FirstBank

CRA Public File

PERFORMANCE RELATED WRITTEN COMMENTS
AND
BANK'S WRITTEN ANSWERS
RELATED TO BANK'S PERFORMANCE

(FOR CURRENT YEAR AND PAST 2 YEARS)

2024 - 2025

PUBLIC COMMENTS

Between the calendar years of 2023 and 2024, FirstBank received four (4) comments relating to the bank's performance in helping meet community needs.

Any comments received or replies by the bank during the current calendar year, 2026, will be available upon request.

Bowling Green Strong Women – Strong Coffee
Bowling Green, KY
FY2024

[redacted]

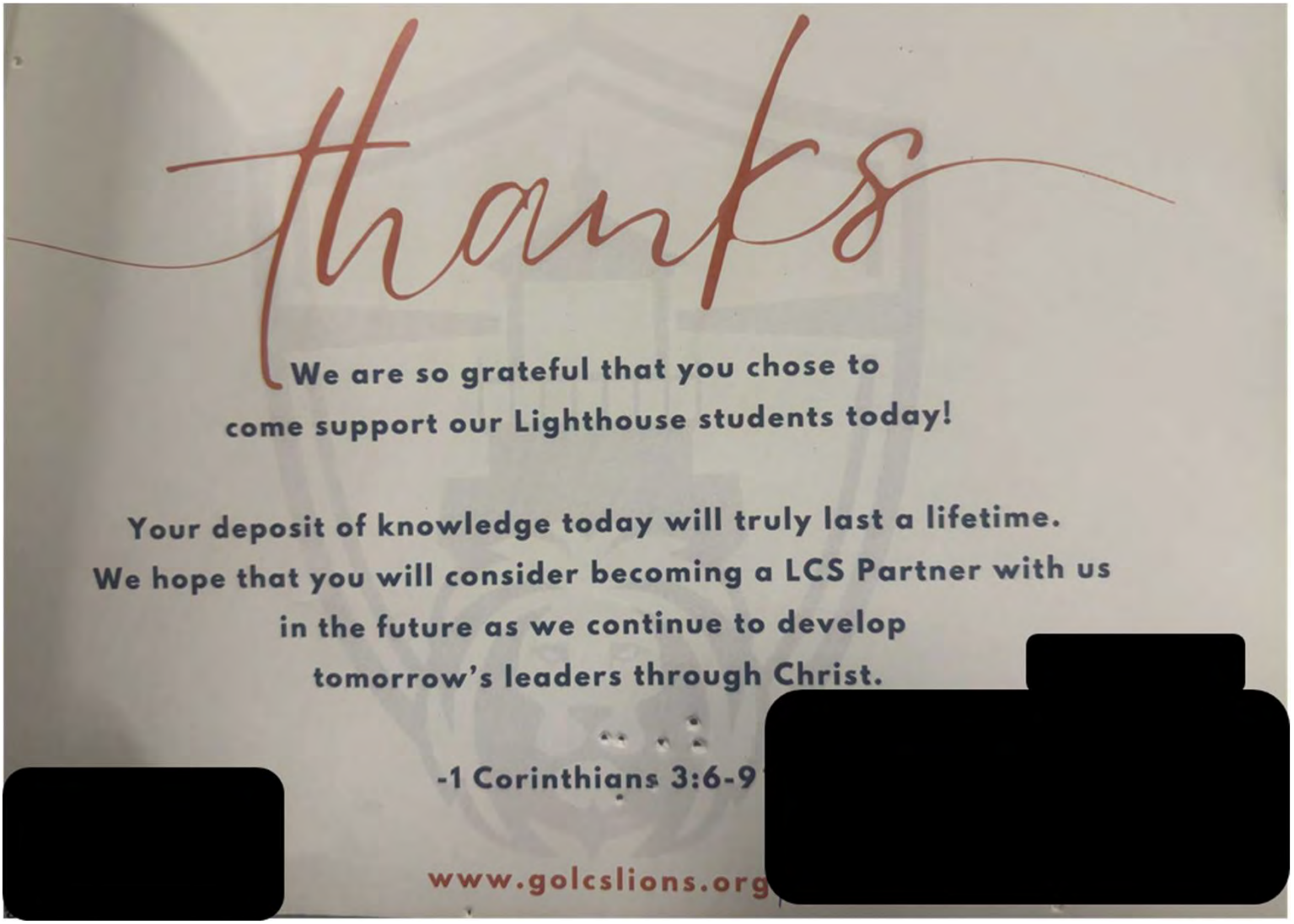
THANK YOU FOR BEING OUR EXCLUSIVE SPONSOR FOR BOWLING GREEN'S STRONG WOMEN STRONG COFFEE. OVER THE YEARS, THE FIRSTBANK TEAM HAS BEEN A VALUED & APPRECIATED PARTNER. YOUR FINANCIAL SUPPORT ALLOWS US TO REACH A BROADER AUDIENCE IN THE REGION, PARTICULARLY WOMEN & MINORITY-OWNED BUSINESSES. YOU ARE A CHAMPION FOR GOOD, [redacted]!

WITH GRATITUDE,

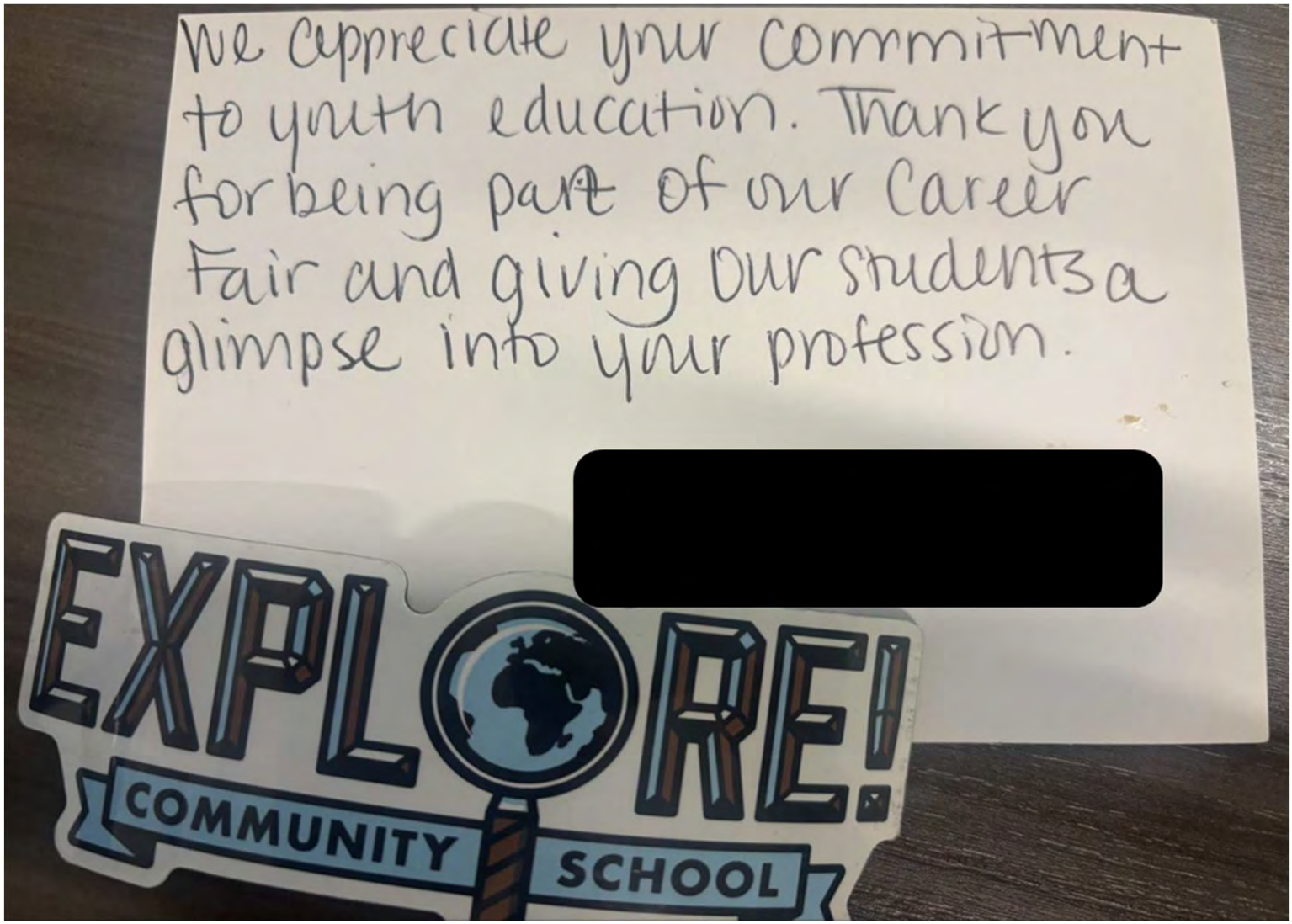
[redacted]

John Early Middle School
Nashville, TN
FY2024

Lighthouse Christian School (LCS)
Antioch, TN
FY2024



Explore Community School
Nashville, TN
FY2025



Trezevant High School
Memphis, TN
FY2025

From: [redacted]

Sent: Saturday, June 22, 2024

To: [redacted]

Complaint Forum:Phone

Customer is frustrated he don't have an available branch open in the Nashville area on Saturdays, for the branches that are open, are all very far out from Middle Tennessee.

FirstBank Provided a Response.

FROM: [redacted]

SENT: June 11, 2025

TO: [redacted]

COMPLAIN FORUM: Phone

"The customer called into the contact center stating he went to the branch on 6815 Poplar Avenue, Suite 100, Germantown, TN 38138 and they had closed 10 minutes early and he did not appreciate that as he stated he had questions in regard to his account. He states if the business hours on the door state they stay open until 4:30pm, then they should."

FirstBank Provided a Response.

FROM: [redacted]

SENT: November 14, 2025

TO: [redacted]

COMPLAIN FORUM: Phone

“Wants someone to address the issue; their local branch closed and now they have to drive a longer distance to reach an ATM. They speak to someone who can make a change, or tell me what change is in the plan. Is FirstBank going to partner with anyone so that customers can use other select ATMs without a fee? I'm not going to go someone to pay a fee and will not drive 30 minutes one way. That means I have to drive an hour to use an ATM. Requesting a call back at: [redacted].“

FirstBank Provided a Response.

PUBLIC DISCLOSURE

June 6, 2022

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

FirstBank
Certificate Number: 8663

211 Commerce Street
Nashville, Tennessee 37201

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Dallas Regional Office

600 North Pearl Street, Suite 700
Dallas, Texas 75201

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, nor should it 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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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory.**

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

PERFORMANCE LEVELS	**PERFORMANCE TESTS**		
	Lending Test*	**Investment Test**	**Service Test**
Outstanding			
High Satisfactory		X	
Low Satisfactory	X		X
Needs to Improve			
Substantial Noncompliance			
** The Lending Test is weighted more heavily than the Investment and Service Tests when arriving at an overall rating.*			

The Lending Test is rated Low Satisfactory.

- Lending levels reflect excellent responsiveness to assessment areas' credit needs.
- The institution originated a small percentage of loans inside its assessment areas.
- The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes.
- The geographic distribution of loans reflects adequate penetration throughout the assessment areas.
- The institution makes extensive use of innovative and/or flexible lending practices in order to serve assessment area credit needs.
- The bank is a leader in originating community development (CD) loans.

The Investment Test is rated High Satisfactory.

- The bank has an excellent level of qualified investments.
- The institution exhibits adequate responsiveness to credit and community economic development needs.
- The institution makes occasional use of innovative and/or complex investments to support CD needs.

The Service Test is rated <u>Low Satisfactory</u>.

- Delivery systems are reasonably accessible to essentially all portions of the institution's assessment areas.
- To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its retail delivery systems, particularly in low- or moderate-income geographies or to low- or moderate-income individuals.
- Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the assessment areas, particularly low- or moderate-income geographies or individuals.
- The institution provides an adequate level of CD services.

DESCRIPTION OF INSTITUTION

FirstBank operates as a state-chartered retail commercial bank headquartered in Nashville, Tennessee. FirstBank Financial Corporation, Nashville, Tennessee a one-bank holding company, wholly owns the subject bank, as well as additional subsidiaries and affiliates that provide investment and financial services. During the evaluation period, FirstBank merged with Franklin Synergy Bank, Franklin, Tennessee in August 2020. FirstBank entered new markets through opening new branches Birmingham, Alabama. The bank received a "Satisfactory" rating at its previous FDIC CRA Evaluation dated April 6, 2020, using Large Bank Examination Procedures.

The bank operates 82 full-service offices and 75 automated teller machines (ATMs) in the AAs located throughout Chattanooga Multi-State MSA, Alabama, Georgia, Kentucky, and Tennessee. FirstBank offers a full line of loan products, deposit accounts, and other financial services. It also offers hours and days of service consistent with area and industry norms.

As of March 31, 2022, assets totaled $12.7 billion, consisting primarily of Net Loans & Leases of $8.3 billion (65.4 percent of the total) and Securities of $1.7 billion (13.4 percent of the total). Total deposits equaled $11.0 billion as of the same date.

As reflected in the following table, the mix of outstanding loans of the bank's major loan products shows commercial loans (Commercial and Industrial Loans and Secured by Nonfarm and Nonresidential Properties) at 48.6 percent and home mortgage loans (Secured by 1-4 Family and Multifamily Residential Properties) as the second largest at 29.3 percent.

Loan Portfolio Distribution as of 3/31/2022		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	1,468,811	17.5
Secured by Farmland	48,629	0.6
Secured by 1-4 Family Residential Properties	2,057,638	24.5
Secured by Multifamily (5 or more) Residential Properties	400,501	4.8
Secured by Nonfarm Nonresidential Properties	2,636,353	31.4
Total Real Estate Loans	**6,611,932**	**78.7**
Commercial and Industrial Loans	1,443,351	17.2
Agricultural Production and Other Loans to Farmers	13,755	0.2
Consumer Loans	278,652	3.3
Obligations of State and Political Subdivisions in the U.S.	36,969	0.4
Other Loans	17,045	0.2
Lease Financing Receivable (net of unearned income)	0	0.0
Less: Unearned Income	0	0.0
Total Loans	**8,401,704**	**100.0**
Source: Reports of Condition and Income		

Based on the information discussed in this section as well as other regulatory data, the institution's financial condition, size, product offerings, prior performance, and status of any legal impediments did not affect its ability to meet the assessment areas' credit needs.

DESCRIPTION OF ASSESSMENT AREAS

As more fully described under Description of Institution for each rated area, FirstBank operates in five rated areas – the Chattanooga Multi-State MSA and the States of Alabama, Georgia, Kentucky, and Tennessee. The bank currently has one assessment area (AA) in the Chattanooga Multi-State MSA, three in Alabama, one in Georgia, one in Kentucky, and six in Tennessee. Please refer to the rated areas and individual AAs for additional information.

SCOPE OF EVALUATION

General Information

This evaluation covers the time period from the previous evaluation dated April 6, 2020, to the current evaluation dated June 6, 2022. To assess performance, examiners applied the Federal Financial Institutions Examination Council (FFIEC) Large Institution CRA Examination Procedures, which include the Lending, Investment, and Service Tests. Appendix A lists the applicable tests' criteria.

Examiners applied full-scope procedures to the following AAs: Chattanooga Multi-State Metropolitan Statistical Area (MSA), Alabama – Florence and Huntsville MSA, Georgia – Dalton MSA, Kentucky – Bowling Green MSA, and Tennessee – Nashville and Knoxville MSAs.

Examiners applied limited-scope procedures to the remaining AAs. Please refer to the rated area sections for additional details.

The following table shows that the bank originated a majority of its loans, deposits, and branches in the State of Tennessee. Consequently, examiners weighed records in the State of Tennessee heaviest when arriving at applicable conclusions and ratings.

Rated Area Breakdown of Loans, Deposits, and Branches						
Rated Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Chattanooga Multi-State MSA	361,720	6.2	785,051	7.7	8	9.8
Alabama	961,313	16.5	117,241	1.2	3	3.7
Georgia	55,593	1.0	198,902	1.9	3	3.7
Kentucky	87,911	1.5	245,933	2.4	4	4.9
Tennessee	4,362,232	74.8	8,886,009	86.8	64	78.0
Total	**5,828,769**	**100.0**	**10,233,136**	**100.0**	**82**	**100.0**
Source: HMDA & CRA Data (2020-2021); FDIC Summary of Deposits (06/30/2021) *Due to rounding, totals may not equal 100.0 percent*						

Activities Reviewed

Lending Test

For the Lending Test, CRA Large Bank procedures require examiners to consider a bank's reported home mortgage, small business, and small farm loans since the previous evaluation, as well as all reported CD loans originated since the previous evaluation. Consequently, this evaluation considers total loans reported (inside and outside of the AAs) either according to the Home Mortgage Disclosure Act (HMDA) or CRA data collection reporting requirements:

Home Mortgage Loans (Total loans reported inside and outside of the AAs)

- 2020 – 25,987 loans totaling $7,595,528,000
- 2021 – 24,377 loans totaling $7,278,191,000

Small Business Loans (Total loans reported inside and outside of the AAs)

- 2020 – 2,788 loans totaling $478,675,000
- 2021 – 2,737 loans totaling $535,623,000

Small Farm Loans (Total loans reported inside and outside of the AAs)

- 2020 – 362 loans totaling $28,053,000
- 2021 – 218 loans totaling $20,624,000

CD Loans:
April 6, 2020 - June 6, 2022: 138 loans totaling $615,492,000

This evaluation does not consider any affiliate lending.

Since no trends exist between the different years' data that materially affect applicable conclusions

or ratings, unless otherwise noted, this evaluation only presents the 2020 HMDA and 2020 CRA data, the most recent year for which aggregate data exists as of this evaluation date. However, examiners included 2020-2021 HMDA data and 2020-2021 CRA data in the Assessment Area Concentration discussion. Examiners will compare the bank's HMDA lending to aggregate data in 2020, as well as 2015 American Community Survey (ACS) data.

Examiners will compare the bank's small business and small farm lending to aggregate data in 2020 and D&B data in 2021.

The weightings for the specific loan categories varies for each of the AAs. As suggested by the above figures, examiners generally weighed home mortgage loans heavier when arriving at applicable conclusions.

Investment and Service Tests

The scopes for the Investment and Service Tests consider applicable current period CD activities, including qualified investments and CD services. Current period activities, including CD loans considered under the Lending Test, involve those generated since the previous evaluation. The Investment Test's scope further encompasses prior period, qualified investments. Prior period qualified investments involve those purchased prior to the previous evaluation but still outstanding as of this evaluation's date. Examiners use the book value as of the current evaluation date for all prior period, qualified investments.

For the Service Test, examiners reviewed the delivery systems for providing retail banking services, including branches and alternative delivery systems, and the impact of any branch openings/closings during the evaluation period. The review evaluated retail banking products and services targeted toward low- and moderate-income individuals or small businesses and/or tailored to meet specific needs within the AAs.

Given the institution's method and compilation of CD data, examiners reviewed all CD loans, qualified investments, and CD services from the previous evaluation to June 6, 2022.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

FirstBank demonstrated a low satisfactory record for the bank as a whole regarding the Lending Test. Excellent lending levels and a leader in making community development loans all support excellent performance records. This was offset by adequate performance records regarding geographic loan distribution, borrower profile loan distribution, the use of innovative and flexible lending practices and a small percentage of loans in the AAs. Conclusions regarding the institution's overall lending performance were generally consistent in each rated area. The appendices list the Lending Test's criteria.

For the CRA Large Bank Lending Test, typically, examiners will first determine whether the presence of any weaker lending activity or Assessment Area Concentration performance warrants

downgrading the overall Lending Test rating. Absent any such warranted downgrading, examiners will then place more weight on the bank's borrower profile and geographic loan distributions as well as on its CD loans when arriving at the overall Lending Test rating.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. Excellent records regarding both home mortgage and small business lending supports this conclusion. Examiners considered the bank's size, business strategy, and capacity relative to the AAs' credit needs when arriving at this conclusion.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs. Excellent performance in the Chattanooga Multi-State MSA, Alabama, Georgia, Kentucky, and Tennessee support this conclusion. For 2020, the bank originated 9,268 total reportable home mortgage loans totaling approximately $2.4 billion in its AAs. FirstBank captured a 3.0 percent market share of the total number of home mortgage loans and a 3.1 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank fourth out of 1,134 total lenders in the bank's AAs. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in the bank's AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans

Small business lending levels reflect excellent responsiveness to AA credit needs. Excellent performance in the Chattanooga Multi-State MSA, Alabama, Georgia, Kentucky, and Tennessee support this conclusion. For 2020, the bank originated 2,488 total reportable small business loans totaling nearly $404.8 million inside its AAs. FirstBank captured a 2.0 percent market share of the total number of small business loans and a 4.6 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 16th out of 325 total lenders in the bank's AAs. This ranking lands the bank in the top 5.0 percent of lenders reporting such loans in the bank's AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Small Farm Loans

Small farm lending levels reflect excellent responsiveness to AA credit needs. Excellent performance in Kentucky and Mississippi support this conclusion. No other areas originated enough small farm loans to make a meaningful conclusion. For 2020, the bank originated 346 total reportable small farm loans totaling nearly $26.2 million inside its AAs. FirstBank captured a 22.6 percent market share of the total number of small farm loans and a 29.6 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank first of 56 total lenders in the bank's AAs. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in the bank's AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Assessment Area Concentration

The institution originated a small percentage of loans inside its AAs. A small percentage of home mortgage loans in the AAs outweighed the high percentage of small business loans and the substantial majority of small farm loans in the AAs to support this conclusion. Examiners considered the bank's asset size and office structure as well as the loan categories reviewed relative to the areas' combined size and economy when arriving at this conclusion.

Home Mortgage Loans

The institution originated a small percentage of home mortgage loans inside its AAs. FirstBank has a significant home mortgage lending division that provides for nationwide lending and this is the primary reason for such a small percentage of home mortgage loans inside the AAs. The home mortgage lending level has increased since the prior evaluation, when only 17.9 percent of home mortgage lending was inside the AAs by number.

Small Business Loans

The institution originated a high percentage of its small business loans inside its AAs. The following table shows that, for small business loans by both measures, the percentages of the number and dollar volume, the bank originated a high percentage inside its AAs.

Small Farm Loans

The institution originated a substantial majority of its small farm loans inside its AAs. The following table shows that, for small farm loans by both measures, the percentages of the number and dollar volume, the bank originated a substantial majority of its small farm loans inside its AAs for 2020 and 2021 combined.

Lending Inside and Outside of the Assessment Area										
	Number of Loans					**Dollar Amount of Loans $(000s)**				
Loan Category	**Inside**		**Outside**		**Total**	**Inside**		**Outside**		**Total**
	#	**%**	**#**	**%**	**#**	**$**	**%**	**$**	**%**	**$(000s)**
Home Mortgage										
2020	9,424	36.3	16,563	63.7	25,987	2,486,997	32.7	5,108,532	67.3	7,595,528
2021	8,774	36.0	15,603	64.0	24,377	2,450,221	33.7	4,827,970	66.3	7,278,191
Subtotal	**18,198**	**36.1**	**32,166**	**63.9**	**50,364**	**4,937,218**	**33.2**	**9,936,502**	**66.8**	**14,873,719**
Small Business										
2020	2,488	89.2	300	10.8	2,788	404,808	84.6	73,868	15.4	478,675
2021	2,396	87.5	341	12.5	2,737	442,720	82.7	92,903	17.3	535,623
Subtotal	**4,884**	**88.4**	**641**	**11.6**	**5,525**	**847,528**	**83.6**	**166,770**	**16.4**	**1,014,298**
Small Farm										
2020	346	95.6	16	4.4	362	26,162	93.3	1,891	6.7	28,053
2021	197	90.4	21	9.6	218	17,861	86.6	2,763	13.4	20,624
Subtotal	**543**	**93.6**	**37**	**6.4**	**580**	**44,023**	**90.4**	**4,653**	**9.6**	**48,676**
Total	**23,625**	**41.8**	**32,844**	**58.2**	**56,469**	**5,828,769**	**36.6**	**10,107,925**	**63.4**	**15,936,694**
Source: Bank Data. Due to rounding, totals may not equal 100.0 percent.										

Consequently, considering the loan categories' relative overall performances and weightings, the institution originated a small percentage of its loans inside its AAs.

Geographic Distribution

FirstBank's geographic distribution of loans reflects adequate penetration throughout its AAs for the bank as a whole. Adequate performance regarding home mortgage, small business, and small farm loans supports this conclusion. Examiners focused on the percentage by number of loans in low- and moderate-income census tracts when arriving at conclusions for this performance factor. Home mortgage and small business lending performance proved consistent throughout the rated areas.

Home Mortgage Loans

FirstBank's geographic distribution of home mortgage loans reflects adequate penetration throughout the AAs. Adequate records in all rated areas support this conclusion.

Small Business Loans

FirstBank's geographic distribution of small business loans reflects adequate penetration throughout the AAs. Adequate records in all rated areas support this conclusion.

Small Farm Loans

FirstBank's only originated small farm loans in Kentucky and Tennessee. The geographic distribution of small farm loans reflects adequate penetration throughout the AAs. Adequate records in both rated areas support this conclusion.

Each rated area includes a more detailed discussion of the bank's geographic loan distribution for home mortgage and small business loans.

Borrower Profile

FirstBank's distribution of borrowers reflects good penetration among individuals of different income levels (including low- and moderate-income) and businesses of different sizes for the bank as a whole. Excellent performance regarding small business and small farm loans uplifted adequate performance regarding home mortgage loans to support this conclusion. Examiners focused on the percentage by number of loans to low- and moderate-income individuals and to businesses with gross annual revenue of $1 million or less when arriving at conclusions for this performance factor. FirstBank's home mortgage, small business, and small farm lending performance proved generally consistent throughout the rated areas.

Home Mortgage Loans

FirstBank's borrower profile distribution of home mortgage loans reflects adequate penetration throughout the AAs. Adequate records in all rated areas support this conclusion.

Small Business Loans

FirstBank's borrower profile distribution of small business loans reflects excellent penetration throughout the AAs. Excellent performance in the Chattanooga Multi-State MSA, Alabama, Kentucky, and Tennessee outweighed the good record in Georgia to support this conclusion.

Small Farm Loans
FirstBank's borrower profile distribution of home mortgage loans reflects excellent penetration throughout the AAs. Excellent records in Kentucky and Tennessee support this conclusion.

Each rated area includes a more detailed discussion of the bank's borrower profile distribution for home mortgage and small business loans.

Innovative or Flexible Lending Practices

The institution extensively uses innovative or flexible lending practices for the bank as a whole in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The tables below show that, since the previous evaluation, the bank originated 12,829 innovative or flexible loans totaling over $3.5 billion. This dollar figure equates to 32.2 percent of average total assets of $10,769,899,000 since the previous evaluation and 47.4 percent of average net loans of $7,327,302,000 for the same period, thereby reflecting excellent levels.

A majority of these loans provide flexible lending terms for home mortgages through little or no down payment requirements. Most of the bank's flexible loan products consist of loans granted through other government programs, such as through the Tennessee Housing Development Agency (THDA), the Alabama Housing Finance Authority (AHFA), Georgia Department of Consumer Affairs (GDCA), U.S. Department of Agriculture's (USDA) home mortgage program, Veterans Administration (VA), and Federal Housing Administration (FHA). The bank's flexible loan products also include programs through Fannie Mae (FNMA) and Freddie Mac (FMCC).

Furthermore, FirstBank also offers a portfolio affordable housing loan program that assists low- and moderate-income homebuyers who cannot qualify for traditional financing. The program offers a fixed-rate 30-year loan with 100.0 percent loan-to-value and requires a 620 minimum credit score and pre-purchase homeownership education.

Given the bank's capacity and the needs in its AAs, the level of innovative and flexible loans reflects excellent responsiveness to the credit needs of its AAs. The table below displays the bank's innovative or flexible loans by rated area.

Innovative or Flexible Loans Institution										
Rated Area	**FMCC/ FNMA/State Housing**		**USDA/FHA/ VA**		**Portfolio Loan Program**		**First Time Homebuyers**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**

Chattanooga Multi-State MSA	715	179,116	99	23,034	13	3,219	134	31,158	**961**	**236,527**
Alabama	2,044	529,325	701	227,699	174	33,282	435	100,906	**3,354**	**891,212**
Georgia	151	29,377	50	8,841	11	1,790	33	5,445	**245**	**45,453**
Kentucky	130	29,997	16	3,178	1	226	33	4,962	**180**	**38,363**
Tennessee	5,816	1,668,318	823	219,775	301	58,071	1,149	315,547	**8,089**	**2,261,711**
Total	**8,856**	**2,436,133**	**1,689**	**482,527**	**500**	**96,588**	**1,784**	**458,018**	**12,829**	**3,473,266**
Source: Bank records.										

Examiners also included below details regarding additional innovative or flexible lending activities.

- **Down Payment Assistance Programs –** FirstBank provides down payment assistance on first-time homebuyer residential loans. During the evaluation period, the bank provided $1.5 million in down payment assistance on 205 residential loans.

As expected due to the bank's growth in asset size, all segments of the innovative and flexible loan programs increased since the previous evaluation. Growth occurred in all categories, with 8,384 innovative or flexible loans totaling $1.5 billion noted at the previous evaluation.

Community Development Loans

The institution is a leader in making CD loans for the bank as a whole. FirstBank's leadership in originating an excellent level of CD loans and its good responsiveness to CD needs support this conclusion. The bank's performance was generally consistent throughout the rated areas. Examiners weighed the State of Tennessee heaviest when forming conclusions. The appendices define CD and list the criteria considered under this performance factor.

Regarding the overall level of CD loans, the following table shows that, since the previous evaluation the bank granted 138 CD loans totaling over $615.5 million. This level equates to 5.7 percent of average total assets of $10,769,899,000 since the last previous evaluation and 8.4 percent of average net loans of $7,327,302,000 for the same period, thereby reflecting excellent levels. These levels reflect increases from the 1.2 percent of average assets and 1.6 percent of average net loans reported at the previous evaluation.

Community Development Lending Institution										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
2020 (4/6 - 12/31)	6	61,880	1	1,100	36	65,995	22	63,160	**65**	**192,135**
2021	9	56,822	7	8,163	2	8,582	47	309,828	**65**	**383,395**
2022 (1/1 – 6/6)	3	10,972	0	0	0	0	5	28,990	**8**	**39,962**
Total	**18**	**129,674**	**8**	**9,263**	**38**	**74,577**	**74**	**401,978**	**138**	**615,492**
Source: Bank Data.										

In addition to reflecting an excellent level of loans, the CD loans reflect good responsiveness to the AAs' CD needs. As seen in the previous table, 65.3 percent of the dollar volume of all CD loans help to revitalize or stabilize low- and moderate-income geographies. Additionally, 21.1 percent helps to provide affordable housing to low- and moderate-income families. Furthermore, another 12.1 percent promotes economic development, and 1.5 percent benefits community services for low- and moderate-income individuals.

As noted under the applicable Description of Assessment Areas sections, activities that revitalize or stabilize qualifying geographies reflect a primary CD need in the AAs. In addition, activities that support community services for low- and moderate-income individuals also represent a CD need. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its AAs, the bank exhibits an excellent level in originating CD loans.

Community Development Loans by Rated Area
Institution

Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Chattanooga Multi-State MSA	2	18,488	2	3,386	1	2,139	5	21,897	**10**	**45,910**
Alabama	3	8,319	1	250	0	0	5	11,655	**9**	**20,224**
Georgia	0	0	0	0	1	2,073	0	0	**1**	**2,073**
Kentucky	1	12,120	0	0	1	5,290	1	1,496	**3**	**18,906**
Tennessee	9	62,205	5	5,627	29	56,193	54	335,017	**97**	**459,042**
Nationwide	1	15,000	0	0	0	0	0	0	**1**	**15,000**
Regional	2	13,541	0	0	6	8,883	9	31,913	**17**	**54,337**
Total	**18**	**129,673**	**8**	**9,263**	**38**	**74,578**	**74**	**401,978**	**138**	**615,492**

Source: Bank records.

INVESTMENT TEST

FirstBank demonstrated a high satisfactory record for the bank as a whole regarding the Investment Test. The significant level of qualified investments (QIs) outweighed the adequate responsiveness to CD needs, and occasional use of complex QIs supports this conclusion. Conclusions regarding the institution's overall Investment Test performance were generally inconsistent in each rated area. The appendices list the criteria considered under this test.

Investment and Grant Activity

The investment activity for the bank as a whole reflects significant level. As seen in the following table, the bank made use of 93 QIs totaling $84,493,000, which includes donations of $126,000 and prior period investments of $28,838,000. The total dollar amount equates to 1.1 percent of average total assets of $10,769,899,000 since the previous evaluation and 9.2 percent of average securities of $1,266,935,000 for the same period, thereby reflecting a good level. The bank's investments for the current evaluation period compare at a good level compared to similarly situated institutions. These levels reflect a slight increase over the 0.7 percent of average total assets and the 6.3 percent of average securities reported in the previous evaluation.

Qualified Investments by Rated Area Institution										
Rated Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Chattanooga Multi-State MSA	5	20,289	0	0	0	0	3	4	**8**	**20,293**
Alabama	6	5,768	0	0	0	0	0	0	**6**	**5,768**
Georgia	0	0	0	0	1	945	1	3,000	**2**	**3,945**
Kentucky	0	0	3	2	0	0	5	2,235	**8**	**2,237**
Tennessee	51	58,193	20	7,073	11	11,923	11	7,304	**93**	**84,493**
Nationwide Activities	0	0	2	23	0	0	0	0	**2**	**23**
Total	**62**	**84,250**	**25**	**7,098**	**12**	**12,868**	**20**	**12,543**	**119**	**116,759**
Source: Bank records										

Qualified Investments by Year Institution										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Prior Period	21	21,503	0	0	4	3,535	3	3,800	**28**	**28,838**
2020 (4/6 - 12/31)	30	49,835	0	0	0	0	4	1,865	**34**	**51,700**
2021	9	10,610	4	6,980	6	8,083	9	6,870	**28**	**32,543**
2022 (1/1 – 6/6)	2	2,302	0	0	1	1,250	0	0	**3**	**3,552**
Subtotal	**62**	**84,250**	**4**	**6,980**	**11**	**12,868**	**16**	**12,535**	**93**	**116,633**
Qualified Grants & Donations	0	0	21	118	1	0	4	8	**26**	**126**
Total	**62**	**84,250**	**25**	**7,098**	**12**	**12,868**	**20**	**12,543**	**119**	**116,759**
Source: Bank Records.										

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show adequate responsiveness using QIs that directly address identified needs in the states where the bank operated. Although the majority of the CD loans were for affordable housing, the bank also had CD loans in all other categories. Community services to low- and moderate-income individuals and activities that help revitalize or stabilize low- and moderate-income geographies are the primary needs in the AAs.

FirstBank's QIs addressed the following needs throughout various AAs:

- Affordable housing needs with approximately $32.5 million in the purchase of mortgage-backed securities with underlying loans to low- and moderate-income individuals.

- Community Service needs with investments of approximately $1.2 million funded a program providing community service needs to seniors living in apartments or nursing facilities. The percentage of low- and moderate-income seniors at these locations varies

from 54.0 percent to 100.0 percent.

- Economic development needs by financing small businesses with approximately $3.8 million through the Tennessee Small Business Job Opportunity Fund. The funds promote economic development by helping to lower the cost of capital for businesses in Tennessee.

- Revitalizing and stabilizing low-income, moderate-income, and distressed middle-income tracts with approximately $1.9 million through general obligation bonds to fund revitalization improvements.

Community Development Initiatives

FirstBank made occasional use of complex investments given the size of the institution and opportunities available. The bank did not have any innovative investments during the evaluation period.

FirstBank's $17.3 million in a Low-Income Housing Tax Credit (LIHTC) addressed affordable housing needs in the Chattanooga Multi-State MSA. Refer to the complex and innovative QIs sections in the rated area to augment the consideration given to the institution's performance under the qualitative criteria in the CRA regulation.

The LIHTC program incentivizes CD by issuing tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to low-income households. Investments through this program have varying degrees of complexity. For FirstBank, complexity through this program involved special expertise needed by staff and a significant amount of time to coordinate the financing process.

SERVICE TEST

FirstBank demonstrated a low satisfactory record for the bank as a whole regarding the Service Test. The adequate levels regarding the institution's CD services, reasonableness of accessibility of delivery systems, its changes in branch locations, and its reasonableness of business hours and services to support this conclusion. The Service Test performance is relatively consistent in each of the rated areas. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the bank's AAs for the bank as a whole. Reasonably accessible branch distribution and alternative delivery systems support this conclusion.

Branch Distribution

The bank makes its full-service offices reasonably accessible to essentially all portions of the institution's AAs for the bank as a whole. Adequate accessibility of branches in moderate-income geographies outweighed near poor performance in low-income geographies to support this conclusion.

The bank's level of branch distribution in low-income tracts falls 7.7 percentage points below the population in low-income census tracts, reflecting a near poor level. The bank's level falls 5.8 percentage points below the population percentage in moderate-income tracts, reflecting an adequate level. More weight is given to the branch distribution in moderate-income tracts given the higher population.

Branch and ATM Distribution Institution												
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Open Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	166	13.9	524,147	10.1	2	2.4	5	7.5	1	16.7	1	14.3
Moderate	255	21.4	1,064,763	20.4	12	14.6	7	10.4	1	16.7	1	14.3
Middle	409	34.3	1,848,682	35.5	35	42.7	32	47.8	2	33.3	1	14.3
Upper	342	28.7	1,747,833	33.5	28	34.1	20	29.8	2	33.3	4	57.1
NA	19	1.6	24,719	0.5	5	6.1	3	4.5	0	0.0	0	0.0
Totals	**1,191**	**100.0**	**5,210,144**	**100.0**	**82**	**100.0**	**67**	**100.0**	**6**	**100.0**	**7**	**100.0**
Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.												

Alternative Delivery Systems

The bank makes its alternative delivery systems reasonably accessible to essentially all portions of the bank's AAs for the bank as a whole. Reasonably accessible ATMs and alternative delivery systems to low- and moderate-income individuals support this conclusion.

The preceding table shows that the bank's ATMs in low-income tracts falls 2.6 percentage points below the population in low-income census tracts, thereby reflecting an adequate level. The bank's ATMs in moderate-income tracts falls 10.0 percentage points below the population in moderate-income tracts, also reflecting a poor level.

FirstBank offers other alternative delivery systems for remote access to banking services at any location and any time. These systems include online banking, mobile banking, mobile deposit, mobile payment, telephone banking, and digital mortgage delivery channels.

- Online banking through the bank's website and mobile banking allows customers to review account statements, set up customized account notifications, and perform transactional capabilities such as bill pay and fund transfers within accounts.
- The mobile banking application accessible on smartphones and tablets affords customers the ability to deposit checks remotely.
- The bank offers free customer access to accounts via a toll-free telephone number that is available in English and Spanish.
- Digital mortgage channels expedite the mortgage process through an online mortgage application.

<u>Changes in Branch Locations</u>

The institution's record of opening and closing of branches has generally not adversely affected low- and moderate-income geographies or individuals for the bank as a whole. Greater percentage changes in middle- and upper-income census tracts as compared to changes in low- and moderate-income tracts supports this conclusion.

Excluding branches acquired during the evaluation, the bank decreased its total full-service branch presence by a net of six offices, with seven branches closed and one branch opened. Excluding acquired branches, the bank opened one branch in an upper-income tract. Of the branch closings excluding acquired branches, one occurred in a low-income tract, one occurred in a moderate-income tract, one occurred in a middle-income tract, and four occurred in upper-income tracts. The bank acquired five branches, one in a low-income tract, one in a moderate-income tract, two in middle-income tracts, and one in a upper-income tract.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the AAs, particularly low- or moderate-income geographies or individuals. The branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly based on the AA needs.

Community Development Services

The institution provides an adequate level of CD services for the bank as a whole. Adequate performances regarding the extent of CD services and good responsiveness of CD services to available opportunities support this conclusion.

The following table shows that the bank provided 191 CD services since the previous evaluation. This is a slight decline from the 202 CD services recorded at the previous evaluation. The current level reflects adequate performance regarding the extent, or number, of CD services provided.

The services primarily involve bank personnel's use of their technical expertise to benefit organizations or projects with a primary purpose of CD, as defined by CRA regulations. In addition to their extent, CD services reflect good responsiveness to available opportunities as illustrated by their level of addressing identified CD needs in the bank's AAs.

Services include Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals. The table below shows adequate distribution across the four major CD service categories. More specifically, 75.9 percent of the bank's CD services benefitted projects or organizations that provide community services targeted to low- and moderate-income individuals. As noted in the rated area sections of this evaluation, such services represent CD needs for many of the bank's AAs.

Community Development Services by Rated Area Institution

Rated Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Chattanooga Multi-State MSA	0	7	1	0	**8**
Alabama	0	5	1	0	**6**
Georgia	0	8	0	0	**8**
Kentucky	0	23	0	0	**23**
Tennessee	33	94	2	4	**133**
Statewide/Regional	5	8	0	0	**13**
Total	**38**	**145**	**4**	**4**	**191**
Source: Bank records.					

Community Development Services by Year Institution					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
2020 (4/6 - 12/31)	5	13	1	0	19
2021	4	44	3	1	52
2022 (1/1 – 6/6)	29	88	0	3	120
Total	**38**	**145**	**4**	**4**	**191**
Source: Bank Data.					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs. Therefore, this consideration did not affect the institution's overall CRA rating.

CHATTANOOGA MULTI-STATE MSA

CRA RATING FOR CHATTANOOGA MULTI-STATE MSA: SATISFACTORY

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: High Satisfactory
The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN CHATTANOGGA MULTI-STATE MSA

The Chattanooga Multi-State MSA AA includes all 93 census tracts that make up Hamilton County in the State of Tennessee and Catoosa County in the State of Georgia.

Economic and Demographic Data

The AA's census tracts reflect the following income designations based on 2015 ACS data: 10 low-, 14 moderate-, 37 middle-, 30 upper-income tracts, and 2 tracts with no income designation. The Federal Emergency Management Agency (FEMA) declared this AA as a major disaster area due to severe storms and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Assessment Area: Chattanooga Multi-State MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	93	10.8	15.1	39.8	32.3	2.2
Population by Geography	413,496	7.4	14.2	39.1	39.3	0.0
Housing Units by Geography	180,465	8.0	15.3	40.1	36.6	0.0
Owner-Occupied Units by Geography	105,884	3.5	12.8	39.9	43.8	0.0
Occupied Rental Units by Geography	54,378	14.5	19.6	41.0	24.9	0.0
Vacant Units by Geography	20,203	13.8	16.9	39.2	30.1	0.0
Businesses by Geography	44,148	7.2	14.2	38.5	39.8	0.2
Farms by Geography	1,001	4.7	11.2	40.6	43.6	0.0
Family Distribution by Income Level	105,839	19.8	16.9	19.8	43.5	0.0
Household Distribution by Income Level	160,262	23.6	15.6	17.3	43.5	0.0
Median Family Income MSA - 16860 Chattanooga, TN-GA MSA		$58,694	Median Housing Value			$154,857
			Median Gross Rent			$764
			Families Below Poverty Level			11.0%

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

Currently, major employers in the Chattanooga Multi-State MSA consist of the Erlanger Health System, Blue Cross Blue Shield of Tennessee, Tennessee Valley Authority, and CHI Memorial.[1] Unemployment rates increased substantially in most areas across the nation starting in April 2020 from the COVID-19 pandemic and some local government orders closed nonessential businesses. The Chattanooga Multi-State MSA's unemployment rate of 3.8 percent in 2021 is below the U.S. rate of 5.3 percent.[2]

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 111 offices from its 20 institutions serving about 3,725 people on average. FirstBank ranks 6th in market share by capturing 6.4 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Chattanooga Multi-State MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data indicates that 36.7 percent of the AA's families receive a designation of low- or moderate-income, with 11.0 percent below the poverty level. This signifies a continued need for CD services. The national COVID-19 major disaster area, and the AA's designation as a federal disaster area for other reasons supports the need for revitalization and stabilization efforts.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, a variety of reasons from the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

SCOPE OF EVALUATION – CHATTANOOGA MULTI-STATE MSA

Lending Test

Loan Categories Reviewed

[1]Source: Moody's Analytics, Precis U.S. Metro, April 2022
[2]Source: U. S. Bureau of Labor Statistics

Examiners considered the following loans granted inside the bank's Chattanooga Multi-State MSA AA:

Home Mortgage Loans:
- 2020: 510 loans totaling $115,182,000
- 2021: 683 loans totaling $165,437,000

Small Business Loans:
- 2020: 180 loans totaling $39,119,000
- 2021: 161 loans totaling $41,382,000

Examiners did not analyze small farm loans since no loans were originated in 2020, and only two were originated in 2021. Based on the above figures, home mortgage loans received the heaviest weighting for this rated area.

Investment and Service Tests

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

CONCLUSIONS ON PERFORMANCE CRITERIA IN CHATTANOOGA MULTI-STATE MSA

LENDING TEST

FirstBank demonstrated a low satisfactory record in the Chattanooga Multi-State MSA regarding the Lending Test. Excellent lending levels, adequate performance records regarding geographic loan distribution, borrower profile, and CD loans primarily support this conclusion. The bank further made use of innovative and flexible lending levels in this rated area.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Chattanooga Multi-State MSA. Excellent performance regarding home mortgage loans outweighed good performance regarding small business loans to support this conclusion. Examiners placed more weight on the bank's home mortgage loans than small business loans based on the loan volumes. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Chattanooga Multi-State MSA. For 2020, the bank originated 510 total reportable home mortgage loans totaling approximately $115.8 million in its Chattanooga Multi-State MSA AA. FirstBank captured a 2.2 percent market share of the total number of home mortgage loans and 2.2 percent market share of the total dollar volume of home mortgage loans in the Chattanooga Multi-State

MSA AAs.

This volume of activity ranks the bank 13th out of 480 total lenders in the bank's Chattanooga Multi-State MSA AA. This ranking lands the bank in the top 2.7 percent of lenders reporting such loans in the bank's Chattanooga Multi-State MSA AA. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect good responsiveness to AA credit needs in the Chattanooga Multi-State MSA. For 2020, the bank originated 180 total reportable small business loans totaling approximately $39.1 million inside its Chattanooga Multi-State MSA AAs. FirstBank captured a 1.8 percent market share of the total number of small business loans and a 4.9 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 15th out of 115 total lenders in the bank's Chattanooga Multi-State MSA AA. This ranking lands the bank in the top 13.0 percent of lenders reporting such loans in the bank's Chattanooga Multi-State MSA AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Chattanooga Multi-State MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Chattanooga Multi-State MSA AA.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects adequate performance in the Chattanooga Multi-State MSA AA. Adequate performances in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is slightly higher than the aggregate data by 0.2 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank's lending level falls 2.1 percentage points below the aggregate data, also reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans
Chattanooga Multi-State MSA AA

Tract Income Level	% of Owner-Occupied Housing Units	Aggregate Performance % of #	#	%	$(000s)	%
Low	3.5	2.3	13	2.5	3,392	2.9
Moderate	12.8	9.4	37	7.3	5,843	5.1
Middle	39.9	37.5	206	40.4	40,154	34.9
Upper	43.8	50.7	254	49.8	65,793	57.1
Not Available	0.0	0.0	0	0.0	0	0.0

Totals	**100.0**	**100.0**	**510**	**100.0**	**115,182**	**100.0**

Source: 2015 ACS Data; 2020 HMDA Data; 2020 HMDA Aggregate Data,
Due to rounding, totals may not equal 100.0 percent

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Chattanooga Multi-State MSA AA. Adequate performance in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is higher than the aggregate data by 1.0 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls 2.5 percentage points below the aggregate data, also reflecting an adequate level.

Geographic Distribution of Small Business Loans
Chattanooga Multi-State MSA AA

Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	7.0	9.0	18	10.0	3,220	8.2
Moderate	14.4	13.6	20	11.1	3,523	9.0
Middle	38.7	36.8	72	40.0	16,375	41.9
Upper	39.6	40.5	70	38.9	16,002	40.9
Not Available	0.3	0.1	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**180**	**100.0**	**39,120**	**100.0**

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data
Due to rounding, totals may not equal 100.0 percent.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent performance regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Chattanooga Multi-State MSA AA.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Chattanooga Multi-State MSA AA. Adequate performances to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is lower than the aggregate data by 1.2 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank's lending level falls 1.0 percentage point below the aggregate data, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Chattanooga Multi-State MSA AA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	19.8	5.7	23	4.5	2,156	1.9
Moderate	16.9	16.7	80	15.7	12,827	11.1
Middle	19.8	19.8	123	24.1	22,960	19.9
Upper	43.5	39.1	262	51.4	69,127	60.0
Not Available	0.0	18.6	22	4.3	8,112	7.0
Totals	**100.0**	**100.0**	**510**	**100.0**	**115,182**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data; 2020 HMDA Aggregate Data. *Due to rounding, totals may not equal 100.0 percent.*						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Chattanooga Multi-State MSA AA. Excellent performance to businesses with gross annual revenues of $1 million or less supports this conclusion.

As shown in the table below, the bank's level of lending to small businesses with gross annual revenues of $1 million or less is 23.0 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Chattanooga Multi-State MSA.

Distribution of Small Business Loans by Gross Annual Revenue Category Chattanooga Multi-State MSA AA						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	85.9	37.6	109	60.6	19,991	51.1
>$1,000,000	4.4	--	70	38.9	19,102	48.8
Revenue Not Available	9.7	--	1	0.6	26	0.1
Totals	**100.0**	**100.0**	**180**	**100.0**	**39,119**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. *Due to rounding, totals may not equal 100.0 percent*						

Innovative or Flexible Lending Practices

The institution made use of innovative or flexible lending practices in the Chattanooga Multi-State MSA. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 961 innovative or flexible loans totaling $236.5 million in the Chattanooga Multi-State MSA. This dollar figure

equates to 6.8 percent of the bank's total innovative or flexible loans. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the Chattanooga Multi-State MSA.

Innovative or Flexible Loans Chattanooga Multi-State MSA										
Assessment Area	**FHLMC/ FNMA/State Housing**		**USDA/FHA/VA**		**Portfolio Loan Program**		**First Time Hombuyers**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Chattanooga Multi-State MSA	715	179,116	99	23,034	13	3,219	134	31,158	**961**	**236,527**
Source: Bank Data (04/16/2020 – 6/6/2022)										

Community Development Loans

The institution has made an adequate level of CD loans in the Chattanooga Multi-State MSA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

The following table shows that, since the previous evaluation, the bank granted 10 CD loans totaling approximately $45.9 million in this assessment area. The dollar amount equates to 7.5 percent of the bank's overall level of CD loans as compared to the 6.2 percent of overall HMDA and CRA loans in this AA.

Community Development Loans Chattanooga Multi-State MSA										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Chattanooga Multi-State MSA	2	18,488	2	3,386	1	2,139	5	21,897	**10**	**45,910**
Source: Bank Data (04/06/2020 – 06/06/2022)										

Besides their extent, the CD loans reflect adequate responsiveness to the state's CD needs. As seen in the table above, 47.7 percent of the dollar volume of CD loans help revitalize or stabilize low- and moderate-income geographies, while 7.4 percent benefits community services.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AAs. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

INVESTMENT TEST

FirstBank demonstrated a high satisfactory record in the Chattanooga Multi-State MSA regarding the Investment Test. The significant level of QIs outweighed the adequate responsiveness to CD needs and the occasional use of complex QIs to support this conclusion.

Investment and Grant Activity

The bank has a significant level of QIs in the Chattanooga Multi-State MSA.

The table below shows that FirstBank made eight QIs totaling approximately $20.3 million in the Chattanooga Multi-State MSA. By dollar volume, this equates to 17.4 percent of the bank's total QIs as compared to 7.7 percent of total deposits in this rated area.

Qualified Investments Chattanooga Multi-State MSA										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Chattanooga Multi-State MSA	5	20,289	0	0	0	0	3	4	8	20,293
Source: Bank Data (04/06/2020 – 06/06/2022)										

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show adequate responsiveness through use of investments that directly address identified needs in the Chattanooga Multi-State MSA. The previous table shows responsiveness by the dollar amount to two of four CD purpose categories, including a significant dollar volume to affordable housing for low- and moderate-income.

FirstBank's major investments addressed the following needs throughout the Chattanooga Multi-State MSA:

- Affordable housing needs with approximately $1.3 million in the purchase of mortgage-backed securities with underlying loans to low- and moderate-income individuals.

Community Development Initiatives

FirstBank made occasional use of complex or innovative investments, given the size of the institution and opportunities available in the Chattanooga Multi-State MSA. One new investment in a LIHTC totaled approximately $17.3 million.

SERVICE TEST

FirstBank demonstrated a low satisfactory record for the Chattanooga Multi-State MSA regarding the Service Test. The adequate level regarding the bank's CD services and reasonable accessibility of its delivery systems, its changes in branch locations, and its reasonableness of business hours and services to support this conclusion.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to portions of the Chattanooga Multi-State MSA.

Limited accessible branch distribution was lifted by reasonable accessibility to alternative delivery systems to support this conclusion.

Branch Distribution
The bank makes its full-service offices accessible to limited portions of the Chattanooga Multi-State MSA.

The bank does not operate any branches in low- and moderate-income tracts, falling 7.4 percentage points below the population in low-income tracts and 20.8 percentage points below the population in moderate-income tracts. This level of distribution reflects poor performance.

Branch and ATM Distribution by Geography Income Level Chattanooga Multi-State MSA												
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Open Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	10	10.8	30,488	7.4	0	0.0	3	12.5	0	0.0	0	0.0
Moderate	14	15.1	58,914	14.2	0	0.0	5	20.8	0	0.0	0	0.0
Middle	37	39.8	161,598	39.1	3	37.5	11	45.58	0	0.0	0	0.0
Upper	30	32.3	162,496	39.3	5	62.5	5	20.8	0	0.0	0	0.0
NA	2	2.2	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**93**	**100.0**	**413,496**	**100.0**	**8**	**100.0**	**24**	**100.0**	**0**	**0.0**	**0**	**0.0**
Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent												

Alternative Delivery Systems
The bank makes its alternative delivery systems reasonably accessible in the Chattanooga Multi-State MSA.

The preceding table shows that the bank's ATMs in low-income tracts rises 5.1 percentage points above the population in low-income census tracts, thereby reflecting an adequate level. The bank's ATMs in moderate-income tracts rises 6.6 percentage points above the population in moderate-income tracts, reflecting adequate performance. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

The institution's record of opening and closing of branches in Chattanooga Multi-State MSA has generally not adversely affected low- and moderate-income geographies or individuals of geographies. No branch changes occurred in the Chattanooga Multi-State MSA.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Chattanooga Multi-State MSA, particularly low- or moderate-income geographies or individuals. The Chattanooga Multi-State MSA reflects product offerings, services, and branch hours consistent with discussion at the institution level.

The branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly according to area needs. Branch and drive-thru hours are primarily from Monday to Friday.

Community Development Services

The institution provides an adequate level of CD services for the Chattanooga Multi-State MSA. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities support this conclusion. The appendices list the criteria considered under this performance factor.

The following table shows that the bank provided eight CD services since the previous evaluation.

Community Development Services Chattanooga Multi-State MSA					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
Chattanooga Multi-State MSA	0	7	1	0	**8**
Source: Bank Data (04/06/2020 – 06/06/2022)					

STATE OF ALABAMA

CRA RATING FOR ALABAMA: SATISFACTORY

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

FirstBank designated four AAs in Alabama as noted in the table below. All of the bank's AAs in Alabama conform to the CRA regulatory requirements.

Description of Alabama Assessment Areas			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Birmingham MSA	Jefferson	163	1
Florence MSA	Lauderdale	22	1
Huntsville MSA	Madison	73	1
Source: Bank Records; 2015 ACS.			

SCOPE OF EVALUATION – ALABAMA

Full-Scope Assessment Area
Of the three AAs in Alabama, examiners applied full-scope procedures to the Huntsville MSA assessment area since it generated the largest percentage of the bank's loans and deposits in this rated area. In addition, in accordance with outstanding procedures, examiners also randomly selected the Florence MSA AA for review since this area had not been reviewed using full-scope procedures during the previous two evaluations. Examiners applied limited-scope procedures to the other Alabama AA.

Lending Test

Loan Categories Reviewed
Examiners considered the following loans granted inside the bank's Alabama AAs as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:
- 2020: 1,768 loans totaling $454,708,000
- 2021: 1,744 loans totaling $476,557,000

Small Business Loans:
- 2020: 39 loans totaling $8,172,000
- 2021: 85 loans totaling $21,495,000

Examiners did not analyze small farm loans since less than four loans were made each year in this

rated area and examiners would not be able to draw meaningful conclusions. As suggested by the above figures, home mortgage loans generally received the heaviest weighting.

Assessment Area Weighting
The following table shows that the Huntsville MSA AA generated the largest percentage of the bank's Alabama loans and deposits. Consequently, examiners weighed records in the Huntsville MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners weighed performance in each reviewed area consistent with that area's lending level as reflected in the following table.

Assessment Area Distribution – State of Alabama						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Birmingham MSA	280,577	29.2	173	0.2	1	33.3
Florence MSA	27,254	2.8	43,739	37.3	1	33.3
Huntsville MSA	653,482	68.0	73,329	62.5	1	33.3
Total	**961,313**	**100.0**	**117,241**	**100.0**	**3**	**100.0**
Source: HMDA & CRA Data (2020-2021); FDIC Summary of Deposits (06/30/2021) *Due to rounding, totals may not equal 100.0 percent*						

Investment and Service Tests

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA

LENDING TEST

FirstBank demonstrated a low satisfactory record in the State of Alabama regarding the Lending Test. Excellent lending levels and adequate performance records regarding geographic distribution loan distribution, borrower profile, and community development loans primarily support this conclusion. The bank further made use of innovative and flexible lending levels in this rated area. Conclusions regarding the institution's performance in the State of Alabama were generally consistent with the conclusions for each AA within the rated area, unless otherwise noted.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the State of Alabama. Excellent performance regarding home mortgage loans outweighed adequate performance regarding small business loans to support this conclusion. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the State of Alabama. For 2020, the bank originated 1,769 total reportable home mortgage loans totaling

approximately $455.5 million in its Alabama AAs. FirstBank captured a 2.8 percent market share of the total number of home mortgage loans and 3.1 percent market share of the total dollar volume of home mortgage loans in the Alabama AAs.

This volume of activity ranks the bank sixth out of 567 total lenders in the bank's Alabama AAs. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in the bank's Alabama AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect adequate responsiveness to AA credit needs in the State of Alabama. For 2020, the bank originated 39 total reportable small business loans totaling approximately $8.2 million inside its Alabama AAs. FirstBank captured a 0.1 percent market share of the total number of small business loans and a 0.4 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 49th out of 170 total lenders in the bank's Alabama AAs. This ranking lands the bank in the top 28.8 percent of lenders reporting such loans in the bank's Alabama AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the State of Alabama. Adequate records regarding both home mortgage and small business loans support this conclusion. The bank's performance is generally consistent throughout the AAs within the rated area, unless otherwise noted. Examiners placed the most weight on the bank's Huntsville MSA AA.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects adequate penetration throughout the State of Alabama. Adequate performances in all AAs support this conclusion.

Small Business Loans
The geographic distribution of small business loans reflects adequate penetration throughout the State of Alabama. Adequate performances in the Birmingham MSA and Florence-Muscle Shoals MSA AAs outweighed poor performance in the Huntsville MSA AA to support this conclusion.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent records regarding small business loans to support this conclusion. The bank's performance is generally consistent throughout the AAs within the rated area, unless otherwise noted. Examiners placed the most weight on the bank's Huntsville MSA AA.

Home Mortgage Loans
The distribution of borrowers reflects adequate penetration among retail customers of different income levels. Adequate performances in all AAs support this conclusion.

Small Business Loans
The distribution of borrowers reflects excellent penetration among business customers of different sizes. Excellent performance in the Huntsville MSA and Florence MSA AAs outweighed the adequate performance in the Birmingham MSA AA to support this conclusion.

Innovative or Flexible Lending Practices

The institution made use of innovative or flexible lending practices in the State of Alabama. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 3,354 innovative or flexible loans totaling $891.2 million in the State of Alabama. This dollar figure equates to 25.7 percent of the bank's total innovative or flexible loans. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects adequate responsiveness to the credit needs of the State of Alabama.

Innovative or Flexible Loans
State of Alabama

Assessment Area	FHLMC/ FNMA/State Housing		USDA/FHA/VA		Portfolio Loan Program		First Time Homebuyers		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Birmingham MSA	630	160,313	135	34,489	149	27,080	149	34,869	**1,063**	**256,751**
Florence MSA	24	6,210	4	765	0	0	3	900	**31**	**7,875**
Huntsville MSA	1,390	362,802	562	192,445	25	6,202	283	65,137	**2,260**	**626,586**
Total	**2,044**	**529,325**	**701**	**227,699**	**174**	**33,282**	**435**	**100,906**	**3,354**	**891,212**

Source: Bank Data

Community Development Loans

The institution has made an adequate level of CD loans in the State of Alabama. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion. The bank's performance is generally consistent throughout the AAs, with the exception of the Birmingham MSA AA, where the bank only made one CD loans. Examiners placed the most weight on the bank's Huntsville MSA AA.

