receiving a Full-Scope Review

Based on a full-scope review, the bank's lending performance in the state of Alabama is excellent.

Distribution of Loans by Income Level of the Geography

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

Home Mortgage Loans

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

For 2021, the bank's lending levels in low-income geographies was near the amount of owner-occupied housing units and exceeded the aggregate peer performance. For moderate-income CTs, the level of bank loans significantly exceeded the percent of owner-occupied housing units and aggregate peer performance.

For 2022-23, the bank's lending levels in low-income geographies was below the percentage of owner-occupied housing units and slightly below aggregate peer performance. For moderate income CTs, the percent of bank loans significantly exceeded the percentage of owner-occupied housing units and the aggregate peer performance.

Small Loans to Businesses

Refer to Table Q for the Huntsville AL MSA AA 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.

For 2021, the geographic distribution of small loans to businesses in low-income geographies was significantly below the percent of businesses in those geographies and below the aggregate peer performance. However, FNB's lending in moderate-income geographies significantly exceeds the percent of businesses in those geographies and the aggregate peer performance.

For 2022-2023, the geographic distribution of small loans to business in low-income geographies was significantly below the percentage of businesses in those geographies. However, FNB's lending in moderate-income geographies significantly exceeds the percentage of businesses in those geographies. Aggregate peer lending data was not available, so we relied on comparisons to the demographic comparator for these conclusions.

Distribution of Loans by Income Level of the Borrower

The bank exhibits 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 P for the Huntsville AL MSA AA in appendix D for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

For 2021, the bank's lending performance was below the percentage of low-income families and slightly below the aggregate peer performance level. For moderate-income borrowers, the bank's lending exceeded the percentage of moderate-income families and the aggregate peer performance.

For 2022-2023, the bank's lending was below the percent of low-income families, but exceeded the aggregate peer performance. The bank's lending to moderate-income borrowers exceeded the percentage of families and aggregate peer performance.

Small Loans to Businesses

Refer to Table R for the Huntsville AL MSA AA 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.

In 2021, the bank's lending of small loans to businesses with gross revenues less than \$1 million was slightly below the percentage of businesses in this category, but significantly exceeded the aggregate peer performance.

In 2022-2023, the bank's lending of small loans to businesses with annual gross revenues less than \$1 million was below the percentage of businesses with revenues less than \$1 million, but generally consistent with 2021 performance. Aggregate peer lending performance data was not available.

Responses to Complaints

FNB did not have any consumer complaints relating to the bank’s CRA performance in the Huntsville AL MSA AA during this evaluation period.

Conclusions for the Non-MSA Cullman AA Receiving a Limited Scope Review

Based on a limited-scope review, the bank’s performance under the Lending Test in the Non-MSA Cullman AA is consistent with the bank’s overall performance under the Lending Test in the full scope area.

COMMUNITY DEVELOPMENT TEST

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

Conclusions for the Huntsville AL MSA AA Receiving a Full-Scope Review

Based on a full-scope review, 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 community development in the bank’s assessment area.

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. Note that there were no CD loans in the state of Alabama.

<i>Community Development Loans</i>				
Assessment Area	Total			
	#	% of Total #	\$(000's)	% of Total \$
Huntsville AL MSA AA	0	100.0	0	100.0

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)
Huntsville AL MSA AA	3	\$1,660	4	3,693	7	100.0	5,353	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.

In current period investments, the bank purchased three mortgage-backed securities securitized with residential mortgage loans totaling \$3.7 million that provided affordable home loans to LMI families in the AA. CD donations totaled \$14.7 thousand.

Extent to Which the Bank Provides Community Development Services

The bank's directors and officers contributed 491 hours related to CD concerning community services, economic development, and affordable housing. Board members actively support recruiting, expansion, and promoting new and existing industries in FNB's Huntsville AL MSA AA. Several of the bank's officers, some directors, and other personnel are members of civic clubs and community boards serving the bank's Huntsville AL MSA AA and its people. Individually, FNB employees have been involved in civic organizations which assist and support LMI individuals and children of LMI families. Employees assist with various area charities, schools, and other organizations which assist LMI individuals and children of LMI families with issues such as literacy, income, and food through programs at local schools, libraries, churches, and other civic organizations. Practical financial programs are provided to older students regarding budgeting, savings, credit card dangers, building good credit, and establishing a good relationship with banks and bankers. It has been the bank's practice to have a Bank Student Advisory Board at each county high school. Board members are seniors and include students from LMI families. Students receive formal presentations at the bank's main office on financial planning, investment options, account operations, how to protect credit, business opportunities, and financial security. Individual financial and business counseling is available for each student as needed.