The following table shows that, since the previous evaluation, the bank granted 10 CD loans totaling approximately $29.4 million in this state. The dollar amount equates to 3.3 percent of the bank's overall level of CD loans as compared to the 16.5 percent of overall HMDA and CRA loans in this state.

Community Development Loans State of Alabama										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Birmingham MSA	0	0	0	0	0	0	1	1,300	**1**	**1,300**
Florence MSA	0	0	0	0	0	0	3	6,992	**3**	**6,992**
Huntsville MSA	3	8,319	1	250	0	0	1	3,363	**5**	**11,932**
Statewide or Regional	1	9,206	0	0	0	0	0	0	**1**	**9,206**
Total	**4**	**17,525**	**1**	**250**	**0**	**0**	**5**	**11,655**	**10**	**29,430**
Source: Bank Data										

Besides their extent, the CD loans reflect adequate responsiveness to the state's CD needs. As seen in the table above, 59.5 percent of the dollar volume of the state's CD loans help to provide affordable housing, while 39.6 help revitalize or stabilize low- and moderate-income geographies.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AAs. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

The following point is an example of the bank's CD lending activities in the broader statewide area of Alabama:

- ***Affordable Housing*** – The bank originated one loan totaling $9.2 million to an organization who provides affordable housing for low- and moderate-income individuals.

INVESTMENT TEST

FirstBank demonstrated a low satisfactory record in the State of Alabama regarding the Investment Test. The adequate level of QIs outweighed the poor repsponsiveness to CD needs and the rare use of complex QIs to support this conclusion. The assessment areas in this state generally reflect consistent performance in the Investment Test, with the exception of the Huntsville MSA AA that was below performance for the state.

Investment and Grant Activity

The bank has an adequate level of QIs in the State of Alabama.

The table below shows that FirstBank made six QIs totaling approximately $5.8 million in the State of Alabama. By dollar volume, this equates to 4.9 percent of the bank's total QIs as compared to 1.2 percent of total deposits in this rated area. The dollar amount includes QIs in the statewide area.

Qualified Investments

State of Alabama										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Birmingham-Hoover MSA	3	3,001	0	0	0	0	0	0	3	3,001
Florence-Muscle Shoals MSA	0	0	0	0	0	0	0	0	0	0
Huntsville MSA	2	2,267	0	0	0	0	0	0	2	2,267
Statewide Activities	1	500	0	0	0	0	0	0	1	500
Total	**6**	**5,768**	**0**	**0**	**0**	**0**	**0**	**0**	**6**	**5,768**
Source: Bank Data										

Since FirstBank's QIs addressed community credit needs inside the bank's AAs within the State of Alabama, statewide activities include investments in different areas outside of the bank's AAs within the State of Alabama.

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show poor responsiveness through use of investments that directly address identified needs in the State of Alabama. All of the bank's QIs were to provide affordable housing for low- and moderate-income families. Community services to low- and moderate-income individuals and activities that help revitalize or stabilize low- and moderate-income geographies are the primary needs in the area.

Community Development Initiatives

FirstBank made rare use of complex or innovative investments, given the size of the institution and opportunities available in the State of Alabama.

SERVICE TEST

FirstBank demonstrated a low satisfactory record for the State of Alabama regarding the Service Test. The adequate level regarding the bank's CD services, its changes in branch locations, and its reasonableness of business hours and services lifted the limited accessibility of its delivery systems, to support this conclusion. The AAs in this state generally reflect consistent performance in the Service Test. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the bank's AAs in the State of Alabama. Limited accessible branch distribution and alternative delivery systems support this conclusion. The State of Alabama reflects consistent conclusions to the institution's Accessibility of Delivery System performance.

Branch Distribution
The distribution of branches is accessible to limited portions of the AAs in the State of Alabama.

The bank's level of branch distribution in low-income tracts rises 20.8 percentage points above the population in low-income census tracts, reflecting an excellent level. The bank's level falls 23.5 percentage points below the population percentage in the moderate-income census tracts, reflecting a poor level. Given the consideration of the greater population within moderate-income geographies, the poor performance for moderate-income geographies outweighed the excellent performance in the low-income geographies.

Branch and ATM Distribution by Geography Income Level State of Alabama												
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Open Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	46	17.8	137,648	12.5	1	33.3	0	0.0	0	0.0	1	100.0
Moderate	71	27.5	257,986	23.5	0	0.0	0	0.0	0	0.0	0	0.0
Middle	75	29.1	339,692	30.9	0	0.0	0	0.0	0	0.0	0	0.0
Upper	65	25.2	358,127	32.6	2	66.7	0	0.0	1	100.0	0	0.0
NA	1	0.4	4,748	0.4	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**258**	**100.0**	**1,098,201**	**100.0**	**3**	**100.0**	**0**	**100.0**	**1**	**100.0**	**1**	**100.0**
Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent												

Alternative Delivery Systems

The alternative delivery systems are accessible to limited portions of the area. The bank does not operate any ATMs in low- or moderate-income tracts, falling 12.5 percentage points below the population in low-income tracts and 23.5 percentage points below the population in moderate-income tracts. This level of distribution reflects a poor performance.

Changes in Branch Locations

The institution's record of opening and closing of branches in State of Alabama has generally not adversely affected low- and moderate-income geographies or individuals of geographies. The bank closed one branch in a low-income tract in the State of Alabama. One branch opened in an upper-income tract.

Reasonableness of Business Hours and Services

Services, including, where appropriate, business hours, do not vary in a way that inconveniences portions of the State of Alabama, particularly low- and moderate-income geographies or individuals. The State of Alabama reflects product offerings, services, and branch hours consistent with those discussed at the institution level. Branch hours are from Monday to Friday.

Community Development Services

The institution provides an adequate level of CD services for the State of Alabama. Adequate

performances regarding the extent of CD services and the responsiveness of CD services to available opportunities support this conclusion. The appendices list the criteria considered under this performance factor.

The following table shows that the bank provided six CD services since the previous evaluation.

Community Development Services State of Alabama					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
Birmingham MSA	0	0	1	0	**1**
Florence-Muscle Shoals MSA	0	2	0	0	**2**
Huntsville MSA	0	3	0	0	**3**
Total	**0**	**5**	**1**	**0**	**6**
Source: Bank Data					

HUNTSVILLE MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN HUNTSVILLE MSA

The Huntsville MSA AA includes all 73 census tracts that make up Madison County, one of two counties that make up the Huntsville, AL MSA, located in northern Alabama.

Economic and Demographic Data

The AA's census tracts reflect the following income designations based on 2015 ACS data: 12 low-, 19 moderate-, 21 middle-, and 21 upper-income census tracts. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Assessment Area: Huntsville MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	73	16.4	26.0	28.8	28.8	0.0
Population by Geography	346,438	10.8	20.8	31.2	37.2	0.0
Housing Units by Geography	152,720	12.3	21.9	32.1	33.7	0.0
Owner-Occupied Units by Geography	93,319	5.1	18.3	33.0	43.6	0.0
Occupied Rental Units by Geography	44,448	23.9	28.3	30.9	16.9	0.0
Vacant Units by Geography	14,953	22.7	25.3	30.2	21.8	0.0
Businesses by Geography	27,224	12.4	21.6	28.7	37.3	0.0
Farms by Geography	809	7.7	20.1	37.0	35.2	0.0

Family Distribution by Income Level	89,551	22.9	16.0	17.4	43.8	0.0
Household Distribution by Income Level	137,767	24.5	15.6	15.6	44.3	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		$72,576	Median Housing Value			$164,667
			Median Gross Rent			$800
			Families Below Poverty Level			10.0%

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

Huntsville's economy is strong. Jobs in manufacturing and professional services are continuing to grow. The housing market is strong and house price appreciation is beating the state and regional averages. Population growth has significantly outpaced that of the region. This above-average population growth will most likely boost housing demand. [3]

Currently, major employers in the Huntsville MSA consist of the U.S. Army/Redstone Arsenal, Huntsville Hospital, and NASA/Marshall Space Flight Center.[4] Unemployment rates increased substantially in most areas across the nation starting in April 2020 from the COVID-19 pandemic and some local government orders closing nonessential businesses. The Huntsville MSA's unemployment rate of 2.6 percent in 2021 is below the 3.4 percent rate for the State of Alabama but below the U.S. rate of 5.3 percent.

Competition

The area contains a high level of competition from other chartered banks based on its population, with each of the 99 offices from its 30 institutions serving about 3,499 people on average. FirstBank ranks 18th in market share by capturing 0.7 percent of the area's deposits based on the June 30, 2021 FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Huntsville MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data indicates that 38.9 percent of the AA's families receive a designation of low- or moderate-income, with 10.0 percent below the poverty level. This signifies a continued need for community development services. The high percentage (42.4 percent) of low- and moderate-

[3]Source: Moody's Analytics, Precis U.S. Metro, April 2022
[4]Source: Moody's Analytics, Precis U.S. Metro, April 2022

income census tracts and the national COVID-19 major disaster area designation supports the need for revitalization and stabilization efforts.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, a variety of reasons from the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

CONCLUSIONS ON PERFORMANCE CRITERIA IN HUNTSVILLE MSA

LENDING TEST

FirstBank demonstrated a low satisfactory record in the Huntsville MSA AA regarding the Lending Test. Excellent lending levels and adequate performance records regarding geographic distribution of loans, borrower profile, and community development loans primarily support this conclusion. The bank further made extensive use of innovative and flexible lending levels in this AA.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Huntsville MSA AA. Excellent performance regarding home mortgage loans outweighed adequate performance regarding small business loans supports this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Huntsville MSA AA.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Huntsville MSA AA. For 2020, the bank originated 1,189 total reportable home mortgage loans totaling approximately $313 million. FirstBank captured a 4.4 percent market share of the total number and a 4.9 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it fourth out of 425 total lenders in the Huntsville MSA AA. This ranking lands the bank in the top 1.0 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

Small Business Loans

Small business lending levels reflect adequate responsiveness to AA credit needs in the Huntsville MSA AA. For 2020, the bank originated 12 total reportable small business loans totaling approximately $4.0 million. FirstBank captured a 0.2 percent market share of the total number of loans and a 0.6 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 45th out of 117 total lenders in the Huntsville MSA AA. This ranking lands the bank in the top 38.5 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects adequate performance for small business loans.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration in the Huntsville MSA AA. An adequate record regarding home mortgage loans outweighs a poor record regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Huntsville MSA AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Huntsville MSA AA. Adequate performances in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is slightly lower than the aggregate data by 0.5 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank's lending level falls 3.9 percentage points below the aggregate data, also reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Huntsville MSA AA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	5.1	2.1	19	1.6	3,259	1.0
Moderate	18.3	11.8	94	7.9	16,153	5.2
Middle	33.0	34.8	450	37.9	113,314	36.3
Upper	43.6	51.3	625	52.6	179,724	57.5
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**1,188**	**100.0**	**312,450**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data; 2020 HMDA Aggregate Data. *Due to rounding, totals may not equal 100.0 percent*						

Small Business Loans

The geographic distribution of small business loans reflects poor performance in the Huntsville MSA AA. Adequate performance in low-income geographies and very poor performance in moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is higher than the aggregate data by 2.2 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank did not originate any loans. The bank lending level falls 18.5 percent point below aggregate data, reflecting a very poor level.

Geographic Distribution of Small Business Loans Huntsville MSA AA						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	12.1	14.5	2	16.7	710	17.6
Moderate	21.6	18.5	0	0.0	0	0.0
Middle	28.6	29.0	2	16.7	611	15.1
Upper	37.7	37.9	8	66.7	2,724	67.3
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**12**	**100.0**	**4,045**	**100.0**

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0 percent.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent performance regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Huntsville MSA AA.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Huntsville MSA AA. Adequate performances to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is slightly higher than the aggregate data by 0.2 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank's lending level is higher than aggregate data by 3.0 percent, also reflective of adequate performance.

Distribution of Home Mortgage Loans by Borrower Income Level Huntsville MSA AA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	22.9	6.2	76	6.4	9,787	3.1
Moderate	16.0	14.1	203	17.1	36,812	11.8
Middle	17.4	18.6	267	22.5	60,741	19.4
Upper	43.8	36.0	545	45.9	171,896	55.0
Not Available	0.0	25.1	97	8.2	33,213	10.6
Totals	**100.0**	**100.0**	**1,188**	**100.0**	**312,449**	**100.0**

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Huntsville MSA AA. Excellent performance to businesses with gross annual revenues of $1 million or less supports this conclusion.

As shown in the table below, the bank's level of lending to small businesses with gross annual revenues of $1 million or less is 16.9 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Huntsville MSA AA.

Distribution of Small Business Loans by Gross Annual Revenue Category Huntsville MSA AA						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	83.4	41.4	7	58.3	1,862	46.0
>$1,000,000	5.0	--	5	41.7	2,183	54.0
Revenue Not Available	11.7	--	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**12**	**100.0**	**4,045**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent						

Innovative or Flexible Lending Practices

The institution made extensive use of innovative or flexible lending practices in the Huntsville MSA AA. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 2,260 innovative or flexible loans totaling $626.6 million in the Huntsville MSA AA. This dollar figure equates to 70.3 percent of the total innovative or flexible loans in the State of Alabama. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects excellent responsiveness to the credit needs of the Huntsville MSA AA.

Innovative or Flexible Loans Huntsville MSA AA										
Assessment Area	**FHLMC/FNMA/ State Housing**		**USDA/FHA/VA**		**Portfolio Loan Program**		**First Time Homebuyers**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Huntsville MSA	1,390	362,802	562	192,445	25	6,202	283	65,137	**2,260**	**626,586**
Source: Bank Data (04/16/2020 – 06/06/2022)										

Community Development Loans

The institution made an adequate level of CD loans in the Huntsville MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated five CDLs totaling approximately $11.9 million in the Huntsville MSA AA. By dollar volume, this equates to 40.5 percent of the bank's CDLs in the State of Alabama as compared to the 68.0 percent of the bank's HMDA- and CRA-reportable loans in this AA. However, a significant percentage of the bank's CDLs in the State of Alabama are in the broader statewide area. Without considering the statewide CDLs, the bank would have had 59.0 percent of their Alabama CDLs in the Huntsville MSA AA. The bank's CDL lending level is also significantly higher than its level at the last evaluation ($3.3 million).

The following point provides an example of the bank's CDLs in the Huntsville MSA AA:

- ***Affordable Housing*** – The bank originated a $4.0 million loan to purchase and renovate an 88-unit rent restricted apartment complex in a low-income area.

In addition, the CD loans reflect good responsiveness to the CD needs of the AA. Approximately 69.7 percent of the dollar volume of the AA's CD loans provide affordable housing for low- or moderate-income individuals. As noted under the applicable Description of Assessment Areas, activities that provide community services for low- or moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AA.

INVESTMENT TEST

FirstBank demonstrated an adequate record in the Huntsville MSA AA regarding the Investment Test. The adequate level of QIs outweighed the good responsiveness to CD needs and the rare use of complex and innovative QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

Investment and Grant Activity

The bank has an adequate level of QIs in the Huntsville MSA AA. The table for the State of Alabama shows that FirstBank made two QIs totaling approximately $2.3 million in the Huntsville MSA AA. By dollar volume, this equates to 39.3 percent of the total QIs in Alabama as compared to 62.5 percent of total deposits in this AA.

The following is an example of key investments in the Huntsville MSA AA:

- ***Affordable Housing*** – The bank maintained approximately $2.2 million in mortgage-backed securities in the Huntsville MSA AA with the underlying loans to finance single-family and multi-family housing for low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show adequate responsiveness through use of QIs that directly address identified needs in the Huntsville MSA AA. The QIs table for the State of Alabama shows responsiveness in the Huntsville MSA AA by providing affordable housing for low- or moderate-income individuals.

Community Development Initiatives

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Huntsville MSA AA.

SERVICE TEST

FirstBank demonstrated a low satisfactory record in the Huntsville MSA AA regarding the Service Test. The adequate level regarding the bank's CD services outweighed the reasonableness of accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

The institution's delivery systems are accessible to limited portions of the area. The branch distribution and alternative delivery systems is consistent with the institution level performance.

Branch Distribution
The distribution of branches is accessible to limited portions of the AA.

The bank's level of branch distribution in low-income tracts falls 10.8 percentage points below the population in low-income census tracts, reflecting a poor level. The bank's level falls 20.8 percentage points below the population percentage, reflecting a very poor level.

Branch and ATM Distribution by Geography Income Level
Huntsville MSA AA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	12	16.4	37,362	10.8	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	19	26.0	72,090	20.8	0	0.0	0	0.0	0	0.0	0	0.0
Middle	21	28.8	108,084	31.2	0	0.0	0	0.0	0	0.0	0	0.0
Upper	21	28.8	128,902	37.2	1	100.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**73**	**100.0**	**346,438**	**100.0**	**1**	**100.0**	**0**	**100.0**	**0**	**100.0**	**0**	**100.0**

Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent

Alternative Delivery Systems
The alternative delivery systems are accessible to limited portions of the area. The bank does not

operate any ATMs in low- or moderate-income tracts, falling 10.8 percentage points below the population in low-income tracts and 20.8 percentage points below the population in moderate-income tracts. This level of distribution reflects a poor performance.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

The institution did not have any changes to branch locations since the last evaluation in the Huntsville MSA AA. Therefore, this criterion did not affect the overall Service Test rating for the Mobile MSA AA.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Huntsville MSA AA, particularly low- or moderate-income geographies or individuals. The Huntsville MSA AA reflects product offerings, services, and branch hours consistent with the State of Alabama. Branch hours are from Monday to Friday.

Community Development Services

The institution provides an adequate level of CD services in the Huntsville MSA AA. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Alabama section shows that the bank provided three CD services since the previous evaluation in the Huntsville MSA AA. This number equates to 50 percent of CD services, thereby reflecting an adequate level.

Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the Huntsville MSA AA:

- ***Community Services*** – An employee serves on the Board of Directors for a non-profit organization that provides school supplies to low- and moderate-income students. Thus, the activity benefits an organization that provides community services primarily to low- and moderate-income individuals.

FLORENCE MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN FLORENCE MSA

The Florence MSA AA includes all 22 census tracts that make up Lauderdale County, one of the two counties that make up the Florence-Muscle Shoals, AL MSA, located in northwest Alabama.

Economic and Demographic Data

The AA's census tracts reflect the following income designations based on 2015 ACS data: 3 low-, 4 moderate-, 11 middle-, and 4 upper-income tracts. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Assessment Area: Florence MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	22	13.6	18.2	50.0	18.2	0.0
Population by Geography	92,737	5.6	15.2	56.4	22.9	0.0
Housing Units by Geography	44,158	5.4	15.7	56.7	22.2	0.0
Owner-Occupied Units by Geography	26,757	2.4	10.4	62.0	25.3	0.0
Occupied Rental Units by Geography	11,855	10.0	27.5	45.2	17.3	0.0
Vacant Units by Geography	5,546	10.1	16.5	55.7	17.7	0.0
Businesses by Geography	5,514	15.4	14.9	47.5	22.2	0.0
Farms by Geography	194	6.7	6.7	65.5	21.1	0.0
Family Distribution by Income Level	25,104	20.0	16.1	21.7	42.1	0.0
Household Distribution by Income Level	38,612	25.1	15.0	17.3	42.7	0.0
Median Family Income MSA - 22520 Florence-Muscle Shoals, AL MSA		$54,339	Median Housing Value			$118,763
			Median Gross Rent			$595
			Families Below Poverty Level			13.0%

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

Florence's economy is recovering. Manufacturing and government jobs have been growing. The labor force overall has also made a turn for the better. The housing market is good, and single-family construction is rising. Travel demand is growing and will remain high, providing a boost to the southern economy. [5]

Currently, major employers in the Florence MSA consist of North American Lighting, Constellium (Wise Alloys LLC), and Walgreens Call Center.[6] The Florence MSA's unemployment rate of 3.5 percent for 2021 is slightly above the 3.4 percent rate for the State of Alabama and below the U.S.

[5]Source: Moody's Analytics, Precis U.S. Metro, April 2022
[6]Source: Moody's Analytics, Precis U.S. Metro, April 2022

rate of 5.3 percent.

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 34 offices from its 13 institutions serving about 2,728 people on average. FirstBank ranks 11th in market share by capturing 1.8 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Florence MSA AA created varied loan demand for small business and residential real estate loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 36.1 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. In addition, 31.8 percent of the area's census tracts received low- and moderate-income designations and the national COVID-19 major disaster area designation suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

CONCLUSIONS ON PERFORMANCE CRITERIA IN FLORENCE MSA

LENDING TEST

FirstBank demonstrated a low satisfactory record in the Florence MSA AA area regarding the Lending Test. Good lending activity and adequate performance records regarding borrower profile loan distribution, geographic loan distribution, and CD lending and the use of innovative and flexible lending practices support this conclusion.

Lending Activity

Lending levels reflect good responsiveness to AA credit needs in the Florence MSA AA. Good performance regarding both home mortgage and small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Florence MSA AA.

Home Mortgage Loans

Home mortgage lending levels reflect good responsiveness to AA credit needs in the Florence MSA AA. For 2020, the bank originated 22 total reportable home mortgage loans totaling approximately $4.7 million. FirstBank captured a 0.5 percent market share of the total number and a 0.6 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 35th out of 194 total lenders in the Florence MSA AA. This ranking lands the bank in the top 18.0 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for home mortgage loans.

Small Business Loans

Small business lending levels reflect good responsiveness to AA credit needs in the Florence MSA AA. For 2020, the bank originated 24 total reportable small business loans totaling approximately $2.8 million. FirstBank captured a 1.4 percent market share of the total number of loans and a 2.8 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 15th out of 68 total lenders in the Florence MSA AA. This ranking lands the bank in the top 22.1 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for small business loans.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Florence MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Florence MSA AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in the Florence MSA AA. Adequate performances in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank did not make any loans in low-income tracts in the AA. However, the lending level is 1.0 percentage point below aggregate data, reflecting an adequate level. The table further shows that in moderate-income census tracts the bank's lending level rises 3.9 percentage points above the aggregate data, reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Florence MSA AA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	2.4	1.0	0	0.0	0	0.0
Moderate	10.4	9.7	3	13.6	882	18.8
Middle	62.0	57.8	12	54.5	2,427	51.7
Upper	25.3	31.6	7	31.8	1,387	29.5
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**22**	**100.0**	**4,696**	**100.0**

Source: 2015 ACS Data; 2020 HMDA Data; and 2020 HMDA Aggregate Data.
Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Florence MSA AA. Adequate performance in low-income geographies outweighs poor performance in moderate-income geographies to support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is higher than the aggregate data by 4.8 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls 7.9 percentage points below the aggregate data, reflecting a poor level.

Geographic Distribution of Small Business Loans Florence MSA AA						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	15.6	16.0	5	20.8	798	28.6
Moderate	14.5	12.1	1	4.2	100	3.6
Middle	47.7	45.7	11	45.8	1,105	39.5
Upper	22.3	26.2	7	29.2	792	28.3
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	100.0	100.0	24	100.0	2,795	100.0

Source: 2020 D&B Data; 2020 CRA Data; and 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage lending and excellent small business lending support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Florence MSA AA.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Florence MSA AA. Adequate performance to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is higher than the aggregate data by 2.0 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank's lending level falls 6.7 percentage points below the aggregate data, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Florence MSA AA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	20.0	7.1	2	9.1	230	4.9
Moderate	16.1	15.8	2	9.1	340	7.2
Middle	21.7	19.5	3	13.6	619	13.2
Upper	42.1	36.1	11	50.0	1,850	39.4
Not Available	0.0	21.5	4	18.2	1,657	35.3
Totals	**100.0**	**100.0**	**22**	**100.0**	**4,696**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data; and 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Florence MSA AA. Good performance to businesses with gross annual revenues of $1 million or less supports this conclusion.

As shown in the table below, the bank's level of lending to small businesses with gross annual revenues of $1 million or less is 41.1 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Florence MSA AA.

Distribution of Small Business Loans by Gross Annual Revenue Category Florence MSA AA						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	82.3	46.4	21	87.5	2,095	75.0
>$1,000,000	4.9	--	2	8.3	450	16.1
Revenue Not Available	12.7	--	1	4.2	250	8.9
Totals	**100.0**	**100.0**	**24**	**100.0**	**2,795**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent						

Innovative or Flexible Lending Practices

The institution makes use of innovative or flexible lending practices in the Florence MSA AA in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion. Please refer to the discussion under the State of Alabama for additional details regarding the innovative or flexible lending practices in the Florence MSA AA.

Community Development Loans

The institution made a relatively high level of CD loans in the Florence MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated three CD loans totaling approximately $6.9 million in the Florence MSA AA. By dollar volume, this equates to 23.8 percent of the bank's CD loans in the State of Alabama as compared to the 2.8 percent of the bank's home mortgage and small business loans in this AA. The following points discuss the bank's CD loans in the Florence MSA AA:

- ***Revitalize and Stabilize*** – The bank granted a $1.9 million loan to purchase an apartment complex in a low-income census tract. The loan helps to retain residents in a low-income census tract. Thus, the activity revitalizes and stabilizes a qualifying geography by helping to attract new, or retain existing businesses or residents.

In addition, the CD loans reflect adequate responsiveness to the CD needs of the AA. All of the bank's CD loans in the Florence MSA AA were for revitalization or stabilization efforts in this AA.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AAs. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

INVESTMENT TEST

FirstBank demonstrated a substantial noncompliant record in the Florence MSA AA regarding the Investment Test. The few, if any QIs, very poor responsiveness to CD needs, and no use of complex and innovative QIs support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

Investment and Grant Activity

The bank made few, if any QIs in the Florence MSA AA.

Responsiveness to Credit and Community Development Needs

FirstBank shows very poor responsiveness through use of investments that directly address identified needs in the Florence MSA AA.

Community Development Initiatives

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Florence MSA AA.

SERVICE TEST

FirstBank demonstrated a low satisfactory record in the Florence MSA AA regarding the Service Test. The adequate level regarding the bank's CD services and the limited accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

Delivery systems are accessible to limited portions of the Florence MSA AA. Limited branch distribution accessibility and alternative delivery systems support this conclusion. The Florence MSA AA reflects a consistent conclusion to the State of Alabama's Accessibility of Delivery System performance.

Branch Distribution
The bank makes its full-service offices accessible to limited portions of the Florence MSA AA.

The bank's level of branch distribution in low-income tracts rises 94.4 percentage points above the population in low-income census tracts, reflecting an excellent level. The bank maintains no branches in moderate-income tracts. The bank's level falls 15.2 percentage points below the population percentage, reflecting a poor record. Given the consideration of the greater population within moderate-income geographies, the poor performance for moderate-income geographies outweighed the excellent performance in the low-income geographies.

Branch and ATM Distribution by Geography Income Level
Florence MSA AA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	3	13.6	5,184	5.6	1	100.0	0	0.0	0	0.0	1	100.0
Moderate	4	18.2	14,050	15.2	0	0.0	0	0.0	0	0.0	0	0.0
Middle	11	50.0	52,310	56.4	0	0.0	0	0.0	0	0.0	0	0.0
Upper	4	18.2	21,193	22.9	0	0.0	0	0.0	0	0.0	0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**22**	**100.0**	**92,737**	**100.0**	**1**	**100.0**	**0**	**100.0**	**0**	**100.0**	**1**	**100.0**

Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.

Alternative Delivery Systems
The alternative delivery systems are accessible to limited portions of the area. The bank does not operate any ATMs in low- or moderate-income tracts, falling 5.6 percentage points below the population in low-income tracts and 15.2 percentage points below the population in moderate-income tracts. This level of distribution reflects a poor performance.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

The institution's record of opening and closing of branches in the Florence MSA AA has generally not adversely affected low- and in moderate- income geographies or individuals of geographies. One branch closed in a low-income tract the Florence MSA AA. No other changes occurred.

Reasonableness of Business Hours and Services

Services, including, where appropriate, business hours, do not vary in a way that inconveniences portions of the Florence MSA AA, particularly low- and moderate-income geographies or individuals. The Florence MSA AA reflects product offerings, services, and branch hours consistent with those discussed at the institution level. Branch hours are from Monday to Friday.

Community Development Services

The institution provides an adequate level of CD services in the Florence MSA AA. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Alabama section shows that the bank provided two CD services since the previous evaluation in the Florence MSA AA. This number equates to 33.3 percent of CD services in the State of Alabama, thereby reflecting an adequate level.

Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the Florence MSA AA:

- ***Community Services*** –Bank employees assisted with a fundraiser to help raise money for an organization that provides mentoring to low- and moderate-income children.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Birmingham MSA	Below	Exceeds	Below

Facts and data supporting conclusions for each limited-scope AA follow, including a summary of FirstBank's operations and activities. The demographic data for the limited-scope AAs is in Appendix C.

Birmingham MSA AA

The bank's Birmingham MSA AA consists of all of Jefferson County. FirstBank operates one branch in an upper-income tract. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	$(000s)
Home Mortgage Loans	558	137,563
Small Business Loans	3	1,332
Small Farm Loans	0	0
Community Development Loans	1	1,300
Investments	3	3,001
Community Development Services	1	-

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography 2020

	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area	#	$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate
Birmingham MSA	558	137,563	5.9	31,065	8.8	2.2	2.1	23.0	10.2	10.7	30.7	28.0	27.2	37.4	59.5	59.9	0.1	0.2	0.1

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020

	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area	#	$	% of Total	Overall Market	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate
Birmingham MSA	3	1,332	0.1	17,676	10.7	0.0	10.7	24.8	33.3	21.4	22.7	0.0	20.6	39.7	66.7	45.7	2.0	0.0	1.6

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020

	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	Aggre-gate	% Families	% Bank Loans	Aggre-gate	% Families	% Bank Loans	Aggre-gate	% Families	% Bank Loans	Aggre-gate	% Families	% Bank Loans	Aggre-gate
Birmingham MSA	558	137,563	5.9	31,065	26.3	6.8	4.5	15.9	22.4	14.1	17.4	24.2	18.1	40.4	44.6	45.0	0.0	2.0	18.2

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues 2020

	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area	#	$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Birmingham MSA	3	1,332	0.1	17,676	81.9	33.3	37.7	6.3	66.7	11.8	0.0

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

STATE OF GEORGIA

CRA RATING FOR GEORGIA: SATISFACTORY

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

FirstBank designated one AA in Georgia. The Dalton MSA AA includes all 18 CTs in all of Whitfield County, one of the two counties that make up the Dalton, Georgia MSA. The bank operates three full-service offices and one ATM in this area. There have not been any offices opened or closed since the prior evaluation.

Economic and Demographic Data

The assessment area's census tracts reflect the following income designations based on 2015 ACS data: 4 moderate-, 8 middle-, and 6 upper-income tracts. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Assessment Area: Dalton MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	18	0.0	22.2	44.4	33.3	0.0
Population by Geography	103,456	0.0	21.1	42.1	36.9	0.0
Housing Units by Geography	39,731	0.0	20.2	42.5	37.3	0.0
Owner-Occupied Units by Geography	22,242	0.0	16.5	40.9	42.7	0.0
Occupied Rental Units by Geography	12,333	0.0	25.6	43.9	30.5	0.0
Vacant Units by Geography	5,156	0.0	23.2	46.6	30.2	0.0
Businesses by Geography	8,075	0.0	18.4	51.2	30.4	0.0
Farms by Geography	238	0.0	5.9	51.7	42.4	0.0
Family Distribution by Income Level	25,402	19.4	19.2	20.5	40.9	0.0
Household Distribution by Income Level	34,575	20.3	17.9	18.5	43.3	0.0
Median Family Income MSA - 19140 Dalton, GA MSA		$47,062	Median Housing Value			$120,921
			Median Gross Rent			$676
			Families Below Poverty Level			14.5%

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

Currently, major employers in the Dalton MSA consist of Shaw Industries Inc., Mohawk Industries, and Engineered Floors/J&J Industries.[7] The Dalton MSA's unemployment rate of 4.0 percent for 2021 is consistent with the 3.9 percent rate for the State of Georgia and below the U.S. rate of 5.3 percent.

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 22 offices from its 9 institutions serving about 4,702 people on average. FirstBank ranks 6th in market share by capturing 7.1 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Community Contact

Examiners reviewed a contact with a community member knowledgeable about the area's socio-economic conditions to help assess community credit needs and potential opportunities for bank involvement in the AA. The contact indicated that the community is in need of support for the economy and housing development. The contact stated that opportunities exist for financial institutions to provide credit for single- and multi-family housing.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Dalton MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 38.6 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. The high percentage (22.0 percent) of moderate-income census tracts and the national COVID-19 major disaster area designation suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

[7]Source: Moody's Analytics, Precis U.S. Metro, April 2022

SCOPE OF EVALUATION – GEORGIA

Lending Test

Loan Categories Reviewed
Examiners considered the following loans granted inside the bank's Dalton MSA AA:

Home Mortgage Loans:
- 2020: 111 loans totaling $19,257,000
- 2021: 147 loans totaling $26,181,000

Small Business Loans:
- 2020: 19 loans totaling $4,878,000
- 2021: 23 loans totaling $5,277,000

As suggested by the above figures, home mortgage loans generally received the heaviest weighting followed by small business loans.

Investment and Service Tests

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

LENDING TEST

FirstBank demonstrated a low satisfactory record in the State of Georgia regarding the Lending Test. Adequate performance regarding geographic distribution, borrower profile and CD loans, outweighed excellent lending levels to support this conclusion. Examiners also noted that the bank makes limited use of innovative or flexible loans in this AA.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Dalton MSA AA. Excellent performance regarding home mortgage loans outweighs adequate performance regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Dalton MSA AA.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Dalton MSA AA. For 2020, the bank originated 111 total reportable home mortgage loans totaling approximately $19.3 million. FirstBank captured a 4.0 percent market share of the total number and a 4.2 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it sixth out of 193 total lenders in the Dalton MSA

AA. This ranking lands the bank in the top 3.1 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

Small Business Loans
Small business lending levels reflect adequate responsiveness to AA credit needs in the Dalton MSA AA. For 2020, the bank originated 19 total reportable small business loans totaling approximately $4.9 million. FirstBank captured a 1.3 percent market share of the total number of loans and a 4.0 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 17th out of 64 total lenders in the Dalton MSA AA. This ranking lands the bank in the top 26.6 percent of lenders reporting such loans in this assessment area. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects adequate performance for small business loans.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Dalton MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Dalton MSA AA.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects adequate performance in the Dalton MSA AA. Adequate performances in moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in moderate-income tracts exceeds aggregate data by 4.1 percentage points, reflective of adequate performance.

Geographic Distribution of Home Mortgage Loans Dalton MSA AA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	0.0	0.0	0	0.0	0	0.0
Moderate	16.5	9.4	15	13.5	1,625	8.4
Middle	40.9	41.1	33	29.7	5,139	26.7
Upper	42.7	49.6	63	56.8	12,494	64.9
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**111**	**100.0**	**19,258**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent						

Small Business Loans
The geographic distribution of small business loans reflects adequate performance in the Dalton MSA AA. Adequate performance in moderate-income geographies supports this conclusion.

As seen in the table below, the bank's lending in moderate-income tracts falls below aggregate data by 2.5 percentage points, reflective of adequate performance.

Geographic Distribution of Small Business Loans Dalton MSA AA						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	0.0	0.0	0	0.0	0	0.0
Moderate	17.9	18.3	3	15.8	1,245	25.5
Middle	51.8	52.6	9	47.4	2,406	49.3
Upper	30.3	29.1	7	36.8	1,227	25.2
Not Available	0.0	0.0	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**19**	**100.0**	**4,878**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed excellent records regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Dalton MSA AA.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Dalton MSA AA. Adequate performance to both low- and moderate-income borrowers supports this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is higher than the aggregate data by 1.8 percent, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level is higher than aggregate data by 1.5 percentage points, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Dalton MSA AA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	19.4	3.6	6	5.4	339	1.8
Moderate	19.2	17.4	21	18.9	2,708	14.1
Middle	20.5	20.8	21	18.9	2,698	14.0
Upper	40.9	41.6	61	55.0	13,243	68.8
Not Available	0.0	16.6	2	1.8	269	1.4

Totals	100.0	100.0	111	100.0	19,257	100.0
Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects good performance in the Dalton MSA AA. Good performance to businesses with gross annual revenues of $1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

Distribution of Small Business Loans by Gross Annual Revenue Category Dalton MSA AA						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	81.8	37.9	9	47.4	1,008	20.7
>$1,000,000	6.3	--	9	47.4	3,800	77.9
Revenue Not Available	11.9	--	1	5.3	70	1.4
Totals	**100.0**	**100.0**	**19**	**100.0**	**4,878**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent						

As shown in the table above, the bank's level of lending to small businesses with gross annual revenues of $1 million or less is 9.5 percent higher than the aggregate level. As a result, this reflects a good level of small business lending in the Dalton MSA AA.

Innovative or Flexible Lending Practices

The institution makes limited use of innovative or flexible lending practices in the State of Georgia in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion.

Community Development Loans

The institution made an adequate level of CD loans in the State of Georgia. Its extent, or dollar volume outweighed the CD loans' poor responsiveness support this conclusion.

FirstBank originated one CD loan totaling approximately $2.1 million in the State of Georgia. The dollar amount equates to 0.3 percent of the bank's overall level of CD loans as compared to the 1.0 percent of overall HMDA and CRA loans in this AA.

Community Development Lending State of Georgia										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**

Dalton MSA	0	0	0	0	1	2,073	0	0	**1**	**2,073**
Source: Bank data										

The following is a notable example of CD loans in the State of Georgia:

- ***Economic Development*** – The bank granted a $2.0 million loan that helped promote economic development by financing a loan to a small business that provides primarily low- and moderate-income jobs.

In addition, the CD loans reflect poor responsiveness to the CD needs of the AA. As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AA.

INVESTMENT TEST

FirstBank demonstrated a low satisfactory record in the State of Georgia regarding the Investment Test. The adequate level of QIs and responsiveness outweighed the rare occasional use of complex and innovative QIs support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

Investment and Grant Activity

The bank has an adequate level of QIs in the State of Georgia. The table shows that FirstBank made two QIs totaling approximately $3.9 million in the State of Georgia. By dollar volume, this equates to 3.4 percent of the total QIs in State of Georgia as compared to 1.9 percent of total deposits in this rated area.

Qualified Investments State of Georgia										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Dalton MSA	0	0	0	0	1	945	1	3,000	**2**	**3,945**
Source: Bank data										

The following is an example of a key investment in the State of Georgia:

- ***Economic Development*** – The bank allocated approximately $945,000 in a mortgage-backed security in the Dalton MSA AA with the underlying loans to finance small businesses.

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show adequate responsiveness through use of QIs that directly address identified needs in the State of Georgia. The QIs table shows responsiveness to CD needs in two of four CD purpose categories.

FirstBank's major QIs addressed revitalization and stabilization needs with $3.0 million in an

investment fund to help provide safe residences for low- and moderate-income seniors.

Community Development Initiatives

FirstBank made rare use of complex or innovative investments, given the size of the institution and opportunities available in the State of Georgia.

SERVICE TEST

FirstBank demonstrated a low satisfactory record in the State of Georgia regarding the Service Test. The relatively adequate level regarding the bank's CD services outweighed the reasonableness of accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to limited portions of the State of Georgia. Reasonably accessible branch distribution and alternative delivery systems support this conclusion.

Branch Distribution
The bank makes its full-service offices accessible to limited portions of the State of Georgia.

The bank does not have any branches in moderate-income tracts. The bank's level of branch distribution in moderate-income tracts falls 21.1 percentage points below the population in moderate-income census tracts, reflecting a poor level.

Branch and ATM Distribution by Geography Income Level
State of Georgia

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0	0.0	0	0.0	0.0
Moderate	4	22.2	21,779	21.1	0	0.0	0	0.0	0.0	0	0.0	0.0
Middle	8	44.4	43,551	42.1	2	66.7	0	0.0	0.0	0	0.0	0.0
Upper	6	33.3	38,126	36.9	1	33.3	1	100.0	0.0	0	0.0	0.0
NA	0	0.0	0	0.0	0	0.0	0	0.0	0.0	0	0.0	0.0
Totals	**18**	**100.0**	**103,456**	**100.0**	**3**	**100.0**	**1**	**100.0**	**0.0**	**100.0**	**0.0**	**100.0**

Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.

Alternative Delivery Systems
The alternative delivery systems are accessible to limited portions of the AA. As the preceding table illustrates, the bank does not operate any ATMs in moderate-income tracts, which falls 21.1 percentage points below the population in moderate-income CTs, reflecting poor performance.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

To the extent changes have been made, the institution's opening and closing of branches has generally not adversely affected the accessibility of its delivery systems, particularly in low- and moderate-income geographies or low- or moderate-income individuals. Since the prior evaluation, the bank has not opened or closed branches in the State of Georgia.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences certain portions of the State of Georgia, particularly low- or moderate-income geographies or individuals. The State of Georgia reflects product offerings, services, and branch hours consistent with discussion at the institution level.

The branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly according to individual area needs. Branch hours are from Monday to Friday.

Community Development Services

The institution provides an adequate level of CD services in the State of Georgia. Adequate performances regarding the extent of CD services and the responsiveness of CD services to available opportunities primarily support this conclusion. The appendices list the criteria considered under this performance factor.

The table shows that the bank provided eight CD services in the State of Georgia since the previous evaluation. This number equates to 4.2 percent of the bank's CD services, thereby reflecting an adequate level.

Community Development Services State of Georgia					
Rated Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
Dalton MSA	0	8	0	0	**8**
Source: Bank records.					

Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the State of Georgia:

- ***Community Service*** –Bank employees participated in a fundraiser with an organization that provides human needs for the homeless and families struggling with poverty.

- ***Community Services*** –Bank employees worked with a non-profit organization to teach financial literacy classes to low- and moderate-income kids. The organization's volunteers serve as role models helping to impact young people's lives by teaching lessons that promote financial capability, work and career readiness, and business ownership.

STATE OF KENTUCKY

CRA RATING FOR KENTUCKY: SATISFACTORY

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KENTUCKY

FirstBank designated one AA in Kentucky. The Bowling Green MSA AA includes all 30 CTs in Allen and Warren Counties, two of the four counties that make up the Bowling Green, Kentucky MSA. The bank operates four full-service offices and one ATM in this area. All three offices are new since the previous evaluation and opened as a part of the February 2020 acquisition of The Farmers National Bank of Scottsville. The acquisition required that the bank expand their AA into the State of Kentucky creating a separate rated area and the Bowling Green MSA AA.

Economic and Demographic Data

The AA's census tracts reflect the following income designations based on 2015 ACS data: 2 low-, 6 moderate-, 11 middle-, 10 upper-income tracts, and 1 tract with no income designation. FEMA declared this AA as a major disaster area due to flooding, tornadoes, and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Assessment Area: Bowling Green MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	30	6.7	20.0	36.7	33.3	3.3
Population by Geography	139,305	5.8	18.8	33.6	40.1	1.8
Housing Units by Geography	58,456	5.6	19.5	36.3	36.7	1.9
Owner-Occupied Units by Geography	31,800	2.3	12.4	39.2	45.9	0.3
Occupied Rental Units by Geography	21,361	10.7	29.5	31.3	24.3	4.1
Vacant Units by Geography	5,295	4.5	22.0	39.4	32.1	2.1
Businesses by Geography	12,967	5.7	17.0	33.9	39.5	4.0
Farms by Geography	608	1.5	8.4	40.0	48.7	1.5
Family Distribution by Income Level	35,020	19.9	17.2	19.8	43.1	0.0
Household Distribution by Income Level	53,161	24.4	14.0	17.6	43.9	0.0
Median Family Income MSA - 14540 Bowling Green, KY MSA		$55,109	Median Housing Value			$135,071
			Median Gross Rent			$687
			Families Below Poverty Level			13.1%

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

Bowling Green's economy is backpedaling. Total employment has shrunk in the last couple of months. Employment in manufacturing and government is steady while services payrolls have fallen. The labor market has encouraged additional workers to leave the labor force, which remains well below its pre-pandemic peak. Bowling Green's recovery will pick up later this year but remain a step behind the national average. [8]

Currently, major employers in the Bowling Green MSA consist of Houchens Industries, The Medical Center at BG, and Western Kentucky University.[9] The Bowling Green MSA's unemployment rate of 6.3 percent for 2020 is consistent with the 6.4 percent rate for the State of Kentucky and below the U.S. rate of 8.1 percent.

Competition

The area contains a moderate level of competition from other chartered banks based on its population, with each of the 63 offices from its 20 institutions serving about 2,211 people on average. FirstBank ranks 7th in market share by capturing 6.4 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Bowling Green MSA AA created varied loan demand for home mortgage and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 37.1 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. The national COVID-19 major disaster area, and the assessment area's designation as federal disaster areas for other reasons suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact

[8] Source: Moody's Analytics, Precis U.S. Metro, April 2022

[9] Source: Moody's Analytics, Precis U.S. Metro, April 2022

with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

SCOPE OF EVALUATION – KENTUCKY

Lending Test

Loan Categories Reviewed
Examiners considered the following loans granted inside the bank's Bowling Green MSA AA:

Home Mortgage Loans:
- 2020: 154 loans totaling $25,161,000
- 2021: 165 loans totaling $42,821,000

Small Business Loans:
- 2020: 69 loans totaling $10,333,000
- 2021: 51 loans totaling $6,801,000

Small Farm Loans:
- 2020: 24 loans totaling $2,336,000
- 2021: 7 loans totaling $459,000

As suggested by the above figures, home mortgage loans generally received the heaviest weighting followed by small business loans.

Investment and Service Tests

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Evaluation section.

CONCLUSIONS ON PERFORMANCE CRITERIA IN KENTUCKY

LENDING TEST

FirstBank demonstrated a low satisfactory record in the State of Kentucky regarding the Lending Test. The adequate performance records regarding geographic distribution and borrower profile distribution, as well as the adequate level of CD loans, limited use of innovative and flexible lending practices, and excellent lending levels, support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to the credit needs in the Bowling Green MSA AA. Excellent performance regarding home mortgage loans and good performance regarding both small business and small farm loans support this conclusion. Examiners weighed home mortgage loans heavier than small business and small farm loans in the Bowling Green MSA AA.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to the credit needs in the Bowling Green MSA AA. For 2020, the bank originated 154 total reportable home mortgage loans totaling approximately $25.3 million. FirstBank captured a 2.0 percent market share of the total number and a 1.5 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 15th out of 259 total lenders in the Bowling Green MSA AA. This ranking lands the bank in the top 5.8 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

Small Business Loans
Small business lending levels reflect good responsiveness to the credit needs in the Bowling Green MSA AA. For 2020, the bank originated 69 total reportable small business loans totaling approximately $10.3 million. FirstBank captured a 2.5 percent market share of the total number of loans and a 5.7 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 13th out of 83 total lenders in the Bowling Green MSA AA. This ranking lands the bank in the top 15.7 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for small business loans.

Small Farm Loans
Small farm lending levels reflect good responsiveness to the credit needs in the Bowling Green MSA AA. For 2020, the bank originated 24 total reportable small farm loans totaling approximately $2.3 million. FirstBank captured a 17.0 percent market share of the total number of loans and a 22.3 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 2nd out of 15 total lenders in the Bowling Green MSA AA. This ranking lands the bank in the top 13.3 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects good performance for small farm loans.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Bowling Green MSA AA. Adequate records regarding home mortgage, small business and small farm loans support this conclusion. Examiners weighed home mortgage loans heavier than small business and small farm loans in the Bowling Green MSA AA.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects adequate performance in the Bowling Green MSA AA. Adequate performances in low- and moderate-income geographies

support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is higher than aggregate data by 3.4 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level rises 1.2 percentage points above the aggregate data, also reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Bowling Green MSA AA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	2.3	1.8	8	5.2	746	3.0
Moderate	12.4	10.5	18	11.7	2,015	8.0
Middle	39.2	31.5	45	29.2	7,301	29.0
Upper	45.9	55.9	82	53.2	13,603	54.1
Not Available	0.3	0.4	1	0.6	1,496	5.9
Totals	**100.0**	**100.0**	**154**	**100.0**	**25,161**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Bowling Green MSA AA. Adequate performance in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank did not lend in low-income tracts; however, this falls below aggregate data by only 5.6 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls 6.2 percentage points below the aggregate data, also reflecting an adequate level.

Geographic Distribution of Small Business Loans Bowling Green MSA AA						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	5.9	5.6	0	0.0	0	0.0
Moderate	18.0	19.2	9	13.0	425	4.1
Middle	33.5	30.2	30	43.5	4,349	42.1
Upper	38.2	41.9	30	43.5	5,559	53.8
Not Available	4.4	3.1	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**69**	**100**	**10,333**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Farm Loans

The geographic distribution of small farm loans reflects adequate performance in the Bowling

Green MSA AA. Adequate performance in low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is consistent with aggregate data, reflecting adequate performance. The table further shows that in moderate-income census tracts the bank's lending level falls 2.9 percentage points below the aggregate data, also reflecting an adequate level.

Geographic Distribution of Small Farm Loans Bowling Green MSA AA						
Tract Income Level	**% of Farms**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	1.3	0.0	0	0.0	0	0.0
Moderate	8.8	7.1	1	4.2	344	14.7
Middle	38.9	48.2	19	79.2	1,412	60.4
Upper	49.2	44.7	4	16.7	580	24.8
Not Available	1.7	0.0	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**24**	**100.0**	**2,336**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, good penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans was lifted by excellent records regarding small business and small farm loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business and small farm loans in the Bowling Green MSA AA.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Bowling Green MSA AA. Adequate performance to both low- and moderate-income borrowers supports this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is higher than the aggregate data by 5.8 percent, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level is 0.5 percentage points below the aggregate data, reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Bowling Green MSA AA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	19.9	5.2	17	11.0	1,284	5.1

Moderate	17.2	16.7	25	16.2	2,719	10.8
Middle	19.8	20.5	25	16.2	3,789	15.1
Upper	43.1	39.1	60	39.0	12,182	48.4
Not Available	0.0	18.5	27	17.5	5,186	20.6
Totals	**100.0**	**100.0**	**154**	**100.0**	**25,160**	**100.0**

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0% percent.

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Bowling Green MSA AA. Excellent performance to businesses with gross annual revenues of $1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

Distribution of Small Business Loans by Gross Annual Revenue Category
Bowling Green MSA AA

Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	$(000s)	%
<=$1,000,000	84.0	43.0	58	84.1	7,215	69.8
>$1,000,000	4.4	-	10	14.5	3,049	29.5
Revenue Not Available	11.6	-	1	1.4	69	0.7
Totals	**100.0**	**100.0**	**69**	**100.0**	**10,333**	**100.0**

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data.
Due to rounding, totals may not equal 100.0 percent

As shown in the table above, the bank's level of lending to small businesses with gross annual revenues of $1 million or less is 41.1 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Bowling Green MSA AA.

Small Farm Loans

The distribution of small farm loans based on the borrowers' profiles reflects excellent performance in the Bowling Green MSA AA. Excellent performance to farms with gross annual revenues of $1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

Distribution of Small Farm Loans by Gross Annual Revenue Category
Bowling Green MSA AA

Gross Revenue Level	% of Businesses	Aggregate Performance % of #	#	%	$(000s)	%
<=$1,000,000	97.7	57.4	23	95.8	2,285	97.8
>$1,000,000	0.2	-	0	0.0	0	0.0
Revenue Not Available	2.1	-	1	4.2	51	2.2
Totals	**100.0**	**100.0**	**24**	**100.0**	**2,336**	**100.0**

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. *Due to rounding, totals may not equal 100.0 percent*

As shown in the table above, the bank's level of lending to small farms with gross annual revenues of $1 million or less is 38.4 percent higher than the aggregate level. As a result, this reflects an excellent level of small farm lending in the Bowling Green MSA AA.

Innovative or Flexible Lending Practices

The institution makes limited use of innovative or flexible lending practices in the State of Kentucky in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion.

Community Development Loans

The institution has made an adequate level of CD loans in the State of Kentucky. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

FirstBank originated three CD loans totaling approximately $18.9 million in the State of Kentucky. The dollar amount equates to 3.1 percent of the bank's overall level of CD loans as compared to the 1.5 percent of overall HMDA and CRA loans.

Community Development Lending State of Kentucky										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Bowling Green MSA	1	12,120	0	0	1	5,290	1	1,496	**3**	**18,906**
Source: Bank data										

The following points provide examples of the bank's CD loans in the State of Kentucky:

- ***Affordable Housing*** – The bank originated a $12.1 million loan for a multi-family apartment complex, where the rents are targeted to individuals with low- and moderate-incomes.

- ***Economic Development*** – The bank granted a $5.3 million loan that helped to promote economic development in the assessment area.

FirstBank's CD loans reflect adequate responsiveness through use of CD loans that directly address identified needs in the State of Kentucky. CD loans show responsiveness to a variety of CD needs by the dollar amount to three of four CD purpose categories; however, there are no loans for community services in the State of Kentucky. As noted under the applicable Description of Assessment Areas, activities that help revitalize low- and moderate-income geographies and

community services for low- and moderate-income individuals represent CD needs in the bank's AA.

INVESTMENT TEST

FirstBank demonstrated an adequate record in the State of Kentucky regarding the Investment Test. The adequate level of QIs and responsiveness to CD needs outweighed the rare use of complex QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

Investment and Grant Activity

The bank has an adequate level of QIs in the State of Kentucky. The table for the State of Kentucky shows that FirstBank made eight QIs totaling approximately $2.2 million. By dollar volume, this equates to 1.9 percent of the total QIs as compared to 2.4 percent of total deposits in this rated area.

Qualified Investments State of Kentucky										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Bowling Green MSA	0	0	3	2	0	0	5	2,235	**8**	**2,237**
Source: Bank data										

The following are examples of key investments in the State of Kentucky:

- ***Revitalize and Stabilize*** – The bank invested approximately $1.5 million in three municipal bond to construct school facilities.

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show good responsiveness through use of QIs that directly address identified needs in the State of Kentucky. As noted in the investment table, for the State of Kentucky, shows responsiveness to CD needs by the dollar amount to two of four CD purpose categories.

FirstBank's major investments addressed revitalization and stabilization needs with approximately $2.2 million in the purchase of municipal bonds. Larger dollar amount donations support an organization providing human needs for low- and moderate-income individuals.

Community Development Initiatives

FirstBank made rare use of complex or innovative investments, given the size of the institution and opportunities available in the State of Kentucky.

SERVICE TEST

FirstBank demonstrated a low satisfactory record in the State of Kentucky regarding the Service Test. The adequate level regarding the bank's CD services and the reasonableness of accessibility of its delivery systems support this conclusion. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to essentially all portions of the State of Kentucky. Accessible branch distribution outweighed unreasonable access to alternative delivery systems to support this conclusion.

Branch Distribution
The bank makes its full-service offices accessible to essentially all portions of the Bowling Green MSA AA.

The bank's level of branch distribution in low-income tracts rises 19.2 percentage points above the population in low-income census tracts, reflecting an excellent level. The bank's level rises 6.2 percentage points above the population percentage in the moderate-income census tracts, reflecting a good level.

Branch and ATM Distribution by Geography Income Level
Bowling Green MSA AA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	2	6.7	8,078	5.8	1	25.0	0	0.0	1	20.0	0	0.0
Moderate	6	20.0	26,127	18.8	1	25.0	0	0.0	1	20.0	0	0.0
Middle	11	36.7	46,866	33.6	1	25.0	1	100.0	2	40.0	0	0.0
Upper	10	33.3	55,795	40.1	1	25.0	0	0.0	1	20.0	0	0.0
NA	1	3.3	2,439	1.8	0	0.0	0	0.0	0	0.0	0	0.0
Totals	**30**	**100.0**	**139,305**	**100.0**	**4**	**100.0**	**1**	**100.0**	**5**	**100.0**	**0**	**100.0**

Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.

Alternative Delivery Systems
The bank makes its alternative delivery systems unreasonably inaccessible to significant portions of the State of Kentucky.

The preceding table shows that the bank maintains no ATMs in low- and moderate-income tracts. The bank's level falls 5.8 percentage points below the population in low-income census tracts, reflecting an adequate level. The bank's ATMs in moderate-income tracts falls 18.8 percentage points below the population in moderate-income tracts, reflecting very poor performance. Given the consideration of the greater population within moderate-income geographies, the very poor performance for moderate-income geographies outweighed the adequate performance in the low-income geographies. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through

alternative delivery systems.

Changes in Branch Locations

The institution's record of opening and closing of branches in the State of Kentucky improved branch accessibility to low- and moderate-income geographies or individuals. The bank opened five branches, one in a low-income tract, one in a moderate-income tract, two in middle-income tracts, and one in an upper-income tract. No branches opened or closed in low- or moderate-income tracts.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Bowling Green MSA AA, particularly low- or moderate-income geographies or individuals. The Bowling Green MSA AA reflects product offerings, services, and branch hours consistent with discussion for the State of Kentucky.

The bank's branches have the same product offerings and services, and branch locations have the same hours.

Community Development Services

The institution provides an adequate level of CD services in the State of Kentucky. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities primarily support this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that the bank provided 23 CD services since the previous evaluation in the State of Kentucky. This number equates to 12 percent of the bank's CD services, thereby reflecting an adequate level.

Community Development Services State of Kentucky					
Rated Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	**#**	**#**	**#**	**#**
Kentucky	0	23	0	0	**23**
Source: Bank records.					

Leadership is evident through Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs by providing community services to low- and moderate-income individuals.

The following are examples of CD services specific to the State of Kentucky:

- ***Community Service*** – A bank employee taught elementary classes about bank accounts and

budgeting. The classes were taught at a school where the majority of the students receive free and reduced lunch.

- ***Community Services*** –Bank employees worked with a non-profit organization to teach financial literacy classes to low- and moderate-income kids. The organization's volunteers serve as role models helping to impact young people's lives by teaching lessons that promote financial capability, work and career readiness, and business ownership.

STATE OF TENNESSEE

CRA RATING FOR TENNESSEE: SATISFACTORY

The Lending Test is rated: Low Satisfactory
The Investment Test is rated: Low Satisfactory
The Service Test is rated: Low Satisfactory

DESCRIPTION OF INSTITUTION'S OPERATIONS IN TENNESSEE

FirstBank designated six AAs in Tennessee as noted in the table below. All AAs in Tennessee conform to the CRA regulatory requirements.

Description of Tennessee Assessment Areas			
Assessment Area	**Counties in Assessment Area**	**# of CTs**	**# of Branches**
Jackson MSA	Chester, Crockett, and Madison	35	5
Knoxville MSA	Knox and Union	116	6
Memphis MSA	Fayette and Shelby	232	4
Morristown MSA	Jefferson	9	2
Nashville MSA	Cannon, Davidson, Dickson, Rutherford, Williamson, and Wilson	281	24
Tennessee Non-MSA	Bedford, Benton, Carroll, Coffee, Cumberland, Decatur, DeKalb, Franklin, Henderson, Henry, Humphreys, Lincoln, Moore, Perry, Putnam, and Rhea	119	23
Source: Bank Records; 2015 ACS Data.			

SCOPE OF EVALUATION – TENNESSEE

Full-Scope Assessment Area
Of the six AAs in Tennessee, examiners applied full-scope procedures to the Nashville MSA AA since this AA includes the highest percentage of the bank's loans, deposits, and branches in the State of Tennessee. In addition, in accordance with outstanding procedures, examiners also randomly selected the Knoxville MSA AA for review since this area had not been reviewed using full-scope procedures during the previous two evaluations. Examiners applied limited-scope procedures to the other Tennessee AAs.

Lending Test

Loan Categories Reviewed
Examiners considered the following loans granted inside the bank's Tennessee AAs as reported according to either the HMDA or CRA data collection reporting requirements:

Home Mortgage Loans:
- 2020: 6,881 loans totaling $1,872,689,000

- 2021: 6,035 loans totaling $1,739,226,000

Small Business Loans:
- 2020: 2,181 loans totaling $342,305,000
- 2021: 2,076 loans totaling $367,766,000

Small Farm Loans:
- 2020: 321 loans totaling $23,725,000
- 2021: 185 loans totaling $16,522,000

As suggested by the above figures, home mortgage loans generally received the heaviest weighting followed by small business and small farm loans, respectively.

Assessment Area Weighting
The following table shows that the Nashville MSA AA generated the largest percentage of the bank's Tennessee loans, deposits, and branches. Consequently, examiners weighed records in the Nashville MSA AA heaviest when arriving at applicable conclusions and ratings. Examiners weighed performance in each reviewed area consistent with that area's lending level as reflected in the following table.

Assessment Area Distribution – State of Tennessee						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Jackson MSA	119,866	2.8	534,371	6.0	5	7.8
Knoxville MSA	206,561	4.7	998,295	11.2	6	9.4
Memphis MSA	211,174	4.8	237,758	2.7	4	6.2
Morristown MSA	36,000	0.8	208,749	2.3	2	3.1
Nashville MSA	3,028,467	69.4	4,868,662	54.8	24	37.5
Tennessee Non-MSA	760,164	17.4	2,038,174	23.0	23	36.0
Total	**4,362,232**	**100.0**	**8,886,009**	**100.0**	**64**	**100.0**
Source: HMDA & CRA Data (2020-2021); FDIC Summary of Deposits (06/30/2021) *Due to rounding, totals may not equal 100.0 percent*						

Investment and Service Tests

The scopes for the Investment and Service Tests remain the same for this rated area as it did for the institution as a whole. Please refer to the institution-level Scope of Examination section.

CONCLUSIONS ON PERFORMANCE CRITERIA IN TENNESSEE

LENDING TEST

FirstBank demonstrated a low satisfactory record in the State of Tennessee regarding the Lending Test. Excellent lending levels, combined with adequate performance records regarding borrower profile distribution, geographic distribution loan distribution, and community development loans

primarily support this conclusion. The bank further exhibited extensive use of innovative and flexible lending levels in this rated area. Conclusions regarding the institution's performance in the State of Tennessee were generally consistent with the conclusions for each AA within the rated area, unless otherwise noted.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. Excellent performance regarding home mortgage, small business, and small farm loans support this conclusion. Examiners placed more weight on the bank's home mortgage loans based on the loan volumes. Examiners considered the bank's size, business strategy, and capacity in this state relative to its credit needs when arriving at this conclusion.

Home Mortgage Loans
Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. For 2020, the bank originated 6,724 total reportable home mortgage loans totaling approximately $1.8 billion in its Tennessee AAs. FirstBank captured a 3.2 percent market share of the total number of home mortgage loans and a 3.2 percent market share of the total dollar volume of home mortgage loans in the Tennessee AAs.

This volume of activity ranks the bank 3rd out of 1,003 total lenders in the bank's Tennessee AAs. This ranking lands the bank in the top 0.3 percent of lenders reporting such loans in the bank's Tennessee AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Small Business Loans
Small business lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. For 2020, the bank originated 2,181 total reportable small business loans totaling approximately $342.3 million inside its Tennessee AAs. FirstBank captured a 2.5 percent market share of the total number of small business loans and a 6.1 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 12th out of 299 total lenders in the bank's Tennessee AAs. This ranking lands the bank in the top 4.0 percent of lenders reporting such loans in the bank's Tennessee AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Small Farm Loans
Small farm lending levels reflect excellent responsiveness to AA credit needs in the State of Tennessee. For 2020, the bank originated 321 total reportable small farm loans totaling approximately $23.7 million inside its Tennessee AAs. FirstBank captured a 27.3 percent market share of the total number of small farm loans and a 35.9 percent market share of the total dollar volume of loans.

This volume of activity ranks the bank 1st out of 44 total lenders in the bank's Tennessee AAs. This ranking lands the bank in the top 2.3 percent of lenders reporting such loans in the bank's

Tennessee AAs. The ranking considers the total number and dollar amount of loans made by each institution.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the State of Tennessee. Adequate records regarding home mortgage, small business, and small farm loans support this conclusion. The bank's performance was consistent throughout the AAs within the rated area, except where noted below. Examiners placed the most weight on the bank's Nashville MSA AA.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects adequate penetration throughout the State of Tennessee. Adequate performances in all AAs support this conclusion.

Small Business Loans
The geographic distribution of small business loans reflects adequate penetration throughout the State of Tennessee. Adequate performances in all AAs support this conclusion.

Small Farm Loans
The geographic distribution of small farm loans reflects adequate penetration throughout the State of Tennessee. Adequate performances in the Tennessee Non-MSA AA supports this conclusion. The other AAs did not make enough small farm loans to perform a meaningful analysis.

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage and small farm loans outweighed excellent records regarding small business loans to support this conclusion. The bank's performance was generally consistent throughout the AAs, unless otherwise noted below. Examiners placed the most weight on the bank's Nashville MSA AA.

Home Mortgage Loans
The distribution of borrowers reflects adequate penetration among retail customers of different income levels. Adequate performances in all AAs support this conclusion.

Small Business Loans
The distribution of borrowers reflects excellent penetration among business customers of different sizes. Excellent performances in all AAs support this conclusion.

Small Farm Loans
The distribution of borrowers reflects adequate penetration among business customers of different sizes. Adequate performances in the Tennessee Non-MSA AA supports this conclusion. The other AAs did not make enough small farm loans to perform a meaningful analysis.

Innovative or Flexible Lending Practices

The institution makes extensive use of innovative or flexible lending practices in the State of Tennessee. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of its AAs when arriving at this conclusion. The appendices list the criteria considered under this performance factor.

The table below shows that, since the previous evaluation, the bank originated 8,089 innovative or flexible loans totaling approximately $2.3 billion in the State of Tennessee. This dollar figure equates to 65.1 percent of the bank's total innovative or flexible loans. Given the bank's capacity and the needs in the rated area, the level of innovative and flexible loans reflects excellent responsiveness to the credit needs of the State of Tennessee.

Innovative or Flexible Loans State of Tennessee										
Assessment Area	**FHLMC/ FNMA/State Housing**		**USDA/FHA/VA**		**Portfolio Loan Program**		**First Time Homebuyers**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Jackson MSA	166	35,065	36	7,436	1	151	16	2,839	**219**	**45,491**
Knoxville MSA	291	77,799	24	7,304	2	328	51	15,273	**368**	**100,704**
Memphis MSA	252	73,665	54	15,036	238	42,599	74	13,383	**618**	**144,683**
Morristown MSA	53	11,822	17	3,352	0	0	3	882	**73**	**16,056**
Nashville MSA	3,981	1,253,167	370	126,221	56	14,099	855	258,355	**5,262**	**1,651,842**
Tennessee Non-MSA	1,073	216,800	322	60,425	4	894	150	24,816	**1,549**	**302,935**
Total	**5,816**	**1,668,318**	**823**	**219,774**	**301**	**58,071**	**1,149**	**315,548**	**8,089**	**2,261,711**
Source: Bank records.										

Community Development Loans

The institution made an adequate level of community development loans in the State of Tennessee. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion. The bank's performance is relatively consistent throughout the AAs. Examiners placed the most weight on the bank's Nashville MSA AA.

The following table shows that, since the previous evaluation, the bank granted 113 CD loans totaling approximately $504.2 million in this state. The dollar amount equates to 81.9 percent of the bank's overall level of CD loans as compared to the 74.8 percent of overall HMDA and CRA loans in this state.

Community Development Loans State of Tennessee										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Jackson MSA	1	1,962	0	0	2	2,656	1	8,925	**4**	**13,543**

Knoxville MSA	0	0	2	1,831	2	3,062	3	7,747	**7**	**12,640**
Memphis MSA	1	12,185	0	0	3	7,168	4	58,791	**8**	**78,144**
Morristown MSA	0	0	1	25	0	0	0	0	**1**	**25**
Nashville MSA	7	48,059	1	2,671	16	34,020	44	257,098	**68**	**341,848**
Tennessee Non-MSA	0	0	1	1,100	6	9,286	2	2,456	**9**	**12,842**
Statewide	1	4,335	0	0	6	8,883	9	31,913	**16**	**45,131**
Total	**10**	**66,541**	**5**	**5,627**	**35**	**65,075**	**63**	**366,930**	**113**	**504,173**
Source: Bank records.										

Besides their extent, the CD loans reflect good responsiveness to the state's CD needs. As seen in the table above, 72.8 percent of the dollar volume of the state's CD loans help revitalize or stabilize low- and moderate-income geographies, while 1.1 percent benefit community services for low- and moderate-income individuals.

As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AAs. Therefore, relative to the bank's capacity and the extent of CD lending opportunities and needs in its AAs, the bank established an adequate level in originating CD loans.

The following point discusses the bank's CD lending activities in the broader statewide area of Tennessee:

- ***Revitalize or Stabilize*** – The bank originated a loan totaling approximately $6.2 million to purchase a business in a moderate-income area. This loan revitalized a qualifying geography and provided stabilizing effects by retaining a business in the area.

- ***Economic Development*** – The bank originated a loan totaling approximately $2.5 million that helped promote economic development by retaining jobs in a moderate-income area.

INVESTMENT TEST

FirstBank demonstrated a high satisfactory record in the State of Tennessee regarding the Investment Test. The AAs in this state generally reflect consistent performance in the Investment Test for the state. The significant level of QIs outweighed the adequate responsiveness to CD needs and no use of complex and innovative QIs to support this conclusion.

Investment and Grant Activity

The bank has a significant level of QIs in the State of Tennessee.

The table below shows that FirstBank made 93 QIs totaling approximately $84.5 million in the State of Tennessee. By dollar volume, this equates to 72.4 percent of the bank's total QIs as compared to 74.8 percent of total deposits in this rated area. The dollar amount includes QIs in the

statewide area within the State of Tennessee when the dollar amount of QIs is readily available within the State of Tennessee.

Qualified Investments State of Tennessee										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Jackson MSA	1	500	1	1,160	2	1,285	0	0	**4**	**2,945**
Knoxville MSA	1	500	4	1,201	1	1,250	0	0	**6**	**2,951**
Memphis MSA	6	11,184	0	0	0	0	2	2,000	**8**	**13,184**
Morristown MSA	1	500	1	3,000	0	0	0	0	**2**	**3,500**
Nashville MSA	33	37,181	8	1,204	2	1,000	2	254	**45**	**39,639**
Tennessee Non-MSA	0	0	6	8	0	0	6	4,800	**12**	**4,808**
Statewide Activities	9	8,828	0	0	6	8,388	1	250	**16**	**17,466**
Total	**51**	**58,693**	**20**	**6,573**	**11**	**11,923**	**11**	**7,304**	**93**	**84,493**
Source: Bank records										

Since FirstBank's investments addressed community credit needs inside the bank's AAs within the State of Tennessee, statewide Tennessee activities includes investments in different areas outside of the bank's AAs within the State of Tennessee.

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities shows adequate responsiveness through use of QIs that directly address identified needs in the State of Tennessee. Although the majority of the CD loans in the State of Tennessee were for affordable housing (69.5 percent by dollar volume), the bank also had CD loans in all other categories. Community services to low- and moderate-income individuals and activities that help revitalize or stabilize low- and moderate-income geographies are the primary needs in the area.

FirstBank's major QIs addressed the following needs throughout various AAs in the State of Tennessee:

- Affordable housing needs with approximately $25.5 million in the purchase of mortgage-backed securities with underlying loans to low- and moderate-income individuals.

- Affordable housing needs with approximately $2.5 million in three Community Development Financial Institutions (CDFI) for permanent financing to developers of Low-Income Housing Tax Credit properties that construct or rehabilitate affordable or mixed-income multifamily housing.

- Economic Development needs with approximately $3.8 million in four CDFIs for financing to small businesses for permanent job creation and business expansion.

Community Development Initiatives

FirstBank does not use innovative or complex investments to support CD initiatives in the State of Tennessee.

SERVICE TEST

FirstBank demonstrated a high satisfactory record for the State of Tennessee regarding the Service Test. The relatively high level regarding the bank's CD services lifted the limited accessibility of its delivery systems, its changes in branch locations, and its reasonableness of business hours and services to support this conclusion. The Jackson MSA, Memphis MSA, Morristown MSA, and Tennessee Non-MSA assessment areas reflect performances, regarding the Service Test, below that of the state level. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

Delivery systems reasonably accessible to portions of the bank's AAs in the State of Tennessee. Reasonable accessible branch distribution and alternative delivery systems' accessibility to limited portions of bank's AAs support this conclusion. The State of Tennessee reflects consistent conclusions to the institution's Accessibility of Delivery System performance.

Branch Distribution

The bank makes its full-service offices reasonably accessible to portions of the institution's AAs in the State of Tennessee.

The bank's level of branch distribution in low-income tracts falls 10.1 percentage points below the population in low-income census tracts, reflecting a poor level. The bank's level rises 3.1 percentage points above the population percentage in the moderate-income census tracts, reflecting an adequate level. Given the consideration of the greater population within moderate-income geographies, the adequate performance for moderate-income geographies outweighed the poor performance in the low-income geographies.

Branch and ATM Distribution by Geography Income Level
State of Tennessee

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	108	13.6	347,933	10.1	0	0.0	2	4.9	0	0.0	0	0.0
Moderate	160	20.2	699,957	20.3	11	17.2	2	4.9	0	0.0	1	16.7
Middle	278	35.1	1,256,975	36.4	29	45.3	20	48.8	0	0.0	1	16.7
Upper	231	29.2	1,133,289	32.8	19	29.7	14	34.1	0	0.0	4	66.7
NA	15	1.9	17,532	0.5	5	7.8	3	7.3	0	0.0	0	0.0
Totals	**792**	**100.0**	**3,455,686**	**100.0**	**64**	**100.0**	**41**	**100.0**	**0**	**100.0**	**6**	**100.0**

Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.

Alternative Delivery Systems
The bank makes its alternative delivery systems accessible to limited portions of the bank's AAs in the State of Tennessee.

The preceding table shows that the bank's ATMs in low-income tracts falls 5.2 percentage points below the population in low-income census tracts, thereby reflecting an adequate level. The bank's ATMs in moderate-income tracts falls 15.4 percentage points below the population in moderate-income tracts, reflecting a poor performance. Examiners placed more weight on moderate-income tracts given the significantly higher population in those geographies.

Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

The institution's record of opening and closing of branches in State of Tennessee has generally not adversely affected low- and moderate- income geographies or individuals of geographies. No branch changes occurred in low-income tracts in the State of Tennessee. Six branches closed, one in a moderate-income tract, one in a middle-income tract, and four in upper-income tracts.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the State of Tennessee, particularly low- or moderate-income geographies or individuals. The State of Tennessee reflects product offerings, services, and branch hours that are generally consistent with discussion at the institution level.

The bank's branches generally have the same product offerings and services, and branch locations have similar hours that vary slightly according to individual AA's needs.

Community Development Services

The institution provides a relatively high level of CD services for the State of Tennessee. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The following table shows that the bank provided 133 CD services since the previous evaluation. This number equates to 69.6 percent of total CD services, thereby reflecting a good level.

Community Development Services State of Tennessee					
Assessment Area	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
Jackson MSA	0	1	1	0	**2**

Community Development Services State of Tennessee					
Knoxville MSA	21	23	0	3	**47**
Memphis MSA	0	0	0	0	**0**
Morristown MSA	0	0	0	0	**0**
Nashville MSA	11	61	0	1	**73**
Tennessee Non-MSA	1	9	1	0	**11**
Total	**33**	**94**	**2**	**4**	**133**
Source: Bank Data					

Leadership is evident through Board or committee participation in a number of those activities. FirstBank had no regional or statewide CD services in this rated area, so please reference the full-scope AA sections for examples of the bank's CD services in the State of Tennessee.

NASHVILLE MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN NASHVILLE MSA

The Nashville MSA AA includes all 281 census tracts that make up Canon, Davidson, Dickson, Rutherford, Williamson, and Wilson Counties, six of 13 total counties that make up the Nashville-Davidson-Murfreesboro-Franklin, Tennessee MSA, located in middle Tennessee.

Economic and Demographic Data

The AA's census tracts reflect the following income designations based on 2015 ACS data: 31 low-, 69 moderate-, 92 middle-, 85 upper-income tracts, and four tracts with no income designation. FEMA declared this AA as a major disaster area due to flooding, severe storms, tornadoes, and the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Assessment Area: Nashville MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	281	11.0	24.6	32.7	30.2	1.4
Population by Geography	1,327,224	7.9	23.6	35.7	32.5	0.3
Housing Units by Geography	545,551	8.3	24.5	35.8	31.4	0.0
Owner-Occupied Units by Geography	318,124	3.8	17.5	38.8	39.8	0.0
Occupied Rental Units by Geography	184,698	14.7	35.3	31.1	18.8	0.0
Vacant Units by Geography	42,729	13.5	29.7	32.9	23.8	0.0
Businesses by Geography	162,723	8.1	18.9	27.5	44.7	0.9
Farms by Geography	3,388	4.4	17.0	37.0	41.3	0.4

Family Distribution by Income Level	322,056	20.5	16.8	19.6	43.1	0.0
Household Distribution by Income Level	502,822	22.6	16.4	17.8	43.2	0.0
Median Family Income MSA - 34980 Nashville-Davidson--Murfreesboro--Franklin, TN MSA		$66,441	Median Housing Value			$211,181
			Median Gross Rent			$906
			Families Below Poverty Level			10.3%

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

Nashville's economy is soaring above its in-state peers. Non-farm employment has fully recovered from the COVID-19 pandemic. Professional services are leading growth with new jobs, higher than the national average. However, the manufacturing sector is not showing job growth. House prices are rising at a chart-topping pace and are among the top fastest growing nationally. Strong price gains are attracting investors. Meanwhile, price affordability is rapidly falling, and dropping below the U.S. level by a large margin. Strong net migration should keep a floor under demand, but given highly inflated housing valuations, elevated speculation, and quickly growing debt burdens, the risk of a correction is high. [10]

Currently, major employers in the Nashville MSA consist of Vanderbilt University Medical Center, Nissan North America Inc., and HCA Inc.[11] The Nashville MSA's unemployment rate of 7.0 percent for 2020 is lower than the 7.4 percent rate for the State of Tennessee but below the U.S. rate of 8.1 percent.

Competition

The area contains a high level of competition from other chartered banks based on its population, with each of the 444 offices from its 56 institutions serving about 2,989 people on average. FirstBank ranks 6th in market share by capturing 6.2 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Nashville MSA AA created varied loan demand for small business and residential real estate and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

[10]Source: Moody's Analytics, Precis U.S. Metro, April 2022
[11]Source: Moody's Analytics, Precis U.S. Metro, April 2022

Demographic data showing that 37.3 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. In addition, 35.6 percent of the area's census tracts received low- or moderate-income designations, the national COVID-19 major disaster area, and the AA's designation as federal disaster areas for other reasons, suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

CONCLUSIONS ON PERFORMANCE CRITERIA IN NASHVILLE MSA

LENDING TEST

FirstBank demonstrated a high satisfactory record in the Nashville MSA AA regarding the Lending Test. Excellent performance regarding lending activity and a relatively high level of CD lending lifted adequate performance records regarding the borrower profile loan distribution and geographic loan distribution to support this conclusion. The bank further exhibited extensive use of innovative and flexible lending levels in this rated area.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. Excellent performance regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Nashville MSA AA.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. For 2020, the bank originated 4,477 total reportable home mortgage loans totaling approximately $1.4 billion. FirstBank captured a 3.9 percent market share of the total number and a 4.0 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 3rd out of 835 total lenders in the Nashville MSA AA. This ranking lands the bank in the top 0.4 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

Small Business Loans

Small business lending levels reflect excellent responsiveness to AA credit needs in the Nashville MSA AA. For 2020, the bank originated 483 total reportable small business loans totaling approximately $115.9 million. FirstBank captured a 1.1 percent market share of the total number of loans and a 4.0 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 19th out of 250 total lenders in the Nashville MSA AA. This ranking lands the bank in the top 7.6 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for small business loans.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Nashville MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Nashville MSA AA.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects adequate performance in Nashville MSA AA. Adequate performances in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is slightly lower than the aggregate data by 0.4 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank's lending level falls 2.1 percentage points below the aggregate data, also reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Nashville MSA AA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	3.8	4.9	208	4.5	74,570	5.0
Moderate	17.5	13.1	507	11.0	130,800	8.8
Middle	38.8	36.9	1,579	34.1	406,007	27.4
Upper	39.8	45.1	2,333	50.4	869,163	58.7
Not Available	0.0	0.0	2	0.0	490	0.0
Totals	**100.0**	**100.0**	**4,629**	**100.0**	**1,481,030**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Nashville MSA AA. Adequate performances in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is slightly higher than the aggregate data by 0.4 percent, reflective of adequate performance. The table further shows that in moderate-income census tracts the bank's lending level rises 1.8 percentage points above the aggregate data, reflecting an adequate level.

Geographic Distribution of Small Business Loans Nashville MSA AA						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	8.0	8.7	44	9.1	13,684	11.8
Moderate	19.0	18.1	96	19.9	22,619	19.5
Middle	27.1	26.0	147	30.4	30,081	26.0
Upper	45.0	46.4	193	40.0	48,845	42.2
Not Available	1.0	0.9	3	0.6	650	0.6
Totals	**100.0**	**100.0**	**483**	**100.0**	**115,879**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed and excellent records regarding small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Nashville MSA AA.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Nashville MSA AA. Adequate performance to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is slightly lower than the aggregate data by 0.8 percent, reflective of adequate performance. The table further shows that to moderate-income borrowers the bank's lending level falls 0.4 percentage points below the aggregate data, reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Nashville MSA AA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	20.5	4.1	155	3.3	23,841	1.6
Moderate	16.8	15.0	712	15.4	142,709	9.6
Middle	19.6	19.2	926	20.0	244,373	16.5
Upper	43.1	44.8	2,603	56.2	945,991	63.9

Not Available	0.0	16.8	233	5.0	124,115	8.4
Totals	**100.0**	**100.0**	**4,629**	**100.0**	**1,481,029**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Nashville MSA AA. Excellent performance to businesses with gross annual revenues of $1 million or less supports this conclusion.

As shown in the table above, the bank's level of lending to small businesses with gross annual revenues of $1 million or less is 30.4 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Nashville MSA AA.

Distribution of Small Business Loans by Gross Annual Revenue Category Nashville MSA AA						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	86.5	41.7	348	72.1	76,457	66.0
>$1,000,000	4.4	-	131	27.1	38,101	32.9
Revenue Not Available	9.1	-	4	0.8	1,320	1.1
Totals	**100.0**	**100.0**	**483**	**100.0**	**115,878**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent						

Innovative or Flexible Lending Practices

The institution makes extensive use of innovative or flexible lending practices in the Nashville MSA AA in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion. Please refer to the discussion under the State of Tennessee for additional details regarding the innovative or flexible lending practices in the Nashville MSA AA.

Community Development Loans

The institution made a relatively high level of CD loans in the Nashville MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated 68 CD loans totaling approximately $504.2 million in the Nashville MSA AA. By dollar volume, this equates to 67.8 percent of the bank's CD loans in the State of Tennessee as compared to the 69.4 percent of the bank's home mortgage and small business loans in this AA. The following points discuss examples of the bank's CD loans in the Nashville MSA AA:

- ***Revitalize or Stabilize*** – The bank originated a $32.5 million loan to purchase a student housing complex in a moderate-income area. The loan revitalized the area and provided a stabilizing effect by attracting businesses and residents to the area.

- ***Revitalize or Stabilize*** – The bank granted a $2.2 million loan to purchase a retail store located in a moderate-income census tract. The loan revitalized the area and provided a stabilizing effect by attracting businesses and residents to the area.

In addition, the CD loan reflects excellent responsiveness to the CD needs of the AA. The institution's CD lending activities in the Nashville MSA AA are dispersed among the various categories and are responsive to the two CD needs in the Nashville MSA AA.

INVESTMENT TEST

FirstBank demonstrated a low satisfactory record in the Nashville MSA AA regarding the Investment Test. The adequate level of QIs and responsiveness to CD needs outweighed no use of complex and innovative QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

Investment and Grant Activity

The bank has an adequate level of QIs in the Nashville MSA AA. The table for the State of Tennessee shows that FirstBank made 45 QIs totaling approximately $39.6 million in the Nashville MSA AA. By dollar volume, this equates to 46.9 percent of the total QIs in the State of Tennessee as compared to 54.8 percent of total deposits in this area.

The following is an example of a key investment in the Nashville MSA AA:

- ***Affordable Housing*** **-** The bank allocated approximately $33.0 million in mortgage-backed securities in the Nashville MSA AA with the underlying loans to finance affordable housing for low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show adequate responsiveness through use of investments that directly address identified needs in the Nashville MSA AA. The QIs table for the State of Tennessee shows responsiveness in the Nashville MSA AA to CD needs by the dollar amount for all CD purpose categories.

FirstBank's major investments addressed affordable housing needs with approximately $37.1 million in the purchase of mortgage-backed securities and municipal bonds with underlying loans to low- and moderate-income individuals.

Additional CD investment opportunities for larger dollar amounts and donations were made for economic development to small businesses, community services for low- and moderate-income individuals, and revitalization and stabilization efforts within the Nashville MSA AA.

Community Development Initiatives

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Nashville MSA AA.

SERVICE TEST

FirstBank demonstrated a high satisfactory record in the Nashville MSA AA regarding the Service Test. The relatively high level regarding the bank's CD services outweighed the reasonableness of accessibility of its delivery systems to support this conclusion. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

Delivery systems are accessible to limited portions of the Nashville MSA AA. Accessibility to limited portions of the AA outweighed unreasonable access to alternative delivery systems to support this conclusion.

Branch Distribution

The bank makes its full-service offices accessible to limited portions of the Nashville MSA AA.

The bank's level of branch distribution in low-income tracts falls 7.9 percentage points below the population in low-income census tracts, reflecting a poor level. The bank's level falls 11.1 percentage points below the population percentage in the moderate-income census tracts, reflecting a poor level.

Branch and ATM Distribution by Geography Income Level
Nashville MSA AA

Tract Income Level	Census Tracts		Population		Branches		ATMs		Open Branches		Closed Branches	
	#	%	#	%	#	%	#	%	#	%	#	%
Low	31	11.0	104,688	7.9	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	69	24.6	313,200	23.6	3	12.5	0	0.0	0	0.0	1	16.7
Middle	92	32.7	473,161	35.7	6	25.0	0	0.0	0	0.0	1	16.7
Upper	85	30.2	431,978	32.5	10	41.7	0	0.0	0	0.0	4	66.7
NA	4	1.4	4,197	0.3	5	20.8	0	0.0	0	0.0	0	0.0
Totals	**281**	**100.0**	**1,327,224**	**100.0**	**24**	**100.0**	**0**	**100.0**	**0**	**100.0**	**6**	**100.0**

Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent.

Alternative Delivery Systems

The bank makes its alternative delivery systems unreasonably accessible to significant portions of the Nashville MSA AA.

The preceding table shows that the bank does not have ATMs in low- and moderate-income tracts, thereby reflecting a very poor level. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

The institution's record of opening and closing of branches in the Nashville MSA AA has generally not adversely affected low- and in moderate- income geographies or individuals of geographies. One branch closed in a moderate-income tract in the Nashville MSA AA. No branches opened in this AA.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Nashville MSA AA, particularly low- or moderate-income geographies or individuals. The Nashville MSA AA reflects product offerings, services, and branch hours consistent with discussion for the State of Tennessee.

The bank's branches generally have the same product offerings and services, and branch locations have the same hours.

Community Development Services

The institution provides a relatively high level of CD services in the Nashville MSA AA. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Tennessee section shows that the bank provided 73 CD services since the previous evaluation in the Nashville MSA AA. This number equates to 54.9 percent of CD services for the State of Tennessee.

Leadership is evident through Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs for community services to low- and moderate-income individuals.

The following are examples of CD services specific to the Nashville MSA AA:

- ***Affordable Housing*** – A bank employee provided financial education on the process of purchasing a home to low- and moderate-income homebuyers.
- ***Community Services*** – A bank employee teaches personal finance classes at a non-profit organization that assists men as they transition from prison to the community.

KNOXVILLE MSA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN KNOXVILLE MSA

The Knoxville MSA AA includes all 116 census tracts that make up Knox and Union Counties, two of the eight counties that make up the Knoxville, Tennessee MSA, located in east Tennessee.

Economic and Demographic Data

The AA's census tracts reflect the following income designations based on 2015 ACS data: 9 low-, 23 moderate-, 43 middle-, 39 upper-income tracts, and 2 tracts with no income designation. FEMA declared this AA as a major disaster area due to the COVID-19 pandemic during the majority of the evaluation period. The following table notes certain demographic data for the area.

Demographic Information of the Assessment Area Assessment Area: Knoxville MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	116	7.8	19.8	37.1	33.6	1.7
Population by Geography	463,444	6.2	19.4	38.1	35.0	1.2
Housing Units by Geography	207,180	6.8	21.7	38.7	32.7	0.1
Owner-Occupied Units by Geography	121,304	3.1	15.5	41.4	40.1	0.0
Occupied Rental Units by Geography	66,727	13.3	30.7	34.2	21.6	0.1
Vacant Units by Geography	19,149	8.1	29.2	37.4	24.9	0.3
Businesses by Geography	43,217	4.6	15.4	31.6	47.9	0.5
Farms by Geography	1,004	2.8	15.8	37.0	43.9	0.5
Family Distribution by Income Level	115,735	20.6	15.7	19.0	44.7	0.0
Household Distribution by Income Level	188,031	23.3	15.8	16.1	44.7	0.0
Median Family Income MSA - 28940 Knoxville, TN MSA		$59,829	Median Housing Value			$165,132
			Median Gross Rent			$787
			Families Below Poverty Level			11.2%

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

Competition

The area contains a high level of competition from other chartered banks based on its population, with each of the 143 offices from its 30 institutions serving about 3,240 people on average. FirstBank ranks 6th in market share by capturing 5.7 percent of the area's deposits based on the June 30, 2021, FDIC Deposit Market Share Report. However, non-banks heighten the competition level with many offering the remote delivery of products through digital devices. These non-banks

include fintech companies, credit unions, mortgage companies, and finance companies. Overall, the competition level allows for lending opportunities.

Credit and Community Development Needs and Opportunities

Consistent with other metropolitan areas, the Knoxville MSA AA created varied loan demand for residential real estate and small business loans. Considering information from bank management and demographic and economic information, examiners ascertained that the primary credit needs of the area include home mortgage and small business loans.

Demographic data showing that 36.3 percent of the area's families reported low- or moderate-incomes also suggest a need for activities that benefit projects or organizations that provide community services targeted to these families. In addition, 27.6 percent of the area's census tracts received low- and moderate-income designations and the national COVID-19 major disaster area suggests a need for activities that revitalize or stabilize qualifying geographies.

The financial hardship from the COVID-19 pandemic created an emerging need for retail banking service products to the unbanked for quick access to funds from Economic Impact checks, funds for unemployment payments, and to pay bills preventing late payments on existing debt obligations. Given that the COVID-19 pandemic affected borrowers in a variety of ways, a significant emerging need exists for payment accommodations that facilitate the borrower's ability to work through the immediate impact of the virus. Lastly, the COVID-19 pandemic resulted in less customer contact with physical banking facilities, significantly increasing the need for the digital delivery of banking products and services throughout the whole product life cycle.

CONCLUSIONS ON PERFORMANCE CRITERIA IN KNOXVILLE MSA

LENDING TEST

FirstBank demonstrated a low satisfactory record in the Knoxville MSA AA regarding the Lending Test. Adequate performance records regarding borrower profile loan distribution, geographic loan distribution, and CD lending and the limited use of innovative and flexible lending practices outweighed excellent performance regarding lending activity to support this conclusion.

Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs in the Knoxville MSA AA. Excellent performance regarding both home mortgage and small business loans to support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Knoxville MSA AA.

Home Mortgage Loans

Home mortgage lending levels reflect excellent responsiveness to AA credit needs in the Knoxville MSA AA. For 2020, the bank originated 273 total reportable home mortgage loans totaling approximately $70.3 million. FirstBank captured a 1.0 percent market share of the total number and a 1.0 percent market share of the total dollar volume of home mortgage loans.

The bank's activity by number of loans ranks it 26th out of 534 total lenders in the Knoxville MSA AA. This ranking lands the bank in the top 4.9 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar amount of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for home mortgage loans.

Small Business Loans
Small business lending levels reflect excellent responsiveness to AA credit needs in the Knoxville MSA AA. For 2020, the bank originated 151 total reportable small business loans totaling approximately $38.9 million. FirstBank captured a 1.3 percent market share of the total number of loans and a 4.5 percent market share of the total dollar volume of loans.

The bank's activity by number of loans ranks it 15th out of 142 total lenders in the Knoxville MSA AA. This ranking lands the bank in the top 10.6 percent of lenders reporting such loans in this AA. The ranking considers the total number and dollar volume of loans made by each institution. Given the considerations previously noted, the activity level reflects excellent performance for small business loans.

Geographic Distribution

The geographic distribution of loans reflects adequate penetration throughout the Knoxville MSA AA. Adequate records regarding both home mortgage and small business loans support this conclusion. Examiners weighed home mortgage loans heavier than small business loans in the Knoxville MSA AA.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects adequate performance in the Knoxville MSA AA. Adequate performance in both low- and moderate-income geographies supports this conclusion.

As seen in the table below, the bank's lending in low-income tracts is slightly higher than the aggregate data by 0.4 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank's lending level rises 0.5 percentage points higher than the aggregate data, also reflecting an adequate level.

Geographic Distribution of Home Mortgage Loans Knoxville MSA AA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	3.1	1.9	7	2.6	629	0.9
Moderate	15.5	10.9	31	11.4	4,211	6.0
Middle	41.4	36.3	68	24.9	11,483	16.4
Upper	40.1	50.8	166	60.8	53,500	76.4
Not Available	0.0	0.0	1	0.4	191	0.3

Totals	**100.0**	**100.0**	**273**	**100.0**	**70,014**	**100.0**
Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The geographic distribution of small business loans reflects adequate performance in the Knoxville MSA AA. Adequate performance in both low- and moderate-income geographies support this conclusion.

As seen in the table below, the bank's lending in low-income tracts is higher than the aggregate data by 2.8 percent, which is reflective of adequate performance. The table further shows that, in moderate-income census tracts, the bank's lending level falls 3.6 percentage points lower than the aggregate data, also reflecting an adequate level.

Geographic Distribution of Small Business Loans Knoxville MSA AA						
Tract Income Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	4.5	3.2	9	6.0	1,201	3.1
Moderate	15.6	12.9	14	9.3	2,604	6.7
Middle	31.8	31.3	45	29.8	12,561	32.3
Upper	47.6	52.5	83	55.0	22,525	57.9
Not Available	0.5	0.1	0	0.0	0	0.0
Totals	**100.0**	**100.0**	**151**	**100.0**	**38,891**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Borrower Profile

The distribution of borrowers reflects, given the product lines offered by the institution, adequate penetration among retail customers of different income levels and business customers of different sizes. Adequate records regarding home mortgage loans outweighed small business loans to support this conclusion. Examiners weighed small business loans heavier than home mortgage loans in the Knoxville MSA AA.

Home Mortgage Loans

The distribution of home mortgage loans based on the borrowers' profiles reflects adequate performance in the Knoxville MSA AA. Adequate performance to both low- and moderate-income borrowers support this conclusion.

As seen in the table below, the bank's lending to low-income borrowers is higher than the aggregate data by 1.4 percent, reflective of adequate performance. The table further shows that, to moderate-income borrowers, the bank's lending level falls 2.1 percentage points below the aggregate data, also reflecting an adequate level.

Distribution of Home Mortgage Loans by Borrower Income Level Knoxville MSA AA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low	20.6	4.8	17	6.2	1,419	2.0
Moderate	15.7	14.9	35	12.8	4,933	7.0
Middle	19.0	18.7	32	11.7	7,230	10.3
Upper	44.7	44.6	165	60.4	49,062	70.1
Not Available	0.0	17.1	24	8.8	7,370	10.5
Totals	**100.0**	**100.0**	**273**	**100.0**	**70,014**	**100.0**
Source: 2015 ACS Data; 2020 CRA Data, 2020HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.						

Small Business Loans

The distribution of small business loans based on the borrowers' profiles reflects excellent performance in the Knoxville MSA AA. Excellent performance to businesses with gross annual revenues of $1 million or less supports this conclusion. The following table illustrates the distribution of lending by borrower revenue levels within the AA.

As shown in the table above, the bank's level of lending to small businesses with gross annual revenues of $1 million or less is 17.8 percent higher than the aggregate level. As a result, this reflects an excellent level of small business lending in the Knoxville MSA AA.

Distribution of Small Business Loans by Gross Annual Revenue Category Knoxville MSA AA						
Gross Revenue Level	**% of Businesses**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	83.0	39.2	86	57.0	20,115	51.7
>$1,000,000	5.5	-	60	39.7	17,668	45.4
Revenue Not Available	11.4	-	5	3.3	1,107	2.8
Totals	**100.0**	**100.0**	**151**	**100.0**	**38,890**	**100.0**
Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. *Due to rounding, totals may not equal 100.0 percent*						

Innovative or Flexible Lending Practices

The institution makes limited use of innovative or flexible lending practices in the Knoxville MSA AA in order to serve AA credit needs. The number and dollar volume of innovative loan products and flexible lending practices supports this conclusion. Examiners considered the dollar volume relative to the institution's capacity and the credit needs of the AA when arriving at this conclusion. Please refer to the discussion under the State of Tennessee for additional details regarding the innovative or flexible lending practices in the Knoxville MSA AA.

Community Development Loans

The institution made an adequate level of CD loans in the Knoxville MSA AA. Its extent, or dollar volume, of CD loans and the CD loans' responsiveness support this conclusion.

As noted under the rated area level, FirstBank originated seven CD loans totaling approximately $12.6 million in the Knoxville MSA AA. By dollar volume, this equates to 2.5 percent of the bank's CD loans in the State of Tennessee as compared to the 4.7 percent of the bank's home mortgage and small business loans in this AA. The following points discuss the bank's CD loans in the Knoxville MSA AA:

- ***Affordable Housing*** – The bank granted a $1.7 million loan for the construction of a senior living center for low- and moderate-income seniors.

- ***Revitalize or Stabilize*** – The bank granted a $5.0 million loan to help expand a business and provide low- and moderate-income employment. The loan helps to support primarily low- and moderate-income jobs.

In addition, the CD loans reflect good responsiveness to the CD needs of the AA. Approximately 61.3 percent of the dollar volume of the AA's CD loans help to revitalize and stabilize low- and moderate-income geographies, while 24.2 percent promote economic development, and 14.5 percent help provide community services for low- and moderate-income individuals. As noted under the applicable Description of Assessment Areas, activities that provide community services for low- and moderate-income individuals and revitalize or stabilize qualifying geographies represent CD needs in the bank's AA.

INVESTMENT TEST

FirstBank demonstrated a low satisfactory record in the Knoxville MSA AA regarding the Investment Test. The adequate level of QIs and responsiveness to CD needs outweigh no use of complex and innovative QIs to support this conclusion. The appendices list the criteria used to evaluate the Investment Test.

Investment and Grant Activity

The bank has an adequate level of QIs in the Knoxville MSA AA. The table for the State of Tennessee shows that FirstBank made six QIs totaling approximately $2.9 million in the Knoxville MSA AA. By dollar volume, this equates to 3.5 percent of the total QIs in the State of Tennessee as compared to 11.2 percent of total deposits in this rated area.

The following is an example of a key investment in the Knoxville MSA AA:

- ***Affordable Housing*** – The bank allocated approximately $1.3 million in a mortgage-backed security in the Knoxville MSA AA with the underlying loans to finance multi-family housing for low- and moderate-income individuals.

Responsiveness to Credit and Community Development Needs

FirstBank's CD activities show adequate responsiveness through use of investments that directly address identified needs in the Knoxville MSA AA. The QIs table for the State of Tennessee shows responsiveness in the Knoxville MSA AA to CD needs by the dollar amount for three of the four CD purpose categories.

Community Development Initiatives

FirstBank made no use of complex or innovative investments, given the size of the institution and opportunities available in the Knoxville MSA AA.

SERVICE TEST

FirstBank demonstrated a low satisfactory record in the Knoxville MSA AA regarding the Service Test. The adequate level regarding the bank's CD services and reasonable accessibility of its delivery systems support this conclusion. The appendices list the criteria considered under this test.

Accessibility of Delivery Systems

Delivery systems are reasonably accessible to portions of the Knoxville MSA AA. Reasonable branch distribution outweighed limited accessibility to alternative delivery systems to support this conclusion. The Knoxville MSA AA area reflects a consistent conclusion to the State of Tennessee's Accessibility of Delivery System performance.

Branch Distribution
The bank makes its full-service offices reasonably accessible to portions of the Knoxville MSA AA.

The bank maintains no branches in low-income tracts. The bank's level falls 6.2 percentage points below the population percentage, reflecting an adequate level. In moderate-income tracts, the bank's level rises 13.9 percentage points above the population percentage, reflecting an excellent level. Given the consideration of the greater population within moderate-income geographies, the adequate performance for moderate-income geographies outweighed the poor performance in the low-income geographies.

Branch and ATM Distribution by Geography Income Level Knoxville MSA AA												
Tract Income Level	**Census Tracts**		**Population**		**Branches**		**ATMs**		**Open Branches**		**Closed Branches**	
	#	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**	**#**	**%**
Low	9	7.8	28,915	6.2	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	23	19.8	90,077	19.4	2	33.3	0	0.0	0	0.0	0	0.0
Middle	43	37.1	176,528	38.1	1	16.7	0	0.0	0	0.0	0	0.0
Upper	39	33.6	162,249	35.0	3	50.0	2	100.0	0	0.0	0	0.0
NA	2	1.7	5,675	1.2	0	0.0	0	0.0	0	0.0	0	0.0

Totals	**116**	**100.0**	**463,444**	**100.0**	**6**	**100.0**	**2**	**100.0**	**0**	**100.0**	**0**	**100.0**
Source: 2015 ACS Data & Bank Data. Due to rounding, totals may not equal 100.0 percent												

Alternative Delivery Systems
The bank makes its alternative delivery systems accessible to limited portions of the Knoxville MSA AA.

The preceding table shows that the bank maintains no ATMs in low-income tracts. The bank's ATMs in low-income tracts falls 6.2 percentage points below the population in low-income tracts, reflecting adequate performance. The preceding table also shows that the bank maintains no ATMs in moderate-income tracts. The bank's ATMs in moderate-income tracts falls 33.3 percentage points below the population in moderate-income tracts, reflecting poor performance. Examiners also observed the alternative delivery systems such as online and mobile banking provide some services to those in low- and moderate-income tracts or low- and moderate-income population. Refer to the Service Test section for the overall bank for specific details of retail banking systems available through alternative delivery systems.

Changes in Branch Locations

The institution's record of opening and closing of branches in the Knoxville MSA AA has generally not adversely affected low- and in moderate- income geographies or individuals of geographies. No branch changes occurred in low- and moderate-income tracts the Knoxville MSA AA.

Reasonableness of Business Hours and Services

Services, including where appropriate, business hours, do not vary in a way that inconveniences portions of the Knoxville MSA AA, particularly low- or moderate-income geographies or individuals. The Knoxville MSA AA reflects product offerings, services, and branch hours generally consistent with discussion for the State of Tennessee.

The bank's branches have the same product offerings and services, and branch locations have similar hours that vary slightly according to area needs.

Community Development Services

The institution provides an adequate level of CD services in the Knoxville MSA AA. Good performances regarding the extent of CD services and the responsiveness of CD services to available opportunities to support this conclusion. The appendices list the criteria considered under this performance factor.

The table in the State of Tennessee section shows that the bank provided 47 CD services since the previous evaluation in the Knoxville MSA AA. This number equates to 35.3 percent CD services, in the State of Tennessee, reflecting an adequate level.

Leadership is evident through Board or committee participation in a number of those activities. Service activities demonstrate the responsiveness to community needs for community services to

low- and moderate-income individuals.

The following are examples of CD services specific to the Knoxville MSA AA:

- ***Community Services*** –Bank employees taught financial literacy classes to kids at an organization that provides community services to low- and moderate-income youth. Thus, the activity provides community services primarily to low- and moderate-income individuals.

- ***Community Service –*** A bank employee serves on the Board of Directors of a local organization that provides affordable and quality health care to low-income individuals.

OTHER ASSESSMENT AREAS – Limited-Scope Review

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE LIMITED-SCOPE ASSESSMENT AREAS

The following table summarizes the conclusions for this rated area's AAs reviewed using limited-scope examination procedures. Examiners drew conclusions regarding the institution's CRA performance from reviewing available facts and data, including performance figures, aggregate lending data comparisons, and demographic information. The conclusions did not alter the bank's overall performance rating.

Assessment Area	Lending Test	Investment Test	Service Test
Jackson MSA	Consistent	Below	Below
Memphis MSA	Consistent	Consistent	Below
Morristown MSA	Consistent	Below	Below
Tennessee Non-MSA	Consistent	Consistent	Below

Facts and data supporting conclusions for each limited-scope AA follow, including a summary of FirstBank's operations and activities. The demographic data for the limited-scope AAs is in Appendix C.

Jackson MSA AA

The bank's Jackson MSA AA consists of all of Chester, Crockett, and Madison Counties. FirstBank operates five branches in this AA, four in middle-income tracts and one in an upper-income tract. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000s)
Home Mortgage Loans	189	34,303
Small Business Loans	174	22,608
Small Farm Loans	0	0
Community Development Loans	4	13,543
Investments	4	2,945
CD Services	2	-

Memphis MSA AA
The bank's Memphis MSA AA consists of all of Fayette and Shelby Counties. FirstBank operates four branches in this AA: one in a middle-income tract and three in upper-income tracts. The bank originated and engaged in the following activities in the assessment area during the review period.

Activity	#	$(000s)
Home Mortgage Loans	308	66,390
Small Business Loans	93	27,613
Small Farm Loans	0	0
Community Development Loans	8	78,144
Investments	8	13,184
CD Services	0	-

Morristown MSA AA
The bank's Morristown MSA AA consists of all of Jefferson County. FirstBank operates two branches in this AA in middle-income tracts. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000s)
Home Mortgage Loans	57	9,733
Small Business Loans	37	5,010
Small Farm Loans	0	0
Community Development Loans	1	25
Investments	2	3,500
CD Services	0	-

Tennessee Non-MSA AA
The bank's Tennessee Non-MSA AA consists of all of Cannon, Davidson, Dickson, Rutherford, Williamson, and Wilson Counties. FirstBank operates 23 branches in this AA: 6 in moderate-income tracts, 15 in middle-income tracts, and 2 in an upper-income tracts. The bank originated and engaged in the following activities in the AA during the review period.

Activity	#	$(000s)
Home Mortgage Loans	1,425	211,219
Small Business Loans	1,243	132,306
Small Farm Loans	304	21,936
Community Development Loans	9	12,842
Investments	12	4,808
CD Services	11	-

Geographic Distribution

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Geography																				2020
	Total Home Mortgage Loans				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area	#	$	% of Total	Overall Market	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate	% of Owner-Occupied Housing Units	% Bank Loans	Aggre-gate

Jackson MSA	189	34,303	2.0	4,819	2.9	0.0	0.6	14.1	8.5	10.9	47.4	41.3	38.6	35.3	50.3	49.8	0.2	0.0	0.1
Memphis MSA	308	66,390	3.3	40,720	13.1	4.9	3.6	17.6	16.2	8.2	19.2	14.6	15.9	50.0	64.3	72.3	0.2	0.0	0.0
Morristown MSA	57	9,733	0.6	2,302	0.0	0.0	0.0	0.0	0.0	0.0	66.3	73.7	67.6	33.7	26.3	32.4	0.0	0.0	0.0
TN Non-MSA	1,425	211,219	15.1	20,972	0.0	0.0	0.0	8.3	7.6	6.7	71.3	68.4	70.6	20.4	24.0	22.7	0.0	0.0	0.0

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography 2020

	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area	#	$	% of Total	Overall Market	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate	% Busi-nesses	% Bank Loans	Aggre-gate
Jackson MSA	174	22,608	7.0	2,691	2.6	1.7	1.6	22.0	21.3	21.9	40.6	37.9	36.0	28.6	33.9	32.9	6.1	5.2	7.7
Memphis MSA	93	27,613	3.7	19,976	13.8	3.2	12.1	16.1	14.0	15.5	17.8	15.1	16.9	51.0	64.5	54.4	1.2	3.2	1.2
Morristown MSA	37	5,010	1.5	710	0.0	0.0	0.0	0.0	0.0	0.0	67.8	67.6	67.3	32.2	32.4	32.7	0.0	0.0	0.0
TN Non-MSA	1,243	132,306	50.0	7,113	0.0	0.0	0.0	17.7	12.0	15.6	62.4	64.1	63.0	19.9	23.9	21.4	0.1	0.0	0.0

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Farm Loans

Assessment Area Distribution of Loans to Farms by Income Category of the Geography 2020

	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
Assessment Area	#	$	% of Total	Overall Market	% Farms	% Bank Loans	Aggre-gate	% Farms	% Bank Loans	Aggre-gate	% Farms	% Bank Loans	Aggre-gate	% Farms	% Bank Loans	Aggre-gate	% Farms	% Bank Loans	Aggre-gate
TN Non-MSA	304	21,936	87.9	670	0.0	0.0	0.0	6.2	3.3	2.5	73.7	74.3	76.0	20.1	22.4	21.5	0.0	0.0	0.0

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Borrower Profile

Home Mortgage Loans

Assessment Area Distribution of Home Mortgage Loans by Income Category of the Borrower 2020

	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	Aggre-gate	% Families	% Bank Loans	Aggre-gate	% Families	% Bank Loans	Aggre-gate	% Families	% Bank Loans	Aggre-gate	% Families	% Bank Loans	Aggre-gate
Jackson MSA	189	34,303	2.0	4,819	22.1	2.1	3.4	17.8	13.8	14.5	18.7	21.2	19.4	41.4	59.3	43.0	0.0	3.7	19.7
Memphis MSA	308	66,390	3.3	40,720	26.0	5.8	2.3	15.2	17.2	9.7	16.3	21.8	16.5	42.5	47.4	49.7	0.0	7.8	21.8
Morristown MSA	57	9,733	0.6	2,302	18.0	7.0	3.1	18.2	8.8	13.8	21.1	24.6	18.2	42.7	56.1	42.6	0.0	3.5	22.3
TN Non-MSA	1,425	211,219	15.1	20,972	19.5	3.9	3.1	17.6	14.7	11.6	20.3	19.4	19.5	42.6	57.5	44.3	0.0	4.4	21.5

Source: 2015 ACS Data; 2020 HMDA Data, 2020 HMDA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Business Loans

Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2020
	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
Assessment Area	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
Jackson MSA	174	22,608	7.0	2,691	79.7	89.1	44.1	5.4	9.8	14.8	1.1
Memphis MSA	93	27,613	3.7	19,976	83.3	51.6	33.4	5.6	48.4	11.1	0.0
Morristown MSA	37	5,010	1.5	710	85.4	73.0	35.6	3.4	27.0	11.2	0.0
TN Non-MSA	1,243	132,306	50.0	7,113	82.1	88.2	45.5	4.6	11.1	13.3	0.7

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

Small Farm Loans

Assessment Area Distribution of Loans to Farms by Gross Annual Revenues											2020
	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
Assessment Area:	**#**	**$**	**% of Total**	**Overall Market**	**% Businesses**	**% Bank Loans**	**Aggregate**	**% Businesses**	**% Bank Loans**	**% Businesses**	**% Bank Loans**
TN Non-MSA	304	21,936	87.9	670	96.1	99.0	70.7	1.8	1.0	2.2	0.0

Source: 2020 D&B Data; 2020 CRA Data; 2020 CRA Aggregate Data. Due to rounding, totals may not equal 100.0 percent.

APPENDICES

LARGE BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) through its lending activities by considering a bank's home mortgage, small business, small farm, and community development lending. If consumer lending constitutes a substantial majority of a bank's business, the FDIC will evaluate the bank's consumer lending in one or more of the following categories: motor vehicle, credit card, other secured, and other unsecured. The bank's lending performance is evaluated pursuant to the following criteria:

1) The number and amount of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, in the bank's assessment area;
2) The geographic distribution of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on the loan location, including:
    i. The proportion of the bank's lending in the bank's assessment area(s);
    ii. The dispersion of lending in the bank's assessment areas(s); and
    iii. The number and amount of loans in low-, moderate-, middle- and upper-income geographies in the bank's assessment area(s);
3) The distribution, particularly in the bank's assessment area(s), of the bank's home mortgage, small business, small farm, and consumer loans, if applicable, based on borrower characteristics, including the number and amount of:
    i. Home mortgage loans low-, moderate-, middle- and upper-income individuals
    ii. Small business and small farm loans to businesses and farms with gross annual revenues of $1 million or less;
    iii. Small business and small farm loans by loan amount at origination; and
    iv. Consumer loans, if applicable, to low-, moderate-, middle- and upper-income individuals;
4) The bank's community development lending, including the number and amount of community development loans, and their complexity and innovativeness; and
5) The bank's use of innovative or flexible lending practices in a safe and sound manner to address the credit needs of low- and moderate-income individuals or geographies.

Investment Test

The Investment Test evaluates the institution's record of helping to meet the credit needs of its assessment area(s) through qualified investments that benefit its assessment area(s) or a broader statewide or regional area that includes the bank's assessment area(s). Activities considered under the Lending or Service Test may not be considered under the investment test. The bank's investment performance is evaluated pursuant to the following criteria:

1) The dollar amount of qualified investments;
2) The innovativeness or complexity of qualified investments;
3) The responsiveness of qualified investments to available opportunities; and
4) The degree to which qualified investments are not routinely provided by private investors.

Service Test

The Service Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by analyzing both the availability and effectiveness of the bank's systems for delivering retail banking services and the extent and innovativeness of its community development services.

The bank's retail banking services are evaluated pursuant to the following criteria:

1) The current distribution of the bank's branches among low-, moderate-, middle-, and upper-income geographies;
2) In the context of its current distribution of the bank's branches, the bank's record of opening and closing branches, particularly branches located in low- or moderate-income geographies or primarily serving low- or moderate-income individuals;
3) The availability and effectiveness of alternative systems for delivering retail banking services (*e.g.*, RSFs, RSFs not owned or operated by or exclusively for the bank, banking by telephone or computer, loan production offices, and bank-at-work or bank-by-mail programs) in low- and moderate-income geographies and to low- and moderate-income individuals; and
4) The range of services provided in low-, moderate-, middle-, and upper-income geographies and the degree to which the services are tailored to meet the needs of those geographies.

The bank's community development services are evaluated pursuant to the following criteria:

1) The extent to which the bank provides community development services; and
2) The innovativeness and responsiveness of community development services.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Investment Test	Service Test	Rating
Chattanooga Multi-State MSA	Low Satisfactory	High Satisfactory	Low Satisfactory	Satisfactory
Alabama	Low Satisfactory		Low Satisfactory	Satisfactory
Georgia	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Kentucky	Low Satisfactory	Low Satisfactory	Low Satisfactory	Satisfactory
Tennessee	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory

DESCRIPTION OF LIMITED-SCOPE ASSESSMENT AREAS

ALABAMA

Birmingham MSA

The Birmingham MSA AA consists of all of Jefferson County. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area Assessment Area: Birmingham MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	163	19.0	29.4	26.4	24.5	0.6
Population by Geography	659,026	14.4	26.1	27.2	31.6	0.7
Housing Units by Geography	303,755	16.1	28.0	26.1	29.3	0.5
Owner-Occupied Units by Geography	164,894	8.8	23.0	30.7	37.4	0.1
Occupied Rental Units by Geography	96,035	24.2	32.6	20.6	21.4	1.2
Vacant Units by Geography	42,826	26.4	36.7	20.6	15.6	0.7
Businesses by Geography	53,296	10.8	25.5	22.7	39.0	2.0
Farms by Geography	951	6.3	18.6	24.4	49.6	1.1
Family Distribution by Income Level	166,460	26.3	15.9	17.4	40.4	0.0
Household Distribution by Income Level	260,929	28.2	15.9	16.0	39.9	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		$63,259	Median Housing Value			$161,491
			Median Gross Rent			$805
			Families Below Poverty Level			15.0%

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

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 39 institutions operated 191 offices within this AA. Of these institutions, FirstBank ranked 38th with less than zero percent of the deposit market share. The top five financial institutions account for 80.7 percent of the total deposit market share.

TENNESSEE

Jackson MSA

The Jackson MSA AA consists of all of Chester, Crockett, and Madison Counties. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area

Assessment Area: Jackson MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	35	8.6	20.0	42.9	25.7	2.9
Population by Geography	130,108	5.7	18.7	43.3	31.3	1.1
Housing Units by Geography	55,856	6.2	20.3	42.6	29.6	1.3
Owner-Occupied Units by Geography	31,990	2.9	14.1	47.4	35.3	0.2
Occupied Rental Units by Geography	16,303	10.2	29.1	35.4	22.4	2.8
Vacant Units by Geography	7,563	11.6	27.2	37.4	21.1	2.7
Businesses by Geography	9,570	2.6	21.9	40.2	29.6	5.8
Farms by Geography	381	0.5	17.6	49.1	31.2	1.6
Family Distribution by Income Level	32,623	22.1	17.8	18.7	41.4	0.0
Household Distribution by Income Level	48,293	24.9	15.7	16.5	43.0	0.0
Median Family Income MSA - 27180 Jackson, TN MSA		$51,510	Median Housing Value			$113,822
			Median Gross Rent			$743
			Families Below Poverty Level			14.8%

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

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 17 institutions operated 50 offices within this AA. Of these institutions, FirstBank ranked 2nd with 17.1 percent deposit market share. The top 5 financial institutions account for 72.0 percent of the total deposit market share.

Memphis MSA

The Memphis MSA AA consists of all of Fayette and Shelby Counties. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area Assessment Area: Memphis MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	232	28.0	20.7	17.2	31.5	2.6
Population by Geography	976,564	21.2	21.0	17.4	39.7	0.6
Housing Units by Geography	417,807	23.7	20.7	17.4	37.9	0.3
Owner-Occupied Units by Geography	210,883	13.1	17.6	19.2	50.0	0.2
Occupied Rental Units by Geography	151,187	32.0	24.0	16.0	27.7	0.3
Vacant Units by Geography	55,737	41.0	23.6	14.3	20.0	1.1
Businesses by Geography	85,399	14.2	16.5	17.9	50.4	1.0

Farms by Geography	1,754	8.6	12.3	23.4	54.8	0.9
Family Distribution by Income Level	231,420	26.0	15.2	16.3	42.5	0.0
Household Distribution by Income Level	362,070	26.8	15.5	15.9	41.8	0.0
Median Family Income MSA - 32820 Memphis, TN-MS-AR MSA		$58,214	Median Housing Value			$136,512
			Median Gross Rent			$865
			Families Below Poverty Level			16.3%

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

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 34 institutions operated 236 offices within this AA. Of these institutions, FirstBank ranked 22nd with 1.0 percent deposit market share. The top five financial institutions account for 71.1 percent of the total deposit market share.

Morristown MSA

The Morristown MSA AA consists of all of Jefferson County. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area						
Assessment Area: Morristown MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	9	0.0	0.0	66.7	33.3	0.0
Population by Geography	52,490	0.0	0.0	69.6	30.4	0.0
Housing Units by Geography	23,592	0.0	0.0	70.7	29.3	0.0
Owner-Occupied Units by Geography	14,439	0.0	0.0	66.3	33.7	0.0
Occupied Rental Units by Geography	5,240	0.0	0.0	78.9	21.1	0.0
Vacant Units by Geography	3,913	0.0	0.0	76.1	23.9	0.0
Businesses by Geography	2,916	0.0	0.0	68.0	32.0	0.0
Farms by Geography	129	0.0	0.0	58.9	41.1	0.0
Family Distribution by Income Level	14,068	18.0	18.2	21.1	42.7	0.0
Household Distribution by Income Level	19,679	22.0	14.6	17.9	45.6	0.0
Median Family Income MSA - 34100 Morristown, TN MSA		$48,094	Median Housing Value			$132,645
			Median Gross Rent			$643
			Families Below Poverty Level			11.6%

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

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, nine institutions operated 15 offices within this AA. Of these institutions, FirstBank ranked 1st with 25.1 percent deposit market share. The top five financial institutions account for 82.9 percent of the total deposit market share.

Tennessee Non-MSA

The Tennessee Non-MSA AA consists of all of Bedford, Benton, Carroll, Coffee, Cumberland, Decatur, DeKalb, Franklin, Henderson, Henry, Humphreys, Lincoln, Moore, Perry, Putnam and Rhea Counties. Demographic data for this AA is included in the following table.

Demographic Information of the Assessment Area **Assessment Area: Tennessee Non-MSA**						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	119	0.0	10.9	68.9	18.5	1.7
Population by Geography	505,856	0.0	13.2	68.1	18.7	0.0
Housing Units by Geography	236,505	0.0	12.6	69.4	18.0	0.0
Owner-Occupied Units by Geography	143,947	0.0	8.3	71.3	20.4	0.0
Occupied Rental Units by Geography	57,269	0.0	24.4	62.0	13.7	0.0
Vacant Units by Geography	35,289	0.0	11.1	73.9	15.0	0.0
Businesses by Geography	31,715	0.0	17.6	62.5	19.9	0.1
Farms by Geography	1,641	0.0	6.3	73.6	20.0	0.0
Family Distribution by Income Level	136,480	19.5	17.6	20.3	42.6	0.0
Household Distribution by Income Level	201,216	22.7	15.6	17.9	43.8	0.0
Median Family Income Non-MSAs - TN		$46,066	Median Housing Value			$114,989
			Median Gross Rent			$619
			Families Below Poverty Level			14.5%

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

The AA is competitive in the financial services market. According to the FDIC Deposit Market Share data as of June 30, 2021, 51 institutions operated 184 offices within this AA. Of these institutions, FirstBank ranked 1st with 15.6 percent deposit market share. The top five financial institutions account for 41.8 percent of the total deposit market share.