FNB has an array of alternative delivery systems which benefit LMI individuals. Within the bank's Huntsville AL MSA AA, there are four full-service branches with drive-up facilities and ATMs, which are available via auto and pedestrian means. Branches provide at least 40 hours of teller service weekly. Lobby hours and drive-up hours are set to meet customer needs. ATMs that disburse cash and take deposits are located at each branch office. Additionally, there are several free-standing ATMs that disburse cash only. The bank offers internet and telephone banking, and MasterCard debit cards that can be used to access customer accounts at point of sale or ATM locations. Additionally, Visa and MasterCard credit cards are offered by the bank through a third-party. Investment, brokerage, and insurance services are also available through third-party providers.

Conclusions for the Non-MSA Cullman AA Receiving a Limited Scope Review

Based on a limited-scope review, the bank's performance under the CD Test in the Non-MSA Cullman AA is consistent with the bank's overall performance under the CD Test in the full scope area. The Non-MSA Cullman AA was added in April 2023; therefore, only a limited time was included within this consideration.

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:	01/01/2021 to 12/31/2023	
Bank Products Reviewed:	Home mortgage, small business loans, community development loans, qualified investments, and 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
State of Tennessee		
Non-MSA TN AA	Full scope	Giles, Lincoln, and Marshall Counties
State of Alabama		
Huntsville AL MSA AA	Full scope	Madison and Limestone Counties only
Non-MSA Cullman AA	Limited scope	Cullman County

Appendix B: Summary of MMSA and State Ratings

RATINGS First National Bank			
Overall Bank:	Lending Test Rating*	CD Test Rating	Overall Bank/State/Multistate Rating
First National Bank	Outstanding	Satisfactory	Satisfactory
State:			
State of Tennessee	X	X	Satisfactory
State of Alabama	X	X	Satisfactory

(*) 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 Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix D: Tables of Performance Data

Content of Standardized Tables

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

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

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

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

Table 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
2021 Huntsville AL MSA AA	183	45,588	100.0	35,499	4.0	3.3	2.2	24.5	45.4	15.8	33.8	34.4	36.7	37.7	16.9	45.2	0.0	0.0	0.0
Total	183	45,588	100.0	35,499	4.0	3.3	2.2	24.5	45.4	15.8	33.8	34.4	36.7	37.7	16.9	45.2	0.0	0.0	0.0

Source: 2015 ACS; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
 Due to rounding, totals may not equal 100.0%

FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate.

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

Table O: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																			2022-23	
Assessment Area:	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	% of Owner-Occupied Housing Units	% Bank Loans	Aggregate	
2022-2023 Huntsville AL MSA AA	163	49,084	100.0	22,648	6.1	3.1	4.7	17.4	28.2	15.3	35.0	48.5	38.6	41.4	20.2	41.4	0.1	0.0	0.1	
Total	163	49,084	100.0	22,648	6.1	3.1	4.7	17.4	28.2	15.3	35.0	48.5	38.6	41.4	20.2	41.4	0.1	0.0	0.1	
<p>Source: 2020 U.S. Census; 01/01/2022 - 03/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0% Filter: 2023 HMDA: Action Taken Date is between 1/1/2023 12:00:00 AM and 3/31/2023 12:00:00 AM.</p> <p>FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate.</p>																				

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2021 Non MSA TN AA	197	34,433	100.0	4,648	17.4	5.6	2.5	17.2	18.8	12.5	21.1	18.3	20.3	44.3	52.3	42.2	0.0	5.1	22.5
Total	197	34,433	100.0	4,648	17.4	5.6	2.5	17.2	18.8	12.5	21.1	18.3	20.3	44.3	52.3	42.2	0.0	5.1	22.5

*Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2022-2023 Non MSA TN AA	303	67,291	100.0	3,466	15.6	6.9	5.2	16.5	14.2	15.5	19.2	20.8	23.5	48.8	53.1	40.0	0.0	5.0	15.7
Total	303	67,291	100.0	3,466	15.6	6.9	5.2	16.5	14.2	15.5	19.2	20.8	23.5	48.8	53.1	40.0	0.0	5.0	15.7