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

(1) Support affordable housing for low- and moderate-income individuals;
(2) Target community services toward low- and moderate-income individuals;
(3) Promote economic development by financing small businesses or farms; or
(4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

(1) Has as its primary purpose community development; and
(2) Except in the case of a wholesale or limited purpose bank:
  (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

(1) Has as its primary purpose community development;
(2) Is related to the provision of <u>financial</u> services; and
(3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

(1) An unemployment rate of at least 1.5 times the national average;
(2) A poverty rate of 20 percent or more; or
(3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (for example, geographic distribution, borrower profile, and total number and dollar amount of investments), and qualitative factors (for example, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (for example, geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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 metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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.

Micropolitan Statistical Area: CBSA associated with at least one urbanized area having a population of at least 10,000, but less than 50,000.

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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

PUBLIC DISCLOSURE

November 18, 2021

COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

Southern States Bank
Certificate Number: 58558

615 Quintard Ave
Anniston, Alabama 36202

Federal Deposit Insurance Corporation
Division of Depositor and Consumer Protection
Atlanta Regional Office

10 10th Street NE, Suite 800
Atlanta, Georgia 30309-3849

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, nor should it 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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INSTITUTION RATING

INSTITUTION'S CRA RATING: This institution is rated **Satisfactory**.

An institution in this group has a satisfactory record of helping to meet the credit needs of its assessment area, including low- and moderate-income neighborhoods, in a manner consistent with its resources and capabilities.

The Lending Test is rated Satisfactory.

- The loan-to-deposit ratio is reasonable given the bank's size, financial condition, and credit needs of the assessment areas.
- A majority of the bank's loans are originated in the assessment areas.
- The geographic distribution of loans reviewed reflects a reasonable dispersion throughout the assessment areas.
- The distribution of borrowers reflects a reasonable penetration among individuals of different income levels and businesses of different sizes.
- The bank did not receive any Community Reinvestment Act (CRA) related complaints since the previous evaluation; therefore, this factor did not affect the Lending Test rating.

The Community Development Test is rated Satisfactory.

- The institution's community development performance demonstrates adequate responsiveness to community development needs in its assessment areas through community development loans, qualified investments, and community development services, as appropriate, considering the institution's capacity and the need and availability of such opportunities for community development in the institution's assessment areas.

DESCRIPTION OF INSTITUTION

Southern States Bank (SSB) is a state-chartered commercial bank headquartered in Anniston, Alabama, and operates primarily in northern Alabama, central Alabama, and west Georgia. SSB is wholly owned by Southern States Bancshares, Inc., a one-bank holding company, also located in Anniston, Alabama. SSB does not operate with any affiliates other than the holding company.

An overall CRA rating of "Satisfactory" was assigned at the previous FDIC CRA Performance Evaluation, dated November 5, 2018. SSB's CRA performance was evaluated using Interagency Intermediate Small Bank (ISB) examination procedures. The Lending and Community Development Tests were rated "Satisfactory".

SSB's primary lending focus continues to be commercial lending, followed by construction loans and loans secured by real estate. The bank offers personal lending such as auto loans, boat and RV loans, home equity lines of credit, and credit cards. Personal checking products include a rewards checking account, a basic checking account, an age-based checking account, and an interest-earning checking account. Personal savings accounts include a basic savings, money market demand account, and certificates of deposit. Businesses have the opportunity to have either a small business

checking account or a commercial checking account. Business lending includes mortgages, equipment loans, investor real estate loans, working capital lines of credit, and a business credit card. SSB is also a Small Business Administration (SBA) preferred lender. Businesses also have the ability to obtain a business savings account or money market account. SSB also gives businesses the opportunity to use direct deposit and ACH payroll services.

Online banking and mobile banking are available to all consumers and businesses. These services provide account summaries, account activity, transfer of funds, and loan payments. Telephone banking is also available.

SSB operates 15 full-service branches across Alabama and Georgia, including the main office in Anniston, Alabama and a loan production office (LPO) in Atlanta, Georgia. Since the prior CRA evaluation, SSB acquired Small Town Bank, Wedowee, Alabama, on September 13, 2019. As a result of this acquisition, the bank has acquired 5 of its current 15 branches. These branches are located in Dallas, Georgia, and Heflin, Ranburne, Roanoke, and Wedowee, Alabama. Since the previous evaluation, the LPO in Bremen, Georgia closed; no other bank branches have opened or closed.

Based on the Consolidated Reports of Condition and Income (Call Report), as of September 30, 2021, the bank reported total assets of $1.6 billion. The bank's total loans were $1.1 billion and total deposits were $1.3 billion. Refer to the table below for additional loan portfolio details.

Loan Portfolio Distribution as of 09/30/2021		
Loan Category	**$(000s)**	**%**
Construction, Land Development, and Other Land Loans	165,637	14.4
Secured by Farmland	14,273	1.2
Secured by 1-4 Family Residential Properties	116,228	10.1
Secured by Multifamily (5 or more) Residential Properties	23,431	2.1
Secured by Nonfarm Nonresidential Properties	623,879	54.4
Total Real Estate Loans	**943,448**	**82.2**
Commercial and Industrial Loans	192,921	16.8
Agricultural Production and Other Loans to Farmers	2,052	0.2
Consumer Loans	8,987	0.8
Obligations of State and Political Subdivisions in the U.S.	4,341	0.4
Other Loans	0.0	0.0
Lease Financing Receivable (net of unearned income)	0.0	0.0
Less: Unearned Income	4,205	0.4
Total Loans	**1,147,544**	**100.0**
Source: 09/30/2021 Call Report of Condition and Income		

The bank provides for the credit needs of its communities in a manner consistent with its size, financial condition, resources, and local economic conditions. While examiners did not identify any financial or legal impediments that affect the bank's ability to meet the assessment area's credit needs, several economic and demographic indicators could affect the bank's lending opportunities.

DESCRIPTION OF ASSESSMENT AREAS

For the purposes of this evaluation, the bank operates with seven designated assessment areas: five in Alabama and two in Georgia. The assessment areas have changed since the previous evaluation due to the bank's merger. No new assessment areas have been designated, but the bank entered into Paulding County, Georgia; and Coweta, Cleburne, and Randolph Counties in Alabama. The bank's assessment areas consist of counties and Metropolitan Statistical Areas (MSA) located in Alabama and Georgia. Each state will be rated separately; therefore, there will be two rated areas.

The first assessment area is comprised of Calhoun County, Alabama, which is the Anniston Assessment Area. The second assessment area is comprised of Lee County, Alabama, which is the Auburn Assessment Area. The third assessment area is comprised of Madison County, Alabama, which is the Huntsville Assessment Area. The fourth assessment area is comprised of Muscogee County, Georgia, which is the Columbus Assessment Area. The fifth assessment area is comprised of Carroll, Coweta, and Paulding Counties in Georgia, which is the Atlanta Assessment Area. The sixth assessment area is comprised of Jefferson and Shelby County, Alabama, which is the Birmingham Assessment Area. The seventh assessment area is comprised of Talladega, Cleburne, and Randolph Counties in Alabama, which is the AL Non-MSA Assessment Area. Refer to the table below for an overview of each assessment area.

Description of Assessment Areas			
Assessment Area	**Counties in Assessment Area**	**# of Census Tracts**	**# of Branches**
ALABAMA			
Anniston	Calhoun County	31	1
Auburn	Lee County	27	2
Birmingham	Jefferson and Shelby Counties	211	1
AL Non-MSA	Talladega, Randolph, and Cleburne Counties	32	5
Huntsville	Madison County	73	1
GEORGIA			
Atlanta	Carroll, Coweta, and Paulding Counties	56	3
Columbus	Muscogee County	53	2
Source: Bank Data			

SCOPE OF EVALUATION

General Information

Examiners used the ISB Examination Procedures to evaluate SSB's CRA performance. The evaluation period is from the last evaluation dated, November 5, 2018 to the current evaluation dated November 15, 2021. These procedures consist of two tests: the Lending Test and Community Development Test. Banks must achieve at least a Satisfactory rating under each test to obtain an overall Satisfactory rating. Refer to Appendix A for additional details regarding each test.

The bank's Auburn, Columbus, and Anniston Assessment Areas account for most of the loan and deposit activity combined; therefore, they will be reviewed using full-scope procedure. In addition, the Atlanta and AL Non MSA Assessment Areas were reviewed using full-scope procedures because the bank has a high level of deposits, largest number of branches, and has a high percentage of its small business loans in these assessment areas. The Huntsville and Birmingham Assessment Areas will be reviewed using limited-scope procedures. The Auburn and Columbus Assessment Areas will receive more weight given the level of lending, deposits, and branches.

Assessment Area Breakdown of Loans, Deposits, and Branches						
Assessment Area	**Loans**		**Deposits**		**Branches**	
	$(000s)	**%**	**$(000s)**	**%**	**#**	**%**
Anniston	13,399	11.3	220,768	16.8	1	6.7
Atlanta	9,394	7.9	236,339	18.0	4	26.7
Auburn	19,225	16.2	248,191	18.9	2	13.3
Birmingham	10,272	8.6	63,631	4.8	1	6.7
Huntsville	26,977	22.7	63,916	4.9	1	6.7
AL Non-MSA	9,433	7.9	246,640	18.8	4	26.7
Columbus	30,336	25.5	233,397	17.8	2	13.3
Total	**119,036**	**100.0**	**1,312,882**	**100.0**	**15**	**100.0**
Source: Bank Data; FDIC Summary of Deposits (6/30/2020); HMDA Loan 01/01/2018 – 12/31/2020. Due to rounding, totals may not equal 100.0%						

Activities Reviewed

For the Lending Test, the CRA requires a review of the lending performance of a bank in its defined assessment area(s) with respect to home mortgage, small business, and small farm loans, if significant. Based on the September 30, 2021 Call Report, examiners determined that SSB's major loan products are commercial and home mortgage loans. This conclusion considered the bank's business strategy and the number and dollar amount of loans originated during the 2020 evaluation period. Since the bank's lending focus is not agricultural-related, and these products represent a minimal portion of the bank's loan portfolio, small farm lending will not be reviewed.

The bank is subject to the Home Mortgage Disclosure Act (HMDA) reporting requirements. Therefore, this evaluation includes a review of all reportable loans originated in 2018, 2019, and 2020. The bank's 2018 HMDA loans were not included at the previous evaluation; therefore, 2018 HMDA data will be included in this evaluation.

A sample of the universe of small business loans originated in 2020 was reviewed. Refer to the following table for additional details regarding the loan products reviewed.

Loan Products Reviewed				
Loan Category	Universe		Reviewed	
	#	$(000s)	#	$(000s)
Home Mortgage	334	117,189	334	117,189
Small Business	825	379,315	363	63,043
Source: Bank Data				

While the number and dollar volume of loans are presented, examiners emphasized performance by number of loans, because the number of loans is a better indicator of the number of businesses, farms, and individuals served. Home mortgage loans and small business loans account for the majority of the bank's lending activities; therefore, equal weight was given to each loan category. The 2015 American Community Survey (ACS) data provided a standard of comparison for the bank's home mortgage loans, and 2020 Dun & Bradstreet, Inc. (D&B), data provided a standard of comparison for small business loans. Lastly, examiners identified an increased lending trend, by number, when comparing 2018 to 2020 HMDA data; therefore, HMDA lending performance for all three years (2018 – 2020) will be presented. As previously noted, lending data for small business loans is presented for the most recent full calendar year, 2020.

CONCLUSIONS ON PERFORMANCE CRITERIA

LENDING TEST

Overall, SSB demonstrated satisfactory performance under the Lending Test. This conclusion is based on the bank's reasonable performance regarding the loan-to-deposit ratio and reasonable performance regarding assessment area concentration, geographic distribution, and borrower profile. The bank's overall performance is consistent with the conclusions for each rated area.

Loan-to-Deposit Ratio

SSB's average Net-Loan-to-Deposit Ratio (NLTD) was 86.5 percent over the previous 12 quarters, from December 31, 2018 through September 30, 2021. The NLTD is reasonable considering the institution's size, financial condition, and needs of the assessment areas. This NLTD ratio was calculated from Call Report data. The ratio varied from a high of 89.8 percent on December 31, 2020 and a low of 82.3 percent on June 30, 2019.

The bank's average NLTD is compared to similarly-situated institutions that operate in similar areas with comparable asset size and loan portfolio composition. There were no similarly-situated institutions identified that would be comparable to SSB. One potentially similar bank's product offering was contrasting to SSB's and another had a very different number of branches and locations than SSB. Therefore, SSB's average NLTD was compared to the UBPR peer group. During the same 12-quarter period, the bank's average NLTD of 86.5 percent was slightly higher than that of the bank's peer group average of 81.7 percent.

Assessment Area Concentration

The bank originated a majority of home mortgage and small business loans, by number and dollar, inside the bank's combined assessment area. SSB originated approximately 77 percent of home mortgage loans and nearly 70.0 percent of small business loans inside the bank's combined assessment area during 2020. The following table provides further details about the combined assessment area's lending concentration.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total	Dollar Amount of Loans $(000s)				Total
	Inside		Outside			Inside		Outside		
	#	%	#	%	#	$	%	$	%	$(000s)
Home Mortgage										
2018	75	82.4	16	17.6	91	12,615	70.1	5,370	29.9	17,985
2019	64	72.7	24	27.3	88	12,530	59.5	8,520	40.5	21,050
2020	118	76.1	37	23.9	155	54,269	69.4	23,885	30.6	78,154
Subtotal	**257**	**76.9**	77	**23.1**	**334**	**79,414**	**67.8**	**37,775**	**32.2**	**117,189**
Small Business										
2020	249	68.6	114	31.4	363	39,641	62.9	23,402	37.1	63,043
Subtotal	**249**	**68.6**	**114**	**31.4**	**363**	**39,641**	**62.9**	**23,402**	**37.1**	**63,043**
Source: Bank Data. Due to rounding, totals may not equal 100.0%										

Geographic Distribution

Overall, the geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the combined assessment area. Overall conclusions are consistent with the conclusions of each rated area. Only the loans originated inside the assessment areas are included in the conclusion.

Borrower Profile

Overall, the distribution of borrowers reflects reasonable penetration among borrowers of different income levels and businesses of different sizes. Overall conclusions are consistent with the conclusions of each rated area. Only the loans originated inside the assessment areas are included in the conclusion.

Response to Complaints

The institution has not received any CRA-related complaints since the previous evaluation; therefore, this criterion did not affect the Lending Test rating.

COMMUNITY DEVELOPMENT TEST

SSB's Community Development Test is rated Satisfactory. Overall, the bank has demonstrated adequate responsiveness to the community development needs of the institution-wide assessment area through community development loans, qualified investments, and community development services. Examiners considered the bank's capacity and the need and availability of such opportunities for community development in arriving at this conclusion. A majority of the bank's community development loans, qualified investments, and services were in the Auburn Assessment Area. In addition, the overall level of community development activities increased institution-wide since the last evaluation.

Community Development Loans

During the evaluation period, the bank originated, renewed, or refinanced 52 community development loans totaling $86.5 million. The number and dollar volume of SSB's community development loans increased since the previous evaluation. The dollar amount of the community development loans equates to 9.2 percent of average total loans and 6.9 percent of average total assets. SSB met the needs of its assessment areas through the noted community development loans. Therefore, the bank received consideration for seven loans totaling $6.1 million originated statewide in Alabama, which includes the bank's assessment areas.

By number of community development loans, 44.2 percent supported affordable housing, 28.8 percent supported economic development, 17.4 percent supported community services, and 9.6 percent supported the revitalization and stabilization of low- and moderate-income areas or distressed or underserved nonmetropolitan middle-income geographies. In addition, 28.3 percent were originated in the Columbus Assessment Area, 20.8 percent were originated in the Auburn Assessment Area, 15.1 percent were originated in the Atlanta Assessment Area, 7.5 percent were originated in the Birmingham Assessment Area, 5.7 percent were originated in the Anniston Assessment Area, 5.7 percent were originated in the AL Non-MSA, and 3.8 percent were originated in the Huntsville Assessment Area.

Community Development Lending by Assessment Area

Rated Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Alabama *	11	12,092	4	23,080	11	14,718	3	14,912	29	64,802
Georgia	12	4,571	5	8,642	4	4,281	2	4,230	23	21,724
Total	**23**	**16,663**	**9**	**31,722**	**15**	**18,999**	**5**	**19,142**	**52**	**86,526**

*Source: Bank Data. *Includes Statewide loans*

The following table reflects the bank's community development lending activity by year and purpose. Refer to the *Community Development Loans* section within each assessment area for further details on the bank's community development lending activities.

Community Development Lending										
Activity Year	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Total	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
2019	8	6,824	2	390	3	11,472	1	2,000	**14**	**20,685**
2020	11	4,829	3	23,060	6	335	3	6,334	**23**	**34,558**
YTD 2021	4	5,010	4	8,272	6	7,192	1	10,808	**15**	**31,282**
Total	**23**	**16,663**	**9**	**31,722**	**15**	**18,999**	**5**	**19,142**	**52**	**86,526**
Source: Bank Records. Due to rounding, totals in this table may not equal the sum of the assessment area tables.										

Below are notable examples of the bank's community development loans:

- In 2021, the bank originated a loan totaling $10.8 million to improve an office building located in a moderate-income census tract, in an effort to revitalize the area.
- In 2021, the bank originated a loan totaling $7.5 million to purchase a grocery store located in a moderate-income census tract, which retained jobs for low- and moderate-income individuals.
- In 2020, the bank originated a loan totaling $2.1 million to purchase retail space located in an opportunity zone as a part of local government's revitalization plan.
- In 2019, the bank originated a loan totaling $3.8 million to fund a project for affordable housing as a part of a USDA Rural Development- Tax Credit Project.
- In 2019, a loan totaling $8.5 million was originated to construct a new hotel in a moderate-income census tract, which created jobs for low- and moderate-income individuals.
- In 2019, a loan totaling approximately $2.5 million was originated through the SBA's Certified Development Company/504 Loan Program. This program is specifically designed to promote economic development through job creation and retention. The loan was used to fund a local development council promoting economic development.

The bank also offers loans through the Alabama Multifamily Loan Consortium (AMLC). Since the prior evaluation, the bank originated six loans totaling $6 million in the state of Alabama. These loans provide affordable housing to low- and moderate-income individuals.

Qualified Investments

During the evaluation period, the bank made 47 qualified investments and donations totaling $12.8 million, of which 46 investments and donations totaling $8.8 million where located within the bank's assessment areas. The investments during this period included mortgage backed securities, refund warrants, and general obligation bonds. The investments and donations were made to organizations that support community development activities throughout the assessment areas. The dollar amount of the qualified investments equates to 1.0 percent of average total assets and 15.1 percent of average total securities. This represents a significant increase in qualified investments since the last evaluation.

SSB met the needs of its assessment areas through community development activities. Therefore, the bank received consideration for an additional investment totaling $4 million for a mortgage-backed security outside of its assessment area.

By dollar volume, 51.1 percent of the qualified investments supported community services for low- and moderate-income individuals, 48.8 percent supported affordable housing, and 0.1 percent supported the revitalization and stabilization of low- and moderate-income geographies or distressed or underserved nonmetropolitan middle-income geographies.

By dollar volume, 20.7 percent of the investments were made to organizations serving the Birmingham Assessment Area, 12.4 percent were made to organizations serving the Atlanta Assessment Area, 11.8 percent were made to organizations serving the Auburn Assessment Area, 11.8 percent were made to organizations serving the Anniston Assessment Area, 7.9 percent were made to organizations serving the AL Non-MSA Assessment Area, and 4.1 percent were made to organizations serving the Huntsville Assessment Area.

The following table illustrates the qualified investment totals by activity purpose during the evaluation period. Refer to the *Qualified Investments* section within each assessment area for further details on the bank's qualified investment activities.

Qualified Investments by State and Purpose										
State	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Alabama	2	881	12	6,285	0	0	0	0	14	7,166
Georgia	1	230	2	1,355	0	0	0	0	3	1,585
Subtotal	**3**	**1,111**	**14**	**7,640**	**0**	**0**	**0**	**0**	**17**	**8,751**
Donations/Grants	1	1	27	44	0	0	1	15	29	60
Subtotal	**4**	**1,112**	**41**	**7,684**	**0**	**0**	**1**	**15**	**46**	**8,811**
Statewide (Alabama)	**1**	**4,000**	**0**	**0**	**0**	**0**	**0**	**0**	**1**	**4,000**
Total	**5**	**5,112**	**41**	**7,684**	**0**	**0**	**0**	**0**	**47**	**12,811**
Source: Bank Records										

Qualified Investments										
Activity Year	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
2019	3	1,111	4	2,005	0	0	0	0	7	3,116
2020	0	0	6	3,100	0	0	0	0	6	3,100
YTD 2021	0	0	4	2,535	0	0	0	0	4	2,535
Subtotal	**3**	**1,111**	**14**	**7,640**	**0**	**0**	**0**	**0**	**17**	**8,751**
Donations/Grants	1	1	27	44	0	0	1	15	29	60
Subtotal	**4**	**1,112**	**41**	**7,684**	**0**	**0**	**1**	**15**	**46**	**8,811**
Statewide (Alabama)	**1**	**4,000**	**0**	**0**	**0**	**0**	**0**	**0**	**1**	**4,000**
Total	**5**	**5,112**	**41**	**7,684**	**0**	**0**	**0**	**0**	**47**	**12,811**
Source: Bank Data. Due to rounding, totals in this table may not equal the sum of the assessment area tables.										

Below are notable examples of the bank's qualified investments:

- In 2019, SSB participated in the Freddie Mac loan pool for a total of $3.3 million. The loan pool was designated to assist low-income borrowers with home purchases.
- In 2019, SSB purchased a bond totaling $500,000 from a local government. The utility bond was issued to finance improvements to the lines for electrical services in rural low- and moderate-income areas.

The bank also participated in a regional investment in 2021. The investment was through the American Home Opportunity Fund, an investment fund target to unbanked borrowers to aid in homeownership. The total investment since the prior evaluation total $4 million. These loans provide affordable housing to low- and moderate-income individuals.

Community Development Services

SSB employees provided 70 qualified community development services during this evaluation period. By purpose, 98.6 percent of the services supported community service organizations, and 1.4 percent supported economic development organizations. The bank's performance reflects an increase in the number of qualified community development services since the last evaluation. The number of community development services increased from 62 to 70 since the pervious evaluation. The following tables illustrate the bank's community development services by purpose and rated area.

Community Development Services by State and Purpose					
State	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
Alabama	0	54	1	0	55
Georgia	0	15	0	0	15
Total	**0**	**69**	**1**	**0**	**70**
Source: Bank Records					

The bank provided 45.6 percent of its financial expertise or technical assistance to organizations in the AL Non-MSA Assessment Area, 18.6 percent to organizations in the Anniston Assessment Area, 18.6 percent to organizations in the Atlanta Assessment Area, 7.1 percent to organizations in the Auburn Assessment Area, 4.29 percent to organizations in the Huntsville Assessment Area, 2.86 percent to organizations in the Birmingham Assessment Area, and 2.86 percent to organizations in the Columbus Assessment Area.

The following tables illustrate the bank's community development services activity by year and type. Refer to the *Community Development Services* section within each assessment area for further details on the bank's community development services activities.

Community Development Services for All Assessment Areas by Activity Year					
Activity Year	**Affordable Housing**	**Community Services**	**Economic Development**	**Revitalize or Stabilize**	**Totals**
	#	#	#	#	#
2019	0	35	0	0	**35**
2020	0	28	0	0	**28**
YTD 2021	0	6	1	0	7
Totals	**0**	**69**	**1**	**0**	**70**
Source: Bank Records. Due to rounding, totals in this table may not equal the sum of the assessment area tables.					

DISCRIMINATORY OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

Examiners did not identify any evidence of discriminatory or other illegal credit practices. Therefore, this consideration did not affect the intuition's overall CRA rating.

ALABAMA

CRA RATING FOR (RATED AREA #1): SATISFACTORY

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN ALABAMA

SSB operates ten full-service branches (66.7 percent of its branches) in five assessment areas within Alabama. There are four branches located in moderate-income census tracts within the assessment areas. The first assessment area is comprised of Calhoun County, Alabama and is referred to as the Anniston Assessment Area. The second assessment area is comprised of Talladega, Randolph, and Cleburne Counties in Alabama and is referred to as the AL Non-MSA Assessment Area. The third assessment area is comprised of Lee County, Alabama and is referred to as the Auburn Assessment Area. The fourth assessment area is comprised of Madison County, Alabama and is referred to as the Huntsville Assessment Area. The fifth assessment area is comprised of Jefferson and Shelby Counties in Alabama and is referred to as the Birmingham Assessment Area.

SCOPE OF EVALUATION – ALABAMA

The evaluation of SSB's performance in Alabama was based on a review of the bank's home mortgage and small business lending in its Alabama assessment areas.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ALABAMA

LENDING TEST

The Lending Test is rated Satisfactory for the State of Alabama. This rating is supported by an overall reasonable geographic distribution of loans and borrower profile performance. This performance is consistent with the bank's performance throughout its assessment areas within Alabama.

Geographic Distribution
The geographic distribution reflects reasonable dispersion throughout four of its five assessment areas in Alabama. This conclusion is consistent with the bank's performance in the assessment areas in this state.

Borrower Profile
Given the demographics of the five assessment areas in Alabama, the distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. This conclusion is consistent with the bank's performance in the assessment areas in this state.

COMMUNITY DEVELOPMENT TEST

SSB's community development performance in the State of Alabama demonstrate adequate responsiveness to the community development needs of its Alabama assessment areas. The bank met these needs through community development loans, qualified investments, and community development services. Refer to the overall *Community Development Test* section for additional details.

Community Development Loans

Since the previous evaluation, SSB originated 29 community development loans totaling $64.8 million within the assessment areas in the State of Alabama. Refer to the *Community Development Loans* section of the overall *Community Development Test* for additional details.

Community Development Lending by Assessment Area										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Anniston	2	448	0	0	1	405	0	0	**3**	**853**
Auburn	1	210	2	22,970	7	4,911	1	2,000	**11**	**30,091**
Birmingham	1	1,580	0	0	2	8,999	1	2,104	**4**	**12,683**
Huntsville	0	0	0	0	1	403	1	10,808	**2**	**11,211**
AL Non-MSA	1	3,800	1	50	0	0	0	0	**2**	**3,850**
Statewide*	6	6,054	1	60	0	0	0	0	**7**	**6,114**
Total	**11**	**12,092**	**4**	**23,080**	**11**	**14,718**	**3**	**14,912**	**29**	**64,802**

Source: Bank Data
**Indicates affordable housing loan participations through Alabama Multifamily Loan Consortium (AMLC) and other community development activities in the State of Alabama.*

Qualified Investments

The majority of the bank's investments were in the State of Alabama. Of the 47 qualified community development investments and donations, 37 totaling $7.2 million were in the State of Alabama. Refer to the *Community Development Investment* section of the overall *Community Development Test* for additional details.

Qualified Investments by Assessment Area										
Assessment Area	Affordable Housing		Community Services		Economic Development		Revitalize or Stabilize		Totals	
	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)	#	$(000s)
Anniston	0	0	3	1,500	0	0	0	0	**3**	**1,500**
Auburn	0	0	3	1,500	0	0	0	0	**3**	**1,500**
Birmingham	1	364	4	2,280	0	0	0	0	**5**	**2,644**
Huntsville	1	517	0	0	0	0	0	0	**1**	**517**
AL Non-MSA	0	0	2	1,005	0	0	0	0	**2**	**1,005**
Subtotal	**2**	**881**	**12**	**6285**	**0**	**0**	**0**	**0**	**14**	**7,166**
Qualified Grants & Donations	1	1	21	35	0	0	1	15	**23**	**51**
Total	**3**	**882**	**33**	**6320**	**0**	**0**	**1**	**15**	**37**	**7217**
Source: Bank Data										

Community Development Services

Of the 70 community development services, 55 were in the State of Alabama.

Community Development Services by Assessment Area					
Assessment Area	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Anniston	0	13	0	0	**13**
Auburn	0	5	0	0	**5**
Birmingham	0	2	0	0	**2**
Huntsville	0	3	0	0	**3**
AL Non-MSA	0	31	1	0	**32**
Total	**0**	**54**	**1**	**0**	**55**
Source: Bank Data					

AUBURN ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE AUBURN ASSESSMENT AREA

SSB's Auburn Assessment Area consists of all 27 census tracts in Lee County. Of these census tracts, 1 is low-income, 6 are moderate-income census tracts, 16 are middle-income census tracts, 3 are upper-income census tracts, and 1 was not available. Since the previous evaluation, no changes have occurred within this assessment area.

The bank operates two full-service branches (13.3 percent of its offices) within this assessment area. Both branches are located in moderate-income census tracts. The bank originated 16.2 percent of its home mortgage and small business loans in this assessment area during 2020.

According to 2020 D&B data, service industries represent the largest portion of businesses at 37.4 percent, followed by non-classifiable establishments and retail trade at 18.8 percent and 14.2 percent, respectively. Of the 8,797 businesses that operate within the assessment area, 83.2 percent reported GARs of $1 million of less, 4.5 percent reported GARs over $1 million, and 12.3 percent did not report GAR information. Refer to the following table for demographical information of the assessment area.

Demographic Information of the Assessment Area Assessment Area: Auburn						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	27	3.7	22.2	59.3	11.1	3.7
Population by Geography	150,982	2.4	21.4	62.7	11.3	2.2
Housing Units by Geography	64,964	2.5	20.3	62.4	11.0	3.7
Owner-Occupied Units by Geography	33,753	1.8	12.5	70.9	14.3	0.5
Occupied Rental Units by Geography	23,418	3.1	30.6	52.6	7.2	6.5
Vacant Units by Geography	7,793	3.8	23.0	55.1	8.6	9.5
Businesses by Geography	8,539	1.5	32.9	53.1	11.3	1.1
Farms by Geography	258	1.2	20.5	65.5	12.8	0.0
Family Distribution by Income Level	35,939	24.8	15.2	18.6	41.4	0.0
Household Distribution by Income Level	57,171	28.5	13.4	15.3	42.8	0.0
Median Family Income MSA - 12220 Auburn-Opelika, AL MSA		$61,141	Median Housing Value			$156,485
			Median Gross Rent			$788
			Families Below Poverty Level			14.3%

Source: 2015 ACS and 2020 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.

Economic and Demographic Data

Based on the 2015 ACS data, the 27 census tracts income designations are as follows: 1 is a low-income census tract, 6 are moderate-income census tracts, 16 are middle-income census tracts, and 3 are upper-income census tracts and 1 was not available.

Based on 2020 D&B data, service industries represent the largest portion of businesses at 37.4 percent, followed by non-classifiable establishments and retail trade at 18.8 percent and 14.2 percent, respectively. There are 8,539 businesses in the Auburn Assessment Area. Of these businesses, 83.3 percent reported GARs of $1 million or less, 4.4 percent reported GARs of over $1 million and 13.3 percent did not report GAR information.

According to Opelika Economic Development information, the top employers in the assessment area are Auburn University, Lee County School Systems, and the East Alabama Medical Center. The following table provides select demographic information for the assessment area.

Demographic Information of the Assessment Area Assessment Area: Auburn						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	27	3.7	22.2	59.3	11.1	3.7
Population by Geography	150,982	2.4	21.4	62.7	11.3	2.2
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Owner-Occupied Units by Geography	33,753	1.8	12.5	70.9	14.3	0.5
Occupied Rental Units by Geography	23,418	3.1	30.6	52.6	7.2	6.5
Vacant Units by Geography	7,793	3.8	23.0	55.1	8.6	9.5
Businesses by Geography	8,539	1.5	32.9	53.1	11.3	1.1
Farms by Geography	258	1.2	20.5	65.5	12.8	0.0
Family Distribution by Income Level	35,939	24.8	15.2	18.6	41.4	0.0
Household Distribution by Income Level	57,171	28.5	13.4	15.3	42.8	0.0
Median Family Income MSA - 12220 Auburn-Opelika, AL MSA		$61,141	Median Housing Value			$156,485
			Median Gross Rent			$788
			Families Below Poverty Level			14.3%

Source: 2015 ACS and 2020 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.

Unemployment data indicates that in 2018 and 2019 the county's average unemployment rate was slightly lower than state and national averages. In 2020, data indicates the county unemployment rate was lower than the state of Alabama and significantly lower than the nation averages. Refer to the following table for additional details.

Unemployment Rates			
Area	**2018**	**2019**	**2020**
	%	%	%
Auburn, AL MSA	3.6	2.8	5.2
Alabama*	3.9	3.0	5.9
U.S.	3.9	3.7	8.1
*Source: Bureau of Labor Statistics and Moody's Analytics *Not Seasonally Adjusted*			

The Federal Financial Institutions Examination Council (FFIEC) estimated MFI levels were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and

upper-income ranges and categories are presented in the following table for the Auburn Assessment Area.

Table B – Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Auburn-Opelika, AL MSA Median Family Income (12220)				
2018 ($66,900)	<$33,450	$33,450 to <$53,520	$53,520 to <$80,280	≥$80,280
2019 ($71,100)	<$35,550	$35,550 to <$56,880	$56,880 to <$85,320	≥$85,320
2020 ($76,500)	<$38,250	$38,250 to <$61,200	$61,200 to <$91,800	≥$91,800
Source: FFIEC				

Competition

According to the FDIC Deposit Market Share data, as of June 30, 2020, 19 FDIC-insured financial institutions operated 42 offices within this assessment area. Of these institutions, SSB ranked 5th with a 5.8 percent deposit market share.

In relation to home mortgage lending, there is a high level of competition within this assessment area. In 2020, 310 lenders originated and purchased 8,920 home mortgage loans. SSB ranked 5th in the assessment area, with 3.95 percent of the market share. CMG Mortgage, Inc., Renasant Bank, Quicken Loans, LLC, and Wells Fargo Bank, N.A., led the market with 23.6 percent of the market share, combined.

The bank is not required to collect or report its small business loan data, and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, aggregate data was reviewed to assess the level of competition within the assessment area. The 2020 aggregate lending data was not available; therefore, 2019 data was reviewed. The 2019 aggregate data shows that 78 lenders reported 2,742 small business loans in the assessment area. American Express National Bank, JP Morgan Chase Bank, N.A., Capital One Bank, Wells Fargo Bank N.A., and Synchrony Bank are the major small business lenders in the area with a combined market share of 51.71 percent.

Community Contacts

During a CRA evaluation, it is customary for examiners to contact various third parties within the institution's assessment area to gain insight regarding local economic conditions and credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available. Examiners contacted a representative of an area organization involved in economic development within the bank's assessment area. The contact indicated that economic conditions have declined because of the pandemic. The contact said that there is a need for affordable housing; and indicated affordable housing stock is minimal as many low- and moderate-income individuals have been priced out of the market, and the underwriting standards are too strict for low- and moderate income borrowers. The contact believes that while the banks are meeting the credit needs of the area, improvements

can be made. For example, credit workshops and programs designed to assist low- and moderate-income individuals and families would benefit these individuals in the Auburn MSA.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact and demographic and economic data, examiners determined small business loans and affordable housing represent the most significant credit needs within the assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE AUBURN ASSESSMENT AREA

LENDING TEST

The Lending Test performance in the Auburn Assessment Area is satisfactory. This is supported by overall reasonable geographic distribution and borrower profile performance for home mortgage and small business loans.

Geographic Distribution

The geographic distribution of home mortgage and small business loans reflects reasonable dispersion throughout the assessment area. The bank's reasonable performance in home mortgage and small business lending supports this conclusion.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. In 2018 and 2020, the bank did not lend in low-income census tracts. In 2019, the bank made one loan in a low-income census tract, which exceeded demographic and aggregate lending performance. Although the bank did not originate any home mortgage loans in low-income census tracts, demographics reflect less than two percent of businesses are located in these census tracts. Therefore, lending opportunities may be limited.

In 2018, the bank's lending performance in moderate-income census tracts significantly exceeded demographic and aggregate data. In 2019, lending performance was slightly below aggregate lending performance but mirrored demographic data. In 2020, lending in moderate-income geographies was slightly below demographic data and aggregate lending performance. Refer to the following table for details.

Geographic Distribution of Home Mortgage Loans Assessment Area: Auburn						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	1.8	0.4	0	0.0	0	0.0
2019	1.8	0.5	1	6.3	45	0.8
2020	1.8	0.3	0	0.0	0	0.0
Moderate						
2018	12.5	15.1	5	35.7	2,465	68.5
2019	12.5	14.5	2	12.5	1,130	20.9
2020	12.5	12.5	1	9.1	78	2.8
Middle						
2018	70.9	69.6	8	57.1	890	24.7
2019	70.9	69.9	13	81.3	4,235	78.3
2020	70.9	70.1	8	72.7	1,754	61.8
Upper						
2018	14.3	13.6	1	7.1	245	6.8
2019	14.3	14.3	0	0.0	0	0.0
2020	14.3	16.3	2	18.2	1,005	35.4
Not Available						
2018	0.5	1.3	0	0.0	0	0.0
2019	0.5	0.9	0	0.0	0	0.0
2020	0.5	0.8	0	0.0	0	0.0
Totals						
2018	**100.0**	**100.0**	**14**	**100.0**	**3,600**	**100.0**
2019	**100.0**	**100.0**	**16**	**100.0**	**5,410**	**100.0**
2020	**100.0**	**100.0**	**11**	**100.0**	**2,837**	**100.0**

Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Small Business Loans

The bank's geographic distribution of small business lending reflects reasonable dispersion. SSB extended three loans in low-income census tracts, which exceeds the percentage of businesses located in those tracts. Lending performance in moderate-income census tracts also exceeds demographic data. Refer to the following table for details.

Geographic Distribution of Small Business Loans Assessment Area: Auburn					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	1.5	3	6.3	285	3.9
Moderate	32.9	20	41.7	3,308	44.7
Middle	53.1	18	37.5	2,294	31.0
Upper	11.3	7	14.6	1,511	20.4
Not Available	1.1	0	0.0	0	0.0
Totals	**100.0**	**48**	**100.0**	**7,398**	**100.0**
Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among individuals of different income levels and businesses of different sizes. Home mortgage and small business lending performance supports this conclusion.

Home Mortgage Loans
The bank's dispersion of home mortgage lending to borrowers of different income levels reflects reasonable performance. In 2018, home mortgage lending to low-income borrowers was above aggregate data but below demographics. In 2019, and 2020, home mortgage lending to low-income borrowers significantly exceed aggregate performance, and was in line with and slightly below demographic data, respectively.

For moderate-income borrowers, the lending level for 2018 exceeded aggregate performance and demographic data. In 2019, lending was comparably below demographic data and aggregate performance. In 2020, the bank did not originate any loans to moderate-income borrowers.

As stated by the community contact, this assessment area has experienced weakened economic conditions due to the COVID-19 pandemic, which contributed to the decline in lending in 2020. Further, it is noted that, in 2020, nearly 55 percent of loans were made to businesses for investment purposes, where income is not required for HMDA. Refer to the following table for details.

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Auburn						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	24.8	4.9	1	7.1	65	1.8
2019	24.8	5.7	4	25.0	390	7.2
2020	24.8	5.3	2	18.2	196	6.9
Moderate						
2018	15.2	15.8	3	21.4	165	4.6
2019	15.2	15.6	2	12.5	240	4.4
2020	15.2	16.3	0	0.0	0	0.0
Middle						
2018	18.6	20.7	3	21.4	565	15.7
2019	18.6	21.9	3	18.8	345	6.4
2020	18.6	20.4	1	9.1	145	5.1
Upper						
2018	41.4	41.7	3	21.4	2,295	63.8
2019	41.4	39.2	3	18.8	2,915	53.9
2020	41.4	38.5	2	18.2	1,015	35.8
Not Available						
2018	0.0	16.9	4	28.6	510	14.2
2019	0.0	17.6	4	25.0	1,520	28.1
2020	0.0	19.5	6	54.5	1,481	52.2
Totals						
2018	**100.0**	**100.0**	**14**	**100.0**	**3,600**	**100.0**
2019	**100.0**	**100.0**	**16**	**100.0**	**5,410**	**100.0**
2020	**100.0**	**100.0**	**11**	**100.0**	**2,837**	**100.0**

Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.

Small Business Loans

The distribution of small business loans reflects reasonable performance among businesses of different sizes. The bank's penetration level of businesses with GARs of $1 million or less is significantly below the percentage of businesses in that category. It should be noted that 41.7 percent of loans reviewed were SBA PPP loans and did not have GAR information readily available. Given this fact and the high level of competition within this assessment area, lending

performance is considered reasonable. Excluding PPP loans, lending performance to businesses with gross annual revenues of $1 million or less increased to 57.1 percent. Refer to the following table for details.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Auburn					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	83.0	16	33.3	3,205	43.3
>$1,000,000	4.5	12	25.0	1,605	21.7
Revenue Not Available	12.5	20	41.7	2,588	35.0
Total	**100.0**	**48**	**100.0**	**7,398**	**100.0**
Source: 2020 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%					

COMMUNITY DEVELOPMENT TEST

SSB's community development performance demonstrated reasonable responsiveness to community development needs in the assessment area, given its capacity and the need and availability of such opportunities in the assessment area. The bank responded through community development loans, qualified investments, and community development services within the assessment area.

Community Development Loans

SSB originated 11 community development loans totaling $30 million within this assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Community Development Test* section for additional details.

Qualified Investments

SSB made three qualifying investments to support community service totaling $1.5 million within the assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Qualified Investments* section for additional details.

Community Development Services

SSB provided five community development services to organizations located within this assessment area. Given the bank's capacity and availability of opportunities, the bank demonstrated adequate responsiveness for this assessment area. The bank's performance is comparable to its performance during the previous evaluation. Refer to the overall *Community Development Services* section for additional details.

ANNISTON ASSESSMENT AREA– Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ANNISTON ASSESSMENT AREA

SSB's Anniston Assessment Area consists of all 31 census tracts within Calhoun County. The bank operates one full-service branch (6.7 percent of its branches) within this assessment area in a moderate-income census tract. This assessment area is where the main office is located. The bank's lending in this assessment area represents 11.3 percent of the loans originated inside its assessment areas.

Economic and Demographic Data

According to the 2015 ACS data, the income designations of the census tracts are as follows: 3 low-income, 7 moderate-income, 14 middle-income, 3 upper-income, and 4 tracts were not available. Since the previous evaluation, Jacksonville, Alabama, is no longer part of the MSA.

Based on 2020 D&B data, service industries represent the largest portion of businesses at 37.2 percent, followed by non-classifiable establishments and retail trade at 16.8 and 16.6 percent, respectively. There are 6,217 businesses in the Anniston Assessment Area. Of these businesses, 79.1 percent reported GARs of $1 million or less, 5.6 percent reported GARs of over $1 million, and 15.3 percent did not report GAR information.

Demographic Information of the Assessment Area Assessment Area: Anniston						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	31	9.7	22.6	45.2	9.7	12.9
Population by Geography	116,648	5.1	17.5	63.8	10.3	3.2
Housing Units by Geography	53,296	6.7	19.2	61.2	10.3	2.7
Owner-Occupied Units by Geography	31,179	3.2	15.2	69.3	11.8	0.5
Occupied Rental Units by Geography	13,975	10.4	26.6	48.5	7.7	6.8
Vacant Units by Geography	8,142	13.9	22.0	51.7	8.5	3.9
Businesses by Geography	6,044	4.8	30.1	55.4	7.8	1.9
Farms by Geography	173	1.7	15.0	72.8	9.8	0.6
Family Distribution by Income Level	30,581	22.9	16.2	20.9	40.0	0.0
Household Distribution by Income Level	45,154	25.5	15.7	16.8	41.9	0.0
Median Family Income MSA - 11500 Anniston-Oxford, AL MSA		$52,300	Median Housing Value Median Gross Rent Families Below Poverty Level			$104,880 $620 16.5%

Source: 2015 ACS and 2020 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.

According to Moody Analytics, County Economic Development Council, the top employers within the Anniston area are the Anniston Army Depot and Honda Manufacturing of Alabama. The following table provides select demographic information for the assessment area.

Unemployment data indicates that in 2019, the county's unemployment rate slightly higher than state averages, but lower than national averages. In 2020, the county's unemployment rate was also higher than the state average, but lower than the national average. Refer to the following table for additional details.

Unemployment Rates		
Area	**2019**	**2020**
	%	**%**
Calhoun County	3.6	7.1
Alabama*	3.0	5.9
U.S.	3.7	8.1
*Source: Bureau of Labor Statistics and Moody's Analytics *Not Seasonally Adjusted*		

The FFIEC estimated MFI levels were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and upper-income ranges and categories are presented in the following table for the Anniston Assessment Area.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Anniston-Oxford-Jacksonville, AL MSA Median Family Income (11500)				
2018 ($56,800)	<$28,400	$28,400 to <$45,440	$45,440 to <$68,160	≥$68,160
Anniston-Oxford, AL MSA Median Family Income (11500)				
2019 ($56,200)	<$28,100	$28,100 to <$44,960	$44,960 to <$67,440	≥$67,440
2020 ($61,500)	<$30,750	$30,750 to <$49,200	$49,200 to <$73,800	≥$73,800
Source: FFIEC				

Competition

There is a moderate level of competition with in the Anniston Assessment Area. According to the FDIC Deposit Market Share data, as of June 30, 2020, 10 FDIC-insured financial institutions operated 31 offices within the Anniston Assessment Area. Of these institutions, SSB ranked 5th with a 9.7 percent deposit market share.

In relation to home mortgage lending, there is a moderate level of competition within this assessment area. SSB ranked 49th in the assessment area, with 0.36 percent of the market share. In 2020, 155 lenders originated and purchased 3,355 home mortgage loans. Fairway Independent Mortgage Company, Quicken Loans, LLC, Ameris Bank, and Regions Bank led the market with 26.94 percent of the market share, combined.

The bank is not required to collect or report its small business loan data, and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, aggregate data was reviewed to assess the level of competition within the assessment area. The 2020 aggregate lending data was not available; therefore, 2019 data was reviewed. The 2019 aggregate data shows that 57 lenders reported 1,054 small business loans in the assessment area. American Express, National Bank, JP Morgan Chase Bank, NA, Truist Financial, and Synchrony Bank are the major small business lenders in the area with a combined market share of 52.4 percent.

Community Contacts

Examiners conducted a community contact in the Anniston Assessment Area. During a CRA evaluation, it is customary for examiners to contact various third parties within the institution's assessment area to gain insight regarding local economic conditions and credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available. Examiners contacted a representative of an area organization involved in economic development within the bank's assessment area. The contact indicated that local economic was impacted by the COVID-19 pandemic significantly. The contact said that there is a need for small business lending in the area. The contact believed that the banks in the area were involved and were meeting the credit needs of the area. However, the need for additional credit is present.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact and demographic and economic data, examiners determined small business loans and affordable housing represent the most significant credit needs within the assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE ANNISTON ASSESSMENT AREA

LENDING TEST

The Lending Test performance in the Anniston Assessment Area is Satisfactory. This is supported by overall reasonable geographic distribution and borrower profile performance for home mortgage and small business loans.

Geographic Distribution

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The bank's performance in home mortgage lending and small business lending supports this conclusion. In 2018 and 2019, the bank originated five and four home mortgage loans, respectively, from the sampled loans during the review period. Given the low number of loans sampled in in these years, a meaningful analysis could not be reached.

Home Mortgage Loans

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. In 2020, the bank did not originate any loans in low-income census tracts, which is comparable to aggregate data of less than one percent of lending in these tracts. In 2020, SSB originated four loans in moderate-income census tracts, which exceeded aggregate and demographic data. Refer to the following table for details.

Geographic Distribution of Home Mortgage Loans **Assessment Area: Anniston**						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	3.2	0.5	0	0.0	0	0.0
2019	3.2	0.7	0	0.0	0	0.0
2020	3.2	0.3	0	0.0	0	0.0
Moderate						
2018	15.2	12.3	0	0.0	0	0.0
2019	15.2	12.6	1	25.0	45	5.8
2020	15.2	10.0	4	33.3	223	3.4
Middle						
2018	69.3	72.9	3	60.0	275	39.0
2019	69.3	74.0	3	75.0	735	94.2
2020	69.3	75.1	7	58.3	6,122	94.4
Upper						
2018	11.8	13.7	2	40.0	430	61.0
2019	11.8	12.2	0	0.0	0	0.0
2020	11.8	14.2	1	8.3	142	2.2
Not Available						
2018	0.5	0.6	0	0.0	0	0.0
2019	0.5	0.5	0	0.0	0	0.0
2020	0.5	0.4	0	0.0	0	0.0
Totals						
2018	**100.0**	**100.0**	**5**	**100.0**	**705**	**100.0**
2019	**100.0**	**100.0**	**4**	**100.0**	**780**	**100.0**
2020	**100.0**	**100.0**	**12**	**100.0**	**6,487**	**100.0**
Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans
The bank's geographic distribution of small business lending reflects reasonable performance. The bank did not originate any loans in low-income census tracts, but demographic data indicates that opportunities to lend in these tracts may be limited. Lending in moderate-income census tracts is exceeds demographics. Given the level of competition within this assessment area, lending performance is considered reasonable. Refer to the following table for details.

Geographic Distribution of Small Business Loans **Assessment Area: Anniston**					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	4.8	0	0.0	0	0.0
Moderate	30.1	10	40.0	1,708	31.5
Middle	55.4	11	44.0	3,220	59.3
Upper	7.8	4	16.0	499	9.2
Not Available	1.9	0	0.0	0	0.0
Totals	**100.0**	**25**	**100.0**	**5,427**	**100.0**
Source: 2020 D&B Data: Bank Data. Due to rounding, totals may not equal 100.0%.					

Borrower Profile
The distribution of borrowers reflects, given the demographics of the area, reasonable penetration among individuals of different income levels and businesses of different sizes. Home mortgage and small business lending supports this conclusion.

Home Mortgage Loans
The bank's dispersion of home mortgage lending to borrowers of different income levels reflects reasonable performance. In 2020, the bank did not originate any loans to low-income borrowers; aggregate data reflected only 6.7 percent of lending.

Home mortgage lending to moderate-income borrowers in 2020 was slightly lower than aggregate and comparable to demographics. It should be noted that 50 percent of the sampled loans originated in 2020 were made to businesses for investment purposes, where income is not required for HMDA. Refer to the following table for details.

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Anniston						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	22.9	7.4	1	20.0	75	10.6
2019	22.9	7.5	1	25.0	575	73.7
2020	22.9	6.7	0	0.0	0	0.0
Moderate						
2018	16.2	19.8	1	20.0	45	6.4
2019	16.2	17.0	1	25.0	45	5.8
2020	16.2	19.1	2	16.7	50	0.8
Middle						
2018	20.9	22.3	0	0.0	0	0.0
2019	20.9	24.4	0	0.0	0	0.0
2020	20.9	21.7	1	8.3	40	0.6
Upper						
2018	40.0	32.2	2	40.0	390	55.3
2019	40.0	33.1	0	0.0	0	0.0
2020	40.0	28.7	3	25.0	206	3.2
Not Available						
2018	0.0	18.3	1	20.0	195	27.7
2019	0.0	18.1	2	50.0	160	20.5
2020	0.0	23.9	6	50.0	6,191	95.4
Totals						
2018	**100.0**	**100.0**	**5**	**100.0**	**705**	**100.0**
2019	**100.0**	**100.0**	**4**	**100.0**	**780**	**100.0**
2020	**100.0**	**100.0**	**12**	**100.0**	**6,487**	**100.0**
Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The distribution of small business loans reflects reasonable performance among businesses of different sizes. The bank's penetration level of businesses with GARs of $1 million or less is significantly below the percentage of businesses in that category. It should be noted that 36.0 percent of loans reviewed were SBA PPP loans that did not have GAR information readily available. Lending performance is considered reasonable due to the number of competitors in the area compared to the size of the area, the significant number of loans with no revenue information, and the impact the COVID-19 pandemic. Excluding PPP loans, lending performance to businesses

with gross annual revenues of $1 million or less increased to 56.3 percent. Refer to the following table for details.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Anniston					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	78.7	9	36.0	1,606	29.6
>$1,000,000	5.6	7	28.0	946	17.4
Revenue Not Available	15.7	9	36.0	2,875	53.0
Total	**100.0**	**25**	**100.0**	**5,427**	**100.0**
Source: 2020 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%					

COMMUNITY DEVELOPMENT TEST

SSB's community development performance demonstrated adequate responsiveness to community development needs in the assessment area, given its capacity and the need and availability of such opportunities in the assessment area. The bank responded through community development loans, qualified investments, and community development services within the assessment area.

Community Development Loans

SSB originated three community development loans totaling $853,000 within this assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Community Development Test* section for additional details.

Qualified Investments

SSB made three qualifying investments to support community service totaling $1.5 million within the assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Qualified Investments* section for additional details.

Community Development Services

SSB provided 13 community development services to organizations located within this assessment area. Given the bank's capacity and availability of opportunities, the bank demonstrated adequate responsiveness for this assessment area. The bank's performance is comparable to its performance during the previous evaluation. Refer to the overall Community Development Services section for additional details.

AL NON-MSA ASSESSMENT AREA – Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE AL NON-MSA ASSESSMENT AREA

SSB's AL Non-MSA Assessment Area consists of 32 census tracts in Talladega, Randolph, and Cleburne Counties. The bank operates five full-service branches (33.3 percent of its branches) within this assessment area. One branch is located in a moderate-income census tract and four are in middle-income census tracts. The bank's lending in this area represents 7.9 percent of loans originated during 2020 in this area.

Economic and Demographic Data

Based on the 2015 ACS data, the 32 census tracts income designations are as follows: 1 is a low-income census tract, 3 are moderate-income census tracts, 23 are middle-income census tracts, and 5 are upper-income census tracts.

Based on 2020 D&B data, service industries represent the largest portion of businesses at 33.6 percent, followed by non-classifiable establishments and retail trade at 18.1 and 16.2 percent, respectively. There are 5,572 businesses in the AL Non-MSA Assessment Area. Of these businesses, 81.5 percent reported GARs of $1 million or less, 4.6 percent reported GARs of over $1 million and 13.9 percent did not report GAR information.

Demographic Information of the Assessment Area Assessment Area: AL Non MSA						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	32	3.1	9.4	71.9	15.6	0.0
Population by Geography	119,087	2.4	9.2	71.0	17.4	0.0
Housing Units by Geography	55,789	2.8	9.4	71.4	16.5	0.0
Owner-Occupied Units by Geography	33,152	1.3	6.8	73.9	18.1	0.0
Occupied Rental Units by Geography	12,963	7.2	18.1	64.1	10.6	0.0
Vacant Units by Geography	9,674	2.1	6.6	72.4	18.9	0.0
Businesses by Geography	5,510	1.4	13.8	70.0	14.8	0.0
Farms by Geography	242	0.0	5.4	80.6	14.0	0.0
Family Distribution by Income Level	31,740	22.0	17.8	19.2	41.0	0.0
Household Distribution by Income Level	46,115	25.2	15.2	16.6	43.1	0.0
Median Family Income Non-MSAs - AL		$45,454	Median Housing Value			$96,385
			Median Gross Rent			$569
			Families Below Poverty Level			17.6%

Source: 2015 ACS and 2020 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.

According to the Chamber of Talladega & Lincoln areas, Honda of Alabama, and the Alabama institute for the Deaf & Blind are the top employers in Talladega County. According to the City of Heflin's website, (Heflin is located within Cleburne County), major employers in the area are L.E. Bell Construction and Cleburne County Schools. The following table provides select demographic information for the assessment area.

Unemployment data indicates that in 2019 the three counties' unemployment rates were slightly higher than state averages, but lower than national averages. In 2020, the county unemployment rates were lower in Cleburne and Randolph Counties and higher in Talladega County than that of the state of Alabama. All three counties in the assessment area were lower than the national averages during 2020. Refer to the following table for additional details.

Unemployment Rates		
Area	**2019**	**2020**
	%	**%**
Cleburne County	3.2	4.6
Randolph County	3.1	4.7
Talladega County	3.4	7.0
Alabama*	3.0	5.9
U.S.	3.7	8.1
*Source: Bureau of Labor Statistics and Moody's Analytics *Not Seasonally Adjusted*		

The FFIEC estimated MFI levels were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and upper-income ranges and categories are presented in the following table for the AL Non-MSA Assessment Area.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
AL NA Median Family Income (99999)				
2018 ($48,500)	<$24,250	$24,250 to <$38,800	$38,800 to <$58,200	≥$58,200
2019 ($49,700)	<$24,850	$24,850 to <$39,760	$39,760 to <$59,640	≥$59,640
2020 ($51,700)	<$25,850	$25,850 to <$41,360	$41,360 to <$62,040	≥$62,040
Source: FFIEC				

Competition

According to the FDIC Deposit Market Share data, as of June 30, 2020, 11 FDIC-insured financial institutions operated 30 offices within this assessment area. Of these institutions, SSB ranked second with a 14.9 percent deposit market share.

In relation to home mortgage lending, there is a high level of competition within this assessment area. In 2020, 191 lenders originated and purchased 3,308 home mortgage loans. SSB ranked 20th in the assessment area, with 1.15 percent of the market share. Quicken Loans, LLC, Fairway

Independent Mortgage Company, Wells Fargo Bank, and Homestar Financial Corporation led the market with 20.44 percent of the market share, combined.

The bank is not required to collect or report its small business loan data, and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, aggregate data was reviewed to assess the level of competition within the assessment area. The 2020 aggregate lending data was not available; therefore, 2019 data was reviewed. The 2019 aggregate data shows that 61 lenders reported 1,175 small business loans in the assessment area. American Express, National Bank, JP Morgan Chase Bank, NA, Citibank, and Capital One Bank are the major small business lenders in the area with a combined market share of 43.48 percent.

Community Contacts

Examiners utilized a recently conducted community contact in the AL Non-MSA area of Talladega County. During a CRA evaluation, it is customary for examiners to contact various third parties within the institution's assessment area to gain insight regarding local economic conditions and credit needs. This information helps determine whether local financial institutions are responsive to these needs. It also shows what credit and community development opportunities are available. Examiners contacted a representative of an area organization involved in economic development within the bank's assessment area. The contact indicated that economic conditions are improving. The contact said that there is a need for small business loans and residential loans in this area, and there are opportunities for community development. The contact believes that the banks in the area are very involved and are meeting the credit needs of the area.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact and demographic and economic data, examiners determined small business loans and affordable housing represent the most significant credit needs within the assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE AL NON-MSA ASSESSMENT AREA

LENDING TEST

The Lending Test performance in the AL Non-MSA assessment area is satisfactory. This is supported by overall reasonable borrower profile performance for home mortgage and small business loans.

Geographic Distribution

The geographic distribution reflects poor dispersion throughout the assessment area. The bank's performance in home mortgage lending and small business lending supports this conclusion.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects poor dispersion throughout the assessment area. In 2018, 2019, and 2020 the bank did not originate any loans in low-income census tracts. Although the bank did not originate any small business loans in low-income census tracts, demographics reflect slightly more than one percent of businesses are located in these census tracts. Therefore, lending opportunities may be limited.

In 2018 and 2019, the bank did not originate any loans in moderate-income census tracts. Lending performance in moderate-income census tracts improved in 2020, which is comparably lower than to aggregate data and below demographics. Refer to the following table for details.

Geographic Distribution of Home Mortgage Loans Assessment Area: AL Non MSA						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	1.3	0.2	0	0.0	0	0.0
2019	1.3	0.3	0	0.0	0	0.0
2020	1.3	0.1	0	0.0	0	0.0
Moderate						
2018	6.8	5.8	0	0.0	0	0.0
2019	6.8	4.8	0	0.0	0	0.0
2020	6.8	5.1	1	2.6	77	2.0
Middle						
2018	73.9	66.2	6	85.7	210	85.7
2019	73.9	66.0	13	100.0	1,175	100.0
2020	73.9	63.9	36	94.7	2,710	72.5
Upper						
2018	18.1	27.7	1	14.3	35	14.3
2019	18.1	28.8	0	0.0	0	0.0
2020	18.1	30.8	1	2.6	950	25.4
Totals						
2018	**100.0**	**100.0**	**7**	**100.0**	**245**	**100.0**
2019	**100.0**	**100.0**	**13**	**100.0**	**1,175**	**100.0**
2020	**100.0**	**100.0**	**38**	**100.0**	**3,737**	**100.0**
Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans
The bank's geographic distribution of small business lending reflects poor dispersion. The bank did not originate any loans in low-income census tracts. Lending opportunities may be limited in low-income census tracts as the percent of businesses located in these tracts is low. Lending in moderate-income census tracts is significantly below demographics. The bank only originated one loan in a moderate-income census tract. Refer to the following table for details.

Geographic Distribution of Small Business Loans **Assessment Area: AL Non MSA**					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	1.4	0	0.0	0	0.0
Moderate	13.8	1	3.2	25	0.6
Middle	70.0	29	93.5	3,644	85.2
Upper	14.8	1	3.2	607	14.2
Not Available	0.0	0	0.0	0	0.0
Totals	**100.0**	**31**	**100.0**	**4,276**	**100.0**
Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Borrower Profile
The distribution of borrowers reflects, given the demographics of the area, reasonable penetration among individuals of different income levels and businesses of different sizes. Reasonable home mortgage and small business lending supports this conclusion.

Home Mortgage Loans
The bank's dispersion of home mortgage lending to borrowers of different income levels reflects reasonable performance. In 2018, 2019, and 2020, home mortgage lending to low-income borrowers exceed aggregate performance, but was below demographic data for 2019 and 2020.

In 2018, the bank did not originate any loans to moderate-income borrowers. In 2019, the bank's lending to moderate-income borrowers exceeded aggregate data and was slightly below demographics. In 2020 the bank's lending was comparable to aggregate data but below demographic data. Refer to the following table for details.

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: AL Non MSA						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	22.0	3.5	3	42.9	95	38.8
2019	22.0	4.0	2	15.4	40	3.4
2020	22.0	3.1	2	5.3	121	3.2
Moderate						
2018	17.8	13.5	0	0.0	0	0.0
2019	17.8	13.0	2	15.4	60	5.1
2020	17.8	11.8	4	10.5	157	4.2
Middle						
2018	19.2	21.7	1	14.3	35	14.3
2019	19.2	22.1	4	30.8	770	65.5
2020	19.2	19.9	9	23.7	475	12.7
Upper						
2018	41.0	42.9	3	42.9	115	46.9
2019	41.0	45.7	2	15.4	80	6.8
2020	41.0	46.1	18	47.4	1,415	37.9
Not Available						
2018	0.0	18.4	0	0.0	0	0.0
2019	0.0	15.2	3	23.1	225	19.1
2020	0.0	19.1	5	13.2	1,569	42.0
Totals						
2018	**100.0**	**100.0**	**7**	**100.0**	**245**	**100.0**
2019	**100.0**	**100.0**	**13**	**100.0**	**1,175**	**100.0**
2020	**100.0**	**100.0**	**38**	**100.0**	**3,737**	**100.0**
Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The distribution of small business loans reflects reasonable performance among businesses of different sizes. The bank's penetration level of businesses with GARs of $1 million or less is below the percentage of businesses that reported GARs of $1 million or less. It should be noted that 23.8 percent of loans reviewed were SBA PPP loans and did not have GAR information readily available. Lending performance is considered reasonable due to the number of competitors. Excluding PPP loans, lending performance to businesses with gross annual revenues of $1 million or less increased to 69.6 percent. Refer to the following table for details.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: AL Non MSA					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	80.9	16	51.6	2,191	51.2
>$1,000,000	4.7	7	22.6	724	16.9
Revenue Not Available	14.4	8	25.8	1,361	31.8
Total	**100.0**	**31**	**100.0**	**4,276**	**100.0**
Source: 2020 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%					

COMMUNITY DEVELOPMENT TEST

SSB's community development performance demonstrated adequate responsiveness to community development needs in the assessment area, given its capacity and the need and availability of such opportunities in the assessment area. The bank responded through community development loans, qualified investments, and community development services within the assessment area.

Community Development Loans
SSB originated two community development loans totaling $3.8 million within this assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Community Development Test* section for additional details.

Qualified Investments
SSB made two qualifying donations to support community service totaling $1 million within the assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Qualified Investments* section for additional details.

Community Development Services
SSB provided 32 community development services to organizations located within this assessment area. Given the bank's capacity and availability of opportunities, the bank demonstrated adequate responsiveness for this assessment area. The bank's performance is comparable to its performance during the previous evaluation. Refer to the overall Community Development Services section for additional details.

HUNTSVILLE ASSESSMENT AREA – Limited-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HUNTSVILLE ASSESSMENT AREA

SSB's Huntsville Assessment Area consists of all 73 census tracts in Madison County. Of these census tracts, 12 are low-income, 19 are moderate-income census tracts, 21 are middle-income census tracts, and 21 are upper-income census tracts. Since the previous evaluation, there have been no changes within this assessment area.

The bank operates one full-service branch (6.7 percent of its offices) within the Huntsville assessment area located in an upper-income census tract. The bank originated 22.7 percent of its lending in this assessment area during 2020.

According to 2020 D&B data, service industries represent the largest portion of businesses at 42.9 percent, followed by non-classifiable establishments and retail trade at 16.8 percent and 12.6 percent, respectively. Of the 25,852 businesses that operate within the assessment area, 83.6 percent reported GARs of $1 million of less, 5.1 percent reported GARs over $1 million, and 11.4 percent did not report GAR information. Refer to the following table for select demographic information of the assessment area.

Demographic Information of the Assessment Area **Assessment Area: Huntsville**						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	73	16.4	26.0	28.8	28.8	0.0
Population by Geography	346,438	10.8	20.8	31.2	37.2	0.0
Housing Units by Geography	152,720	12.3	21.9	32.1	33.7	0.0
Owner-Occupied Units by Geography	93,319	5.1	18.3	33.0	43.6	0.0
Occupied Rental Units by Geography	44,448	23.9	28.3	30.9	16.9	0.0
Vacant Units by Geography	14,953	22.7	25.3	30.2	21.8	0.0
Businesses by Geography	25,106	12.1	21.6	28.6	37.7	0.0
Farms by Geography	746	8.3	20.2	38.2	33.2	0.0
Family Distribution by Income Level	89,551	22.9	16.0	17.4	43.8	0.0
Household Distribution by Income Level	137,767	24.5	15.6	15.6	44.3	0.0
Median Family Income MSA - 26620 Huntsville, AL MSA		$72,576	Median Housing Value			$164,667
			Median Gross Rent			$800
			Families Below Poverty Level			10.0%

Source: 2015 ACS and 2020 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.

According to the Huntsville Alabama Chamber of Commerce, the top employers in the assessment area are Redstone Arsenal, Huntsville Hospital, and NASA/Marshall Space Flight Center.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE HUNTSVILLE ASSESSMENT AREA

LENDING TEST

The institution's lending performance in the Huntsville Assessment Area is consistent with the institution's lending performance in the assessment areas that were reviewed using full-scope examination procedures. Tables that present the bank's geographic and borrower distribution lending performance are located in the appendices.

COMMUNITY DEVELOPMENT TEST

The institution's community development performance in the assessment area is consistent with the institution's community development performance in the assessment areas within the MSA portion of the state that were reviewed using full-scope examination procedures. For additional details, please refer to the overall community development loans, investments, and services tables.

BIRMINGHAM ASSESSMENT AREA – Limited-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BIRMINGHAM ASSESSMENT AREA

SSB's Birmingham Assessment Area consists of 211 census tracts in Shelby and Jefferson Counties. Of the census tracts, 31 are low-income, 52 are moderate-income census tracts, 57 are middle-income census tracts, 69 are upper-income census tracts, and 2 were not available.

The bank operates one full-service branch (6.7 percent of its offices) within the Birmingham Assessment Area located in an upper-income census tract. The bank originated 8.6 percent of its lending in this assessment area during 2020.

According to 2020 D&B data, service industries represent the largest portion of businesses at 39.9 percent, followed by non-classifiable establishments and retail trade at 17.9 percent and 12.4 percent, respectively. Of the 66,818 businesses that operate within the assessment area, 82.7 percent reported GARs of $1 million of less, 6.24 percent reported GARs over $1 million, and 11.0 percent did not report GAR information. Refer to the following table for demographical information of the assessment area.

Demographic Information of the Assessment Area Assessment Area: Birmingham						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	211	14.7	24.6	27.0	32.7	0.9
Population by Geography	862,556	11.0	21.1	27.7	39.6	0.6
Housing Units by Geography	386,605	12.7	23.1	27.4	36.4	0.4
Owner-Occupied Units by Geography	224,482	6.4	18.0	29.9	45.6	0.0
Occupied Rental Units by Geography	111,981	20.7	29.2	23.7	25.4	1.1
Vacant Units by Geography	50,142	22.6	32.5	24.3	20.1	0.6
Businesses by Geography	65,467	8.1	19.4	25.1	45.8	1.5
Farms by Geography	1,351	4.0	14.2	25.8	55.4	0.6
Family Distribution by Income Level	220,532	23.0	15.0	17.6	44.4	0.0
Household Distribution by Income Level	336,463	25.1	15.1	15.8	44.0	0.0
Median Family Income MSA - 13820 Birmingham-Hoover, AL MSA		$63,259	Median Housing Value			$172,247
			Median Gross Rent			$829
			Families Below Poverty Level			12.7%

Source: 2015 ACS and 2020 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.

According to the Birmingham Business Alliance, the top employers in the assessment area are the University of Alabama at Birmingham, Regions Financial Corporation, St. Vincent's Health System, and Children's Hospital of Alabama.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE BIRMINGHAM ASSESSMENT AREA

LENDING TEST

The institution's lending performance in the Birmingham Assessment Area is consistent with the institution's lending performance in the assessment areas that were reviewed using full-scope examination procedures. Tables that present the bank's geographic and borrower distribution lending performance are located in the appendices.

COMMUNITY DEVELOPMENT TEST

The institution's community development performance in the assessment area is consistent with the institution's community development performance in the assessment areas within the MSA portion of the state that were reviewed using full-scope examination procedures. For additional details, please refer to the overall community development loans, investments, and services tables.

GEORGIA

CRA RATING FOR FLORIDA: SATISFACTORY

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

DESCRIPTION OF INSTITUTION'S OPERATIONS IN GEORGIA

SSB operates five full-service branches (33.3 percent of its offices) in two assessment areas within Georgia. One branch is located in a moderate-income census tract and two each are located in middle- and upper-income census tracts. The first assessment area consists of Carroll, Coweta, and Paulding Counties, which comprises the Atlanta Assessment Area. The second assessment area consists of Muscogee County, which comprises the Columbus Assessment Area. Of the loans originated within all of the assessment areas, 31.2 percent were originated in the Georgia assessment areas.

SCOPE OF EVALUATION – GEORGIA

The evaluation of SSB's performance in Georgia was based on a review of the bank's home mortgage and small business lending in its Georgia assessment areas. The Atlanta and Columbus Assessment Areas were reviewed using full-scope procedures.

CONCLUSIONS ON PERFORMANCE CRITERIA IN GEORGIA

LENDING TEST

The Lending Test is rated Satisfactory for the State of Georgia. This rating is supported by an overall reasonable geographic distribution of loans and borrower profile performance. This performance is consistent with the bank's performance throughout its assessment areas within Georgia.

Geographic Distribution
The geographic distribution reflects reasonable dispersion throughout its two assessment areas in Georgia. This conclusion is consistent with the bank's performance in the assessment areas in Georgia.

Borrower Profile
Given the demographics of the two assessment areas in Georgia, the distribution of borrowers reflects reasonable penetration among individuals of different income levels and businesses of different sizes. This conclusion is consistent with the bank's performance in the assessment areas in Georgia.

COMMUNITY DEVELOPMENT TEST

SSB's community development performance in the State of Georgia demonstrate adequate responsiveness to the community development needs of its Georgia assessment areas. The bank

met these needs through community development loans, qualified investments, and community development services. Refer to the overall *Community Development Test* section for additional details

Community Development Loans

SSB originated 23 community development loans totaling $21.7 million within this rated area. The bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Community Development Test* section for additional details.

Community Development Lending by Assessment Area										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Atlanta	3	1,972	4	1,142	1	2,473	0	0	**8**	**5,587**
Columbus	9	2,599	1	7,500	3	1,808	2	4,230	**15**	**16,137**
Total	**12**	**4,571**	**5**	**8,642**	**4**	**4,281**	**2**	**4,230**	**23**	**21,724**
Source: Bank Data										

Qualified Investments

The bank made three qualifying donations totaling $1.6 million to support community service and affordable housing within this rated area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness in this assessment area. Refer to the overall *Qualified Investments* section for additional details.

Qualified Investments by Assessment Area										
Assessment Area	**Affordable Housing**		**Community Services**		**Economic Development**		**Revitalize or Stabilize**		**Totals**	
	#	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**	**#**	**$(000s)**
Columbus	0	0	0	0	0	0	0	0	**0**	**0**
Atlanta	1	230	3	1,355	0	0	0	0	4	**1,585**
Subtotal	**1**	**230**	**3**	**1,355**	**0**	**0**	**0**	**0**	4	**1,585**
Donations/Grants	0	0	8	10	0	0	0	0	**8**	**10**
Total	1	**230**	**11**	**1,365**	**0**	**0**	**0**	**0**	12	**1,595**

Community Development Services

SSB provided 15 community development services to organizations located within this rated area. Given the bank's capacity and availability of opportunities, and the COVID- 19 pandemic, the bank demonstrated adequate responsiveness for this rated area. Refer to the overall *Community Development Services* section for additional details.

Community Development Services by State and Purpose

State	Affordable Housing	Community Services	Economic Development	Revitalize or Stabilize	Totals
	#	#	#	#	#
Columbus	0	2	**0**	**0**	**2**
Atlanta	0	13	**0**	**0**	**13**
Total	**0**	**15**	**0**	**0**	**15**
Source: Bank Records					

COLUMBUS ASSESSMENT AREA– Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBUS ASSESSMENT AREA

SSB's Columbus Assessment Area consists of all 53 census tracts within Muscogee County. The bank operates two full-service branches (13.3 percent of its branches) within this assessment area located in a middle- and upper-income census tract. The bank's lending in this assessment area represents 26 percent of the loans originated inside its assessment areas.

Economic and Demographic Data

According to the 2015 ACS data, the income designations of the census tracts are as follows: 10 low-income, 15 moderate-income, 16 middle-income, 11 upper-income, and 1 tract was not available. Since the previous examination, there have not been any changes to the assessment area.

Demographic Information of the Assessment Area Assessment Area: Columbus						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	53	18.9	28.3	30.2	20.8	1.9
Population by Geography	200,285	11.0	23.5	34.6	29.6	1.2
Housing Units by Geography	83,503	12.9	24.8	32.0	30.3	0.0
Owner-Occupied Units by Geography	36,266	4.5	23.0	32.0	40.5	0.0
Occupied Rental Units by Geography	36,494	19.4	24.6	33.4	22.6	0.0
Vacant Units by Geography	10,743	18.9	31.6	27.3	22.1	0.2
Businesses by Geography	15,864	8.9	19.0	36.8	35.1	0.1
Farms by Geography	311	4.5	19.3	30.2	46.0	0.0
Family Distribution by Income Level	46,385	23.8	17.4	18.0	40.8	0.0
Household Distribution by Income Level	72,760	25.4	15.2	16.6	42.9	0.0
Median Family Income MSA - 17980 Columbus, GA-AL MSA		$52,902	Median Housing Value Median Gross Rent Families Below Poverty Level			$131,583 $831 15.8%
Source: 2015 ACS and 2020 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.						

Unemployment data indicates that in 2019, the county's unemployment rate was higher than state and national averages. In 2020, the county's unemployment rate was higher than the state average, but lower than the national average. Refer to the following table for additional details.

Unemployment Rates		
Area	**2019**	**2020**
	%	%
Muscogee County	4.7	7.8
Georgia*	4.0	6.0
U.S.	3.7	8.1
*Source: Bureau of Labor Statistics and Moody's Analytics *Not Seasonally Adjusted*		

The FFIEC estimated MFI levels were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and upper-income ranges and categories are presented in the following table for the Columbus Assessment Area.

Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Columbus, GA-AL MSA Median Family Income (17980)				
2018 ($56,000)	<$28,000	$28,000 to <$44,800	$44,800 to <$67,200	≥$67,200
2019 ($57,400)	<$28,700	$28,700 to <$45,920	$45,920 to <$68,880	≥$68,880
2020 ($59,100)	<$29,550	$29,550 to <$47,280	$47,280 to <$70,920	≥$70,920
Source: FFIEC				

Competition

There is a moderate level of competition with in the Columbus Assessment Area. According to the FDIC Deposit Market Share data, as of June 30, 2020, 10 FDIC-insured financial institutions operated 31 offices within the Columbus Assessment Area. Of these institutions, SSB ranked 4th with a 2.64 percent deposit market share.

In relation to home mortgage lending, there is a high level of competition within this assessment area. SSB ranked 34th in the assessment area, with 0.62 percent of the market share. In 2020, 269 lenders originated and purchased 6,637 home mortgage loans. Synovus Bank, Wells Fargo Bank, NA, Freedom Mortgage Corporation, Quicken Loans, LLC, and PennyMac Loan Services, LLC, led the market with 37.3 percent of the market share, combined.

The bank is not required to collect or report its small business loan data, and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include comparisons against aggregate data. However, aggregate data was reviewed to assess the level of competition within the assessment area. The 2020 aggregate lending data was not available; therefore, 2019 data was reviewed. The 2019 aggregate data shows that 69 lenders reported 3,267 small business loans in the assessment area. American Express National Bank, Synovus Bank, JP Morgan Chase Bank, N.A., Wells Fargo Bank N.A., and Capital One, N.A., are the major small business lenders in the area with a combined market share of 54.5 percent.

Community Contacts

Examiners utilized a recently conducted community contact in the Columbus, GA-AL MSA. The contact indicated that economic conditions are satisfactory. The contact indicated the local economy rely on the area's larger business to sustain the economy. The contact further stated that less than 50 percent of small businesses relied on the SBA PPP loan program during the COVID-19 pandemic. The contact felt that the banks are meeting the credit needs of the area. However, the contact indicated there is a credit need for start-up businesses and capital injections.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact and demographic and economic data, examiners determined small business loans and affordable housing represent the most significant credit needs within the assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN THE COLUMBUS ASSESSMENT AREA

LENDING TEST

The Lending Test performance in the Columbus Assessment Area is Satisfactory. This is supported by overall reasonable geographic distribution and borrower profile performance for home mortgage and small business loans.

Geographic Distribution

The geographic distribution of home mortgage loans reflects reasonable dispersion throughout the assessment area. The bank's performance in home mortgage lending and small business lending supports this conclusion.

Home Mortgage Loans
The geographic distribution of home mortgage loans reflects excellent dispersion in low-income census tracts in the assessment area. In 2018, 2019, and 2020, the bank percent of lending in low-income census tracts by number significantly exceeded aggregate lending performance and exceeds demographics.

For moderate-income census tracts, the bank's lending performance is significantly higher than aggregate performance. In addition, the bank is also higher than demographic data in 2019. Refer to the following table for details.

Geographic Distribution of Home Mortgage Loans Assessment Area: Columbus						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	4.5	1.4	3	8.3	1,075	17.5
2019	4.5	1.1	1	3.4	65	1.4
2020	4.5	0.9	4	9.8	690	7.8
Moderate						
2018	24.5	14.5	7	19.4	2,015	32.7
2019	23.0	12.9	8	27.6	500	10.8
2020	23.0	11.5	6	14.6	1,733	19.5
Middle						
2018	30.5	27.2	11	30.6	1,075	17.5
2019	32.0	27.3	9	31.0	1,765	38.0
2020	32.0	28.0	15	36.6	4,689	52.7
Upper						
2018	40.5	56.9	15	41.7	1,995	32.4
2019	40.5	58.7	11	37.9	2,315	49.8
2020	40.5	59.6	16	39.0	1,778	20.0
Totals						
2018	**100.0**	**100.0**	**36**	**100.0**	**6,160**	**100.0**
2019	**100.0**	**100.0**	**29**	**100.0**	**4,645**	**100.0**
2020	**100.0**	**100.0**	**41**	**100.0**	**8,890**	**100.0**
Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Small Business Loans

The bank's geographic distribution of small business lending reflects reasonable performance. Although lending in low-income and moderate- income census tracts is below the demographics, given the impact of the COVID-19 pandemic and the high level of competition in the area, this performance is considered reasonable. Refer to the following table for details.

Geographic Distribution of Small Business Loans Assessment Area: Columbus					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	8.9	2	2.7	90	0.8
Moderate	19.0	8	10.7	989	9.3
Middle	36.8	31	41.3	4,259	40.0
Upper	35.1	34	45.3	5,303	49.8
Not Available	0.1	0	0.0	0	0.0
Totals	**100.0**	**75**	**100.0**	**10,641**	**100.0**
Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.					

Borrower Profile

The distribution of borrowers reflects, given the demographics of the area, reasonable penetration among individuals of different income levels and businesses of different sizes. Small business lending supports this conclusion.

Home Mortgage Loans

The bank's dispersion of home mortgage lending to borrowers of different income levels reflects poor performance. In 2018 and 2020, the bank did not originate any loans to low-income borrowers. In 2019, the bank's lending to low-income borrowers was comparable to aggregate performance. However, the COVID-19 pandemic significantly affected the housing market in the area. For moderate-income borrowers, the lending level for 2018 and 2020 was below demographics and aggregate performance. The bank did not originate any loans to moderate-income borrowers in 2019. It should be noted that 52.8 percent, 37.9 percent, and 61.0 percent of the sampled loans originated in 2018, 2019, and 2020, respectively, were made to businesses for investment purposes, where income is not required for HMDA. Refer to the following table for details.

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Columbus						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	23.8	5.5	0	0.0	0	0.0
2019	23.8	4.0	1	3.4	235	5.1
2020	23.8	2.9	0	0.0	0	0.0
Moderate						
2018	17.4	13.7	3	8.3	115	1.9
2019	17.4	11.6	0	0.0	0	0.0
2020	17.4	10.1	2	4.9	186	2.1
Middle						
2018	18.0	19.3	1	2.8	65	1.1
2019	18.0	18.8	1	3.4	75	1.6
2020	18.0	13.9	2	4.9	173	1.9
Upper						
2018	40.8	39.4	13	36.1	1,485	24.1
2019	40.8	39.1	16	55.2	2,680	57.7
2020	40.8	33.9	12	29.3	1,075	12.1
Not Available						
2018	0.0	22.1	19	52.8	4,495	73.0
2019	0.0	26.5	11	37.9	1,655	35.6
2020	0.0	39.2	25	61.0	7,457	83.9
Totals						
2018	**100.0**	**100.0**	**36**	**100.0**	**6,160**	**100.0**
2019	**100.0**	**100.0**	**29**	**100.0**	**4,645**	**100.0**
2020	**100.0**	**100.0**	**41**	**100.0**	**8,890**	**100.0**
Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%.						

Small Business Loans

The distribution of small business loans reflects reasonable performance among businesses of different sizes. The bank's penetration level of businesses with GARs of $1 million or less is significantly less than the percentage of businesses that reported GARs of $1 million or less. It should be noted that 36.0 percent of loans reviewed were PPP loans and did not have GAR information readily available. Excluding PPP loans, lending performance to businesses with gross annual revenues of $1 million or less increased to 35.4 percent, but remains below demographic data. It is further noted that 23 (85.2 percent) and 19 (70.4 percent) of PPP loans were originated in

amounts of $250,000 or less and $100,000 or less, respectively, which is an indicator that the bank is willing to lend to small businesses. Refer to the following table for details.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Columbus					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	85.8	17	22.7	1,942	18.3
>$1,000,000	4.1	31	41.3	5,418	50.9
Revenue Not Available	10.1	27	36.0	3,281	30.8
Total	**100.0**	**75**	**100.0**	**10,641**	**100.0**
Source: 2020 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%					

COMMUNITY DEVELOPMENT TEST

SSB's community development performance demonstrated reasonable responsiveness to community development needs in the assessment area, given its capacity and the need and availability of such opportunities in the assessment area. The bank responded through community development loans, qualified investments, and community development services within the assessment area.

Community Development Loans

SSB originated 15 community development loans totaling $16.1 million within this assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Community Development Test* section for additional details.

Qualified Investments

SSB made three qualifying investments to support community service totaling $1,500 within the assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Qualified Investments* section for additional details.

Community Development Services

SSB provided two community development services to organizations located within this assessment area. Given the bank's capacity and availability of opportunities, the bank demonstrated adequate responsiveness for this assessment area. The bank's performance is comparable to its performance during the previous evaluation. Refer to the overall *Community Development Services* section for additional details.

ATLANTA ASSESSMENT AREA– Full-Scope Review

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ATLANTA ASSESSMENT AREA

SSB's Atlanta Assessment Area consists of 56 census tracts within Carroll, Coweta, and Paulding Counties. The bank operates three full-service branches (20.0 percent of its branches) within this assessment area located in a moderate-, middle- and upper-income census tract. Since the previous evaluation, Coweta and Paulding Counties were added to the assessment area to include the areas where branches were acquired from Small Town Bank. The bank's lending in this assessment area represents 7.8 percent of the loans originated inside assessment areas.

Economic and Demographic Data

Based on 2020 D&B data, service industries represent the largest portion of businesses at 34.0 percent, followed by non-classifiable establishments and retail trade at 25.2 and 10.6 percent, respectively. There are 33,740 businesses in the Atlanta Assessment Area. Of these businesses, 91.5 percent reported GARs of $1 million or less, 2.3 percent reported GARs of over $1 million, and 6.2 percent did not report GAR information.

According to Moody's Analytics, the top employers in the Atlanta area are Delta Air Lines, Inc., Emory University and Emory Healthcare, and The Home Depot Inc. The following table provides select demographic information for the assessment area.

Demographic Information of the Assessment Area Assessment Area: Atlanta						
Demographic Characteristics	**#**	**Low % of #**	**Moderate % of #**	**Middle % of #**	**Upper % of #**	**NA* % of #**
Geographies (Census Tracts)	56	1.8	25.0	57.1	16.1	0.0
Population by Geography	393,411	0.8	25.7	56.5	17.1	0.0
Housing Units by Geography	149,018	0.9	26.9	56.1	16.1	0.0
Owner-Occupied Units by Geography	99,452	0.1	20.6	59.5	19.8	0.0
Occupied Rental Units by Geography	38,509	2.4	40.9	48.6	8.2	0.0
Vacant Units by Geography	11,057	2.1	34.7	51.9	11.3	0.0
Businesses by Geography	32,621	0.6	28.2	53.5	17.6	0.0
Farms by Geography	1,119	0.1	23.2	59.3	17.3	0.0
Family Distribution by Income Level	102,731	22.6	18.1	21.1	38.3	0.0
Household Distribution by Income Level	137,961	23.7	17.1	19.0	40.3	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA		$67,322	Median Housing Value Median Gross Rent Families Below Poverty Level			$144,009 $905 11.8%

Source: 2015 ACS and 2020 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.

Unemployment data indicates that in prior years, the county unemployment rates remained lower than state and national averages. In 2020, the Carrol and Coweta County unemployment rates were higher than the state average, but less than the national average. Refer to the following table for additional details.

Unemployment Rates		
Area	**2019**	**2020**
	%	**%**
Carroll County	3.6	6.4
Coweta County	3.0	6.2
Paulding County	3.0	5.4
Georgia*	4.0	6.0
U.S.	3.7	8.1
*Source: Bureau of Labor Statistics and Moody's Analytics *Not Seasonally Adjusted*		

The FFIEC estimated MFI levels were used to analyze home mortgage loans for the *Borrower Profile* criterion. The low-, moderate-, middle-, and upper-income ranges and categories are presented in the following table for the Atlanta Assessment Area.

Table B – Median Family Income Ranges				
Median Family Incomes	**Low <50%**	**Moderate 50% to <80%**	**Middle 80% to <120%**	**Upper ≥120%**
Atlanta-Sandy Springs-Roswell, GA MSA Median Family Income (12060)				
2018 ($74,400)	<$37,200	$37,200 to <$59,520	$59,520 to <$89,280	≥$89,280
Atlanta-Sandy Springs-Alpharetta, GA MSA Median Family Income (12060)				
2019 ($79,200)	<$39,600	$39,600 to <$63,360	$63,360 to <$95,040	≥$95,040
2020 ($82,200)	<$41,100	$41,100 to <$65,760	$65,760 to <$98,640	≥$98,640
Source: FFIEC				

Competition

There is a high level of competition within this assessment area. According to FDIC Deposit Market Share data, as of June 30, 2020, 15 FDIC-insured financial institutions operated 60 offices within the Atlanta Assessment Area. Of these institutions, SSB ranked 8th with a 3.7 percent deposit market share.

In relation to home mortgage lending, there is a high number of competitors present in this assessment area. In 2020, 388 lenders originated and purchased 29,816 home mortgage loans. SSB ranked 211th in the assessment area, with 0.03% of the market share. Quicken Loans, LLC, Wells Fargo Bank, Homestar Financial Corporation, and PennyMac Loan Services, LLC, led the market with 22.6 percent, combined.

The bank is not required to collect or report its small business loan data, and has not elected to do so. Therefore, the analysis of small business loans under the Lending Test does not include

comparisons against aggregate data. However, aggregate data was reviewed to assess the level of competition within the assessment area. The 2020 aggregate lending data was not available; therefore, 2019 data was reviewed. The 2019 aggregate data shows that 89 lenders reported 7,543 small business loans in the assessment area. This indicates a high degree of competition for this product. American Express, National Bank, JP Morgan Chase Bank, NA, Bank of America, and Wells Fargo led the market, originating 48.7 percent of the total loans.

Community Contacts

Examiners interviewed two community contacts in Carroll and Paulding Counties. The Paulding contact stated that the overall economy is good within the county and the credit needs of individuals as well as small businesses are being met. The Paulding contact stated that most people leave the county to work and commute to the business area of Cobb County. The Paulding contact also stated that public infrastructure could become a problem as more businesses locate inside of Paulding County. The Carroll contact stated that most individuals work inside the county lines. The Carroll contact stated that the credit needs of individuals as well as small businesses are being met. There have been no discriminatory practices by any financial institutions (that the contacts were aware of) in either county.

Credit and Community Development Needs and Opportunities

Considering information obtained from the community contact and demographic and economic data, examiners determined small business loans and affordable housing represent the most significant credit needs within the assessment area.

CONCLUSIONS ON PERFORMANCE CRITERIA IN ATLANTA ASSESSMENT AREA

LENDING TEST

The Lending Test performance in the Atlanta Assessment Area is Satisfactory. This is supported by overall reasonable geographic distribution and borrower profile performance for small business loans.

Geographic Distribution

The geographic distribution of loans reflects a reasonable dispersion throughout the assessment area. The bank's small business lending performance supports this conclusion. A reasonable conclusion could not be formed for the sampled home mortgage loans given its low volume of originations during the review period.

Home Mortgage Loans

Given the low volume of sampled loans originated in the assessment area, examiners could not form reasonable conclusions regarding the bank's performance. For the three years reviewed, a total of 13 sampled loans were originated. In 2018, the bank originated three loans totaling $285,000: two loans totaling $170,000 were in moderate-income census tracts, and one totaling $155,000 was in a middle-income census tract. In 2019, the bank originated two loans totaling $520,000: one was in a moderate-income tract totaling $425,000 and one in a middle-income tract totaling $95,000. In 2020, the bank

originated eight loans totaling $1.1 million: two were in a moderate-income tract totaling $326,000 and six were in middle-income tracts totaling $775,000.

Small Business Loans
The bank's geographic distribution of small business lending reflects reasonable performance. The bank did not originate any loans in low-income census tracts. Demographic data indicates opportunities to lend may be limited. The bank's small business lending in moderate-income tract levels exceeded demographic data. Refer to the following table for details.

Geographic Distribution of Small Business Loans **Assessment Area: Atlanta**					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	0.6	0	0.0	0	0.0
Moderate	28.2	18	40.0	3,440	45.9
Middle	53.5	24	53.3	3,394	45.3
Upper	17.6	3	6.7	654	8.7
Not Available	0.0	0	0.0	0	0.0
Totals	**100.0**	**45**	**100.0**	**7,488**	**100.0**
Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%.					

Borrower Profile
The distribution of borrowers reflects, given the demographics of the assessment area, reasonable penetration among businesses of different sizes. The bank has an adequate level of and small business lending. This reasonable small business lending supports this conclusion. In addition, given the impact of the COVID-19 pandemic on this assessment area this performance is considered reasonable. For home mortgage loans, a reasonable conclusion could not be formed given its low volume of sampled loan originations during the review period.

Home Mortgage Loans
Given the low volume of sampled loans originated in the assessment area, examiners could not form reasonable conclusions regarding the bank's performance. In 2018, the bank originated three loans totaling $285,000; two loans were originated in 2019 totaling $520,000, and eight loans were originated in 2020 totaling $1.1 million. No sampled loans were originated to low- or moderate-income borrowers.

Small Business Loans
The distribution of small business loans reflects reasonable performance among businesses of different sizes. The bank's penetration level of businesses with GARs of $1 million or less is significantly lower than the percentage of businesses in that category. It should be noted that 35.0 percent of loans reviewed were SBA PPP loans that did not have GAR information readily available. Lending performance is considered reasonable due to the high number of competitors in the area compared to the size of the area. Excluding PPP loans, lending performance to businesses

with gross annual revenues of $1 million or less increased to 55.6 percent. Refer to the following table for details. Refer to the following table for details.

Distribution of Small Business Loans by Gross Annual Revenue Category Assessment Area: Atlanta					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	91.3	15	33.3	2,375	31.7
>$1,000,000	2.2	12	26.7	3,138	41.9
Revenue Not Available	6.4	18	40.0	1,975	26.4
Total	**100.0**	**45**	**100.0**	**7,488**	**100.0**
Source: 2020 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%					

COMMUNITY DEVELOPMENT TEST

SSB's community development performance demonstrated adequate responsiveness to community development needs in the assessment area, given its capacity and the need and availability of such opportunities in the assessment area. The bank responded through community development loans, qualified investments, and community development services within the assessment area.

Community Development Loans

SSB originated eight community development loans totaling $5.5 million within this assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Community Development Test* section for additional details.

Qualified Investments

SSB made three qualifying investments to support community service totaling $1.6 million within the assessment area. Given the bank's capacity, availability of opportunities, and the COVID-19 pandemic, the bank demonstrated adequate responsiveness for this assessment area. Refer to the overall *Qualified Investments* section for additional details.

Community Development Services

SSB provided 13 community development services to organizations located within this assessment area. Given the bank's capacity and availability of opportunities, the bank demonstrated adequate responsiveness for this assessment area. The bank's performance is comparable to its performance during the previous evaluation. Refer to the overall Community Development Services section for additional details.

APPENDICES

INTERMEDIATE SMALL BANK PERFORMANCE CRITERIA

Lending Test

The Lending Test evaluates the bank's record of helping to meet the credit needs of its assessment area(s) by considering the following criteria:

1) The bank's loan-to-deposit ratio, adjusted for seasonal variation, and, as appropriate, other lending-related activities, such as loan originations for sale to the secondary markets, community development loans, or qualified investments;
2) The percentage of loans, and as appropriate, other lending-related activities located in the bank's assessment area(s);
3) The geographic distribution of the bank's loans;
4) The bank's record of lending to and, as appropriate, engaging in other lending-related activities for borrowers of different income levels and businesses and farms of different sizes; and
5) The bank's record of taking action, if warranted, in response to written complaints about its performance in helping to meet credit needs in its assessment area(s).

Community Development Test

The Community Development Test considers the following criteria:

1) The number and amount of community development loans;
2) The number and amount of qualified investments;
3) The extent to which the bank provides community development services; and
4) The bank's responsiveness through such activities to community development lending, investment, and service needs.

SUMMARY OF RATINGS FOR RATED AREAS

Rated Area	Lending Test	Community Development Test	Rating
Anniston	Satisfactory	Satisfactory	Satisfactory
Birmingham	Satisfactory	Satisfactory	Satisfactory
Auburn	Satisfactory	Satisfactory	Satisfactory
Huntsville	Satisfactory	Satisfactory	Satisfactory
AL Non-MSA	Satisfactory	Satisfactory	Satisfactory
Atlanta	Satisfactory	Satisfactory	Satisfactory
Columbus	Satisfactory	Satisfactory	Satisfactory

GLOSSARY

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

American Community Survey (ACS): A nationwide United States Census survey that produces demographic, social, housing, and economic estimates in the form of five year estimates based on population thresholds.

Area Median Income: The median family income for the MSA, if a person or geography is located in an MSA; or the statewide nonmetropolitan median family income, if a person or geography is located outside an MSA.

Assessment Area: A geographic area delineated by the bank under the requirements of the Community Reinvestment Act.

Census Tract: A small, relatively permanent statistical subdivision of a county or equivalent entity. The primary purpose of census tracts is to provide a stable set of geographic units for the presentation of statistical data. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. Census tract boundaries generally follow visible and identifiable features, but they may follow nonvisible legal boundaries in some instances. State and county boundaries always are census tract boundaries.

Combined Statistical Area (CSA): A combination of several adjacent metropolitan statistical areas or micropolitan statistical areas or a mix of the two, which are linked by economic ties.

Community Development: For loans, investments, and services to qualify as community development activities, their primary purpose must:

(1) Support affordable housing for low- and moderate-income individuals;
(2) Target community services toward low- and moderate-income individuals;
(3) Promote economic development by financing small businesses or farms; or
(4) Provide activities that revitalize or stabilize low- and moderate-income geographies, designated disaster areas, or distressed or underserved nonmetropolitan middle-income geographies.

Community Development Corporation (CDC): A CDC allows banks and holding companies to make equity type of investments in community development projects. Bank CDCs can develop innovative debt instruments or provide near-equity investments tailored to the development needs of the community. Bank CDCs are also tailored to their financial and marketing needs. A CDC may purchase, own, rehabilitate, construct, manage, and sell real property. Also, it may make equity or debt investments in development projects and in local businesses. The CDC activities are expected to directly benefit low- and moderate-income groups, and the investment dollars should not represent an undue risk on the banking organization.

Community Development Financial Institutions (CDFIs): CDFIs are private intermediaries (either for profit or nonprofit) with community development as their primary mission. A CDFI facilitates the flow of lending and investment capital into distressed communities and to individuals who have been unable to take advantage of the services offered by traditional financial institutions. Some basic types of CDFIs include community development banks, community development loan funds, community development credit unions, micro enterprise funds, and community development venture capital funds.

A certified CDFI must meet eligibility requirements. These requirements include the following:

- Having a primary mission of promoting community development;
- Serving an investment area or target population;
- Providing development services;
- Maintaining accountability to residents of its investment area or targeted population through representation on its governing board of directors, or by other means;
- Not constituting an agency or instrumentality of the United States, of any state or political subdivision of a state.

Community Development Loan: A loan that:

(1) Has as its primary purpose community development; and
(2) Except in the case of a wholesale or limited purpose bank:
  (i) Has not been reported or collected by the bank or an affiliate for consideration in the bank's assessment area as a home mortgage, small business, small farm, or consumer loan, unless it is a multifamily dwelling loan (as described in Appendix A to Part 203 of this title); and
  (ii) Benefits the bank's assessment area(s) or a broader statewide or regional area including the bank's assessment area(s).

Community Development Service: A service that:

(1) Has as its primary purpose community development;
(2) Is related to the provision of financial services; and
(3) Has not been considered in the evaluation of the bank's retail banking services under § 345.24(d).

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, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Core Based Statistical Area (CBSA): The county or counties or equivalent entities associated with at least one core (urbanized area or urban cluster) of at least 10,000 population, plus adjacent counties having a high degree of social and economic integration with the core as measured through commuting ties with the counties associated with the core. Metropolitan and Micropolitan Statistical Areas are the two categories of CBSAs.

Distressed Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as distressed if it is in a county that meets one or more of the following triggers:

(1) An unemployment rate of at least 1.5 times the national average;
(2) A poverty rate of 20 percent or more; or
(3) A population loss of 10 percent or more between the previous and most recent decennial census or a net migration loss of 5 percent or more over the 5-year period preceding the most recent census.

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. Other family 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).

FFIEC-Estimated Income Data: The Federal Financial Institutions Examination Council (FFIEC) issues annual estimates which update median family income from the metropolitan and nonmetropolitan areas. The FFIEC uses American Community Survey data and factors in information from other sources to arrive at an annual estimate that more closely reflects current economic conditions.

Full-Scope Review: A full-scope review is accomplished when examiners complete all applicable interagency examination procedures for an assessment area. Performance under applicable tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower profile, 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 do 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; and the disposition of the application (approved, denied, and withdrawn).

Home Mortgage Loans: Includes closed-end mortgage loans or open-end line of credits as defined in the HMDA regulation that are not an excluded transaction per the HMDA regulation.

Housing Unit: Includes a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied as separate living quarters.

Limited-Scope Review: A limited-scope review is accomplished when examiners do not complete all applicable interagency examination procedures for an assessment area.

Performance under applicable tests is often analyzed using only quantitative factors (e.g., geographic distribution, borrower profile, total number and dollar amount of investments, and branch distribution).

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

Low Income Housing Tax Credit: The Low-Income Housing Tax Credit Program is a housing program contained within the Internal Revenue Code of 1986, as amended. It is administered by the U.S. Department of the Treasury and the Internal Revenue Service. The U.S. Treasury Department distributes low-income housing tax credits to housing credit agencies through the Internal Revenue Service. The housing agencies allocate tax credits on a competitive basis.

Developers who acquire, rehabilitate, or construct low-income rental housing may keep their tax credits. Or, they may sell them to corporations or investor groups, who, as owners of these properties, will be able to reduce their own federal tax payments. The credit can be claimed annually for ten consecutive years. For a project to be eligible, the developer must set aside a specific percentage of units for occupancy by low-income residents. The set-aside requirement remains throughout the compliance period, usually 30 years.

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 metropolitan area/assessment area.

Median Income: The median income divides the income distribution into two equal parts, one having incomes above the median and other having incomes below the median.

Metropolitan Division (MD): A county or group of counties within a CBSA that contain(s) an urbanized area with a population of at least 2.5 million. A MD is one or more main/secondary counties representing an employment center or centers, plus adjacent counties associated with the main/secondary county or counties through commuting ties.

Metropolitan Statistical Area (MSA): CBSA associated with at least one urbanized area having a population of at least 50,000. The MSA comprises the central county or counties or equivalent entities 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 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 and less than 80 percent in the case of a geography.

Multi-family: Refers to a residential structure that contains five or more units.

Nonmetropolitan Area (also known as **non-MSA):** All areas outside of metropolitan areas. The definition of nonmetropolitan area is not consistent with the definition of rural areas. Urban and rural classifications cut across the other hierarchies. For example, there is generally urban and rural territory within metropolitan and nonmetropolitan areas.

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 lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

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

Rural Area: Territories, populations, and housing units that are not classified as urban.

Small Business Investment Company (SBIC): SBICs are privately-owned investment companies which are licensed and regulated by the Small Business Administration (SBA). SBICs provide long-term loans and/or venture capital to small firms. Because money for venture or risk investments is difficult for small firms to obtain, SBA provides assistance to SBICs to stimulate and supplement the flow of private equity and long-term loan funds to small companies. Venture capitalists participate in the SBIC program to supplement their own private capital with funds borrowed at favorable rates through SBA's guarantee of SBIC debentures. These SBIC debentures are then sold to private investors. An SBIC's success is linked to the growth and profitability of the companies that it finances. Therefore, some SBICs primarily assist businesses with significant growth potential, such as new firms in innovative industries. SBICs finance small firms by providing straight loans and/or equity-type investments. This kind of financing gives them partial ownership of those businesses and the possibility of sharing in the companies' profits as they grow and prosper.

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

Small Farm Loan: 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, including farm residential and other improvements, or are classified as loans to finance agricultural production and other loans to farmers.

Underserved Middle-Income Nonmetropolitan Geographies: A nonmetropolitan middle-income geography will be designated as underserved if it meets criteria for population size, density, and dispersion indicating the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

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

Urban Area: All territories, populations, and housing units in urbanized areas and in places of 2,500 or more persons outside urbanized areas. More specifically, "urban" consists of territory, persons, and housing units in places of 2,500 or more persons incorporated as cities, villages, boroughs (except in Alaska and New York), and towns (except in the New England states, New York, and Wisconsin).

"Urban" excludes the rural portions of "extended cities"; census designated place of 2,500 or more persons; and other territory, incorporated or unincorporated, including in urbanized areas.

LENDING PERFORMANCE TABLES

HUNTSVILLE ASSESSMENT AREA

Geographic Distribution

Geographic Distribution of Home Mortgage Loans Assessment Area: Huntsville						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	5.1	3.0	1	20.0	35	6.2
2019	5.1	2.5	0	0.0	0	0.0
2020	5.1	2.1	1	50.0	65	0.3
Moderate						
2018	18.3	14.0	0	0.0	0	0.0
2019	18.3	13.2	0	0.0	0	0.0
2020	18.3	11.8	0	0.0	0	0.0
Middle						
2018	33.0	34.0	2	40.0	230	40.7
2019	33.0	35.5	0	0.0	0	0.0
2020	33.0	34.8	1	50.0	25,110	99.7
Upper						
2018	43.6	49.1	2	40.0	300	53.1
2019	43.6	48.8	0	0.0	0	0.0
2020	43.6	51.3	0	0.0	0	0.0
Not Available						
2018	0.0	0.0	0	0.0	0	0.0
2019	0.0	0.0	0	0.0	0	0.0
2020	0.0	0.0	0	0.0	0	0.0
Totals						
2018	**100.0**	**100.0**	**5**	**100.0**	**565**	**100.0**
2019	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2020	**100.0**	**100.0**	**2**	**100.0**	**25,175**	**100.0**
Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%						

Geographic Distribution of Small Business Loans Assessment Area: Huntsville					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	12.1	1	20.0	524	42.4
Moderate	21.6	0	0.0	0	0.0
Middle	28.6	1	20.0	65	5.3
Upper	37.7	3	60.0	648	52.4
Not Available	0.0	0	0.0	0	0.0
Totals	**100.0**	**5**	**100.0**	**1,237**	**100.0**
Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Borrower Profile

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Huntsville						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	22.9	9.7	1	20.0	95	16.8
2019	22.9	9.8	0	0.0	0	0.0
2020	22.9	6.2	0	0.0	0	0.0
Moderate						
2018	16.0	16.8	1	20.0	205	36.3
2019	16.0	16.9	0	0.0	0	0.0
2020	16.0	14.1	0	0.0	0	0.0
Middle						
2018	17.4	19.9	1	20.0	105	18.6
2019	17.4	20.0	0	0.0	0	0.0
2020	17.4	18.6	1	50.0	65	0.3
Upper						
2018	43.8	33.5	0	0.0	0	0.0
2019	43.8	34.1	0	0.0	0	0.0
2020	43.8	36.0	0	0.0	0	0.0
Not Available						
2018	0.0	20.1	2	40.0	160	28.3
2019	0.0	19.2	0	0.0	0	0.0
2020	0.0	25.1	1	50.0	25,110	99.7

Totals						
2018	**100.0**	**100.0**	**5**	**100.0**	**565**	**100.0**
2019	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2020	**100.0**	**100.0**	**2**	**100.0**	**25,175**	**100.0**

Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Distribution of Small Business Loans by Gross Annual Revenue Category **Assessment Area: Huntsville**					
Gross Revenue Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
<=$1,000,000	83.4	1	20.0	48	3.9
>$1,000,000	5.0	2	40.0	1,093	88.4
Revenue Not Available	11.7	2	40.0	96	7.8
Total	**100.0**	**5**	**100.0**	**1,237**	**100.0**

Source: 2020 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%

BIRMINGHAM ASSESSMENT AREA

Geographic Distribution

Geographic Distribution of Home Mortgage Loans Assessment Area: Birmingham						
Tract Income Level	**% of Owner-Occupied Housing Units**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	6.4	2.0	0	0.0	0	0.0
2019	6.4	1.8	0	0.0	0	0.0
2020	6.4	1.4	0	0.0	0	0.0
Moderate						
2018	17.7	9.6	2	40.0	150	14.2
2019	18.0	9.9	0	0.0	0	0.0
2020	18.0	7.6	1	16.7	38	0.6
Middle						
2018	28.9	27.1	0	0.0	0	0.0
2019	29.9	27.2	0	0.0	0	0.0
2020	29.9	24.6	1	16.7	38	0.6
Upper						
2018	47.0	61.3	3	60.0	905	85.8
2019	45.6	61.0	0	0.0	0	0.0
2020	45.6	66.4	4	66.7	5,967	98.7
Not Available						
2018	0.1	0.0	0	0.0	0	0.0
2019	0.1	0.1	0	0.0	0	0.0
2020	0.1	0.0	0	0.0	0	0.0
Totals						
2018	**100.0**	**100.0**	**5**	**100.0**	**1,055**	**100.0**
2019	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2020	**100.0**	**100.0**	**6**	**100.0**	**6,043**	**100.0**

Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Geographic Distribution of Small Business Loans Assessment Area: Birmingham					
Tract Income Level	**% of Businesses**	**#**	**%**	**$(000s)**	**%**
Low	8.1	0	0.0	0	0.0
Moderate	19.4	5	25.0	501	15.8
Middle	25.1	3	15.0	693	21.8
Upper	45.8	12	60.0	1,980	62.4
Not Available	1.5	0	0.0	0	0.0
Totals	**100.0**	**20**	**100.0**	**3,174**	**100.0**
Source: 2020 D&B Data; Bank Data. Due to rounding, totals may not equal 100.0%					

Borrower Profile

Distribution of Home Mortgage Loans by Borrower Income Level Assessment Area: Birmingham						
Borrower Income Level	**% of Families**	**Aggregate Performance % of #**	**#**	**%**	**$(000s)**	**%**
Low						
2018	23.1	6.8	0	0.0	0	0.0
2019	23.1	5.6	0	0.0	0	0.0
2020	23.1	4.3	0	0.0	0	0.0
Moderate						
2018	15.0	17.8	0	0.0	0	0.0
2019	15.0	16.0	0	0.0	0	0.0
2020	15.0	14.0	0	0.0	0	0.0
Middle						
2018	17.6	19.4	1	20.0	25	2.4
2019	17.6	19.4	0	0.0	0	0.0
2020	17.6	18.7	0	0.0	0	0.0
Upper						
2018	44.4	38.3	4	80.0	1,030	97.6
2019	44.4	43.0	0	0.0	0	0.0
2020	44.4	45.0	2	33.3	76	1.3
Not Available						
2018	0.0	17.6	0	0.0	0	0.0
2019	0.0	16.0	0	0.0	0	0.0
2020	0.0	18.0	4	66.7	5,967	98.7

Totals						
2018	**100.0**	**100.0**	**5**	**100.0**	**1,055**	**100.0**
2019	**100.0**	**100.0**	**0**	**0.0**	**0**	**0.0**
2020	**100.0**	**100.0**	**6**	**100.0**	**6,043**	**100.0**

Source: 2015 ACS; Bank Data, 2018, 2019 & 2020 HMDA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Distribution of Small Business Loans by Gross Annual Revenue Category

Assessment Area: Birmingham

Gross Revenue Level	% of Businesses	#	%	$(000s)	%
<=$1,000,000	82.7	4	20.0	817	25.7
>$1,000,000	6.1	4	20.0	1,187	37.4
Revenue Not Available	11.2	12	60.0	1,170	36.9
Total	**100.0**	**20**	**100.0**	**3,174**	**100.0**

Source: 2020 D&B Data, Bank Data. Due to rounding, totals may not equal 100.0%

FirstBank Branch Locations and Hours of Operation

Branch Name	Assessment Area Name		Address				ATM Type		Branch Lobby Hours									DRIVE THRU Hours									Geocode Information			
	State	Name	Street Address	City	State	Zip - 5 digits	Deposit Taking	Cash Only	Open	Closed	Days of week	Open	Closed	Days of week	Open	Closed	Days of week	Open	Closed	Days of week	Open	Closed	Days of week	Open	Closed	Days of week	MSA	State	County	Tract
Bowling Green- Campbell Lane	KY	Bowling Green, KY	1515 Campbell Ln	Bowling Green	KY	42104	Y		8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				14540	21	227	0107.01
Bowling Green- Fairview	KY	Bowling Green, KY	948 Fairview	Bowling Green	KY	42101	Y		8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				14540	21	227	0102.00
Bowling Green- Scottsville Road	KY	Bowling Green, KY	5290 Scottsville Rd	Bowling Green	KY	42104	Y		8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				14540	21	227	0108.01
Bruceton- Hollow Rock	TN	TN Non MSA	28915 Broad St	Hollow Rock	TN	38342	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	017	9620.00
Camden 641	TN	TN Non MSA	126 US-641 N	Camden	TN	38320		Y	8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	005	9633.00
Chattanooga- East Ridge	TN	Chattanooga, TN-GA	4227 Ringgold Rd	Chattanooga	TN	37412	Y		8:30	5:00	M-F							8:30	5:00	M-F							16860	47	065	0117.00
Chattanooga- Northshore	TN	Chattanooga, TN-GA	319 Manufacturer's Rd	Chattanooga	TN	37405	Y		8:30	5:00	M-F							8:30	5:00	M-F							16860	47	065	0008.00
Chattanooga- Ooltewah	TN	Chattanooga, TN-GA	9217 Lee Hwy	Ooltewah	TN	37363	Y		8:30	5:00	M-F							8:30	5:00	M-F							16860	47	065	0112.01
Chattanooga- Shallowford	TN	Chattanooga, TN-GA	7442 Shallowford Rd	Chattanooga	TN	37421	Y		8:30	5:00	M-F							8:30	5:00	M-F							16860	47	065	0113.21
Clarksburg	TN	TN Non MSA	3260 Hwy 22 S	Clarksburg	TN	38324		Y	8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	017	9625.00
Cool Springs	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	3310 Aspen Grove Dr	Franklin	TN	37067	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	187	0509.05
Crossville	TN	TN Non MSA	139 Elmore Rd	Crossville	TN	38555	Y		8:00	4:00	M-TH	8:00	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				99999	47	035	9705.02
Dalton- Thornton Ave	GA	Dalton, GA	401 South Thornton Ave	Dalton	GA	30720	Y		9:00	4:00	M-TH	9:00	5:00	F				8:30	4:00	M-TH	8:30	5:30	F				19140	13	313	0005.02
Dalton- Varnell	GA	Dalton, GA	3895 Cleveland Hwy	Dalton	GA	30721	Y		9:00	4:00	M-TH	9:00	5:00	F				8:30	4:00	M-TH	8:30	5:30	F				19140	13	313	0001.02
Dandridge	TN	Morristown, TN	1013 S Hwy 92	Dandridge	TN	37725	Y		9:00	4:00	M-TH	9:00	5:30	F				8:30	4:00	M-TH	8:30	5:30	F				34100	47	089	0707.00
Dayton	TN	TN Non MSA	1525 Market St	Dayton	TN	37321	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	143	9754.01
Decherd	TN	TN Non MSA	2200 Decherd Blvd	Decherd	TN	37324	Y		8:30	4:30	M-TH	8:30	5:00	F				8:15	5:00	M-F							99999	47	051	9604.00
Dickson	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	345 Hwy 46 S	Dickson	TN	37055	Y		8:00	4:00	M-TH	8:00	5:00	F				7:30	4:00	M-TH	7:30	6:00	F				34980	47	043	0606.02
Fairview	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	2202 Fairview Blvd	Fairview	TN	37062	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:30	F				34980	47	187	0505.03
Fayetteville	TN	TN Non MSA	1927 Wilson Pkwy	Fayetteville	TN	37334	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	103	9753.00
Florence	AL	Florence - Muscle Shoals, AL	123 North Court St	Florence	AL	35630	Y		8:30	4:00	M-TH	8:30	5:00	F													22520	01	077	0101.00
Fort Oglethorpe	GA	Chattanooga, TN-GA	3610 Battlefield Pkwy	Fort Oglethorpe	GA	30742	Y		9:00	4:00	M-TH	9:00	5:00	F				8:00	5:00	M-F	9:00	12:00	S				16860	13	047	0304.01
Franklin Post Office	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	510 Columbia Ave	Franklin	TN	37064		Y	8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	187	0508.00
Friendship	TN	Jackson, TN	650 Main St	Friendship	TN	38034		Y	8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				27180	47	033	9612.00
Berry Farms	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	40 Moss Lane, Suite 100	Franklin	TN	37064	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	187	0509.08

FirstBank Branch Locations and Hours of Operation

FS- Nolensville Road	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	7216 Nolensville Rd, Suite 100	Nolensville	TN	37135	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	187	0501.02
FS- Pewitt Dr	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	134 Pewitt Dr, Suite 100	Brentwood	TN	37027	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	187	0503.04
FS- Presidents Place	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	724 Presidents Place	Smyrna	TN	37167	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	149	0403.11
FS- WestHaven	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	1015 Westhaven Blvd, Suite 150	Franklin	TN	37064	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	187	0506.02
Springhill	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	4824 Main Street, Suite A	Spring Hill	TN	37174	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	187	0512.02
FS- Memorial Blvd	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	2415 Memorial Blvd	Murfreesboro	TN	37129	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	149	0413.02
FS- Old Fort	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	2610 Old Fort Parkway	Murfreesboro	TN	37128	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	149	0409.06
Goodlettsville	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	885 Conference Dr	Goodlettsville	TN	37072		Y	8:30	4:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	037	0103.03
Henderson- Main	TN	Jackson, TN	101 East Main St	Henderson	TN	38340			8:30	4:00	M-TH	8:30	5:00	F													27180	47	023	9702.00
Hixson	TN	Chattanooga, TN-GA	1959 Northpoint Blvd	Hixson	TN	37343	Y		8:30	5:00	M-F							8:30	5:00	M-F							16860	47	065	0104.31
Jackson- Channing Way	TN	Jackson, TN	11 Channing Way	Jackson	TN	38305	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F	9:00	1:00	S	27180	47	113	0016.04
Jackson- University Parkway	TN	Jackson, TN	15 West University Pkwy	Jackson	TN	38305		Y	8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				27180	47	113	0016.06
Jefferson City	TN	Morristown, TN	167 W Broadway Blvd	Jefferson	TN	37760	Y		9:00	4:00	M-TH	9:00	5:30	F				8:30	4:00	M-TH	8:30	5:30	F				34100	47	089	0706.00
Knoxville- Langley	TN	Knoxville, TN	520 W Summit Hill Dr	Knoxville	TN	37902		Y	8:30	5:00	M-TH	8:30	5:00	F													28940	47	093	0001.00
Knoxville- West	TN	Knoxville, TN	10216 Kingston Pike	Knoxville	TN	37922	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				28940	47	093	0058.07
Lexington- East	TN	TN Non MSA	53 East Church St	Lexington	TN	38351	Y		8:30	4:30	M-TH	8:30	5:00	F				8:00	5:00	M-F							99999	47	077	9753.00
Lexington- West	TN	TN Non MSA	101 West Church St	Lexington	TN	38351		Y	8:30	4:30	M-TH	8:30	5:00	F				8:00	5:00	M-F	8:00	5:00	F				99999	47	077	9754.00
Linden	TN	TN Non MSA	120 West Main St	Linden	TN	37096		Y	8:00	4:00	M-TH	8:00	5:00	F				8:00	4:00	M-TH	8:00	5:00	F				99999	47	135	9302.00
Lynchburg	TN	TN Non MSA	71 Mechanic St South	Lynchburg	TN	37352	Y		8:30	4:30	M-TH	8:15	5:00	F													99999	47	127	9302.00
Manchester	TN	TN Non MSA	1500 Hillsboro Blvd	Manchester	TN	37355	Y		8:30	4:30	M-TH	8:15	5:00	F				8:15	5:00	M-F							99999	47	031	9705.00
Maynardville	TN	Knoxville, TN	2905 Maynardville Hwy	Maynardville	TN	37807	Y		9:00	4:00	M-TH	9:00	5:30	F				8:30	4:00	M-TH	8:30	5:30	F				28940	47	173	0402.01
Mt Juliet	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	4110 N Mt Juliet Rd	Mt Juliet	TN	37122		Y	8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	189	0303.09
Murfreesboro- Main	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	615 Memorial Blvd	Murfreesboro	TN	37129	Y		8:30	5:00	M-TH	8:30	5:00	F				8:00	5:00	M-TH	8:00	5:00	F				34980	47	149	0417.00
Murfreesboro- Salem	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	2670 New Salem Hwy	Murfreesboro	TN	37128	Y		8:30	5:00	M-TH	8:30	5:00	F				8:00	5:00	M-TH	8:00	5:00	F				34980	47	149	0418.00
Nashville- Green Hills	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	2121 Abbott Martin Rd	Nashville	TN	37215	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	037	0179.01
Nashville- West End	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	1817 West End Ave	Nashville	TN	37203	Y		8:30	5:00	M-TH	8:30	5:00	F				8:30	5:00	M-TH	8:30	5:00	F				34980	47	037	0195.00
Oakland	TN	Memphis, TN	6280 Hwy 64	Oakland	TN	38060	Y		8:30	4:30	M-TH	8:30	5:00	F				8:00	5:00	M-F							32820	47	047	0604.03
Paris- Mineral Wells	TN	TN Non MSA	1068 Mineral Wells Ave	Paris	TN	38242	Y		8:00	4:00	M-TH	8:00	5:00	F				8:00	4:00	M-TH	8:00	5:00	F	9:00	12:00	S	99999	47	079	9695.00
Paris- West Wood St	TN	TN Non MSA	101 West Wood St	Paris	TN	38242		Y	8:00	4:00	M-TH	8:00	5:00	F				8:00	4:00	M-TH	8:00	5:00	F				99999	47	079	9693.00
Parsons	TN	TN Non MSA	450 Tennessee Ave S	Parsons	TN	38363	Y		8:30	4:30	M-TH	8:30	5:00	F	8:30	12:30	S	8:00	5:00	M-F	8:30	12:30	S				99999	47	039	9550.02
Ringgold	GA	Chattanooga, TN-GA	5063 Alabama Hwy	Ringgold	GA	30736	Y		9:00	4:00	M-TH	9:00	5:00	F				8:00	5:00	M-F	9:00	12:00	S				16860	13	047	0302.01
Scotts Hill	TN	TN Non MSA	20 TN-114	Scotts Hill	TN	38374			8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F	8:00	12:00	S	99999	47	077	9755.00
Scottsville- Veterans Memorial Hwy	KY	Bowling Green, KY	1595 Veterans Memorial Hwy	Scottsville	KY	42164	Y		8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F	8:00	12:00	S	14540	21	003	9203.00