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

FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate

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

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2021
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2021 Huntsville AL MSA AA	183	45,588	100.0	35,499	23.8	4.9	6.3	16.9	19.7	14.4	17.3	23.0	18.3	41.9	39.9	36.6	0.0	12.6	24.3
Total	183	45,588	100.0	35,499	23.8	4.9	6.3	16.9	19.7	14.4	17.3	23.0	18.3	41.9	39.9	36.6	0.0	12.6	24.3

*Source: 2015 ACS ; 01/01/2021 - 12/31/2021 Bank Data, 2021 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate

Table P: Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower																			2022-23
	Total Home Mortgage Loans				Low-Income Borrowers			Moderate-Income Borrowers			Middle-Income Borrowers			Upper-Income Borrowers			Not Available-Income Borrowers		
Assessment Area:	#	\$	% of Total	Overall Market	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate	% Families	% Bank Loans	Aggregate
2022-2023 Huntsville AL MSA AA	163	49,084	100.0	22,648	23.1	8.6	7.3	16.3	18.4	17.0	19.5	16.6	21.9	41.1	45.4	36.5	0.0	11.0	17.2
Total	163	49,084	100.0	22,648	23.1	8.6	7.3	16.3	18.4	17.0	19.5	16.6	21.9	41.1	45.4	36.5	0.0	11.0	17.2

*Source: 2020 U.S. Census ; 01/01/2022 - 03/31/2023 Bank Data, 2022 HMDA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%*

Filter: 2023 HMDA: Action Taken Date is between 1/1/2023 12:00:00 AM and 3/31/2023 12:00:00 AM.

FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
2021 Huntsville AL MSA AA	208	21,950	100.0	9,833	10.4	1.9	11.8	25.4	49.5	21.9	30.0	39.4	30.6	34.2	9.2	35.3	0.0	0.0	0.5	
Total	208	21,950	100.0	9,833	10.4	1.9	11.8	25.4	49.5	21.9	30.0	39.4	30.6	34.2	9.2	35.3	0.0	0.0	0.5	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>																				
<i>FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate</i>																				

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 Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography													2022-23	
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	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
2022-2023 Huntsville AL MSA AA	174	28,816	100.0	13.6	5.8	17.4	27.5	26.2	35.1	40.4	31.6	2.4	0.0	
Total	174	28,816	100.0	13.6	5.8	17.4	27.5	26.2	35.1	40.4	31.6	2.4	0.0	
<i>Source: 2023 D&B Data; 01/01/2022 - 03/31/2023 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>														
<i>FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate</i>														

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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$ (000's omitted)	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
2021 Non MSA TN AA	561	29,880	100.0	1,224	83.8	89.7	43.4	4.0	9.3	12.1	1.0	
Total	561	29,880	100.0	1,224	83.8	89.7	43.4	4.0	9.3	12.1	1.0	
<i>Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%</i>												
<i>FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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	
2022-2023 Non MSA TN AA	238	30,512	100.0	NA	86.2	82.8	NA	3.3	7.6	10.5	9.6	
Total	238	30,512	100.0	NA	86.2	82.8	NA	3.3	7.6	10.5	9.6	
<i>Source: 2023 D&B Data; 01/01/2022 - 12/31/2023 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%</i>												
<i>FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate</i>												

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 R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
2021 Huntsville AL MSA AA	253	29,690	100.0	9,833	84.3	83.8	45.7	4.4	16.2	11.3	0.0	
Total	253	29,690	100.0	9,833	84.3	83.8	45.7	4.4	16.2	11.3	0.0	

Source: 2021 D&B Data; 01/01/2021 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.
Due to rounding, totals may not equal 100.0%

FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues												2022-23
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	
2022-2023 Huntsville AL MSA AA	174	28,816	100.0	NA	89.0	76.4	NA	2.7	5.8	8.4	17.8	
Total	174	28,816	100.0	NA	89.0	76.4	NA	2.7	5.8	8.4	17.8	

Source: 2023 D&B Data; 01/01/2022 - 03/31/2023 Bank Data; "--" data not available.
Due to rounding, totals may not equal 100.0%

FIRST NATIONAL BANK OF PULASKI (10000014619) excluded from Aggregate

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.