FirstBank Branch Locations and Hours of Operation

Shelbyville	TN	TN Non MSA	508 Madison St	Shelbyville	TN	37160		Y	8:30	4:00	M-TH	8:30	5:00	F				8:00	4:00	M-TH	8:00	5:00	F				99999	47	003	9505.00
Smithville	TN	TN Non MSA	200 West Main St	Smithville	TN	37166	Y		8:00	4:00	M-TH	8:00	5:00	F	9:00	12:00	S	8:00	4:30	M-TH	8:00	5:00	F	9:00	12:00	S	99999	47	041	9209.00
Smyrna	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	417 S Lowry St	Smyrna	TN	37167	Y		8:30	5:00	M-F							8:00	5:00	M-F							34980	47	149	0423.00
TraVure	TN	Memphis, TN	6815 Poplar Ave	Memphis	TN	37138	Y		8:30	4:30	M-TH	8:30	5:00	F													32820	47	157	0213.20
Tullahoma	TN	TN Non MSA	340 West Lincoln St	Tullahoma	TN	37388	Y		8:30	4:30	M-TH	8:15	5:00	F				8:15	5:00	M-TH	8:15	5:00	F				99999	47	031	9710.00
Waverly	TN	TN Non MSA	416 West Main St	Waverly	TN	37185	Y		8:30	4:00	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				99999	47	085	1303.00
Woodbury	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	101 West Main St	Woodbury	TN	37190	Y		8:00	4:00	M-TH	8:00	5:00	F				8:00	4:00	M-TH	8:00	5:00	F				34980	47	015	9602.00
Bearden	TN	Knoxville, TN	5537 Kingston Pike	Knoxville	TN	37919	Y		8:30	5:00	M-F							8:30	5:00	M-F							28940	47	093	0037.00
Huntsville- Providence	AL	Huntsville, AL	1658 Old Monrovia Rd NW # 110	Huntsville	AL	35806	Y		8:30	4:00	M-TH	8:30	5:00	F													26620	01	089	0106.26
Jackson	TN	Jackson, TN	2113 S Highland Ave	Jackson	TN	38301	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				27180	47	113	0013.00
Cookeville	TN	TN Non MSA	749 South Willow Ave	Cookeville	TN	38501	Y		8:00	4:00	M-TH	8:00	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				99999	47	141	0006.00
Knoxville- Emory Road	TN	Knoxville, TN	233 E. Emory Road # 109	Powell	TN	37849	Y		8:30	5:00	M-F							8:30	5:00	M-F							28940	47	093	0061.02
One22One	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	1221 Broadway #1300	Nashville	TN	37203	Y		8:30	5:00	M-TH	8:30	5:00	F													34980	47	037	0195.02
Huntsville	AL	Huntsville, AL	401 Franklin St	Huntsville	AL	35801	Y		9:00	5:00	M-F							8:30	5:00	M-F							26620	01	089	0031.00
Greystone	AL	Birmingham, AL	5354 Highway 280	Birmingham	AL	35242			8:30	5:00	M-F							8:30	5:00	M-F							13820	01	117	0303.30
Scottsville- White Plains	KY	Bowling Green, KY	1520 Old Gallatin Rd	Scottsville	KY	42164	Y		8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				14540	21	003	9204.00
Henderson- North Side	TN	Jackson, TN	425 East Main St	Henderson	TN	38340	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				27180	47	023	9702.00
Huntingdon- Northside	TN	TN Non MSA	123 Second Ave	Huntingdon	TN	38344			8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	017	9621.02
Huntingdon- East End	TN	TN Non MSA	20340 East Main St	Huntingdon	TN	38344	Y		8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	017	9621.02
Lexington- Hospital Dr	TN	TN Non MSA	164 Hospital Dr	Lexington	TN	38351	Y		8:00	5:00	M-TH	8:00	5:00	F	8:00	12:30	S	8:00	5:00	M-TH	8:00	5:00	F	8:00	12:30	S	99999	47	077	9754.00
Camden	TN	TN Non MSA	25 N Rosemary Ave	Camden	TN	38320		Y										8:30	4:00	M-TH	8:30	5:00	F				99999	47	005	9633.00
Parkers Crossroads	TN	TN Non MSA	45 Wildersville Rd	Wildersville	TN	38388			8:30	4:00	M-TH	8:30	5:00	F				8:30	4:00	M-TH	8:30	5:00	F				99999	47	077	9751.00
Anniston	AL	Anniston-Oxford, AL	615 Quintard Ave	Anniston	AL	36203		Y	9:00	4:00	M-TH	9:00	5:00	F				8:30	4:30	M-TH	8:30	5:00	F				11500	01	015	0008.00
Carrollton	GA	Atlanta-Sandy Springs-Roswell, GA	905 Maple St	Carrollton	GA	30117		Y	9:00	4:00	M-TH	9:00	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				12054	13	045	9105.04
Newnan	GA	Atlanta-Sandy Springs-Roswell, GA	20 Oak Hill Blvd	Newnan	GA	30265		Y	9:00	4:00	M-TH	9:00	5:00	F				8:30	4:30	M-TH	8:30	5:00	F				12054	13	077	1703.10
Opelika	AL	Auburn-Opelika, AL	2601 Frederick Rd	Opelika	AL	36801		Y	9:00	5:00	M-F							8:30	5:00	M-F							12220	01	081	0411.01
Auburn	AL	Auburn-Opelika, AL	815 Opelika Rd	Auburn	AL	36830		Y	9:00	5:00	M-F							8:30	5:00	M-F							12220	01	081	0409.04
Birmingham- Financial Center	AL	Birmingham, AL	505 20th St N Suite 100	Birmingham	AL	35203	Y		8:30	5:00	M-F																13820	01	073	0027.02
Birmingham- Office Park	AL	Birmingham, AL	100 Office Park Dr	Birmingham	AL	35223	Y		8:30	5:00	M-F							8:30	5:00	M-F							13820	01	073	0107.03
Columbus- 13th Street	GA	Columbus, GA	1326 13th St	Columbus	GA	31901		Y	9:00	5:00	M-F							9:00	5:00	M-F							17980	13	215	0012.00
Columbus- Whittlesey	GA	Columbus, GA	5604 Whittlesey Blvd	Columbus	GA	31909		Y	9:00	5:00	M-F							8:30	5:00	M-F							17980	13	215	0102.05
Dallas	GA	Marietta, GA	45 East Paulding Dr	Dallas	GA	30157		Y	8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				31924	13	223	1202.83
Cartersville	GA	Marietta, GA	215 East Main St	Cartersvile	GA	30120	Y		8:30	4:00	M-TH	8:30	5:00	F				8:00	4:00	M-TH	8:00	6:00	F				31924	13	015	9607.01

FirstBank Branch Locations and Hours of Operation

Roanoke	AL	AL Non MSA	548 Main St	Roanoke	AL	36274		Y	8:30	4:30	M-TH	8:30	5:00	F				8:30	4:30	M-TH	8:00	5:00	F				99999	01	111	0004.00
Sylacauga	AL	AL Non MSA	101 West Fort William St	Sylacauga	AL	35150		Y	9:00	4:00	M-F							8:00	5:00	M-F							99999	01	121	0118.00
Wedowee	AL	AL Non MSA	117 North Main St	Wedowee	AL	36278		Y	8:30	4:30	M-TH	8:30	5:00	F				8:00	4:30	M-TH	8:00	5:00	F				99999	01	111	0003.00
Rockmart	GA	GA Non MSA	1201 Nathan Deak Pkwy	Rockmart	GA	30153	Y		8:30	4:00	M-TH	8:30	5:00	F				8:00	4:00	M-TH	8:00	6:00	F				99999	13	233	0107.00
Tuscaloosa	AL	Tuscaloosa, AL	2700 University Blvd Suite A	Tuscaloosa	AL	35401			9:00	5:00	M-F																46220	01	125	0116.00
Huntingdon - Main (Activities Bldg - Huntingdon) Temporary Acting Main Branch	TN	TN Non MSA	108 Second Ave E	Huntingdon	TN	38344																								

FirstBank Stand-Alone ATMs

ATM Location Name	Assessment Area Name		ADDRESS				ATM Type		Geocode			
	State	Name	Street Address	City	State	Zip - 5 digits	Deposit Taking	Cash Only	MSA	County	Census Tract	Tract Income
Knoxville - Bijou (191)	47	28940 - Knoxville TN	803 South Gay Street	Knoxville	TN	37902		Y	28940	093	0001.00	UPP
Henderson - Corner Express (191)	47	27180 - Jackson TN	530 West Main Street	Henderson	TN	38340		Y	27180	023	9702.00	MID
Tullahoma - Daddy Billy's (191)	47	99999 - TN Non-MSA	119 NW Atlantic Street	Tullahoma	TN	37388		Y	99999	031	9708.01	UPP
Henderson - Freed Hardeman (191)	47	27180 - Jackson TN	158 East Main Street	Henderson	TN	38351		Y	27180	023	9702.00	MID
Wildersville - Imart (191)	47	99999 - TN Non-MSA	21465 Highway 22 North	Wildersville	TN	38388		Y	99999	077	9751.00	MID
Lynchburg - JD Visitor's Center (191)	47	99999 - TN Non-MSA	182 Lynchburg Highway	Lynchburg	TN	37352		Y	99999	127	9302.00	UPP
Henderson - Oden's BP (191)	47	27180 - Jackson TN	375 N Church Avenue	Henderson	TN	38340		Y	27180	023	9702.00	MID
Centerville - Owens Corner Mart (191)	47	OUTSIDE BANK'S AA 34980 - Nashville TN	1745 Highway 100	Centerville	TN	37033		Y	34980	081	9503.02	MOD
Henderson - Piggly Wiggly (191)	47	27180 - Jackson TN	539 West Main Street	Henderson	TN	38351		Y	27180	023	9702.00	MID
Signal Mountain - Pruett's (191)	47	16860 - Chattanooga TN-GA	1210 Taft Hwy #R	Signal Mountain	TN	37377	Y		16860	065	0110.04	UPP
Estill Springs - Sak N Pak (191)	47	99999 - TN Non-MSA	500 South Main Street	Estill Springs	TN	37330		Y	99999	051	9602.02	MID
Scotts Hill - Piggly Wiggly (191) Underserved/Distressed Tract	47	99999 - TN Non-MSA	670 Highway 114 S	Scotts Hill	TN	38374		Y	99999	077	9755.00	MID
Jackson - Union University (191)	47	27180 - Jackson TN	1050 University Drive	Jackson	TN	38305	Y		27180	113	0016.05	MID
Buchanan - Paris Landing Inn (191)	47	99999 - TN Non-MSA	400 Lodge Rd	Buchanan	TN	38222		Y	99999	079	9690.01	MID
Friendship - Thriftis (191)	47	27180 - Jackson TN	826 S. Cavalier Drive	Friendship	TN	38034		Y	27180	033	9612.00	MID
Jefferson City - Carson Newman (191)	47	34100 - Morristown TN	2130 Branner Ave	Jefferson City	TN	37760		Y	34100	089	0703.00	MID

FirstBank Stand-Alone ATMs

Chattanooga - Mr. Speedy - Shallowford Road ATM (N/A)	47	16860 - Chattanooga TN-GA	6001 Shallowford Road	Chattanooga	TN	37421		Y	16860	065	0114.43	MID
East Ridge - Mr. Speedy - Spring Creek Road ATM (N/A)	47	16860 - Chattanooga TN-GA	948 Spring Creek Road	East Ridge	TN	37412		Y	16860	065	0116.00	MOD
Williamson Co. Admin Office - FSB (N/A) LIMITED ACCESS TIME TEMPORARILY OUT OF SERVICE	47	34980 - Nashville TN	1320 W Main Street	Franklin	TN	37064		Y	34980	187	0508.01	MOD
Williamson Co. Ag Center - FSB (N/A) LIMITED ACCESS TIME TEMPORARILY OUT OF SERVICE	47	34980 - Nashville TN	4215 Long Lane	Franklin	TN	37064		Y	34980	187	0510.02	UPP
Williamson Co. Courthouse - FSB (N/A) LIMITED ACCESS TIME TEMPORARILY OUT OF SERVICE	47	34980 - Nashville TN	135 S 4th Avenue	Franklin	TN	37064		Y	34980	187	0508.02	UPP
Williamson Co. Sherriff's Office - FSB (N/A) LIMITED ACCESS TIME TEMPORARILY OUT OF SERVICE	47	34980 - Nashville TN	408 Century Court	Franklin	TN	37064		Y	34980	187	0506.04	UPP
Vanderbilty University (191) FirstBank Stadium ATM	47	34980 - Nashville TN	126 28th Ave S	Nashville	TN	37212		Y	34980	037	0166.00	MID
Vanderbilt University (191) Sarratt Student Center	47	34980 - Nashville TN	2302 Vanderbilt Place	Nashville	TN	37240		Y	34980	037	0165.00	MID
Vanderbilt University (191) Warren College	47	34980 - Nashville TN	109 21st Ave S	Nashville	TN	37203		Y	34980	037	0165.00	MID

FirstBank Opened and Closed Branch Locations (2024-2025)

Branch Name	Assessment Area Name		ADDRESS				Opened	Closed	ATM Type		BRANCH SERVICES and HOURS												Geocode			
											Branch Lobby Hours						DRIVE THRU Hours									
	State	Name	Street Address	City	State	Zip - 5 digits	Date	Date	Deposit Taking	Cash Only	Open	Closed	Days of week	Open	Closed	Days of week	Open	Closed	Days of week	Open	Closed	Days of week	MSA	State	County	Tract
Bartlett	TN	Memphis, TN	8398 Highway 64	Bartlett	TN	38133		10/24/25		Y	8:30	4:30	M-TH	8:30	5:00	F	8:00	5:00	M-F				32820	47	157	0208.32
Hollywood	AL	Birmingham, AL	404 Hollywood Blvd	Birmingham	AL	35209		10/31/25			8:30	5:00	M-F										13820	01	073	0108.02
Huntingdon- Main	TN	TN Non MSA	19685 East Main St	Huntingdon	TN	38344		10/04/25			8:30	4:00	M-TH	8:30	5:00	F							99999	47	017	9621.00
Poplar	TN	Memphis, TN	6482 Poplar Ave	Memphis	TN	38119		08/08/24		Y	8:30	4:30	M-TH	8:30	5:00	F	8:00	5:00	M-F				32820	47	157	0213.11
Huntsville	AL	Huntsville, AL	720 Gallatin St SW #150	Huntsville	AL	35801		04/04/25	Y		8:30	4:00	M-TH	8:30	5:00	F	8:30	4:00	M-TH	8:30	5:00	F	26620	01	089	0031.00
Dalton- Cleveland Rd	GA	Dalton, GA	1237 Glenwood Ave	Dalton	GA	30721		01/16/24	Y		9:00	4:00	M - TH	9:00	5:00	F	8:30	4:00	M-TH	8:30	5:30	F	19140	13	313	0005.02
Farragut	TN	Knoxville, TN	11820 Kingston Pike	Farragut	TN	37934		01/16/24		Y	8:30	5:00	M-F				8:30	5:00	M-F				28940	47	093	0058.13
FS- Carothers Parkway	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	5040 Carothers Parkway, Suite 100	Franklin	TN	37067		01/16/24			8:30	5:00	M-F				8:30	5:00	M-F				34980	47	187	0510.01
FS- South Church	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	2782 South Church St	Murfreesboro	TN	37127		01/16/24			8:30	5:00	M-F				8:30	5:00	M-F				34980	47	149	0409.10
Camden- Downtown	TN	TN Non MSA	21 N Forest Ave	Camden	TN	38320		01/16/24	Y		8:30	4:00	M - TH	8:30	5:00	F	8:30	4:00	M-TH	8:30	5:00	F	99999	47	005	9633.00
Huntsville	AL	Huntsville, AL	401 Franklin St	Huntsville	AL	35801	04/07/25		Y		9:00	5:00	M-F				8:30	5:00	M-F				26620	01	089	0031.00
Greystone	AL	Birmingham, AL	5354 Highway 280	Birmingham	AL	35242	05/08/24				8:30	5:00	M-F				8:30	5:00	M-F				13820	01	117	0303.30
Anniston	AL	Anniston-Oxford, AL	615 Quintard Ave	Anniston	AL	36203	07/01/25			Y	9:00	4:00	M-TH	9:00	5:00	F	8:30	4:30	M-TH	8:30	5:00	F	11500	01	015	0008.00
Carrollton	GA	Atlanta-Sandy Springs-Roswell, GA	905 Maple St	Carrollton	GA	30117	07/01/25			Y	9:00	4:00	M-TH	9:00	5:00	F	8:00	4:30	M-TH	8:00	5:00	F	12054	13	045	9105.04
Newnan	GA	Atlanta-Sandy Springs-Roswell, GA	20 Oak Hill Blvd	Newnan	GA	30265	07/01/25			Y	9:00	4:00	M-TH	9:00	5:00	F	8:30	4:30	M-TH	8:30	5:00	F	12054	13	077	1703.10
Opelika	AL	Auburn-Opelika, AL	2601 Frederick Rd	Opelika	AL	36801	07/01/25			Y	9:00	5:00	M-F				8:30	5:00	M-F				12220	01	081	0411.01
Auburn	AL	Auburn-Opelika, AL	815 Opelika Rd	Auburn	AL	36830	07/01/25			Y	9:00	5:00	M-F				8:30	5:00	M-F				12220	01	081	0409.04
Birmingham- Office Park	AL	Birmingham, AL	100 Office Park Dr	Birmingham	AL	35223	07/01/25		Y		8:30	5:00	M-F				8:30	5:00	M-F				13820	01	073	0107.03
Columbus- 13th Street	GA	Columbus, GA	1326 13th St	Columbus	GA	31901	07/01/25			Y	9:00	5:00	M-F				9:00	5:00	M-F				17980	13	215	0012.00
Columbus- Whittlesey	GA	Columbus, GA	5604 Whittlesey Blvd	Columbus	GA	31909	07/01/25			Y	9:00	5:00	M-F				8:30	5:00	M-F				17980	13	215	0102.05
Dallas	GA	Marietta, GA	45 East Paulding Dr	Dallas	GA	30157	07/01/25			Y	8:30	4:30	M-TH	8:30	5:00	F	8:00	4:30	M-TH	8:00	5:00	F	31924	13	223	1202.83
Cartersville	GA	Marietta, GA	215 East Main St	Cartersvile	GA	30120	07/01/25		Y		8:30	4:00	M-TH	8:30	5:00	F	8:00	4:00	M-TH	8:00	6:00	F	31924	13	015	9607.01
Roanoke	AL	AL Non MSA	548 Main St	Roanoke	AL	36274	07/01/25			Y	8:30	4:30	M-TH	8:30	5:00	F	8:30	4:30	M-TH	8:00	5:00	F	99999	01	111	0004.00
Sylacauga	AL	AL Non MSA	101 West Fort William St	Sylacauga	AL	35150	07/01/25			Y	9:00	4:00	M-F				8:00	5:00	M-F				99999	01	121	0118.00

FirstBank Opened and Closed Branch Locations (2024-2025)

Wedowee	AL	AL Non MSA	117 North Main St	Wedowee	AL	36278	07/01/25			Y	8:30	4:30	M-TH	8:30	5:00	F	8:00	4:30	M-TH	8:00	5:00	F	99999	01	111	0003.00
Rockmart	GA	GA Non MSA	1201 Nathan Deak Pkwy	Rockmart	GA	30153	07/01/25		Y		8:30	4:00	M-TH	8:30	5:00	F	8:00	4:00	M-TH	8:00	6:00	F	99999	13	233	0107.00
Tuscaloosa	AL	Tuscaloosa, AL	2700 University Blvd Suite A	Tuscaloosa	AL	35401	06/23/25				9:00	5:00	M-F										46220	01	125	0116.00
Huntingdon - Main (Activities Bldg - Huntingdon) Temporary Acting Main Branch	TN	TN Non MSA	108 Second Ave E	Huntingdon	TN	38344	11/20/24																			
Cookeville	TN	TN Non MSA	851 S Willow Ave	Cookeville	TN	38501		01/13/23			8:00	4:00	M - TH	8:00	5:00	F	8:00	4:30	M-TH	8:00	5:00		99999	47	141	0006.00
Nashville - Commerce	TN	Nashville-Davidson-Murfreesboro-Franklin, TN	211 Commerce St Suite 300	Nashville	TN	37201		06/22/23		Y	8:30	5:00	M-F										34980	47	037	0195.00
Chattanooga - Southside	TN	Chattanooga, TN-GA	1301 Cowart St	Chattanooga	TN	37402		08/31/23		Y	8:30	5:00	M-F				8:30	5:00	M-F				16860	47	065	0031.00
Henderson East End	TN	Jackson, TN	132 N Washington Ave	Henderson	TN	38340		01/16/24									8:30	4:00	M-TH	8:30	5:00	F	27180	47	023	9702.00
Lexington - Eastgate	TN	TN Non MSA	595 E Church St	Lexington	TN	38351		01/16/24		Y							8:30	3:00	M-W	8:30	5:00	TH-F	99999	47	077	9754.00

Installed/Removed from Service Stand-Alone ATMs (JAN2024-MAR2026)

FirstBank

Installed/ Removed	Notes	Year	ATM Name/Address	MSA	County	Census Tract
Removed	Removed from Service November 2024	2024	B & C Quick Stop 200 LaFayette Rd Chickamauga, GA 30707	16860 Chattanooga, TN-GA OUTSIDE BANK'S AA	295 -Walker	0205.03 MID
Removed	Removed from Service November 2024	2024	Lookouts Stadium 201 Power Alley Chattanooga, TN 37402	16860 Chattanooga, TN-GA	065 - Hamilton	0031.00 UPP
Removed	Removed from Service November 2024	2024	Mega Star Food Mart #1 11320 Highway 41 Ringgold, GA 30736	16860 Chattanooga, TN-GA	047 - Catoosa	0301.00 MID
Removed	Removed from Service November 2024	2024	Mega Star Food Mart #2 221 Highway 41 Ringgold, GA 30736	16860 Chattanooga, TN-GA	047 - Catoosa	0304.02 UPP
Removed	Removed from Service November 2024	2024	Mega Star Food Mart #3 1842 Mack Smith Rd Rossville, GA 30741	16860 Chattanooga, TN-GA	047 - Catoosa	0305.02 MOD
Removed	Removed from Service November 2024	2024	Mega Star Food Mart #4 8524 Alabama Highway Ringgold, GA 30736	16860 Chattanooga, TN-GA	047 - Catoosa	0303.03 UPP
Removed	Removed from Service November 2024	2024	Mega Star Food Mart #5 795 Chickamauga Ave Rossville, GA 30741	16860 Chattanooga, TN-GA OUTSIDE BANK'S AA	295 - Walker	0202.00 MOD
Removed	Removed from Service November 2024	2024	Mega Star Food Mart #6 1649 Battlefield Pkwy Fort Oglethorpe, GA 30742	16860 Chattanooga, TN-GA	047 - Catoosa	0307.02 MID
Removed	Removed from Service November 2024	2024	Mega Star Food Mart #7 4317 Cloud Springs Road Ringgold, GA 30736	16860 Chattanooga, TN-GA	047 - Catoosa	0304.02 UPP
Removed	Removed from Service November 2024	2024	Mr. Speedy I 6001 Shallowford Rd Chattanooga, TN 37421	16860 Chattanooga, TN-GA	065 - Hamilton	0114.43 MID
Removed	Removed from Service November 2024	2024	Mr. Speedy II 948 Spring Creek Rd East Ridge TN 37412	16860 Chattanooga, TN-GA	065 - Hamilton	0116.00 MOD
Removed	Removed from Service November 2024	2024	Mr. Speedy III 3326 Ringgold Rd East Ridge, TN 37412	16860 Chattanooga, TN-GA	065 - Hamilton	0118.00 MID
Removed	Removed from Service November 2024	2024	US Xpress 1535 New Hope Church Rd Tunnel Hill, GA 30755	19140 – Dalton, GA	313 - Whitfield	0005.01 MID
Removed	Removed from Service November 2024	2024	UTC McKenzie Arena 720 E 4th St Chattanooga, TN 37403	16860 Chattanooga, TN-GA	065 - Hamilton	0124.00 UPP
Removed	Removed from Service November 2024	2024	Walgreens #04201 35 25th St NW Cleveland, TN 37311	17420 – Cleveland, TN OUTSIDE BANK'S AA	011 - Bradley	0106.00 MID
Removed	Removed from Service November 2024	2024	Walgreens #07540 2399 McGrady Dr SE	17420 – Cleveland, TN	011 - Bradley	0109.00 MID

Installed/Removed from Service Stand-Alone ATMs (JAN2024-MAR2026)

FirstBank

Installed/ Removed	Notes	Year	ATM Name/Address	MSA	County	Census Tract
			Cleveland, TN 37323	OUTSIDE BANK'S AA		
Removed	Removed from Service November 2024	2024	Walgreens #11732 2900 Paul Huff Pkwy NW Cleveland, TN 37312	17420 – Cleveland, TN OUTSIDE BANK'S AA	011 - Bradley	0114.03 MID
Removed	Removed from Service November 2024	2024	ATM Thriftis 826 S Cavalier Dr Friendship, TN 38034	27180 – Jackson, TN	033 - Crockett	9612.00 MID
Removed	Removed from Service November 2024	2024	Walgreens #12049 4420 Ocoee St N Cleveland, TN 37312	17420 – Cleveland, TN OUTSIDE BANK'S AA	011 - Bradley	0102.01 MOD
Removed	Removed from Service November 2024	2024	Carson Newman 2130 Branner Ave Jefferson City, TN 3760	34100 – Morristown, TN	089 - Jefferson	0703.00 MID
Removed	Removed from Service August 2025	2025	The Bodega at The Village 1230 Lynchburg Rd Winchester, TN 37398	99999 TN Non-MSA	051 – Franklin	9604.02 UPP
Removed	Removed from Service February 2026	2026	Mr. Speedy III 3326 Ringgold Rd East Ridge, TN 37412	16860 – Chattanooga, TN-GA	065 – Hamilton	0118.00 MID
Removed	Removed from Service February 2026	2026	B & C Quick Stop 200 LaFayette Rd Chickamauga, GA 30707	16860-Chattanooga, TN-GA OUTSIDE BANK'S AA	295 – Walker	0205.03 MID
Removed	Removed from Service February 2026	2026	Walgreens #04201 35 25th St NW Cleveland, TN 37311	17420 – Cleveland, TN OUTSIDE BANK'S AA	011 – Bradley	0106.00 MID
Removed	Removed from Service February 2026	2026	Walgreens #07540 2399 McGrady Drive SE Cleveland, TN 37323	17420 – Cleveland, TN OUTSIDE BANK'S AA	011 – Bradley	0109.00 MID
Removed	Removed from Service February 2026	2026	Walgreens #11732 2900 Paul Huff Parkway NW Cleveland, TN 37312	17420 – Cleveland, TN OUTSIDE BANK'S AA	011 – Bradley	0114.03 MID
Removed	Removed from Service February 2026	2026	Walgreens #12049 4420 Ocoee St N Cleveland, TN 37312	17420 – Cleveland, TN OUTSIDE BANK'S AA	011 – Bradley	0102.01 MOD
Installed	In-Service February 2025	2025	Vanderbilt University Warren College 109 21st Ave S Nashville, TN 37203	34980- Nashville, TN	037 – Davidson	0165.00 MID
Installed	In-Service February 2025	2025	Vanderbilt University Sarratt Student Center 2302 Vanderbilt Pl Nashville, TN 37240	34980 – Nashville, TN	037 – Davidson	0165.00 MID
Installed	In-Service March 2025	2025	The Bodega at The Village 1230 Lynchburg Rd Winchester, TN 37398	99999 TN Non-MSA	051 – Franklin	9604.02 UPP
Installed	In-Service August 2025	2025	Vanderbilt University FirstBank Stadium	34980 – Nashville, TN	037 – Davidson	0166.00 MID

Installed/Removed from Service Stand-Alone ATMs (JAN2024-MAR2026)

Installed/ Removed	Notes	Year	ATM Name/Address	MSA	County	Census Tract
			126 28th Ave S Nashville, TN 37212			

Products and Services

CREDIT SERVICES OFFERED

Consumer Loans

- Automobile or Truck
- Consumer Goods
- Recreational Vehicles – Boats, RVs, etc.
- Residential Mortgages
- Home Improvement Loans
- Balloon 1st and 2nd Mortgages
- Real Estate Loans
- Construction Loans
- Lots and Vacant Land Loans
- Home Equity Lines of Credit
- Overdraft Protection Plan
- ARM Loans

Business Loans

- Construction Loans on Business & Industrial Properties
- Mortgage Loans on Business & Industrial Properties
- Business Lines of Credit
- Accounts Receivable Loans
- Business Real Estate Term Loans
- Business Equipment or Vehicle Term Loan
- Facility Construction/Expansion Loans
- Debt Consolidation Loans
- Inventory Financing
- Letters of Credit
- Working Capital Lines
- Business Term Loan

Agriculture Loans

Credit Card Applications

Overdraft Protection Options

Fees and Charges may include: *(These fees vary depending on the type and amount of loan.)*

- Finance Charges
- Loan Fees
- Attorney Fees
- Credit Report Charges
- Appraisal Fees
- Miscellaneous Real Estate Closing Fees

Products and Services

CREDIT SERVICES OFFERED

FirstBank Mortgage offers:

- Conventional Fixed Rate Loans
- FHA and VA Fixed Rate Loans
- VA Interest Rate Reduction Loans
- USDA Rural Housing and Acreage Loans
- Jumbo Mortgage Loans
- Adjustable Rate First Mortgages (ARMs)
- First Time Homebuyer Programs
- TN Housing Development Agency loans
- Additional Approved Down Payment Assistance Programs:
  100% Affordable Housing Mortgage
  Alabama Housing Finance Authority Loans
  Georgia Department of Community Affairs Loans
  The Housing Fund-Nashville, TN

DEPOSIT SERVICES OFFERED

- ACH Services/Direct Deposit
- Personal Checking & Savings Accounts
- FirstRewards Checking
- Online Banking/Bill Payment
- Mobile Banking/Mobile App
- Christmas Savings Accounts
- Free Checking Accounts
- Safe Deposit Boxes
- Certificate of Deposit
- IRAs
- ATM/Debit Cards
- Senior Checking Accounts
- 24-Hour Telephone Banking
- 24-Hour ATM Service
- Cashier Checks
- Basic Savings Accounts
- Consumer Fed Funds Money Market
- Consumer Money Market Tiered
- Swipe Smart (Bank On Account)
- Commercial Cash Management Services
- Commercial Checking & Savings Accounts
- FirstBusiness Checking
- FirstCommercial Checking
- Public Funds Regular & Interest Checking
- Commercial Money Market Tiered
- FirstLottery Deposit Accounts
- FirstBank Image Statements
- Wire Transfers
- FirstRate Money Market Savings
- Cashier checks
- Commercial Fed Funds Money Market
- Non-Profit FirstBusiness Deposit Accounts
- UTMA Minor Savings Accounts
- Health Savings Accounts
- FirstIOLTA Checking
- Overdraft Protection

Products and Services

MISCELLANEOUS SERVICES OFFERED

- Internet banking
- Time and temperature services telephone line (731-968-8181)
- Check imaging of monthly statements
- Online business and consumer credit card applications
- No charge for use of FirstBank ATMs at office/branch locations
- Zelle

TREASURY MANAGEMENT SERVICES

Receivables
- ACH Collections and Cash Concentration
- Remote Deposit Capture
- Wholesale Lockbox
- Merchant Services
- Remote Cash Capture Vault
- Cash services
- Wire Services and Notifications

Cash Management
- Balance and Transaction Reporting
- Zero Balance Accounts
- Reconciliation
- Line of Credit Sweep
- Overnight Repurchase Sweep
- Insured Cash Sweep

Payables
- ACH - Direct Deposit & Vendor Payments
- Commercial OneCard
- Business Credit Card
- Online Wire Origination

Fraud Protection Services
- Positive Pay
- ACH Positive Pay
- Online Banking Controls
- Alerts and Notifications

PRODUCTS AND SERVICES FIRSTBANK INVESTMENT PARTNERS OFFER

All FirstBank branches offer the following types of investment products, by appointment only with FirstBank Investment Partners through Raymond James. Services include Financial Planning, Retirement Planning and College Funding. Brokerage and Advisory accounts are based on commission structures.

Types of Accounts
- Custodial Accounts
- Individual Retail Accounts
- Individual Retail Advisory Accounts
- Joint Accounts
- Transfer on Death (TOD)
- Trust Brokerage Accounts
- Uniform Transfer to Minor (UTMA)

Individual Retirement Accounts
- 401k Rollover IRAs
- Roth IRAs
- SEP IRAs
- Simple IRAs
- Traditional IRAs

Employer Retirement Accounts

Bonds & Fixed Income

Products and Services

PRODUCTS AND SERVICES FIRSTBANK INVESTMENT PARTNERS OFFER

All FirstBank branches offer the following types of investment products, by appointment only with FirstBank Investment Partners through Raymond James. Services include Financial Planning, Retirement Planning and College Funding. Brokerage and Advisory accounts are based on commission structures.

• 401k plans • Defined benefit plans • Profit sharing plans	• Brokered CDs • Corporate bonds • Government bonds • Mortgage-backed bonds • Municipal bonds • Treasuries
General Securities • Equities (Stock) • ETFs • Mutual funds • Unit investment trusts	Annuities • 1035 Exchange • Fixed annuities • Fixed indexed annuities • Variable annuities
Alternative Investment • Business development companies • Real estate investment trusts • Single stock risk management • Structured products	Annuities • 1035 Exchange • Fixed annuities • Fixed indexed annuities • Variable annuities

TRUST & ESTATE SERVICES OFFERED

- Estate Planning
- Trust Formation and Administration
- Trustee Services
- Estate Settlement

BUSINESS PRODUCTS

Product	FirstBusiness	Non-Profit First Business	FirstCommercial	First Lottery	First IOLTA	Public Funds Regular Checking	Public Funds Interest Checking	Commercial Money Market Tiered
Minimum to Open	$100	$100	$1,000	$0	$0	$100	$5,000	$5,000
Special Qualifiers		Must have IRS not-for-profit designation		Used for lottery proceeds only	Attorneys only	Must be a public entity	Must be a public entity	
Monthly Service Fee	$0	$0	$20	$0	$0	$0	$10	$10
Balance to Avoid Fee	$0	$0	Earnings Credit	$0	$0	$0	$5,000	$5,000
Transaction Fees	500 items free $.30/item over 500	50 items free $.20/debit & credit $.15/deposited item over 50	(AA only) Varies from $ 0.09 – $0.70			Up to 100 free transactions per statement cycle Varies by item $.07 - $.16/item	Varies by item $.07 - $.16/item	$10/transaction over 6
Interest Bearing	No	No	No	No	Yes	No	Yes	Yes
Interest Tiers					$.01+		$5,000-$19,999.99 $20,000-$99,999.99 $100,000-$249,999.99 $250,000-$499,999.99 $500,000-$999,999.99 $1,000,000+	$5,000-$19,999.99 $20,000-$99,999.99 $100,000-$249,999.99 $250,000-$499,999.99 $500,000-$999,999.99 $1,000,000+
eStatement	Optional	Optional	Optional	Optional	Optional	Optional	Optional	Optional

BUSINESS SCHEDULE OF FEES

Effectice 07.20.2023

BUSINESS ACCOUNTS

FIRSTBUSINESS CHECKING

Up to 500 FREE transactions each statement cycle.
$0.30 per item over 500.

FIRSTCOMMERCIAL CHECKING

$20 Monthly Account Maintenance Fee
$0.16 Checks Paid and Other Debits
$0.70 Deposit and Other Credits
$0.09 On US (FirstBank) items Deposited
$0.10 Not on US (FirstBank) Items Deposited
$0.11 ACH Items Received
$8 Return Items Deposited
$50.00 Online Banking Current Day Reporting
$40.00 Online Banking Previous Day Reporting
$1 Foreign ATM Fee

NON-PROFIT FIRSTBUSINESS CHECKING

Up to 50 FREE items each statement cycle
$0.20 Debit and Credit over 50
$0.15 Deposited item over 50
$1 Foreign ATM Fee

COMMERCIAL MONEY MARKET TIERED

$10 Monthly Account Maintenance Fee if current balance falls below $5,000.
$10 will be assessed for each withdrawal over six per statement cycle.

COMMERCIAL FED FUNDS MONEY MARKET

$10 Monthly Account Maintenance Fee if current balance falls below $100,000.
$10 will be assessed for each withdrawal over six per statement cycle.

FIRST LOTTERY

$0 Monthly Account Maintenance Fee.

FIRST IOLTA

$0 Monthly Account Maintenance Fee.

PUBLIC FUNDS ACCOUNTS

Regular Checking

Up to 100 FREE transactions per statement cycle
$0.16 Debit Transactions
$0.16 Credit Transactions
$0.10 Not on US (FirstBank) Items Deposited
$0.07 On US (FirstBank) Items Deposited
$0.11 ACH Debit and Credit Items

Interest Checking

$10 Monthly Account Maintenance Fee if balance falls below $5,000.
Interest will be forfeited if balance falls below $5,000.
$0.16 Debit Transactions
$0.16 Credit Transactions
$0.10 Not on US (FirstBank) Items Deposited
$0.07 On US (FirstBank) Items Deposited
$0.11 ACH Debit and Credit Items

ADDITIONAL MISCELLANEOUS FEES

Wire Transfer - $15 for incoming domestic and international, $20 for outgoing domestic, $50 for outgoing international.
Account Research - $20 an hour with a $25 minimum
Dormant Accounts - $5 service charge per account cycle on balances below $1,000 and no transaction activity for 18 months.
Account Closing Fee - $15 for accounts closing within six months of opening date.
Escheatment Fee - $100
ATM Debit Card Replacement Fee - $5 (First two cards free)
Statement Reprints - $5 without images - $10 with images
Treasury/Cash Management Services - Custom Pricing
Returned Deposited Item Fee - $5
Overdraft Item Fee (may be created)* **-** $35
Continuous Daily Overdraft Fee - $5 (daily fee applied on all business accounts after 5 consecutive business days overdrawn).
Nonsufficient (NSF) Funds Fee - $35
Night Depository Bag - $20 (First bag free)
Sweep Transaction Charge - $5
Stop Payment Charge - $32
Account Activity Printouts - $5
Account Verification - $25
Garnishments/Levies - $125 (or the maximum allowed by applicable law)
Money Orders - $7.50
Cashier's Checks - $5
Photocopies - $0.25 per page
Money Services Business Fees - Up to $150
See additional MSB fee information.

ATM TRANSACTIONS

No charge for use of ATMs at office/branch locations or ATMs displaying the FirstBank logo.
Non-ATM provider may charge additional fee.

*Overdrafts may be created by check, in-person withdrawals, ATM withdrawals or other electronic means.

Member FDIC

FirstBank

PERSONAL PRODUCTS

Checking Options

Savings Options

	FirstRewards Checking	Essential Checking	Swipe Smart Checking	USA Checking	Interest Checking	FirstRate Money Market	Money Market	Consumer Fed Funds Money Market	FirstUp Savings	Basic Savings	Minor Savings	Christmas Savings	HSA Savings
MINIMUM OPENING BALANCE	$0	$0	$25	$100	$1,000	$5,000	$2,500	$100	$50	$50	$25	$25	$0
MONTHLY MAINTENANCE FEE	$0	$0	$0	$0	$8 if balance falls below $1,000	$10 if balance falls below $5,000	$10 if balance falls below $2,500	$10 a month if balance falls below $100,000	$5 a month if balance falls below $50	$5 a month if balance falls below $50	$0	$0	$0
INTEREST	YES	NO	NO	NO	YES	YES	YES	YES	YES	YES	YES	YES	YES
INTEREST TIERS	$0 - $25,000 Over $25,000	NO	NO	NO	$1,000 - $9,999.99 $10,000 - $24,999.99 $25,000 - $49,999.99 $50,000 +	NO	$2,500 - $9,999.99 $10,000.00 - $99,999.99 $100,000.00 - $249,999.99 $250,000.00 +	40% of Fed Funds Effective rate for balances $0.01 - $99,999.99 80% of Fed Funds Effective Rate for balances $100,000.00 +	$0.01 - $25,000.00 Above $25,000	$25 +	$25 +	NO	NO
FREE DEBIT/ATM CARD*	YES	YES	YES	YES	YES	NO	NO	NO	ATM ONLY	ATM ONLY	ATM ONLY	NO	YES
DAILY BALANCE REQUIREMENTS TO AVOID FEE	NONE	NONE	NONE	NONE	$1,000	$5,000	$2,500	$100,000	$50	$50	NONE	NONE	NONE
FREE OR DISCOUNTED CHECKS	NO	NO	NOT AVAILABLE	YES Some restrictions may apply	NO	NO	NO	NO	NO	NO	NO	NO	NO
FREE ONLINE & MOBILE BANKING WITH BILL PAY**	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
FREE ONLINE E-STATEMENTS	REQUIRED	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES	YES
ADDITIONAL FEATURES/REQUIREMENTS	Limit 2 accounts per primary account holder social security number Non-FirstBank ATM are refunded each month Higher interest earned when these qualifications are met: • 10 settled debit card point of sale (POS) transactions per statement cycle • One (1) automated clearing house (ACH) debit or ACH Credit per statement cycle	Paper statements $2.50 Per month	Dormant and Escheatment Fees Waived	For those 62 years of age and older	Interest paid on $1,000 or greater	Interest paid monthly $2 per withdrawal over six Meet FirstRewards requirements to qualify for Reward rates Limit 1 account per primary account holder social security number	Interest paid monthly $2 per withdrawal over six	$2 per withdrawal over six Interest rate determined will be a percentage of Fed Funds Effective Rate and is subject to change. Monthly service charge can be waived by opening an Essential Checking Account or by maintaining the minimum daily balance requirements	A FirstBank Personal Checking or Money Market Account is required to open FirstUp Savings $2 per withdrawal over six Limit 2 accounts per primary account holder social security number For Higher Interest: A monthly recurring transfer totaling $50.00 or more from a FirstBank Personal Checking or Money Market Account is required each qualifying period	Interest paid monthly $2 per withdrawal over six	Interest paid monthly $2 per withdrawal over six 21 years and under	Interest paid monthly $2 per withdrawal over six	Must follow IRS guidelines

See Schedule of Fees, Terms and Conditions or Truth-in Savings Disclosure Addendum for further account information. All FirstBank accounts are subject to opening requirements. Some restrictions may apply. *Overdraft fees may apply. **Third party rates may apply. See your account disclosure for full details.

CONSUMER SCHEDULE OF FEES

Effective January 29, 2025

PERSONAL ACCOUNTS

FIRSTREWARDS CHECKING
$0 per monthly statement cycle. Electronic statements are required.

INTEREST CHECKING
$8 per monthly statement cycle if account balance falls below $1,000 any day of the monthly statement cycle.

ESSENTIAL CHECKING
Electronic statements. Additional fees may apply for paper statements.

SWIPE SMART
Electronic and paper statements are available. Dormant and escheatment fees are waived.

USA CHECKING
$0 per monthly statement cycle.

FIRSTRATE MONEY MARKET
$10 per month will be imposed if the account balance falls below $5,000 any day of the statement cycle.
$2 will be assessed for each withdrawal over six per statement cycle.

CONSUMER FED FUNDS MONEY MARKET
$10 per month will be imposed if the account balance falls below $100,000 any day of the statement cycle, waived with Essential Checking.
$2 will be assessed for each withdrawal over six per statement cycle.

MONEY MARKET TIERED
$10 per month will be imposed if the account balance falls below $2,500 any day of the statement cycle.
$2 will be assessed for each withdrawal over six per statement cycle.

HEALTH SAVINGS ACCOUNT
$0 per monthly statement cycle.

BASIC SAVINGS
$5 per statement cycle if account balance falls below $50 any day of the statement cycle.
$2 per each withdrawal over six per month.

CHRISTMAS SAVINGS
$2 per withdrawal over six per month.

UTMA (Uniform Transfers to Minor Act)
$2 per withdrawal over six per month.

ADDITIONAL MISCELLANEOUS FEES

Wire Transfer - $15 for incoming domestic and international, $20 for outgoing domestic, $50 for outgoing international.

Account Research - $20 an hour with a $25 minimum.

Dormant Accounts - $5 service charge per account cycle on balances below $1,000 and no transaction activity for 18 months.

Account Closing Fee - $15 for accounts closing within six months of opening date.

Escheatment Fee - $100

ATM Debit Card Replacement Fee - $5 (First two cards free)

Statement Reprints - $5 without images - $10 with images

Paper Statement Fee - $2.50

Overdraft Item Fee* - $35

Night Depository Bag - $20 (First bag free)

Sweep Transaction Charge - $5

Stop Payment Charge - $32

Account Activity Printouts - $5

Account Verification - $25

Garnishments/Levies - $125 (or the maximum allowed by applicable law)

Money Orders - $7.50

Cashier's Checks - $5

Photocopies - $0.25 per page

ATM TRANSACTIONS

No charge for use of ATMs at office/branch locations or ATMs displaying the FirstBank logo.
Non-ATM provider may charge additional fee.

*Overdrafts may be created by check, in-person withdrawals, ATM withdrawals or other electronic means.

Member FDIC

FirstBank

FirstBank

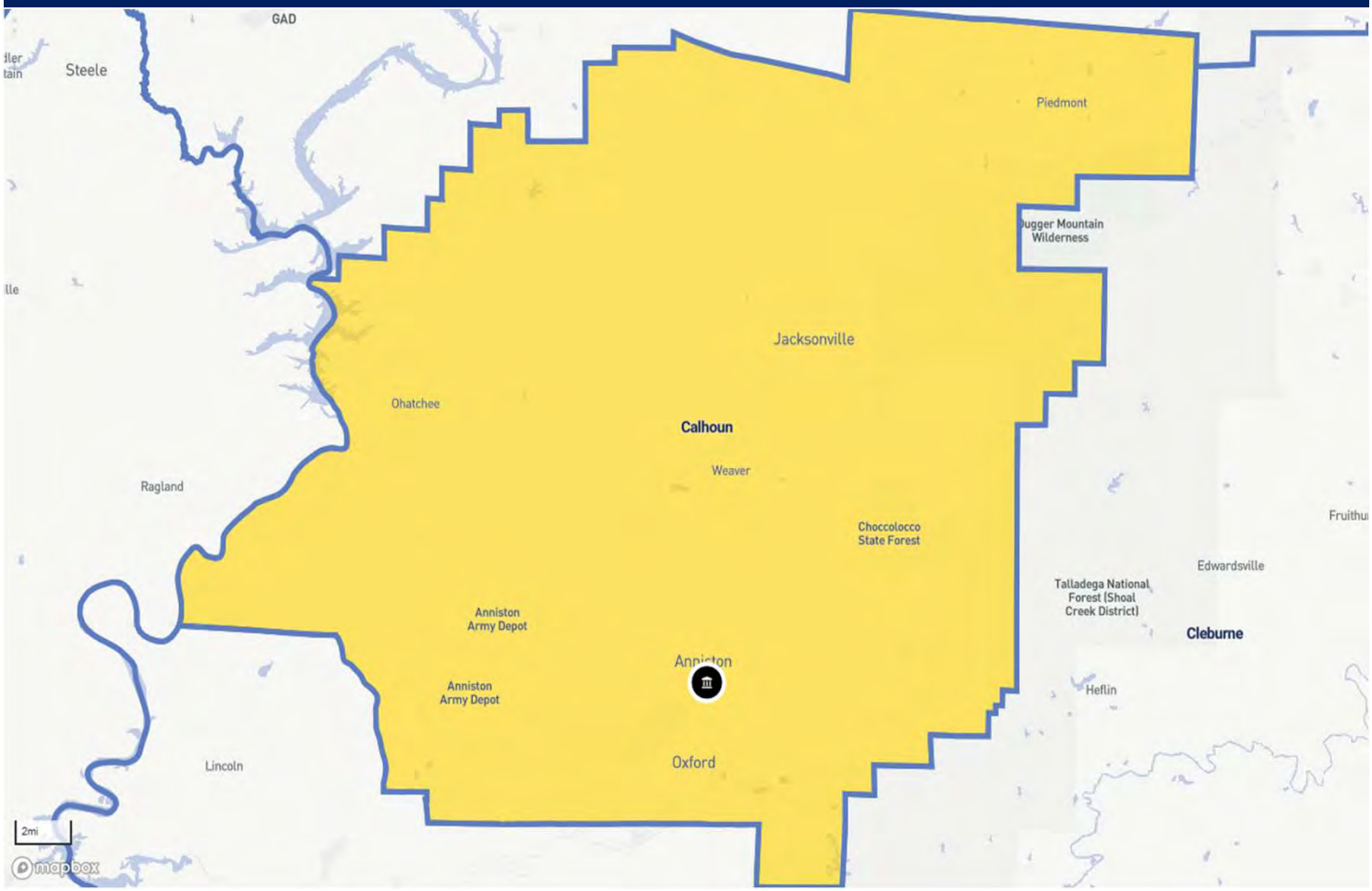
Facility-Based Assessment Areas Maps & Geographical Information

Facility-Based Assessment Areas	Description of Counties
Chattanooga Multi-State MSA	
16860-Chattanooga, TN-GA	Hamilton (065), Catoosa (047)
Alabama	
11500-Anniston-Oxford, AL	Calhoun (015)
12220-Auburn-Opelika, AL	Lee (081)
13820 - Birmingham-Hoover, AL (FB & SSB)	Jefferson (073), Shelby (117)
22520-Florence-Muscle Shoals, AL	Lauderdale (077)
26620-Huntsville, AL (FB & SSB)	Madison (089)
46220-Tuscaloosa, AL	Tuscaloosa (125)
99999-AL Non-MSA	Randolph (111), Talladega (121)
Georgia	
12054-Atlanta-Sandy Springs-Roswell, GA	Carroll (045), Coweta (077)
17980-Columbus, GA-AL	Muscogee (215)
19140-Dalton, GA	Whitfield (313)
31924-Marietta, GA	Bartow (015), Paulding (223)
99999-GA Non-MSA	Polk (233)
Kentucky	
14540-Bowling Green, KY	Allen (003), Warren (227)
Tennessee	
27180-Jackson, TN	Chester (023), Crockett (033), Madison (113)
28940-Knoxville, TN	Knox (093), Union (173)
32820-Memphis, TN-AR-MS	Fayette (047); Shelby (157)
34100-Morristown, TN	Jefferson(089)
34980-Nashville--Davidson--Murfreesboro--Franklin, TN	Cannon (015), Davidson (037), Dickson (043), Rutherford (149), Williamson (187), Wilson (189)
99999-TN Non-MSA	Bedford (003), Benton (005), Carroll (017), Coffee (031), Cumberland (035), Franklin (051), Decatur (039), DeKalb (041), Henderson (077), Henry (079), Humphreys (085), Lincoln (103), Moore (127), Perry (135), Putnam (141), Rhea (143)

STATE OF ALABAMA

11500 Anniston - Oxford, AL

County: Calhoun (015)



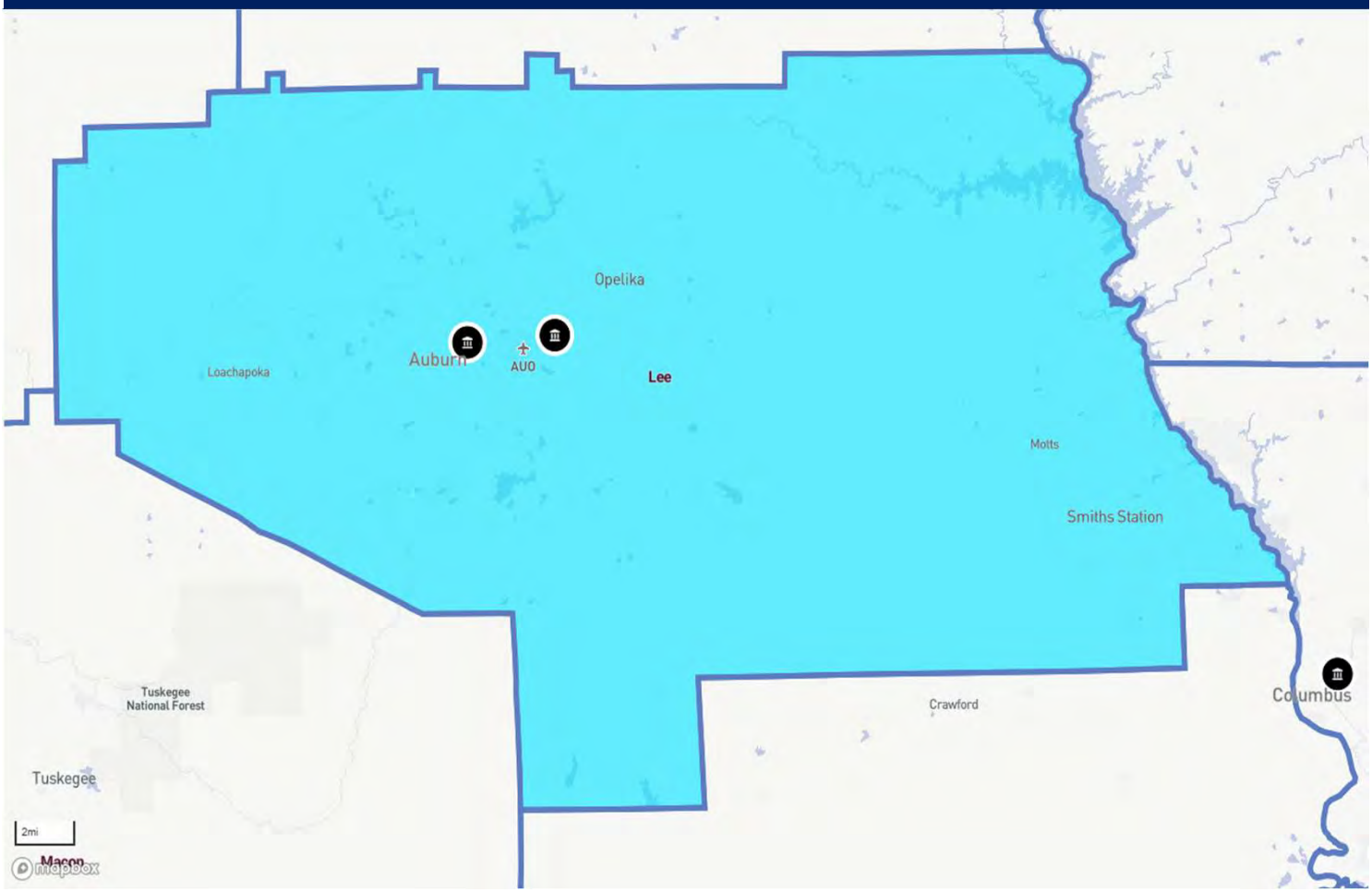
MSA: 11500 - Anniston-Oxford, AL

Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(015) Calhoun	(01) AL	000200	Moderate
(015) Calhoun	(01) AL	000300	Low
(015) Calhoun	(01) AL	000400	Moderate
(015) Calhoun	(01) AL	000500	Unknown
(015) Calhoun	(01) AL	000600	Moderate
(015) Calhoun	(01) AL	000700	Middle
(015) Calhoun	(01) AL	000800	Middle
(015) Calhoun	(01) AL	000900	Upper
(015) Calhoun	(01) AL	001000	Upper
(015) Calhoun	(01) AL	001101	Upper
(015) Calhoun	(01) AL	001102	Moderate
(015) Calhoun	(01) AL	001103	Upper
(015) Calhoun	(01) AL	001201	Middle
(015) Calhoun	(01) AL	001202	Middle
(015) Calhoun	(01) AL	001300	Moderate
(015) Calhoun	(01) AL	001400	Middle
(015) Calhoun	(01) AL	001501	Middle
(015) Calhoun	(01) AL	001502	Moderate
(015) Calhoun	(01) AL	001600	Middle
(015) Calhoun	(01) AL	001700	Middle
(015) Calhoun	(01) AL	001801	Middle
(015) Calhoun	(01) AL	001802	Middle
(015) Calhoun	(01) AL	002001	Middle
(015) Calhoun	(01) AL	002002	Upper
(015) Calhoun	(01) AL	002101	Moderate
(015) Calhoun	(01) AL	002102	Middle
(015) Calhoun	(01) AL	002104	Middle
(015) Calhoun	(01) AL	002105	Moderate
(015) Calhoun	(01) AL	002200	Middle
(015) Calhoun	(01) AL	002300	Moderate
(015) Calhoun	(01) AL	002400	Middle
(015) Calhoun	(01) AL	002502	Middle
(015) Calhoun	(01) AL	002503	Upper
(015) Calhoun	(01) AL	002504	Middle
(015) Calhoun	(01) AL	002600	Middle
(015) Calhoun	(01) AL	981901	Unknown
(015) Calhoun	(01) AL	981902	Unknown
(015) Calhoun	(01) AL	981903	Unknown

12220 Auburn - Opelika, AL

County: Lee (081)



MSA: 12220 - Auburn-Opelika, AL

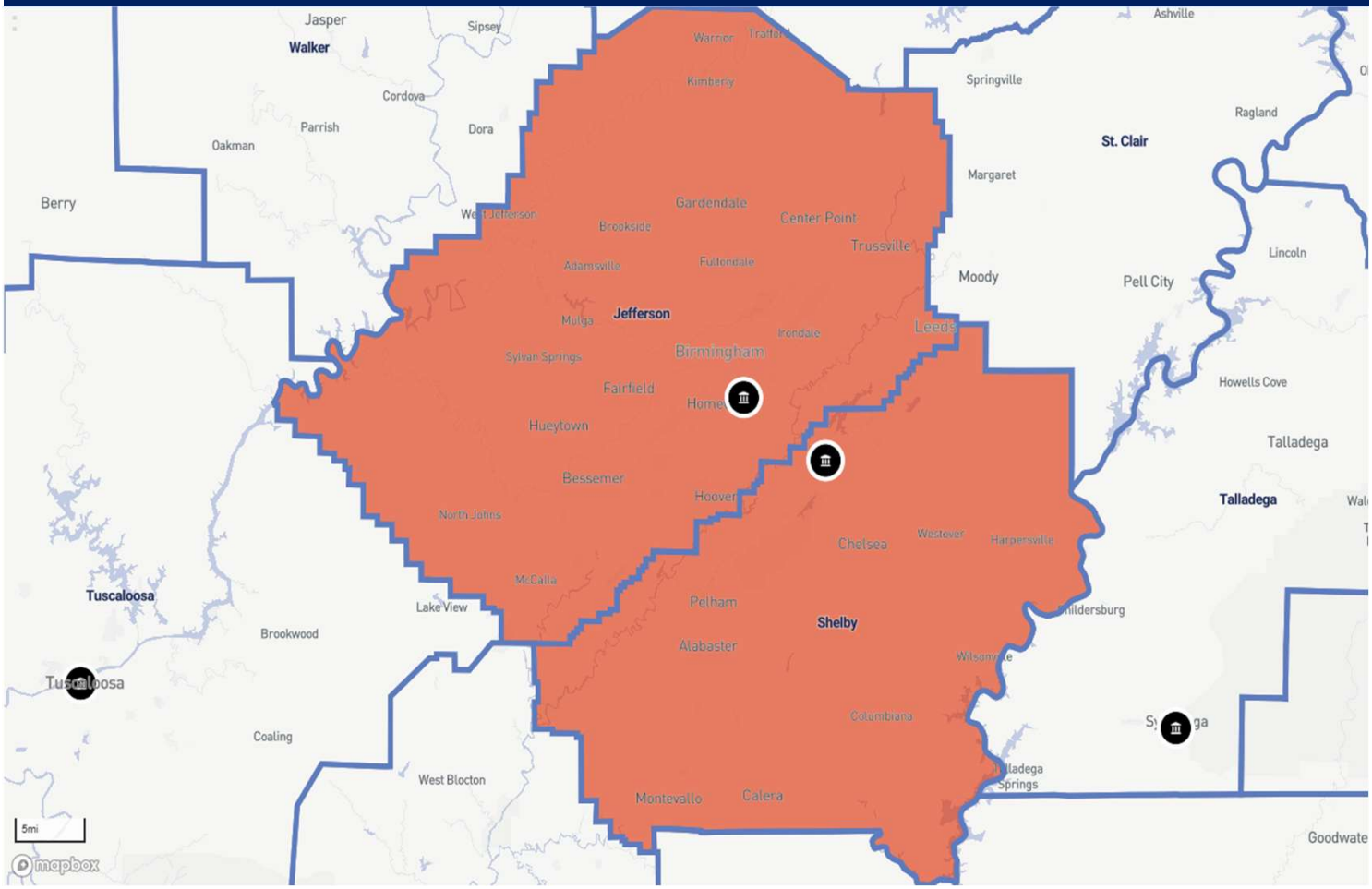
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(081) Lee	(01) AL	040201	Middle
(081) Lee	(01) AL	040202	Upper
(081) Lee	(01) AL	040300	Upper
(081) Lee	(01) AL	040401	Moderate
(081) Lee	(01) AL	040402	Upper
(081) Lee	(01) AL	040403	Upper
(081) Lee	(01) AL	040501	Upper
(081) Lee	(01) AL	040502	Middle
(081) Lee	(01) AL	040602	Middle
(081) Lee	(01) AL	040603	Unknown
(081) Lee	(01) AL	040605	Moderate
(081) Lee	(01) AL	040606	Low
(081) Lee	(01) AL	040607	Unknown
(081) Lee	(01) AL	040700	Unknown
(081) Lee	(01) AL	040801	Unknown
(081) Lee	(01) AL	040802	Unknown
(081) Lee	(01) AL	040901	Upper
(081) Lee	(01) AL	040903	Middle
(081) Lee	(01) AL	040904	Middle
(081) Lee	(01) AL	041001	Upper
(081) Lee	(01) AL	041002	Moderate
(081) Lee	(01) AL	041101	Unknown
(081) Lee	(01) AL	041102	Middle
(081) Lee	(01) AL	041103	Upper
(081) Lee	(01) AL	041104	Middle
(081) Lee	(01) AL	041200	Upper
(081) Lee	(01) AL	041300	Middle
(081) Lee	(01) AL	041400	Low
(081) Lee	(01) AL	041600	Middle
(081) Lee	(01) AL	041701	Middle
(081) Lee	(01) AL	041702	Moderate
(081) Lee	(01) AL	041703	Moderate
(081) Lee	(01) AL	041801	Middle
(081) Lee	(01) AL	041802	Moderate
(081) Lee	(01) AL	041803	Middle
(081) Lee	(01) AL	041901	Upper
(081) Lee	(01) AL	041902	Middle
(081) Lee	(01) AL	041903	Moderate
(081) Lee	(01) AL	042002	Middle
(081) Lee	(01) AL	042003	Middle

County Code	State Code	Tract Code	Tract Income Level
(081) Lee	(01) AL	042005	Middle
(081) Lee	(01) AL	042006	Moderate
(081) Lee	(01) AL	042007	Upper
(081) Lee	(01) AL	042008	Middle
(081) Lee	(01) AL	042009	Moderate
(081) Lee	(01) AL	042101	Middle
(081) Lee	(01) AL	042103	Middle
(081) Lee	(01) AL	042104	Middle

13820 Birmingham - Hoover, AL

Counties: Jefferson (073), Shelby (117)



MSA: 13820 - Birmingham, AL
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(073) Jefferson	(01) AL	0001.00	Low
(073) Jefferson	(01) AL	0003.00	Low
(073) Jefferson	(01) AL	0004.00	Moderate
(073) Jefferson	(01) AL	0005.00	Low
(073) Jefferson	(01) AL	0007.00	Low
(073) Jefferson	(01) AL	0008.00	Low
(073) Jefferson	(01) AL	0011.00	Moderate
(073) Jefferson	(01) AL	0012.00	Middle
(073) Jefferson	(01) AL	0014.00	Middle
(073) Jefferson	(01) AL	0015.00	Moderate
(073) Jefferson	(01) AL	0016.00	Moderate
(073) Jefferson	(01) AL	0019.02	Low
(073) Jefferson	(01) AL	0020.00	Low
(073) Jefferson	(01) AL	0021.00	Moderate
(073) Jefferson	(01) AL	0022.00	Low
(073) Jefferson	(01) AL	0023.03	Moderate
(073) Jefferson	(01) AL	0023.05	Middle
(073) Jefferson	(01) AL	0023.06	Upper
(073) Jefferson	(01) AL	0024.01	Low
(073) Jefferson	(01) AL	0024.02	Low
(073) Jefferson	(01) AL	0027.01	Upper
(073) Jefferson	(01) AL	0027.02	Unknown
(073) Jefferson	(01) AL	0029.00	Low
(073) Jefferson	(01) AL	0030.01	Moderate
(073) Jefferson	(01) AL	0030.02	Moderate
(073) Jefferson	(01) AL	0031.00	Low
(073) Jefferson	(01) AL	0032.00	Low
(073) Jefferson	(01) AL	0033.00	Moderate
(073) Jefferson	(01) AL	0034.00	Low
(073) Jefferson	(01) AL	0035.00	Moderate
(073) Jefferson	(01) AL	0036.00	Moderate
(073) Jefferson	(01) AL	0037.00	Low
(073) Jefferson	(01) AL	0038.02	Moderate
(073) Jefferson	(01) AL	0038.03	Moderate
(073) Jefferson	(01) AL	0039.00	Moderate
(073) Jefferson	(01) AL	0040.00	Low
(073) Jefferson	(01) AL	0042.00	Moderate
(073) Jefferson	(01) AL	0045.01	Unknown
(073) Jefferson	(01) AL	0045.02	Low
(073) Jefferson	(01) AL	0047.01	Upper
(073) Jefferson	(01) AL	0047.02	Upper
(073) Jefferson	(01) AL	0048.00	Upper
(073) Jefferson	(01) AL	0049.01	Upper
(073) Jefferson	(01) AL	0049.02	Upper
(073) Jefferson	(01) AL	0050.00	Moderate
(073) Jefferson	(01) AL	0051.01	Low
(073) Jefferson	(01) AL	0051.03	Moderate
(073) Jefferson	(01) AL	0051.04	Moderate
(073) Jefferson	(01) AL	0052.00	Moderate
(073) Jefferson	(01) AL	0053.02	Middle
(073) Jefferson	(01) AL	0055.00	Low
(073) Jefferson	(01) AL	0056.00	Middle
(073) Jefferson	(01) AL	0057.01	Moderate
(073) Jefferson	(01) AL	0057.02	Unknown

County Code	State Code	Tract Code	Tract Income Level
(073) Jefferson	(01) AL	0058.00	Moderate
(073) Jefferson	(01) AL	0059.03	Middle
(073) Jefferson	(01) AL	0059.05	Moderate
(073) Jefferson	(01) AL	0059.07	Moderate
(073) Jefferson	(01) AL	0059.08	Moderate
(073) Jefferson	(01) AL	0059.09	Moderate
(073) Jefferson	(01) AL	0059.10	Moderate
(073) Jefferson	(01) AL	0100.01	Moderate
(073) Jefferson	(01) AL	0100.02	Middle
(073) Jefferson	(01) AL	0101.00	Unknown
(073) Jefferson	(01) AL	0102.00	Low
(073) Jefferson	(01) AL	0103.01	Moderate
(073) Jefferson	(01) AL	0103.02	Unknown
(073) Jefferson	(01) AL	0104.01	Low
(073) Jefferson	(01) AL	0104.02	Moderate
(073) Jefferson	(01) AL	0105.00	Moderate
(073) Jefferson	(01) AL	0106.03	Moderate
(073) Jefferson	(01) AL	0106.04	Low
(073) Jefferson	(01) AL	0106.05	Moderate
(073) Jefferson	(01) AL	0107.01	Upper
(073) Jefferson	(01) AL	0107.02	Upper
(073) Jefferson	(01) AL	0107.03	Upper
(073) Jefferson	(01) AL	0107.04	Upper
(073) Jefferson	(01) AL	0107.05	Upper
(073) Jefferson	(01) AL	0107.06	Middle
(073) Jefferson	(01) AL	0108.01	Upper
(073) Jefferson	(01) AL	0108.02	Upper
(073) Jefferson	(01) AL	0108.03	Upper
(073) Jefferson	(01) AL	0108.04	Upper
(073) Jefferson	(01) AL	0108.06	Upper
(073) Jefferson	(01) AL	0108.07	Upper
(073) Jefferson	(01) AL	0109.00	Moderate
(073) Jefferson	(01) AL	0110.02	Moderate
(073) Jefferson	(01) AL	0110.03	Moderate
(073) Jefferson	(01) AL	0110.04	Upper
(073) Jefferson	(01) AL	0111.08	Upper
(073) Jefferson	(01) AL	0111.09	Upper
(073) Jefferson	(01) AL	0111.10	Upper
(073) Jefferson	(01) AL	0111.12	Moderate
(073) Jefferson	(01) AL	0111.13	Middle
(073) Jefferson	(01) AL	0111.14	Upper
(073) Jefferson	(01) AL	0111.15	Upper
(073) Jefferson	(01) AL	0111.16	Upper
(073) Jefferson	(01) AL	0111.17	Middle
(073) Jefferson	(01) AL	0112.05	Middle
(073) Jefferson	(01) AL	0112.06	Middle
(073) Jefferson	(01) AL	0112.07	Moderate
(073) Jefferson	(01) AL	0112.08	Middle
(073) Jefferson	(01) AL	0112.09	Middle
(073) Jefferson	(01) AL	0112.10	Moderate
(073) Jefferson	(01) AL	0113.01	Middle
(073) Jefferson	(01) AL	0113.03	Upper
(073) Jefferson	(01) AL	0113.04	Middle
(073) Jefferson	(01) AL	0114.01	Moderate
(073) Jefferson	(01) AL	0114.02	Upper
(073) Jefferson	(01) AL	0115.00	Middle
(073) Jefferson	(01) AL	0116.00	Upper

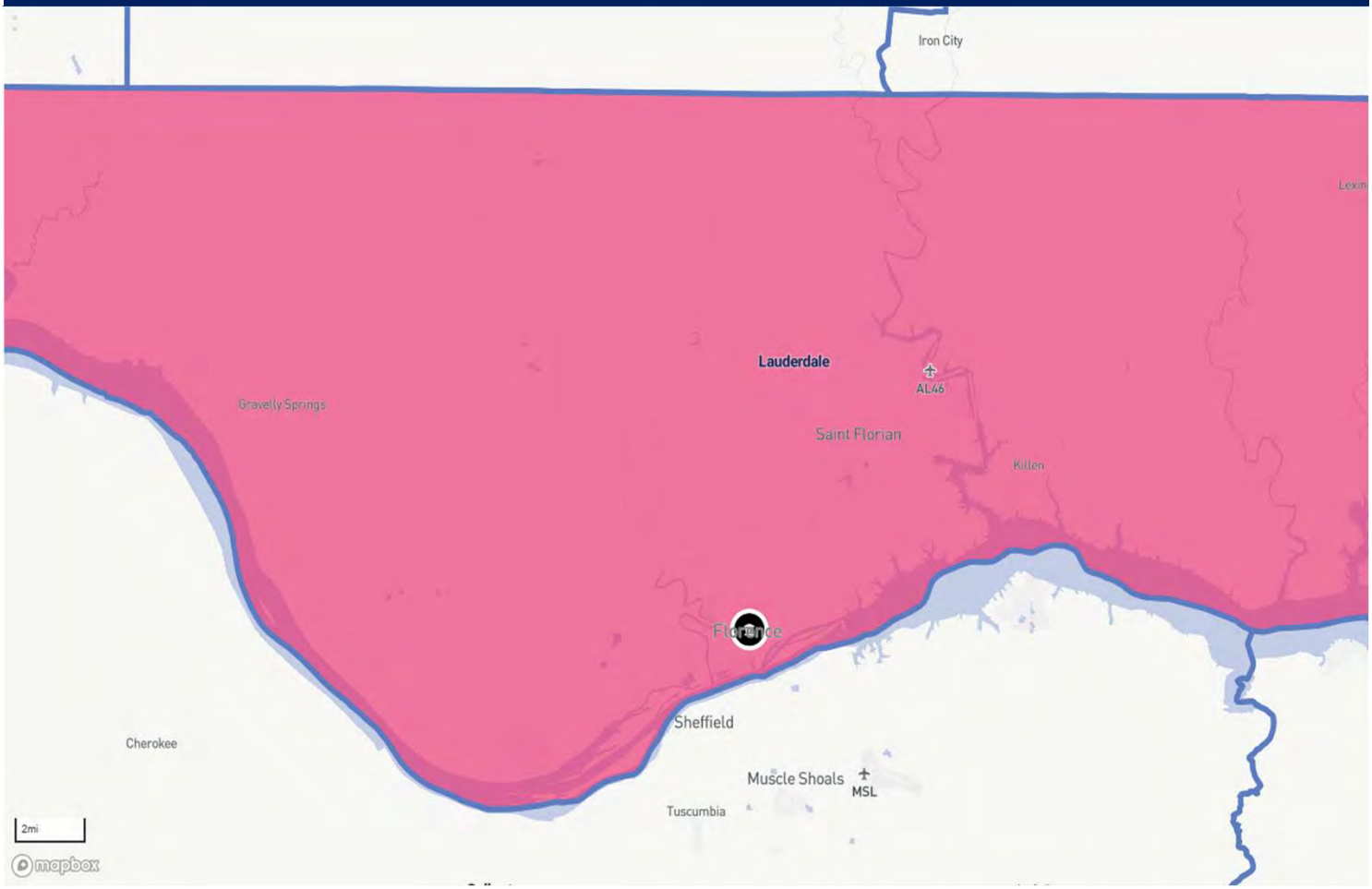
County Code	State Code	Tract Code	Tract Income Level
(073) Jefferson	(01) AL	0117.04	Middle
(073) Jefferson	(01) AL	0117.06	Middle
(073) Jefferson	(01) AL	0117.07	Middle
(073) Jefferson	(01) AL	0117.08	Upper
(073) Jefferson	(01) AL	0117.09	Middle
(073) Jefferson	(01) AL	0117.10	Middle
(073) Jefferson	(01) AL	0118.03	Moderate
(073) Jefferson	(01) AL	0118.04	Moderate
(073) Jefferson	(01) AL	0118.05	Moderate
(073) Jefferson	(01) AL	0118.06	Moderate
(073) Jefferson	(01) AL	0119.01	Moderate
(073) Jefferson	(01) AL	0119.04	Middle
(073) Jefferson	(01) AL	0120.01	Middle
(073) Jefferson	(01) AL	0120.03	Upper
(073) Jefferson	(01) AL	0120.04	Middle
(073) Jefferson	(01) AL	0121.03	Moderate
(073) Jefferson	(01) AL	0121.04	Middle
(073) Jefferson	(01) AL	0122.00	Middle
(073) Jefferson	(01) AL	0123.02	Middle
(073) Jefferson	(01) AL	0123.04	Middle
(073) Jefferson	(01) AL	0123.06	Middle
(073) Jefferson	(01) AL	0123.07	Middle
(073) Jefferson	(01) AL	0124.01	Middle
(073) Jefferson	(01) AL	0124.02	Moderate
(073) Jefferson	(01) AL	0124.03	Middle
(073) Jefferson	(01) AL	0125.00	Moderate
(073) Jefferson	(01) AL	0126.02	Moderate
(073) Jefferson	(01) AL	0127.01	Middle
(073) Jefferson	(01) AL	0127.03	Upper
(073) Jefferson	(01) AL	0127.04	Upper
(073) Jefferson	(01) AL	0128.02	Upper
(073) Jefferson	(01) AL	0128.04	Upper
(073) Jefferson	(01) AL	0128.05	Upper
(073) Jefferson	(01) AL	0129.05	Upper
(073) Jefferson	(01) AL	0129.07	Middle
(073) Jefferson	(01) AL	0129.08	Moderate
(073) Jefferson	(01) AL	0129.10	Upper
(073) Jefferson	(01) AL	0129.11	Upper
(073) Jefferson	(01) AL	0129.13	Middle
(073) Jefferson	(01) AL	0129.14	Upper
(073) Jefferson	(01) AL	0129.16	Upper
(073) Jefferson	(01) AL	0129.17	Upper
(073) Jefferson	(01) AL	0129.18	Middle
(073) Jefferson	(01) AL	0129.19	Middle
(073) Jefferson	(01) AL	0129.20	Middle
(073) Jefferson	(01) AL	0129.21	Upper
(073) Jefferson	(01) AL	0130.02	Low
(073) Jefferson	(01) AL	0131.00	Low
(073) Jefferson	(01) AL	0132.00	Moderate
(073) Jefferson	(01) AL	0133.00	Moderate
(073) Jefferson	(01) AL	0134.00	Moderate
(073) Jefferson	(01) AL	0136.01	Moderate
(073) Jefferson	(01) AL	0138.01	Moderate
(073) Jefferson	(01) AL	0139.01	Moderate
(073) Jefferson	(01) AL	0139.02	Middle
(073) Jefferson	(01) AL	0140.01	Middle
(073) Jefferson	(01) AL	0140.02	Upper

County Code	State Code	Tract Code	Tract Income Level
(073) Jefferson	(01) AL	0141.04	Middle
(073) Jefferson	(01) AL	0141.05	Middle
(073) Jefferson	(01) AL	0141.06	Middle
(073) Jefferson	(01) AL	0141.07	Middle
(073) Jefferson	(01) AL	0142.05	Upper
(073) Jefferson	(01) AL	0142.06	Upper
(073) Jefferson	(01) AL	0142.07	Upper
(073) Jefferson	(01) AL	0142.08	Upper
(073) Jefferson	(01) AL	0142.09	Upper
(073) Jefferson	(01) AL	0143.01	Middle
(073) Jefferson	(01) AL	0143.03	Upper
(073) Jefferson	(01) AL	0143.04	Middle
(073) Jefferson	(01) AL	0144.04	Upper
(073) Jefferson	(01) AL	0144.05	Middle
(073) Jefferson	(01) AL	0144.06	Upper
(073) Jefferson	(01) AL	0144.08	Middle
(073) Jefferson	(01) AL	0144.09	Upper
(073) Jefferson	(01) AL	0144.10	Upper
(073) Jefferson	(01) AL	0144.12	Upper
(073) Jefferson	(01) AL	0144.14	Upper
(073) Jefferson	(01) AL	0144.15	Upper
(117) Shelby	(01) AL	0301.02	Middle
(117) Shelby	(01) AL	0301.03	Middle
(117) Shelby	(01) AL	0302.11	Upper
(117) Shelby	(01) AL	0302.12	Middle
(117) Shelby	(01) AL	0302.15	Middle
(117) Shelby	(01) AL	0302.16	Upper
(117) Shelby	(01) AL	0302.18	Upper
(117) Shelby	(01) AL	0302.19	Upper
(117) Shelby	(01) AL	0302.20	Upper
(117) Shelby	(01) AL	0302.21	Upper
(117) Shelby	(01) AL	0303.04	Upper
(117) Shelby	(01) AL	0303.05	Upper
(117) Shelby	(01) AL	0303.06	Middle
(117) Shelby	(01) AL	0303.14	Middle
(117) Shelby	(01) AL	0303.15	Middle
(117) Shelby	(01) AL	0303.16	Middle
(117) Shelby	(01) AL	0303.17	Upper
(117) Shelby	(01) AL	0303.19	Middle
(117) Shelby	(01) AL	0303.20	Middle
(117) Shelby	(01) AL	0303.30	Upper
(117) Shelby	(01) AL	0303.31	Upper
(117) Shelby	(01) AL	0303.36	Upper
(117) Shelby	(01) AL	0303.37	Middle
(117) Shelby	(01) AL	0303.40	Upper
(117) Shelby	(01) AL	0303.41	Middle
(117) Shelby	(01) AL	0303.45	Upper
(117) Shelby	(01) AL	0303.46	Upper
(117) Shelby	(01) AL	0303.47	Middle
(117) Shelby	(01) AL	0303.48	Upper
(117) Shelby	(01) AL	0303.49	Middle
(117) Shelby	(01) AL	0303.50	Upper
(117) Shelby	(01) AL	0303.51	Upper
(117) Shelby	(01) AL	0303.52	Upper
(117) Shelby	(01) AL	0304.05	Moderate
(117) Shelby	(01) AL	0304.06	Middle
(117) Shelby	(01) AL	0304.07	Middle

County Code	State Code	Tract Code	Tract Income Level
(117) Shelby	(01) AL	0304.08	Moderate
(117) Shelby	(01) AL	0305.02	Middle
(117) Shelby	(01) AL	0305.03	Upper
(117) Shelby	(01) AL	0305.04	Middle
(117) Shelby	(01) AL	0306.07	Upper
(117) Shelby	(01) AL	0306.10	Middle
(117) Shelby	(01) AL	0306.11	Upper
(117) Shelby	(01) AL	0306.12	Upper
(117) Shelby	(01) AL	0306.13	Middle
(117) Shelby	(01) AL	0306.14	Middle
(117) Shelby	(01) AL	0306.15	Upper
(117) Shelby	(01) AL	0306.16	Upper
(117) Shelby	(01) AL	0307.01	Middle
(117) Shelby	(01) AL	0307.03	Middle
(117) Shelby	(01) AL	0307.04	Middle
(117) Shelby	(01) AL	0308.00	Middle
(117) Shelby	(01) AL	0309.00	Moderate
(117) Shelby	(01) AL	9800.00	Unknown
(117) Shelby	(01) AL	9801.00	Unknown

22520 Florence - Muscle Shoals, AL

County: Lauderdale (077)



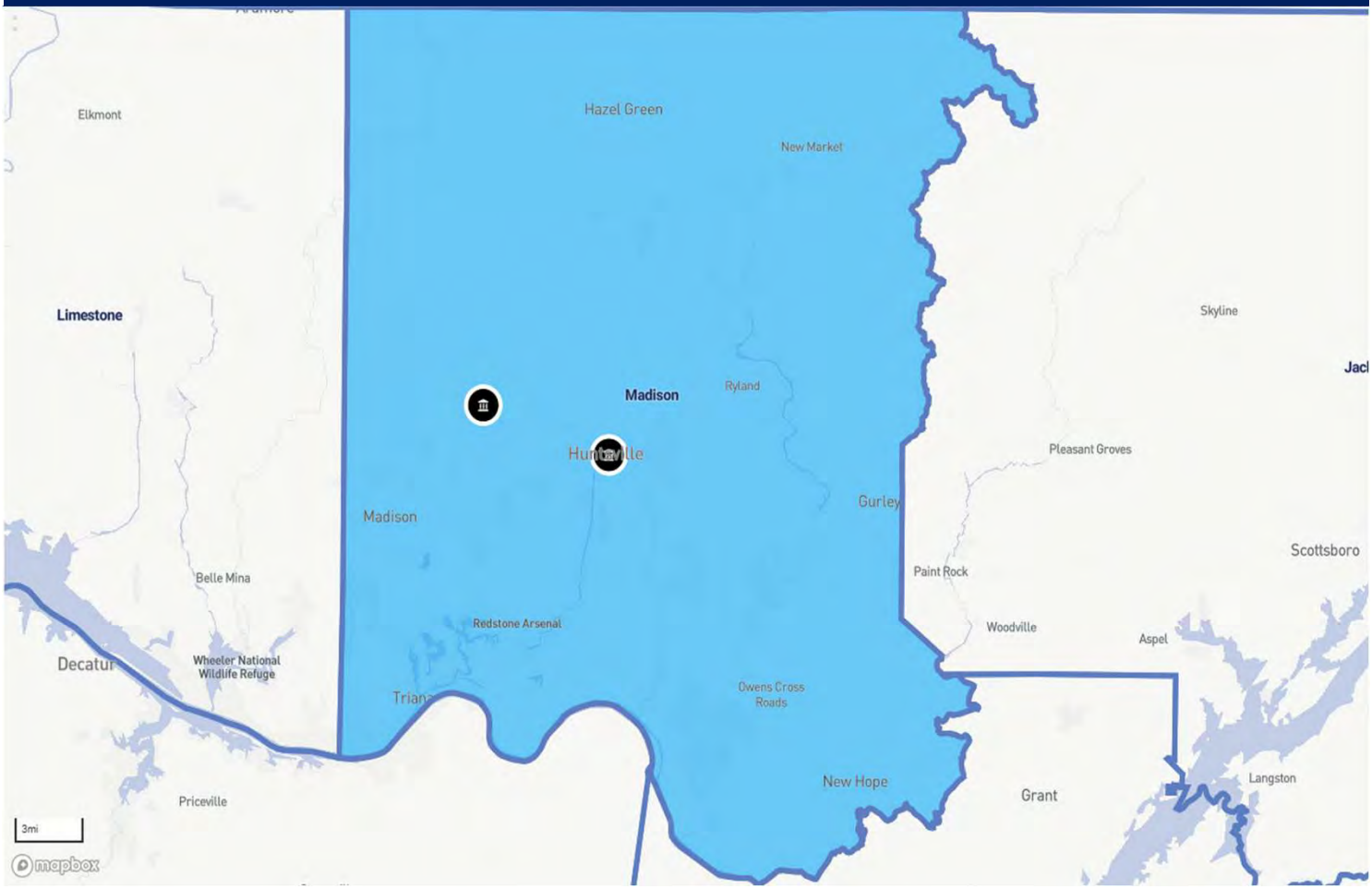
MSA: 22520 - Florence-Muscle Shoals, AL

Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(077) Lauderdale	(01) AL	0101.00	Low
(077) Lauderdale	(01) AL	0102.00	Middle
(077) Lauderdale	(01) AL	0103.00	Unknown
(077) Lauderdale	(01) AL	0104.00	Middle
(077) Lauderdale	(01) AL	0106.00	Moderate
(077) Lauderdale	(01) AL	0107.00	Low
(077) Lauderdale	(01) AL	0108.00	Moderate
(077) Lauderdale	(01) AL	0109.01	Middle
(077) Lauderdale	(01) AL	0109.02	Moderate
(077) Lauderdale	(01) AL	0110.00	Moderate
(077) Lauderdale	(01) AL	0111.01	Middle
(077) Lauderdale	(01) AL	0111.02	Middle
(077) Lauderdale	(01) AL	0112.00	Middle
(077) Lauderdale	(01) AL	0113.00	Middle
(077) Lauderdale	(01) AL	0114.01	Middle
(077) Lauderdale	(01) AL	0114.02	Upper
(077) Lauderdale	(01) AL	0115.02	Upper
(077) Lauderdale	(01) AL	0115.03	Upper
(077) Lauderdale	(01) AL	0115.04	Upper
(077) Lauderdale	(01) AL	0116.02	Upper
(077) Lauderdale	(01) AL	0116.03	Upper
(077) Lauderdale	(01) AL	0116.05	Upper
(077) Lauderdale	(01) AL	0116.06	Middle
(077) Lauderdale	(01) AL	0117.00	Middle
(077) Lauderdale	(01) AL	0118.01	Middle
(077) Lauderdale	(01) AL	0118.02	Middle

26620 Huntsville, AL

County: Madison (089)



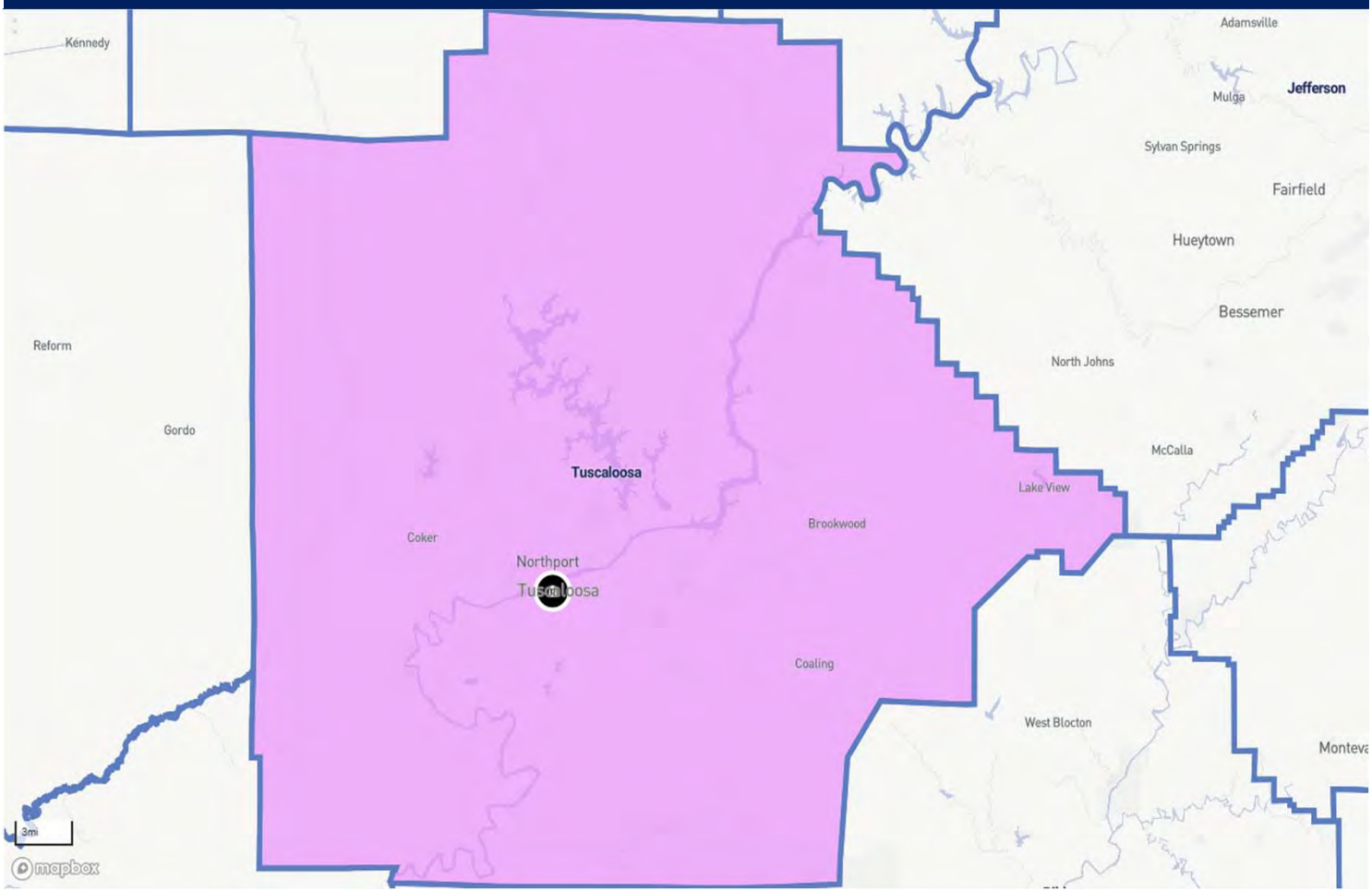
MSA: 22620 - Huntsville, AL
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(089) Madison	(01) AL	0002.03	Low
(089) Madison	(01) AL	0003.01	Low
(089) Madison	(01) AL	0003.02	Low
(089) Madison	(01) AL	0004.03	Moderate
(089) Madison	(01) AL	0005.01	Moderate
(089) Madison	(01) AL	0005.02	Moderate
(089) Madison	(01) AL	0005.03	Moderate
(089) Madison	(01) AL	0006.01	Moderate
(089) Madison	(01) AL	0006.02	Moderate
(089) Madison	(01) AL	0007.01	Low
(089) Madison	(01) AL	0007.02	Middle
(089) Madison	(01) AL	0009.01	Middle
(089) Madison	(01) AL	0009.02	Middle
(089) Madison	(01) AL	0010.00	Middle
(089) Madison	(01) AL	0012.00	Low
(089) Madison	(01) AL	0013.01	Low
(089) Madison	(01) AL	0013.02	Low
(089) Madison	(01) AL	0014.01	Upper
(089) Madison	(01) AL	0014.03	Unknown
(089) Madison	(01) AL	0014.04	Moderate
(089) Madison	(01) AL	0015.00	Low
(089) Madison	(01) AL	0017.00	Upper
(089) Madison	(01) AL	0018.01	Upper
(089) Madison	(01) AL	0019.01	Upper
(089) Madison	(01) AL	0019.02	Upper
(089) Madison	(01) AL	0019.03	Upper
(089) Madison	(01) AL	0020.00	Upper
(089) Madison	(01) AL	0021.00	Low
(089) Madison	(01) AL	0022.00	Low
(089) Madison	(01) AL	0023.00	Low
(089) Madison	(01) AL	0024.00	Low
(089) Madison	(01) AL	0025.01	Low
(089) Madison	(01) AL	0025.02	Moderate
(089) Madison	(01) AL	0026.00	Upper
(089) Madison	(01) AL	0027.01	Upper
(089) Madison	(01) AL	0027.21	Middle
(089) Madison	(01) AL	0027.22	Upper
(089) Madison	(01) AL	0028.01	Moderate
(089) Madison	(01) AL	0028.03	Middle
(089) Madison	(01) AL	0028.04	Upper
(089) Madison	(01) AL	0029.11	Upper
(089) Madison	(01) AL	0029.12	Upper
(089) Madison	(01) AL	0029.22	Upper
(089) Madison	(01) AL	0029.23	Upper
(089) Madison	(01) AL	0029.24	Middle
(089) Madison	(01) AL	0030.00	Low
(089) Madison	(01) AL	0031.00	Upper
(089) Madison	(01) AL	0101.01	Middle
(089) Madison	(01) AL	0101.02	Middle
(089) Madison	(01) AL	0102.00	Upper
(089) Madison	(01) AL	0103.02	Middle
(089) Madison	(01) AL	0103.03	Moderate
(089) Madison	(01) AL	0103.04	Moderate
(089) Madison	(01) AL	0104.03	Moderate

County Code	State Code	Tract Code	Tract Income Level
(089) Madison	(01) AL	0104.04	Moderate
(089) Madison	(01) AL	0104.05	Middle
(089) Madison	(01) AL	0104.06	Moderate
(089) Madison	(01) AL	0105.02	Middle
(089) Madison	(01) AL	0105.03	Middle
(089) Madison	(01) AL	0105.04	Upper
(089) Madison	(01) AL	0106.12	Middle
(089) Madison	(01) AL	0106.23	Upper
(089) Madison	(01) AL	0106.25	Low
(089) Madison	(01) AL	0106.26	Middle
(089) Madison	(01) AL	0106.27	Middle
(089) Madison	(01) AL	0106.28	Upper
(089) Madison	(01) AL	0106.29	Upper
(089) Madison	(01) AL	0106.30	Upper
(089) Madison	(01) AL	0106.31	Upper
(089) Madison	(01) AL	0107.03	Middle
(089) Madison	(01) AL	0107.04	Middle
(089) Madison	(01) AL	0107.05	Moderate
(089) Madison	(01) AL	0107.06	Middle
(089) Madison	(01) AL	0108.01	Upper
(089) Madison	(01) AL	0108.02	Middle
(089) Madison	(01) AL	0109.02	Moderate
(089) Madison	(01) AL	0109.03	Middle
(089) Madison	(01) AL	0109.04	Upper
(089) Madison	(01) AL	0109.05	Upper
(089) Madison	(01) AL	0110.12	Upper
(089) Madison	(01) AL	0110.13	Middle
(089) Madison	(01) AL	0110.21	Moderate
(089) Madison	(01) AL	0110.23	Upper
(089) Madison	(01) AL	0110.24	Upper
(089) Madison	(01) AL	0110.25	Middle
(089) Madison	(01) AL	0110.26	Upper
(089) Madison	(01) AL	0110.27	Upper
(089) Madison	(01) AL	0110.28	Moderate
(089) Madison	(01) AL	0111.00	Middle
(089) Madison	(01) AL	0112.01	Upper
(089) Madison	(01) AL	0112.02	Upper
(089) Madison	(01) AL	0112.03	Upper
(089) Madison	(01) AL	0113.01	Middle
(089) Madison	(01) AL	0113.02	Upper
(089) Madison	(01) AL	0114.00	Middle

46220 Tuscaloosa, AL

County: Tuscaloosa (125)



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MSA: 46220 Tuscaloosa, AL

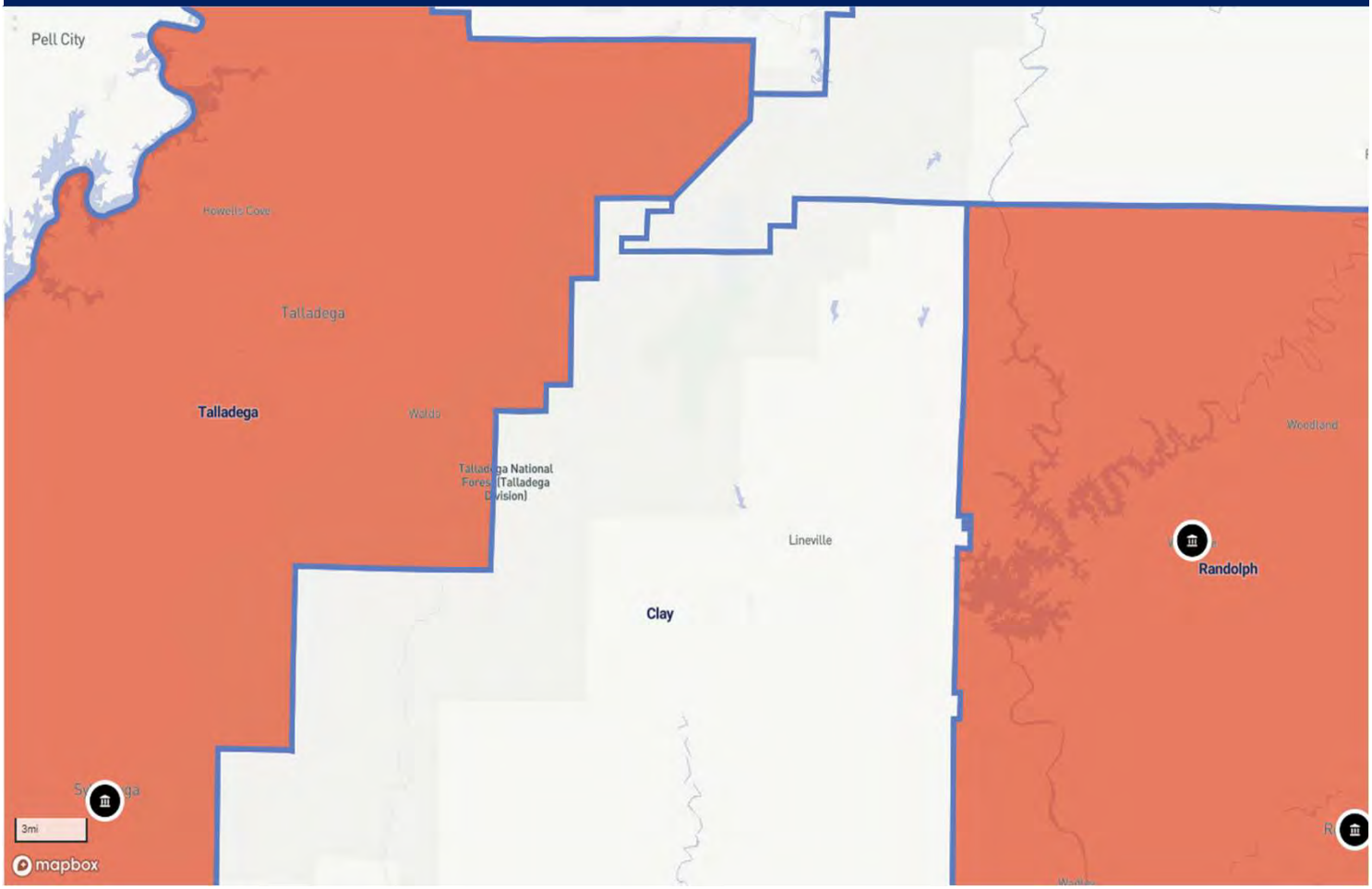
Facility-Based Assessment Area Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(125) Tuscaloosa	(01) AL	010101	Upper
(125) Tuscaloosa	(01) AL	010102	Upper
(125) Tuscaloosa	(01) AL	010104	Upper
(125) Tuscaloosa	(01) AL	010105	Middle
(125) Tuscaloosa	(01) AL	010201	Upper
(125) Tuscaloosa	(01) AL	010203	Upper
(125) Tuscaloosa	(01) AL	010204	Upper
(125) Tuscaloosa	(01) AL	010205	Upper
(125) Tuscaloosa	(01) AL	010206	Upper
(125) Tuscaloosa	(01) AL	010302	Moderate
(125) Tuscaloosa	(01) AL	010303	Middle
(125) Tuscaloosa	(01) AL	010304	Middle
(125) Tuscaloosa	(01) AL	010305	Middle
(125) Tuscaloosa	(01) AL	010403	Middle
(125) Tuscaloosa	(01) AL	010404	Moderate
(125) Tuscaloosa	(01) AL	010405	Upper
(125) Tuscaloosa	(01) AL	010406	Upper
(125) Tuscaloosa	(01) AL	010407	Middle
(125) Tuscaloosa	(01) AL	010500	Moderate
(125) Tuscaloosa	(01) AL	010601	Middle
(125) Tuscaloosa	(01) AL	010603	Upper
(125) Tuscaloosa	(01) AL	010604	Middle
(125) Tuscaloosa	(01) AL	010703	Upper
(125) Tuscaloosa	(01) AL	010704	Middle
(125) Tuscaloosa	(01) AL	010705	Upper
(125) Tuscaloosa	(01) AL	010706	Middle
(125) Tuscaloosa	(01) AL	010707	Middle
(125) Tuscaloosa	(01) AL	010802	Middle
(125) Tuscaloosa	(01) AL	010803	Moderate
(125) Tuscaloosa	(01) AL	010804	Middle
(125) Tuscaloosa	(01) AL	011200	Middle
(125) Tuscaloosa	(01) AL	011401	Upper
(125) Tuscaloosa	(01) AL	011402	Middle
(125) Tuscaloosa	(01) AL	011600	Middle
(125) Tuscaloosa	(01) AL	011701	Low
(125) Tuscaloosa	(01) AL	011703	Low
(125) Tuscaloosa	(01) AL	011800	Low
(125) Tuscaloosa	(01) AL	011901	Middle
(125) Tuscaloosa	(01) AL	011902	Low
(125) Tuscaloosa	(01) AL	012001	Unknown

County Code	State Code	Tract Code	Tract Income Level
(125) Tuscaloosa	(01) AL	012002	Unknown
(125) Tuscaloosa	(01) AL	012101	Middle
(125) Tuscaloosa	(01) AL	012102	Moderate
(125) Tuscaloosa	(01) AL	012304	Moderate
(125) Tuscaloosa	(01) AL	012305	Middle
(125) Tuscaloosa	(01) AL	012306	Middle
(125) Tuscaloosa	(01) AL	012307	Unknown
(125) Tuscaloosa	(01) AL	012403	Middle
(125) Tuscaloosa	(01) AL	012404	Upper
(125) Tuscaloosa	(01) AL	012406	Middle
(125) Tuscaloosa	(01) AL	012407	Low
(125) Tuscaloosa	(01) AL	012408	Moderate
(125) Tuscaloosa	(01) AL	012501	Moderate
(125) Tuscaloosa	(01) AL	012503	Upper
(125) Tuscaloosa	(01) AL	012504	Upper
(125) Tuscaloosa	(01) AL	012505	Unknown
(125) Tuscaloosa	(01) AL	012600	Middle
(125) Tuscaloosa	(01) AL	012700	Middle
(125) Tuscaloosa	(01) AL	012800	Moderate

99999 AL Non-MSA

Counties: Randolph (111), Talladega (121)



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MSA: 99999 AL Non-MSA

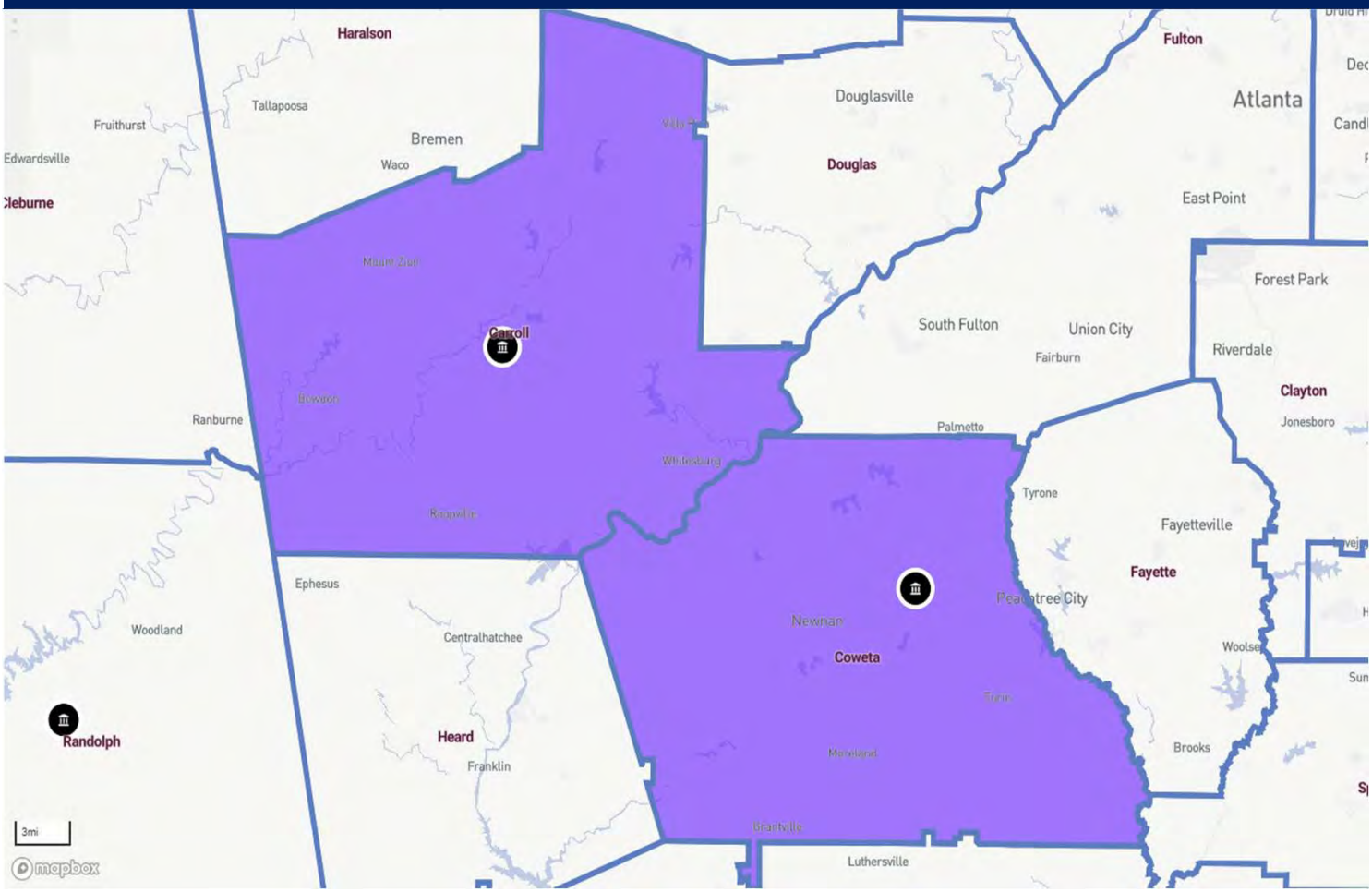
Facility-Based Assessment Area Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(111) Randolph	(01) AL	000100	Middle
(111) Randolph	(01) AL	000200	Upper
(111) Randolph	(01) AL	000300	Middle
(111) Randolph	(01) AL	000400	Middle
(111) Randolph	(01) AL	000500	Middle
(111) Randolph	(01) AL	000600	Middle
(121) Talladega	(01) AL	010101	Upper
(121) Talladega	(01) AL	010102	Middle
(121) Talladega	(01) AL	010201	Upper
(121) Talladega	(01) AL	010202	Middle
(121) Talladega	(01) AL	010301	Moderate
(121) Talladega	(01) AL	010302	Upper
(121) Talladega	(01) AL	010400	Middle
(121) Talladega	(01) AL	010500	Moderate
(121) Talladega	(01) AL	010600	Low
(121) Talladega	(01) AL	010700	Moderate
(121) Talladega	(01) AL	010900	Middle
(121) Talladega	(01) AL	011000	Middle
(121) Talladega	(01) AL	011100	Middle
(121) Talladega	(01) AL	011200	Middle
(121) Talladega	(01) AL	011301	Moderate
(121) Talladega	(01) AL	011302	Moderate
(121) Talladega	(01) AL	011400	Upper
(121) Talladega	(01) AL	011501	Upper
(121) Talladega	(01) AL	011502	Middle
(121) Talladega	(01) AL	011600	Moderate
(121) Talladega	(01) AL	011700	Upper
(121) Talladega	(01) AL	011800	Moderate
(121) Talladega	(01) AL	011900	Upper
(121) Talladega	(01) AL	012000	Middle

STATE OF GEORGIA

12054 Atlanta-Sandy Springs-Roswell, GA

Counties: Carroll (045), Coweta (077)



MSA: 12054 Atlanta-Sandy Springs-Roswell, GA

Facility-Based Assessment Area

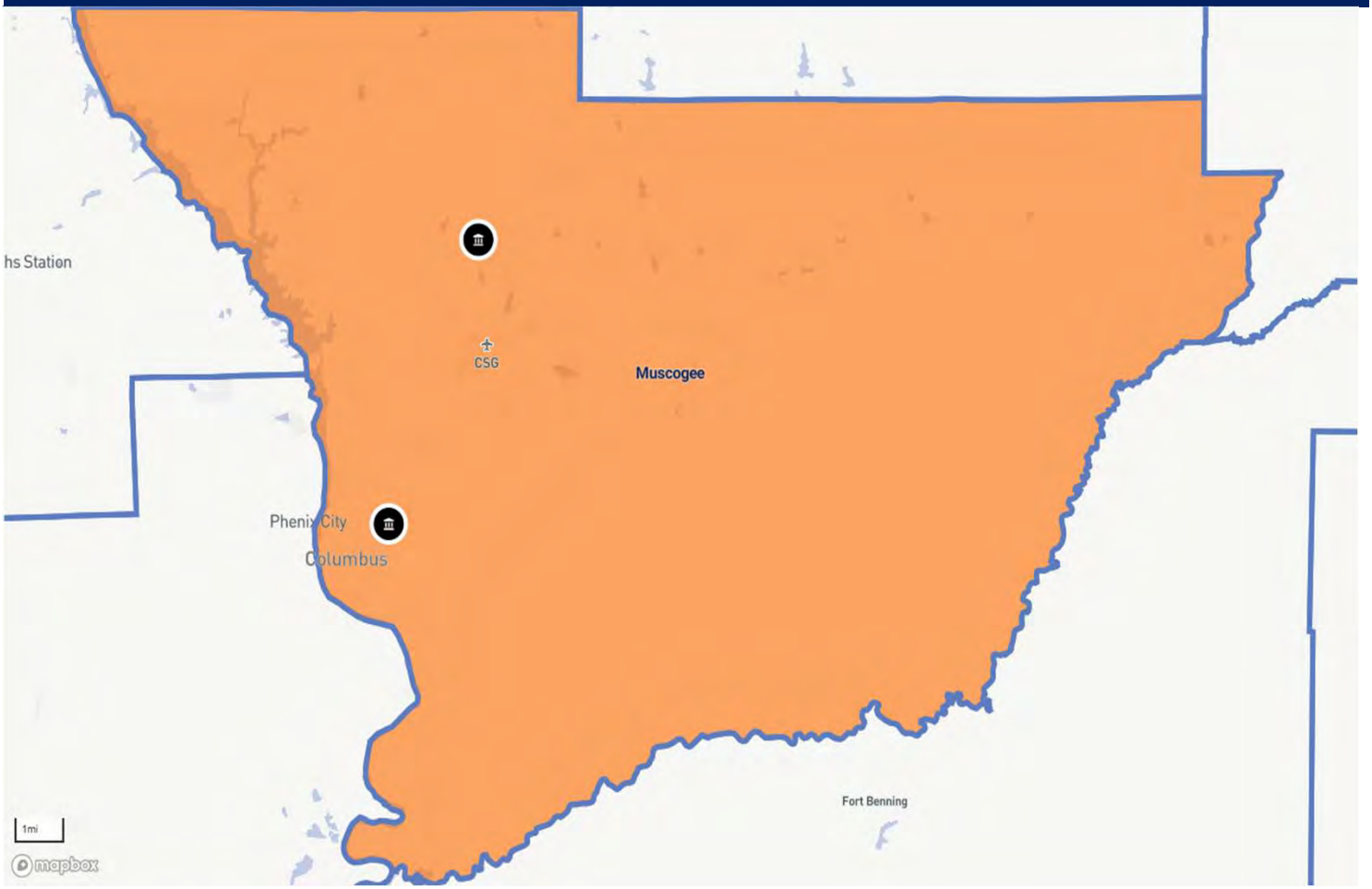
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(045) Carroll	(13) GA	910101	Moderate
(045) Carroll	(13) GA	910103	Middle
(045) Carroll	(13) GA	910105	Middle
(045) Carroll	(13) GA	910106	Middle
(045) Carroll	(13) GA	910201	Middle
(045) Carroll	(13) GA	910202	Moderate
(045) Carroll	(13) GA	910203	Middle
(045) Carroll	(13) GA	910301	Moderate
(045) Carroll	(13) GA	910302	Moderate
(045) Carroll	(13) GA	910400	Middle
(045) Carroll	(13) GA	910502	Low
(045) Carroll	(13) GA	910503	Moderate
(045) Carroll	(13) GA	910504	Middle
(045) Carroll	(13) GA	910600	Middle
(045) Carroll	(13) GA	910704	Upper
(045) Carroll	(13) GA	910705	Moderate
(045) Carroll	(13) GA	910706	Upper
(045) Carroll	(13) GA	910707	Middle
(045) Carroll	(13) GA	910708	Moderate
(045) Carroll	(13) GA	910709	Moderate
(045) Carroll	(13) GA	910800	Moderate
(045) Carroll	(13) GA	910900	Middle
(045) Carroll	(13) GA	911001	Middle
(045) Carroll	(13) GA	911002	Upper
(045) Carroll	(13) GA	911101	Middle
(045) Carroll	(13) GA	911102	Middle
(045) Carroll	(13) GA	911201	Moderate
(045) Carroll	(13) GA	911202	Middle
(077) Coweta	(13) GA	170101	Middle
(077) Coweta	(13) GA	170102	Middle
(077) Coweta	(13) GA	170200	Middle
(077) Coweta	(13) GA	170303	Upper
(077) Coweta	(13) GA	170304	Upper
(077) Coweta	(13) GA	170307	Moderate
(077) Coweta	(13) GA	170308	Middle
(077) Coweta	(13) GA	170309	Middle
(077) Coweta	(13) GA	170310	Upper
(077) Coweta	(13) GA	170403	Upper
(077) Coweta	(13) GA	170404	Upper
(077) Coweta	(13) GA	170405	Upper

County Code	State Code	Tract Code	Tract Income Level
(077) Coweta	(13) GA	170406	Upper
(077) Coweta	(13) GA	170407	Low
(077) Coweta	(13) GA	170408	Upper
(077) Coweta	(13) GA	170501	Middle
(077) Coweta	(13) GA	170502	Middle
(077) Coweta	(13) GA	170503	Upper
(077) Coweta	(13) GA	170603	Middle
(077) Coweta	(13) GA	170604	Unknown
(077) Coweta	(13) GA	170605	Moderate
(077) Coweta	(13) GA	170606	Upper
(077) Coweta	(13) GA	170607	Upper
(077) Coweta	(13) GA	170701	Middle
(077) Coweta	(13) GA	170702	Middle
(077) Coweta	(13) GA	170801	Middle
(077) Coweta	(13) GA	170802	Middle

17980 Columbus, GA-AL

County: Muscogee (215)



FirstBank

MSA: 17980 Columbus, GA

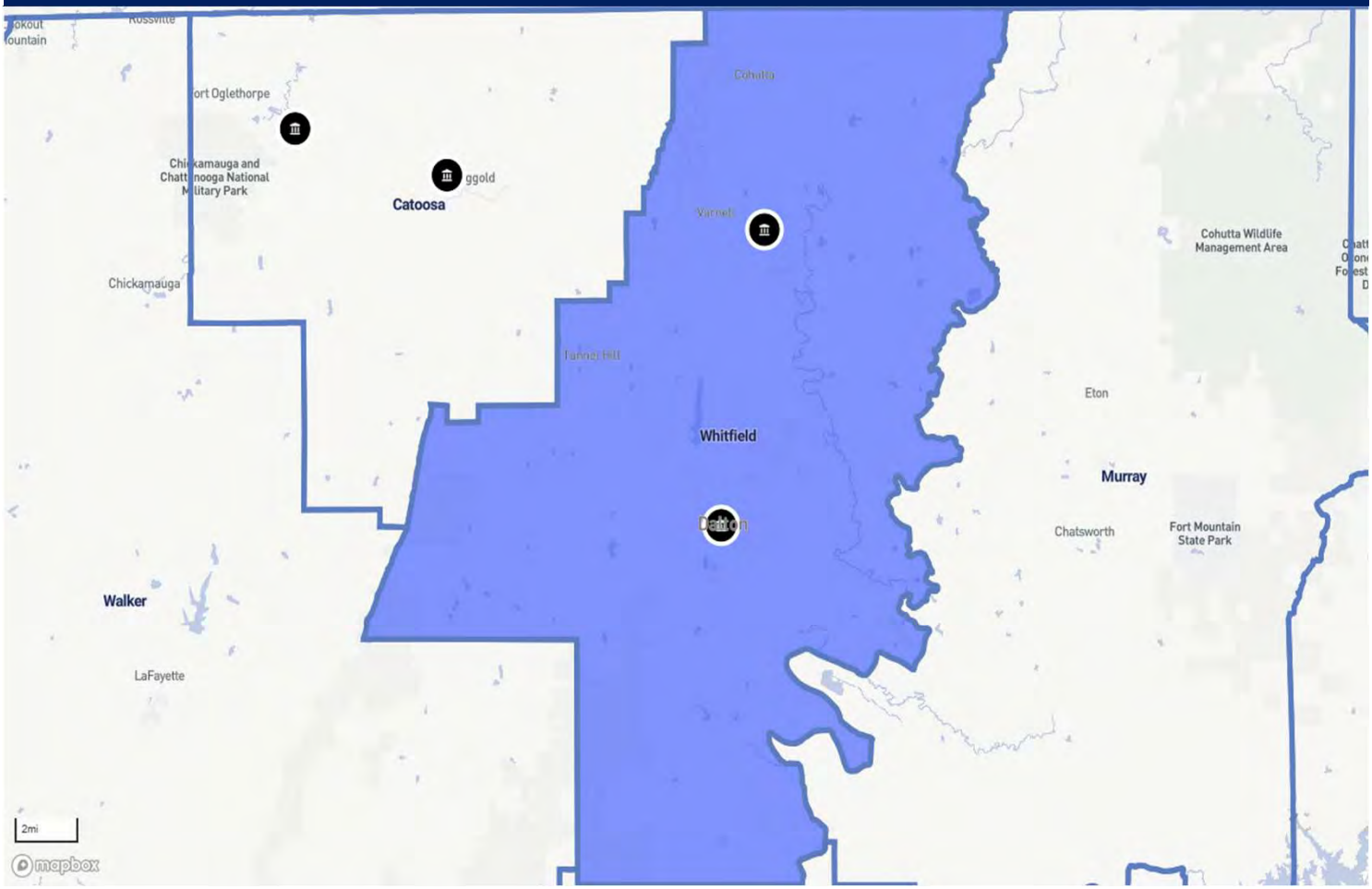
Facility-Based Assessment Area Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(215) Muscogee	(13) GA	000200	Middle
(215) Muscogee	(13) GA	000300	Moderate
(215) Muscogee	(13) GA	000400	Middle
(215) Muscogee	(13) GA	000800	Middle
(215) Muscogee	(13) GA	000900	Moderate
(215) Muscogee	(13) GA	001000	Upper
(215) Muscogee	(13) GA	001100	Upper
(215) Muscogee	(13) GA	001200	Upper
(215) Muscogee	(13) GA	001400	Moderate
(215) Muscogee	(13) GA	001600	Unknown
(215) Muscogee	(13) GA	001800	Moderate
(215) Muscogee	(13) GA	002000	Moderate
(215) Muscogee	(13) GA	002100	Moderate
(215) Muscogee	(13) GA	002200	Moderate
(215) Muscogee	(13) GA	002300	Moderate
(215) Muscogee	(13) GA	002400	Low
(215) Muscogee	(13) GA	002500	Low
(215) Muscogee	(13) GA	002700	Low
(215) Muscogee	(13) GA	002800	Moderate
(215) Muscogee	(13) GA	002901	Moderate
(215) Muscogee	(13) GA	002902	Low
(215) Muscogee	(13) GA	003000	Low
(215) Muscogee	(13) GA	003200	Low
(215) Muscogee	(13) GA	003301	Low
(215) Muscogee	(13) GA	003302	Moderate
(215) Muscogee	(13) GA	003400	Low
(215) Muscogee	(13) GA	010106	Middle
(215) Muscogee	(13) GA	010108	Middle
(215) Muscogee	(13) GA	010109	Upper
(215) Muscogee	(13) GA	010110	Upper
(215) Muscogee	(13) GA	010111	Upper
(215) Muscogee	(13) GA	010204	Middle
(215) Muscogee	(13) GA	010205	Upper
(215) Muscogee	(13) GA	010206	Upper
(215) Muscogee	(13) GA	010207	Upper
(215) Muscogee	(13) GA	010208	Upper
(215) Muscogee	(13) GA	010209	Upper
(215) Muscogee	(13) GA	010301	Upper
(215) Muscogee	(13) GA	010303	Upper
(215) Muscogee	(13) GA	010304	Upper

County Code	State Code	Tract Code	Tract Income Level
(215) Muscogee	(13) GA	010401	Upper
(215) Muscogee	(13) GA	010402	Middle
(215) Muscogee	(13) GA	010501	Middle
(215) Muscogee	(13) GA	010502	Moderate
(215) Muscogee	(13) GA	010602	Middle
(215) Muscogee	(13) GA	010605	Middle
(215) Muscogee	(13) GA	010606	Unknown
(215) Muscogee	(13) GA	010607	Moderate
(215) Muscogee	(13) GA	010608	Moderate
(215) Muscogee	(13) GA	010701	Middle
(215) Muscogee	(13) GA	010702	Moderate
(215) Muscogee	(13) GA	010704	Moderate
(215) Muscogee	(13) GA	010705	Middle
(215) Muscogee	(13) GA	010801	Upper
(215) Muscogee	(13) GA	010802	Middle
(215) Muscogee	(13) GA	011100	Upper
(215) Muscogee	(13) GA	011200	Middle
(215) Muscogee	(13) GA	011400	Low
(215) Muscogee	(13) GA	011500	Moderate

19140 Dalton, GA

County: Whitfield (313)

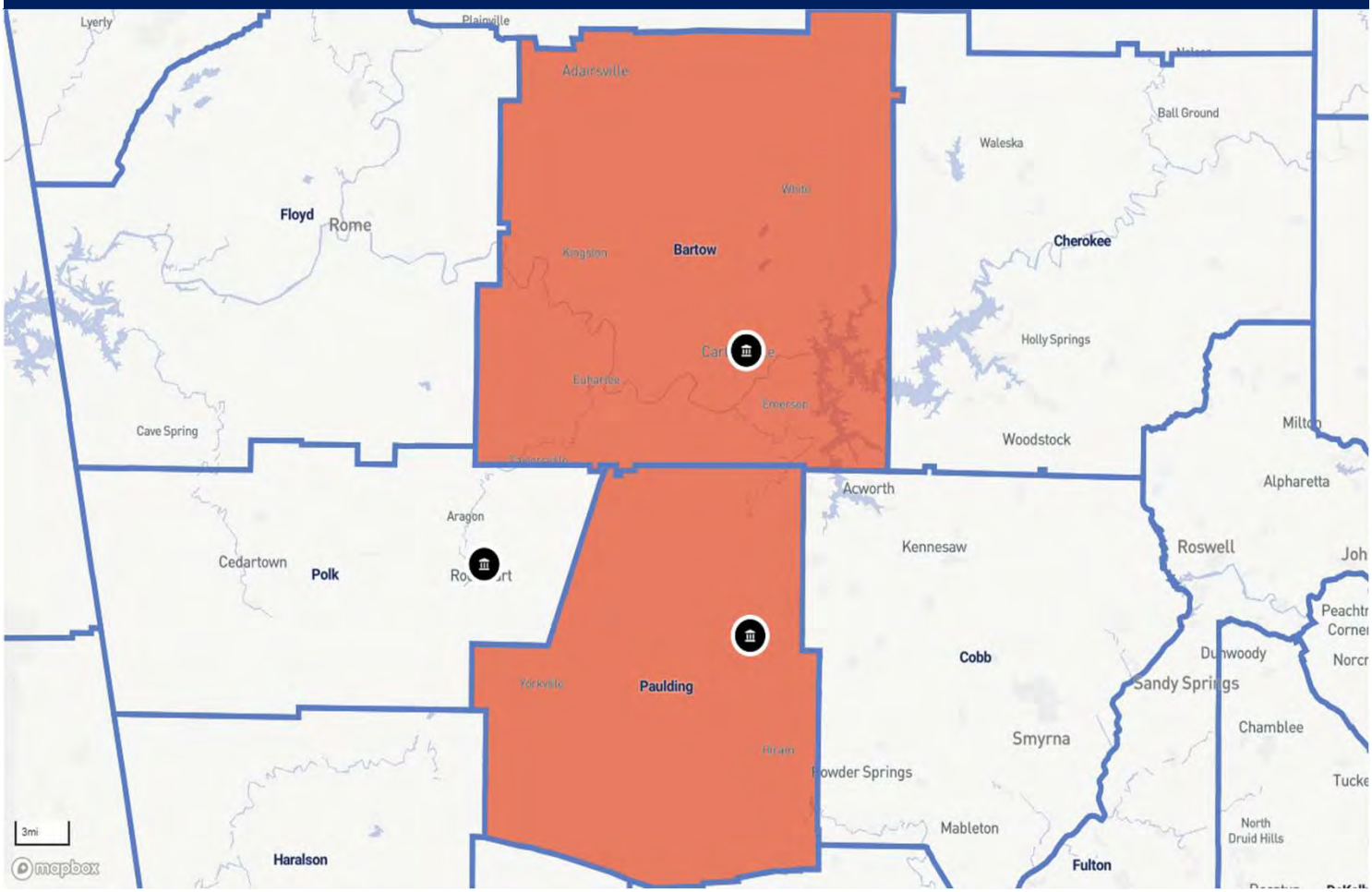


MSA: 19140 - Dalton, GA
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(313) Whitfield	(13) GA	0001.01	Middle
(313) Whitfield	(13) GA	0001.03	Upper
(313) Whitfield	(13) GA	0001.04	Middle
(313) Whitfield	(13) GA	0002.00	Middle
(313) Whitfield	(13) GA	0003.01	Middle
(313) Whitfield	(13) GA	0003.03	Middle
(313) Whitfield	(13) GA	0003.04	Middle
(313) Whitfield	(13) GA	0004.01	Middle
(313) Whitfield	(13) GA	0004.02	Moderate
(313) Whitfield	(13) GA	0005.01	Middle
(313) Whitfield	(13) GA	0005.02	Moderate
(313) Whitfield	(13) GA	0006.00	Upper
(313) Whitfield	(13) GA	0007.00	Middle
(313) Whitfield	(13) GA	0008.01	Middle
(313) Whitfield	(13) GA	0008.02	Middle
(313) Whitfield	(13) GA	0009.00	Upper
(313) Whitfield	(13) GA	0010.00	Middle
(313) Whitfield	(13) GA	0011.00	Moderate
(313) Whitfield	(13) GA	0012.00	Moderate
(313) Whitfield	(13) GA	0013.00	Moderate
(313) Whitfield	(13) GA	0014.00	Upper
(313) Whitfield	(13) GA	0015.00	Middle

31924 Marietta, GA

Counties: Bartow (015), Paulding (223)

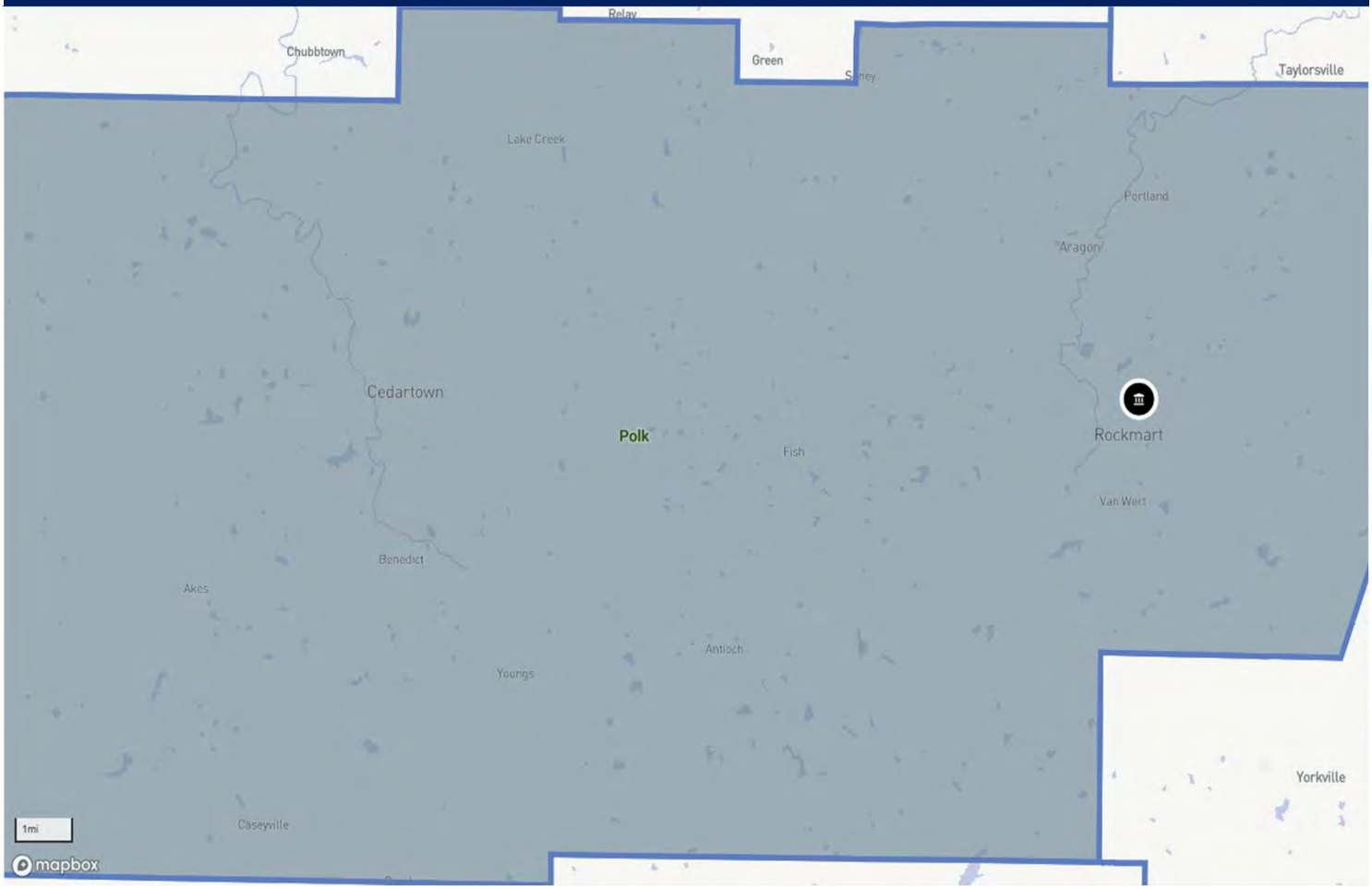


MSA: 19140 - Dalton, GA
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(313) Whitfield	(13) GA	0001.01	Middle
(313) Whitfield	(13) GA	0001.03	Upper
(313) Whitfield	(13) GA	0001.04	Middle
(313) Whitfield	(13) GA	0002.00	Middle
(313) Whitfield	(13) GA	0003.01	Middle
(313) Whitfield	(13) GA	0003.03	Middle
(313) Whitfield	(13) GA	0003.04	Middle
(313) Whitfield	(13) GA	0004.01	Middle
(313) Whitfield	(13) GA	0004.02	Moderate
(313) Whitfield	(13) GA	0005.01	Middle
(313) Whitfield	(13) GA	0005.02	Moderate
(313) Whitfield	(13) GA	0006.00	Upper
(313) Whitfield	(13) GA	0007.00	Middle
(313) Whitfield	(13) GA	0008.01	Middle
(313) Whitfield	(13) GA	0008.02	Middle
(313) Whitfield	(13) GA	0009.00	Upper
(313) Whitfield	(13) GA	0010.00	Middle
(313) Whitfield	(13) GA	0011.00	Moderate
(313) Whitfield	(13) GA	0012.00	Moderate
(313) Whitfield	(13) GA	0013.00	Moderate
(313) Whitfield	(13) GA	0014.00	Upper
(313) Whitfield	(13) GA	0015.00	Middle

99999 GA Non-MSA

County: Polk (233)



MSA: 99999 GA Non-MSA

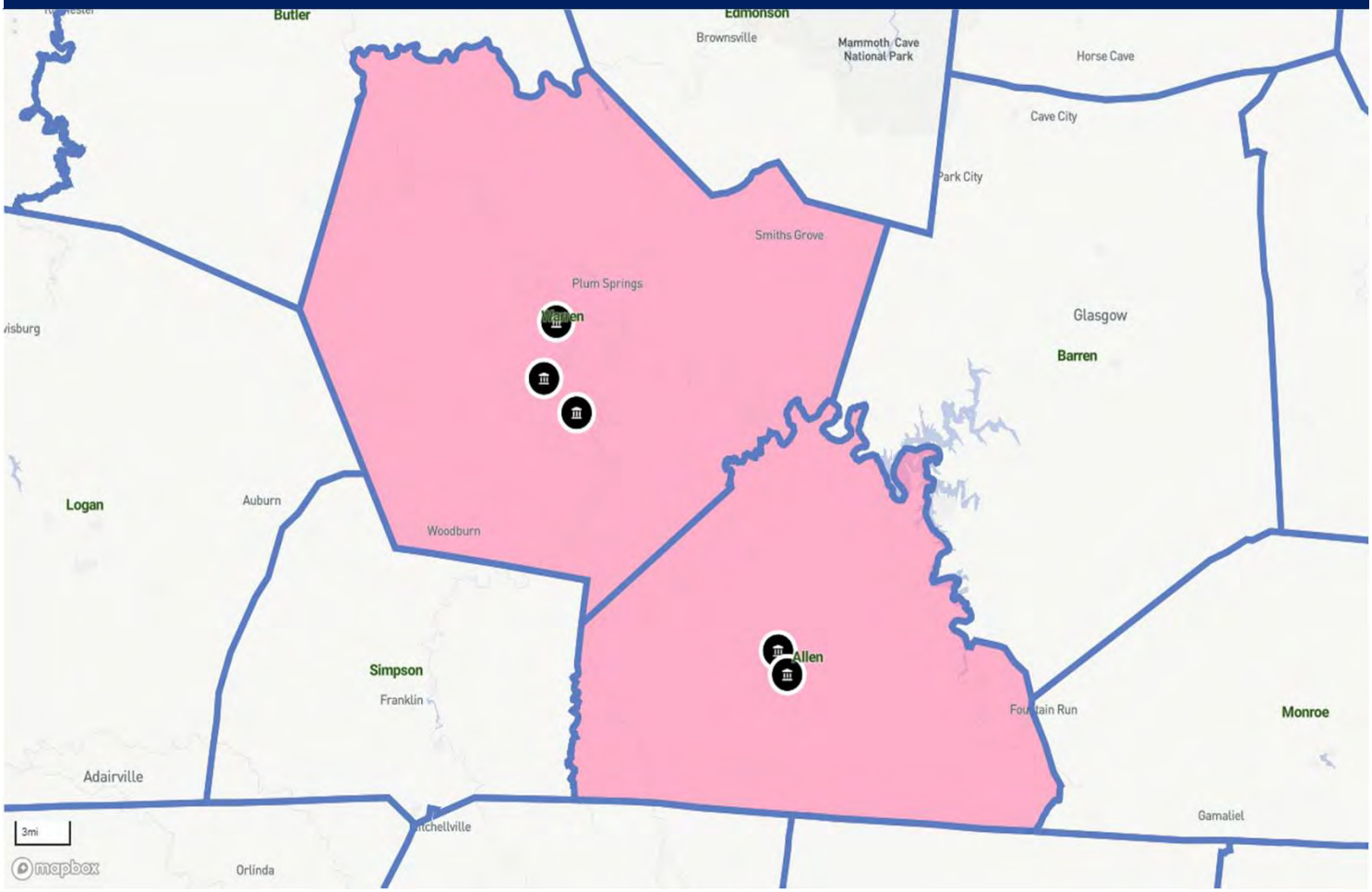
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(233) Polk	(13) GA	010100	Middle
(233) Polk	(13) GA	010201	Upper
(233) Polk	(13) GA	010202	Upper
(233) Polk	(13) GA	010300	Moderate
(233) Polk	(13) GA	010400	Moderate
(233) Polk	(13) GA	010500	Middle
(233) Polk	(13) GA	010600	Upper
(233) Polk	(13) GA	010700	Middle

STATE OF KENTUCKY

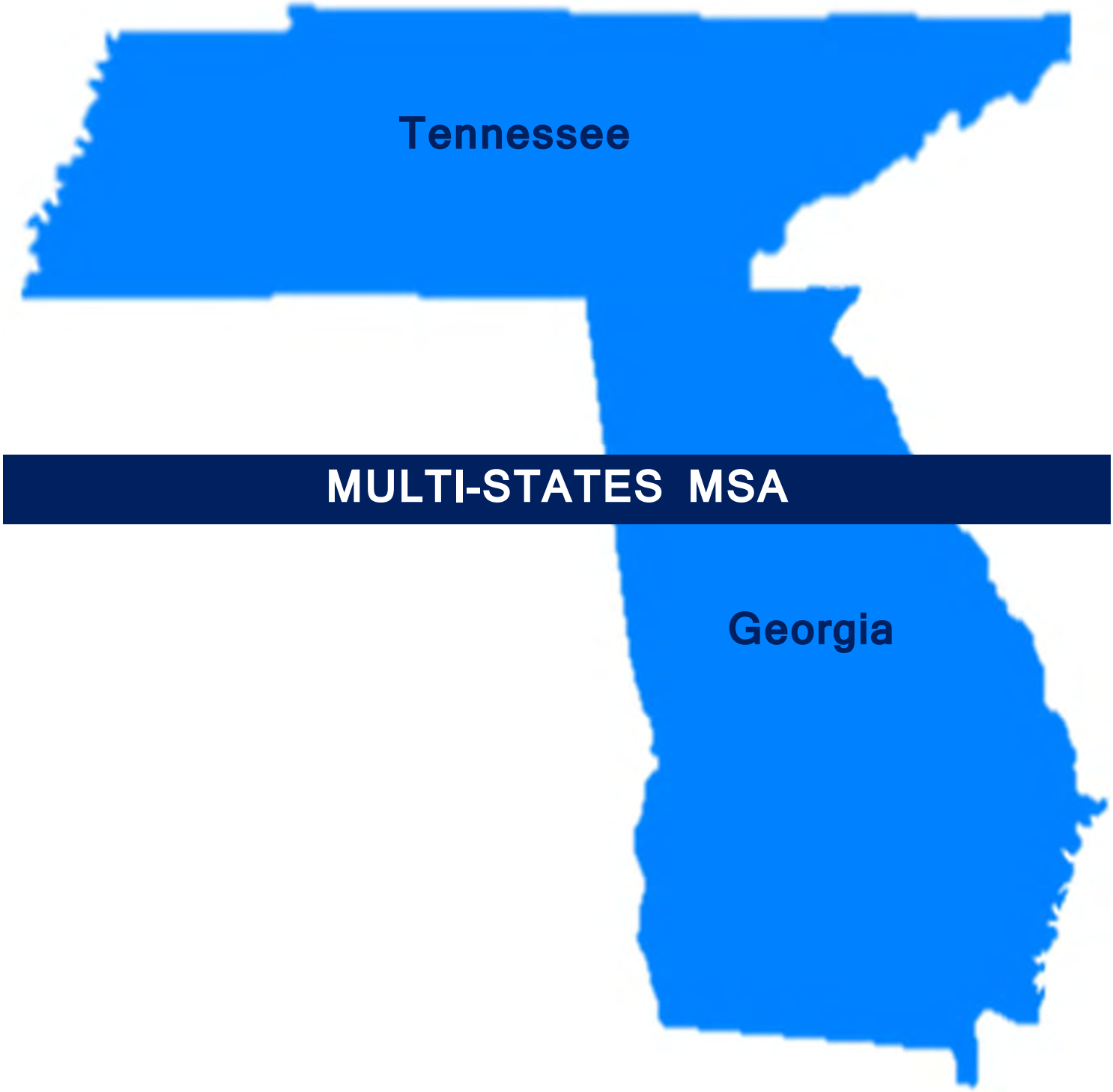
14540 Bowling Green, KY

Counties: Allen (003), Warren (227)



MSA: 14540 - Bowling Green, KY
Facility-Based Assessment Area
Geographical Information

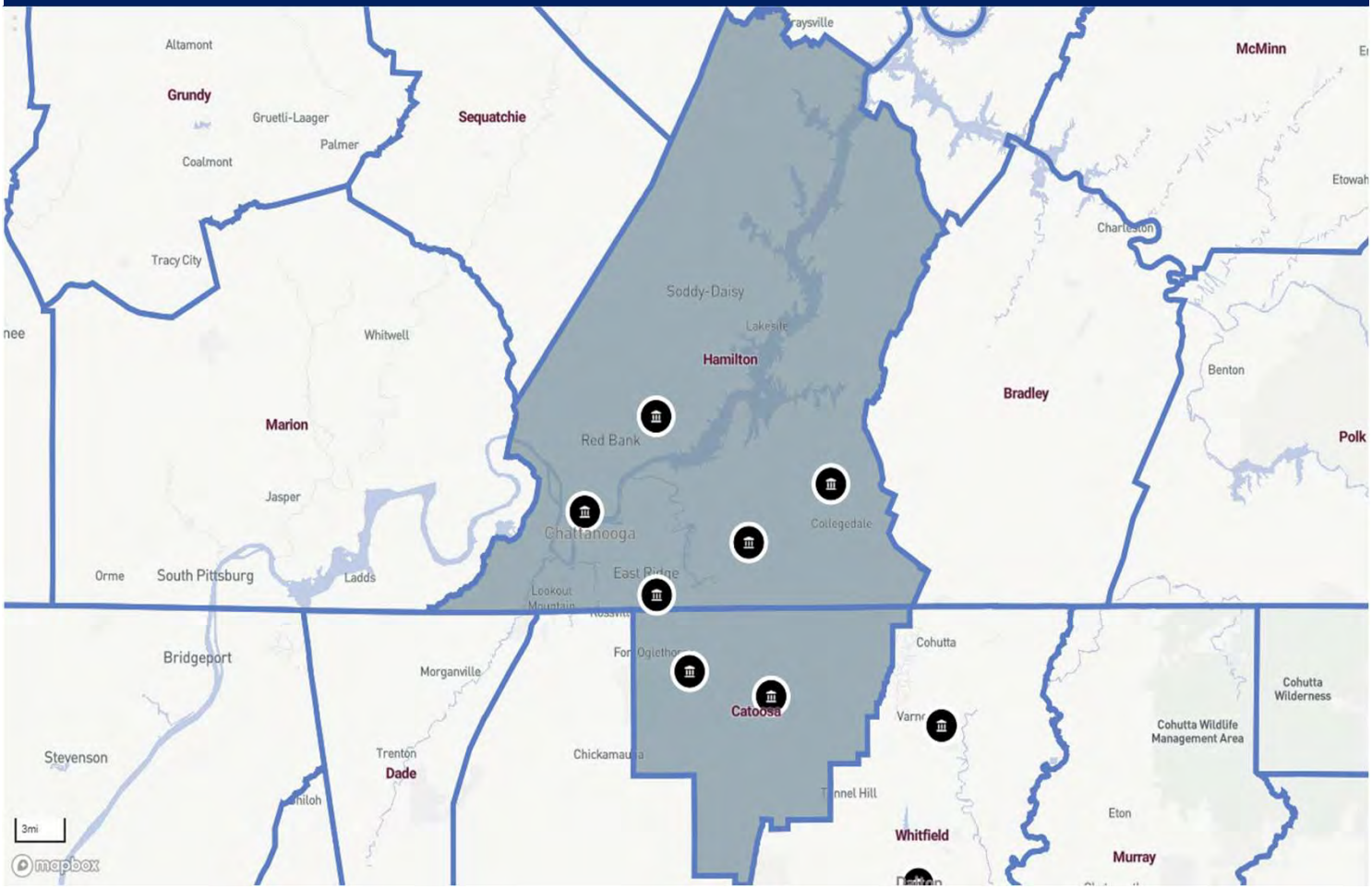
County Code	State Code	Tract Code	Tract Income Level
(003) Allen	(21) KY	9201.00	Middle
(003) Allen	(21) KY	9202.00	Middle
(003) Allen	(21) KY	9203.00	Moderate
(003) Allen	(21) KY	9204.00	Middle
(003) Allen	(21) KY	9205.00	Moderate
(003) Allen	(21) KY	9206.00	Middle
(003) Allen	(21) KY	9999.99	Middle
(227) Warren	(21) KY	0101.00	Unknown
(227) Warren	(21) KY	0102.00	Low
(227) Warren	(21) KY	0103.00	Moderate
(227) Warren	(21) KY	0104.00	Upper
(227) Warren	(21) KY	0105.00	Moderate
(227) Warren	(21) KY	0106.00	Middle
(227) Warren	(21) KY	0107.01	Middle
(227) Warren	(21) KY	0107.02	Middle
(227) Warren	(21) KY	0108.01	Middle
(227) Warren	(21) KY	0108.02	Upper
(227) Warren	(21) KY	0108.04	Moderate
(227) Warren	(21) KY	0108.05	Middle
(227) Warren	(21) KY	0109.00	Upper
(227) Warren	(21) KY	0110.01	Moderate
(227) Warren	(21) KY	0110.02	Moderate
(227) Warren	(21) KY	0111.00	Upper
(227) Warren	(21) KY	0112.00	Moderate
(227) Warren	(21) KY	0113.00	Moderate
(227) Warren	(21) KY	0114.01	Upper
(227) Warren	(21) KY	0114.02	Upper
(227) Warren	(21) KY	0115.00	Upper
(227) Warren	(21) KY	0116.00	Middle
(227) Warren	(21) KY	0117.01	Middle
(227) Warren	(21) KY	0117.02	Middle
(227) Warren	(21) KY	0118.01	Middle
(227) Warren	(21) KY	0118.02	Middle
(227) Warren	(21) KY	0119.00	Middle



MULTI-STATES MSA

16860 Chattanooga, TN-GA

Counties: Hamilton (065), Catoosa (047)

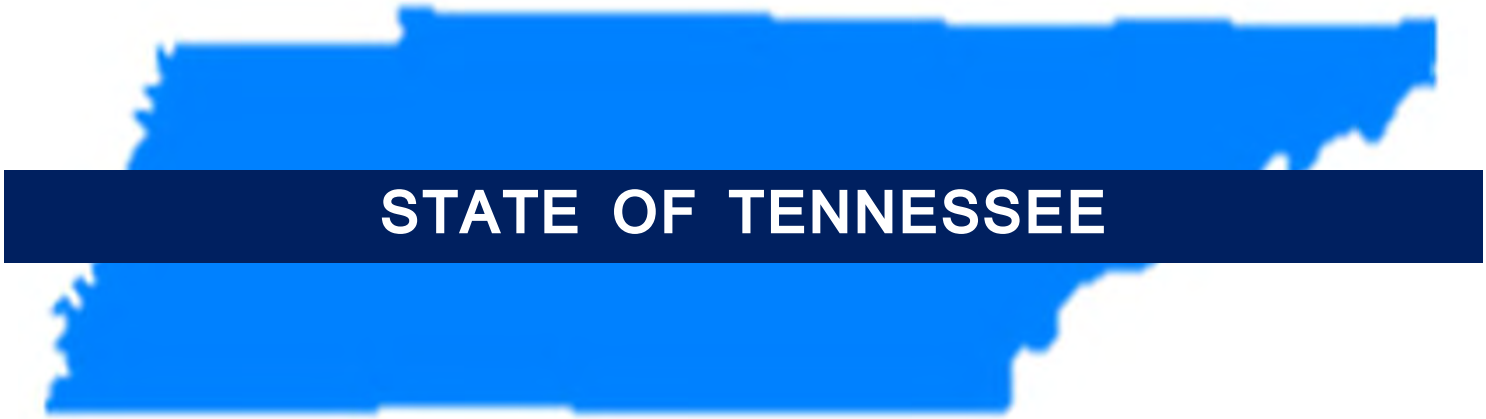


MSA: 16860 - Chattanooga, TN-GA

Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(047) Catoosa	(13) GA	0301.00	Middle
(047) Catoosa	(13) GA	0302.01	Middle
(047) Catoosa	(13) GA	0302.02	Middle
(047) Catoosa	(13) GA	0303.03	Upper
(047) Catoosa	(13) GA	0303.04	Middle
(047) Catoosa	(13) GA	0303.05	Middle
(047) Catoosa	(13) GA	0303.06	Middle
(047) Catoosa	(13) GA	0304.02	Upper
(047) Catoosa	(13) GA	0304.03	Upper
(047) Catoosa	(13) GA	0304.04	Middle
(047) Catoosa	(13) GA	0305.01	Middle
(047) Catoosa	(13) GA	0305.02	Moderate
(047) Catoosa	(13) GA	0306.00	Middle
(047) Catoosa	(13) GA	0307.01	Moderate
(047) Catoosa	(13) GA	0307.02	Middle
(065) Hamilton	(47) TN	0004.00	Low
(065) Hamilton	(47) TN	0006.00	Upper
(065) Hamilton	(47) TN	0007.00	Upper
(065) Hamilton	(47) TN	0008.00	Upper
(065) Hamilton	(47) TN	0011.00	Moderate
(065) Hamilton	(47) TN	0012.00	Moderate
(065) Hamilton	(47) TN	0013.00	Low
(065) Hamilton	(47) TN	0014.00	Moderate
(065) Hamilton	(47) TN	0016.00	Low
(065) Hamilton	(47) TN	0018.00	Moderate
(065) Hamilton	(47) TN	0019.00	Low
(065) Hamilton	(47) TN	0020.00	Upper
(065) Hamilton	(47) TN	0023.00	Moderate
(065) Hamilton	(47) TN	0024.00	Low
(065) Hamilton	(47) TN	0025.00	Low
(065) Hamilton	(47) TN	0026.00	Moderate
(065) Hamilton	(47) TN	0028.00	Upper
(065) Hamilton	(47) TN	0029.00	Middle
(065) Hamilton	(47) TN	0030.00	Moderate
(065) Hamilton	(47) TN	0031.00	Upper
(065) Hamilton	(47) TN	0032.00	Moderate
(065) Hamilton	(47) TN	0033.00	Middle
(065) Hamilton	(47) TN	0034.00	Low
(065) Hamilton	(47) TN	0101.01	Middle
(065) Hamilton	(47) TN	0101.03	Middle
(065) Hamilton	(47) TN	0101.04	Middle
(065) Hamilton	(47) TN	0102.01	Upper
(065) Hamilton	(47) TN	0102.02	Middle
(065) Hamilton	(47) TN	0103.03	Middle
(065) Hamilton	(47) TN	0103.04	Upper
(065) Hamilton	(47) TN	0103.05	Middle
(065) Hamilton	(47) TN	0103.06	Middle
(065) Hamilton	(47) TN	0103.08	Middle
(065) Hamilton	(47) TN	0103.09	Unknown
(065) Hamilton	(47) TN	0104.11	Upper
(065) Hamilton	(47) TN	0104.12	Middle
(065) Hamilton	(47) TN	0104.13	Upper
(065) Hamilton	(47) TN	0104.31	Middle
(065) Hamilton	(47) TN	0104.32	Upper

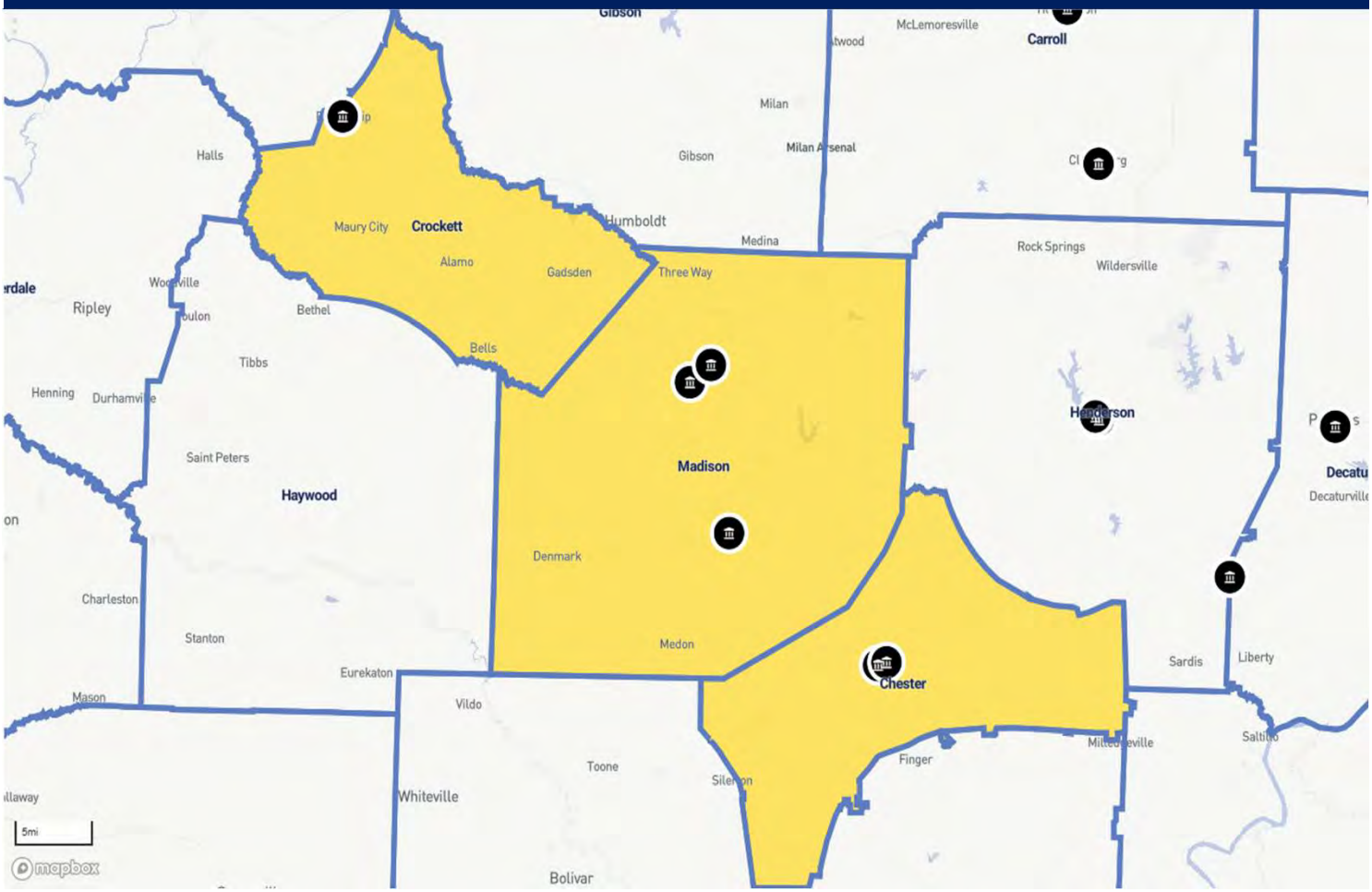
County Code	State Code	Tract Code	Tract Income Level
(065) Hamilton	(47) TN	0104.33	Middle
(065) Hamilton	(47) TN	0104.34	Upper
(065) Hamilton	(47) TN	0104.35	Middle
(065) Hamilton	(47) TN	0105.01	Middle
(065) Hamilton	(47) TN	0105.02	Upper
(065) Hamilton	(47) TN	0106.00	Middle
(065) Hamilton	(47) TN	0107.00	Middle
(065) Hamilton	(47) TN	0108.00	Moderate
(065) Hamilton	(47) TN	0109.01	Upper
(065) Hamilton	(47) TN	0109.02	Middle
(065) Hamilton	(47) TN	0109.04	Middle
(065) Hamilton	(47) TN	0109.05	Middle
(065) Hamilton	(47) TN	0110.01	Middle
(065) Hamilton	(47) TN	0110.03	Upper
(065) Hamilton	(47) TN	0110.04	Upper
(065) Hamilton	(47) TN	0111.00	Upper
(065) Hamilton	(47) TN	0112.03	Upper
(065) Hamilton	(47) TN	0112.04	Middle
(065) Hamilton	(47) TN	0112.05	Upper
(065) Hamilton	(47) TN	0112.06	Middle
(065) Hamilton	(47) TN	0113.11	Middle
(065) Hamilton	(47) TN	0113.14	Upper
(065) Hamilton	(47) TN	0113.21	Upper
(065) Hamilton	(47) TN	0113.23	Upper
(065) Hamilton	(47) TN	0113.24	Upper
(065) Hamilton	(47) TN	0113.25	Upper
(065) Hamilton	(47) TN	0113.26	Upper
(065) Hamilton	(47) TN	0114.02	Middle
(065) Hamilton	(47) TN	0114.11	Moderate
(065) Hamilton	(47) TN	0114.13	Middle
(065) Hamilton	(47) TN	0114.42	Middle
(065) Hamilton	(47) TN	0114.44	Moderate
(065) Hamilton	(47) TN	0114.45	Moderate
(065) Hamilton	(47) TN	0114.46	Middle
(065) Hamilton	(47) TN	0114.47	Upper
(065) Hamilton	(47) TN	0114.48	Middle
(065) Hamilton	(47) TN	0114.49	Middle
(065) Hamilton	(47) TN	0116.00	Moderate
(065) Hamilton	(47) TN	0117.00	Middle
(065) Hamilton	(47) TN	0118.00	Middle
(065) Hamilton	(47) TN	0119.00	Moderate
(065) Hamilton	(47) TN	0120.00	Upper
(065) Hamilton	(47) TN	0121.00	Middle
(065) Hamilton	(47) TN	0122.00	Low
(065) Hamilton	(47) TN	0123.00	Moderate
(065) Hamilton	(47) TN	0124.00	Upper
(065) Hamilton	(47) TN	9801.00	Unknown
(065) Hamilton	(47) TN	9802.00	Unknown



STATE OF TENNESSEE

27180 Jackson, TN

Counties: Chester (023), Crockett (033), Madison (113)



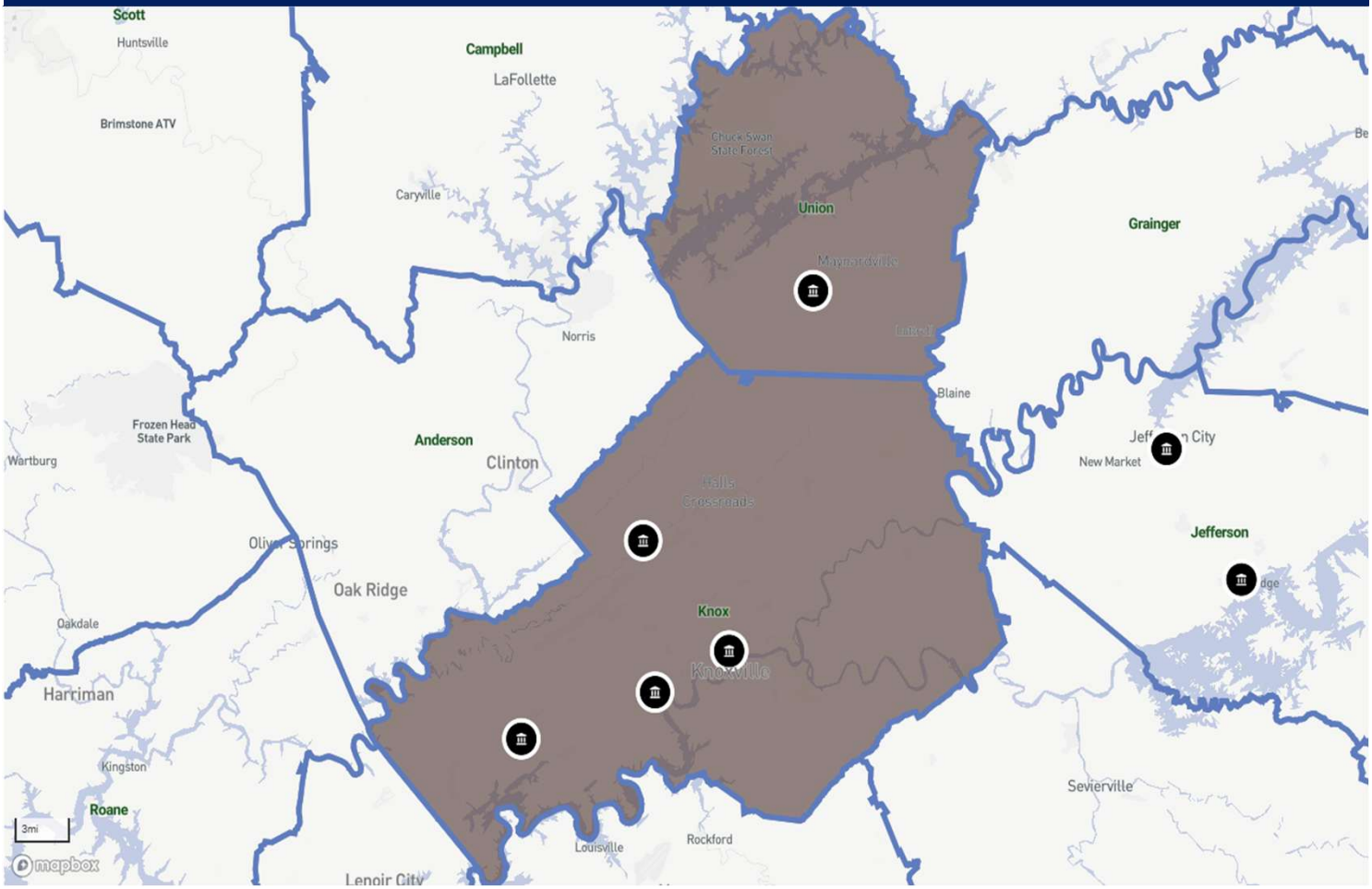
MSA: 27180 - Jackson, TN

Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(023) Chester	(47) TN	9701.01	Upper
(023) Chester	(47) TN	9701.02	Middle
(023) Chester	(47) TN	9702.00	Middle
(023) Chester	(47) TN	9703.01	Middle
(023) Chester	(47) TN	9703.02	Middle
(023) Chester	(47) TN	9999.99	Middle
(033) Crockett	(47) TN	9610.00	Middle
(033) Crockett	(47) TN	9611.00	Middle
(033) Crockett	(47) TN	9612.00	Middle
(033) Crockett	(47) TN	9613.00	Middle
(033) Crockett	(47) TN	9614.00	Middle
(033) Crockett	(47) TN	9999.99	Middle
(113) Madison	(47) TN	0001.00	Middle
(113) Madison	(47) TN	0002.00	Middle
(113) Madison	(47) TN	0003.00	Middle
(113) Madison	(47) TN	0004.00	Moderate
(113) Madison	(47) TN	0005.00	Low
(113) Madison	(47) TN	0006.00	Moderate
(113) Madison	(47) TN	0007.00	Low
(113) Madison	(47) TN	0008.00	Unknown
(113) Madison	(47) TN	0009.00	Low
(113) Madison	(47) TN	0010.00	Moderate
(113) Madison	(47) TN	0011.00	Low
(113) Madison	(47) TN	0013.00	Moderate
(113) Madison	(47) TN	0014.01	Middle
(113) Madison	(47) TN	0014.02	Upper
(113) Madison	(47) TN	0015.01	Middle
(113) Madison	(47) TN	0015.02	Upper
(113) Madison	(47) TN	0016.03	Upper
(113) Madison	(47) TN	0016.04	Upper
(113) Madison	(47) TN	0016.05	Middle
(113) Madison	(47) TN	0016.07	Middle
(113) Madison	(47) TN	0016.08	Upper
(113) Madison	(47) TN	0016.09	Upper
(113) Madison	(47) TN	0016.10	Upper
(113) Madison	(47) TN	0016.11	Upper
(113) Madison	(47) TN	0016.12	Middle
(113) Madison	(47) TN	0017.00	Upper
(113) Madison	(47) TN	0018.00	Middle
(113) Madison	(47) TN	0019.00	Upper

28940 Knoxville, TN

Counties: Knox (093), Union (173)



MSA: 28940 - Knoxville, TN
Facility-Based Assessment Area
Geographical Information

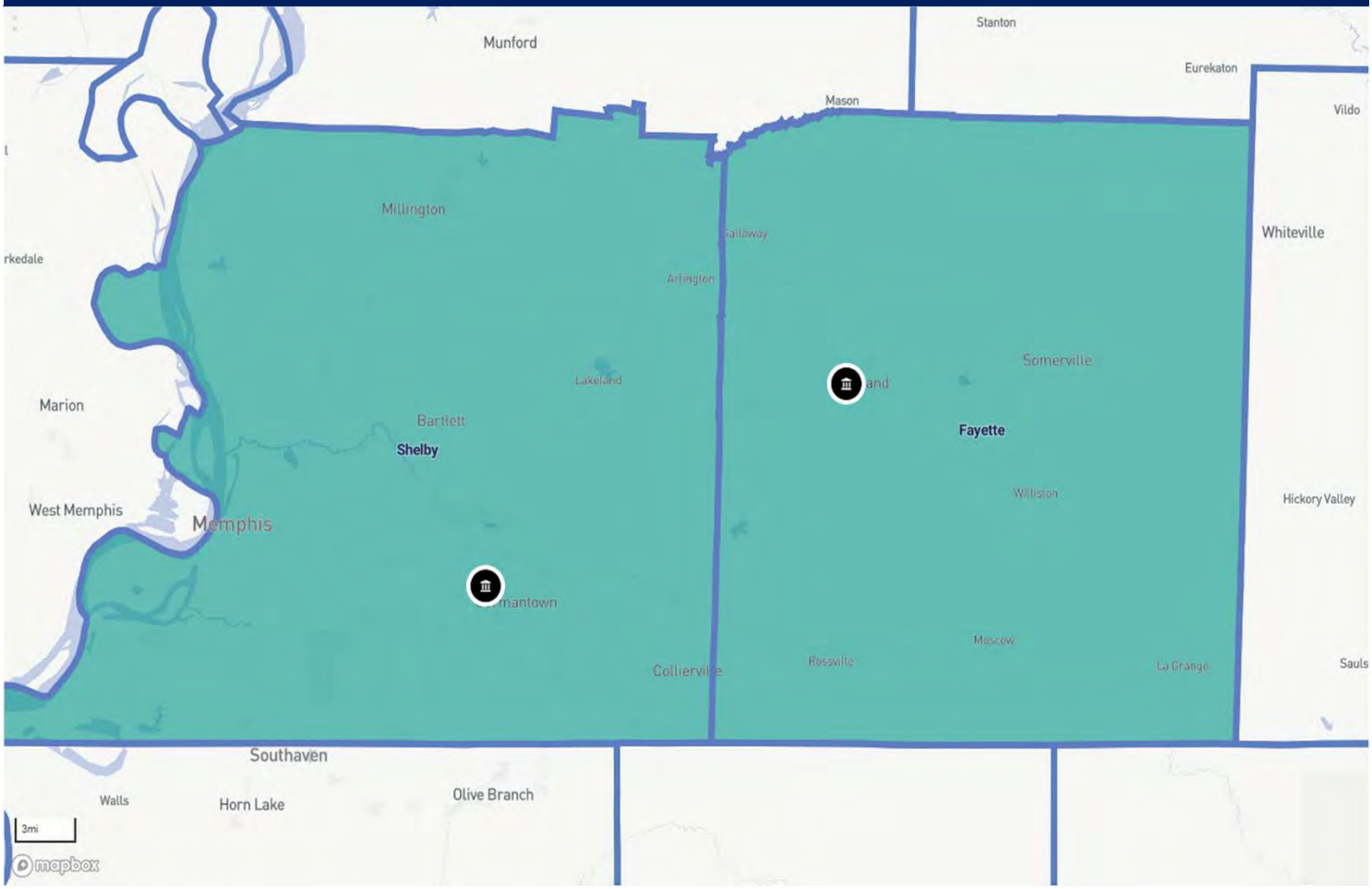
County Code	State Code	Tract Code	Tract Income Level
(093) Knox	(47) TN	0001.00	Upper
(093) Knox	(47) TN	0008.00	Low
(093) Knox	(47) TN	0009.01	Unknown
(093) Knox	(47) TN	0009.02	Unknown
(093) Knox	(47) TN	0014.00	Low
(093) Knox	(47) TN	0015.00	Moderate
(093) Knox	(47) TN	0016.00	Middle
(093) Knox	(47) TN	0017.00	Moderate
(093) Knox	(47) TN	0018.00	Middle
(093) Knox	(47) TN	0019.00	Low
(093) Knox	(47) TN	0020.00	Low
(093) Knox	(47) TN	0021.00	Moderate
(093) Knox	(47) TN	0022.00	Middle
(093) Knox	(47) TN	0023.00	Middle
(093) Knox	(47) TN	0024.00	Moderate
(093) Knox	(47) TN	0026.00	Low
(093) Knox	(47) TN	0027.00	Low
(093) Knox	(47) TN	0028.00	Low
(093) Knox	(47) TN	0029.00	Low
(093) Knox	(47) TN	0030.00	Moderate
(093) Knox	(47) TN	0031.00	Moderate
(093) Knox	(47) TN	0032.00	Low
(093) Knox	(47) TN	0033.00	Upper
(093) Knox	(47) TN	0034.00	Middle
(093) Knox	(47) TN	0035.01	Middle
(093) Knox	(47) TN	0035.02	Middle
(093) Knox	(47) TN	0037.00	Upper
(093) Knox	(47) TN	0038.01	Middle
(093) Knox	(47) TN	0038.02	Middle
(093) Knox	(47) TN	0039.01	Middle
(093) Knox	(47) TN	0039.02	Moderate
(093) Knox	(47) TN	0040.00	Moderate
(093) Knox	(47) TN	0041.00	Middle
(093) Knox	(47) TN	0042.00	Middle
(093) Knox	(47) TN	0043.00	Middle
(093) Knox	(47) TN	0044.01	Upper
(093) Knox	(47) TN	0044.03	Upper
(093) Knox	(47) TN	0044.04	Upper
(093) Knox	(47) TN	0045.01	Moderate
(093) Knox	(47) TN	0045.02	Upper
(093) Knox	(47) TN	0046.06	Upper
(093) Knox	(47) TN	0046.07	Upper
(093) Knox	(47) TN	0046.08	Moderate
(093) Knox	(47) TN	0046.09	Middle
(093) Knox	(47) TN	0046.10	Middle
(093) Knox	(47) TN	0046.11	Upper
(093) Knox	(47) TN	0046.12	Upper
(093) Knox	(47) TN	0046.13	Upper
(093) Knox	(47) TN	0046.14	Middle
(093) Knox	(47) TN	0046.15	Moderate
(093) Knox	(47) TN	0047.00	Middle
(093) Knox	(47) TN	0048.00	Moderate
(093) Knox	(47) TN	0049.00	Middle
(093) Knox	(47) TN	0050.00	Middle

County Code	State Code	Tract Code	Tract Income Level
(093) Knox	(47) TN	0051.00	Upper
(093) Knox	(47) TN	0052.02	Moderate
(093) Knox	(47) TN	0052.03	Middle
(093) Knox	(47) TN	0052.04	Middle
(093) Knox	(47) TN	0053.01	Middle
(093) Knox	(47) TN	0053.02	Middle
(093) Knox	(47) TN	0054.01	Middle
(093) Knox	(47) TN	0054.02	Middle
(093) Knox	(47) TN	0055.01	Middle
(093) Knox	(47) TN	0055.02	Middle
(093) Knox	(47) TN	0056.02	Middle
(093) Knox	(47) TN	0056.03	Upper
(093) Knox	(47) TN	0056.04	Middle
(093) Knox	(47) TN	0057.01	Upper
(093) Knox	(47) TN	0057.04	Middle
(093) Knox	(47) TN	0057.06	Upper
(093) Knox	(47) TN	0057.07	Upper
(093) Knox	(47) TN	0057.08	Upper
(093) Knox	(47) TN	0057.09	Upper
(093) Knox	(47) TN	0057.10	Upper
(093) Knox	(47) TN	0057.11	Upper
(093) Knox	(47) TN	0057.13	Upper
(093) Knox	(47) TN	0057.14	Upper
(093) Knox	(47) TN	0058.03	Upper
(093) Knox	(47) TN	0058.07	Upper
(093) Knox	(47) TN	0058.08	Upper
(093) Knox	(47) TN	0058.09	Upper
(093) Knox	(47) TN	0058.10	Upper
(093) Knox	(47) TN	0058.11	Upper
(093) Knox	(47) TN	0058.13	Upper
(093) Knox	(47) TN	0058.14	Upper
(093) Knox	(47) TN	0058.15	Upper
(093) Knox	(47) TN	0059.03	Upper
(093) Knox	(47) TN	0059.06	Upper
(093) Knox	(47) TN	0059.07	Upper
(093) Knox	(47) TN	0059.08	Middle
(093) Knox	(47) TN	0059.09	Upper
(093) Knox	(47) TN	0059.10	Upper
(093) Knox	(47) TN	0059.11	Upper
(093) Knox	(47) TN	0059.12	Upper
(093) Knox	(47) TN	0060.01	Middle
(093) Knox	(47) TN	0060.02	Middle
(093) Knox	(47) TN	0060.03	Upper
(093) Knox	(47) TN	0061.02	Middle
(093) Knox	(47) TN	0061.03	Middle
(093) Knox	(47) TN	0061.04	Upper
(093) Knox	(47) TN	0062.02	Upper
(093) Knox	(47) TN	0062.03	Middle
(093) Knox	(47) TN	0062.05	Upper
(093) Knox	(47) TN	0062.06	Middle
(093) Knox	(47) TN	0062.07	Middle
(093) Knox	(47) TN	0062.08	Middle
(093) Knox	(47) TN	0063.01	Middle
(093) Knox	(47) TN	0063.02	Moderate
(093) Knox	(47) TN	0064.01	Middle
(093) Knox	(47) TN	0064.02	Middle
(093) Knox	(47) TN	0064.03	Middle

County Code	State Code	Tract Code	Tract Income Level
(093) Knox	(47) TN	0065.01	Middle
(093) Knox	(47) TN	0065.02	Middle
(093) Knox	(47) TN	0066.00	Upper
(093) Knox	(47) TN	0067.00	Moderate
(093) Knox	(47) TN	0068.00	Low
(093) Knox	(47) TN	0069.01	Unknown
(093) Knox	(47) TN	0069.02	Unknown
(093) Knox	(47) TN	0069.03	Low
(093) Knox	(47) TN	0070.00	Low
(093) Knox	(47) TN	0071.00	Upper
(173) Union	(47) TN	0401.01	Moderate
(173) Union	(47) TN	0401.02	Moderate
(173) Union	(47) TN	0402.01	Moderate
(173) Union	(47) TN	0402.02	Middle
(173) Union	(47) TN	0403.00	Middle
(173) Union	(47) TN	9999.99	Moderate

32820 Memphis, TN-MS-AR

Counties: Fayette (047), Shelby (157)



MSA: 32820 - Memphis, TN
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(047) Fayette	(47) TN	0603.00	Middle
(047) Fayette	(47) TN	0604.01	Upper
(047) Fayette	(47) TN	0604.02	Upper
(047) Fayette	(47) TN	0604.03	Upper
(047) Fayette	(47) TN	0604.04	Middle
(047) Fayette	(47) TN	0605.01	Moderate
(047) Fayette	(47) TN	0605.02	Middle
(047) Fayette	(47) TN	0606.00	Middle
(047) Fayette	(47) TN	0607.01	Middle
(047) Fayette	(47) TN	0607.02	Upper
(047) Fayette	(47) TN	0608.00	Middle
(157) Shelby	(47) TN	0001.00	Upper
(157) Shelby	(47) TN	0002.00	Low
(157) Shelby	(47) TN	0003.00	Moderate
(157) Shelby	(47) TN	0004.00	Low
(157) Shelby	(47) TN	0006.00	Low
(157) Shelby	(47) TN	0007.00	Low
(157) Shelby	(47) TN	0008.00	Low
(157) Shelby	(47) TN	0009.00	Moderate
(157) Shelby	(47) TN	0011.00	Moderate
(157) Shelby	(47) TN	0012.00	Moderate
(157) Shelby	(47) TN	0013.00	Low
(157) Shelby	(47) TN	0014.00	Low
(157) Shelby	(47) TN	0015.00	Moderate
(157) Shelby	(47) TN	0016.00	Upper
(157) Shelby	(47) TN	0017.00	Middle
(157) Shelby	(47) TN	0019.00	Moderate
(157) Shelby	(47) TN	0020.00	Low
(157) Shelby	(47) TN	0021.00	Middle
(157) Shelby	(47) TN	0024.00	Low
(157) Shelby	(47) TN	0025.00	Middle
(157) Shelby	(47) TN	0026.00	Upper
(157) Shelby	(47) TN	0027.00	Unknown
(157) Shelby	(47) TN	0028.00	Low
(157) Shelby	(47) TN	0029.00	Upper
(157) Shelby	(47) TN	0030.00	Moderate
(157) Shelby	(47) TN	0031.00	Middle
(157) Shelby	(47) TN	0032.00	Upper
(157) Shelby	(47) TN	0033.00	Upper
(157) Shelby	(47) TN	0034.00	Middle
(157) Shelby	(47) TN	0035.00	Upper
(157) Shelby	(47) TN	0036.00	Middle
(157) Shelby	(47) TN	0037.00	Low
(157) Shelby	(47) TN	0038.00	Unknown
(157) Shelby	(47) TN	0039.00	Moderate
(157) Shelby	(47) TN	0042.00	Upper
(157) Shelby	(47) TN	0043.00	Upper
(157) Shelby	(47) TN	0045.00	Unknown
(157) Shelby	(47) TN	0046.00	Unknown
(157) Shelby	(47) TN	0050.00	Low
(157) Shelby	(47) TN	0053.00	Low
(157) Shelby	(47) TN	0055.00	Moderate
(157) Shelby	(47) TN	0056.00	Moderate
(157) Shelby	(47) TN	0057.00	Moderate

County Code	State Code	Tract Code	Tract Income Level
(157) Shelby	(47) TN	0058.00	Moderate
(157) Shelby	(47) TN	0059.00	Low
(157) Shelby	(47) TN	0060.00	Low
(157) Shelby	(47) TN	0062.00	Moderate
(157) Shelby	(47) TN	0063.00	Upper
(157) Shelby	(47) TN	0064.00	Moderate
(157) Shelby	(47) TN	0065.00	Moderate
(157) Shelby	(47) TN	0066.00	Moderate
(157) Shelby	(47) TN	0067.00	Low
(157) Shelby	(47) TN	0068.00	Moderate
(157) Shelby	(47) TN	0069.00	Low
(157) Shelby	(47) TN	0070.00	Low
(157) Shelby	(47) TN	0071.00	Upper
(157) Shelby	(47) TN	0072.00	Upper
(157) Shelby	(47) TN	0073.00	Upper
(157) Shelby	(47) TN	0074.00	Middle
(157) Shelby	(47) TN	0075.00	Low
(157) Shelby	(47) TN	0078.10	Low
(157) Shelby	(47) TN	0078.21	Moderate
(157) Shelby	(47) TN	0078.22	Moderate
(157) Shelby	(47) TN	0079.00	Moderate
(157) Shelby	(47) TN	0080.00	Moderate
(157) Shelby	(47) TN	0081.10	Low
(157) Shelby	(47) TN	0081.20	Moderate
(157) Shelby	(47) TN	0082.00	Low
(157) Shelby	(47) TN	0085.00	Upper
(157) Shelby	(47) TN	0086.00	Upper
(157) Shelby	(47) TN	0087.00	Moderate
(157) Shelby	(47) TN	0088.00	Moderate
(157) Shelby	(47) TN	0089.00	Low
(157) Shelby	(47) TN	0091.00	Low
(157) Shelby	(47) TN	0092.01	Upper
(157) Shelby	(47) TN	0092.02	Middle
(157) Shelby	(47) TN	0093.00	Moderate
(157) Shelby	(47) TN	0094.00	Middle
(157) Shelby	(47) TN	0095.01	Middle
(157) Shelby	(47) TN	0095.02	Upper
(157) Shelby	(47) TN	0096.00	Upper
(157) Shelby	(47) TN	0097.00	Moderate
(157) Shelby	(47) TN	0098.00	Moderate
(157) Shelby	(47) TN	0099.01	Low
(157) Shelby	(47) TN	0099.02	Low
(157) Shelby	(47) TN	0100.01	Low
(157) Shelby	(47) TN	0100.02	Low
(157) Shelby	(47) TN	0101.20	Low
(157) Shelby	(47) TN	0101.21	Low
(157) Shelby	(47) TN	0101.22	Middle
(157) Shelby	(47) TN	0102.10	Moderate
(157) Shelby	(47) TN	0102.20	Moderate
(157) Shelby	(47) TN	0103.00	Low
(157) Shelby	(47) TN	0105.00	Low
(157) Shelby	(47) TN	0106.10	Low
(157) Shelby	(47) TN	0106.20	Moderate
(157) Shelby	(47) TN	0106.30	Low
(157) Shelby	(47) TN	0107.10	Moderate
(157) Shelby	(47) TN	0107.20	Moderate
(157) Shelby	(47) TN	0108.10	Moderate

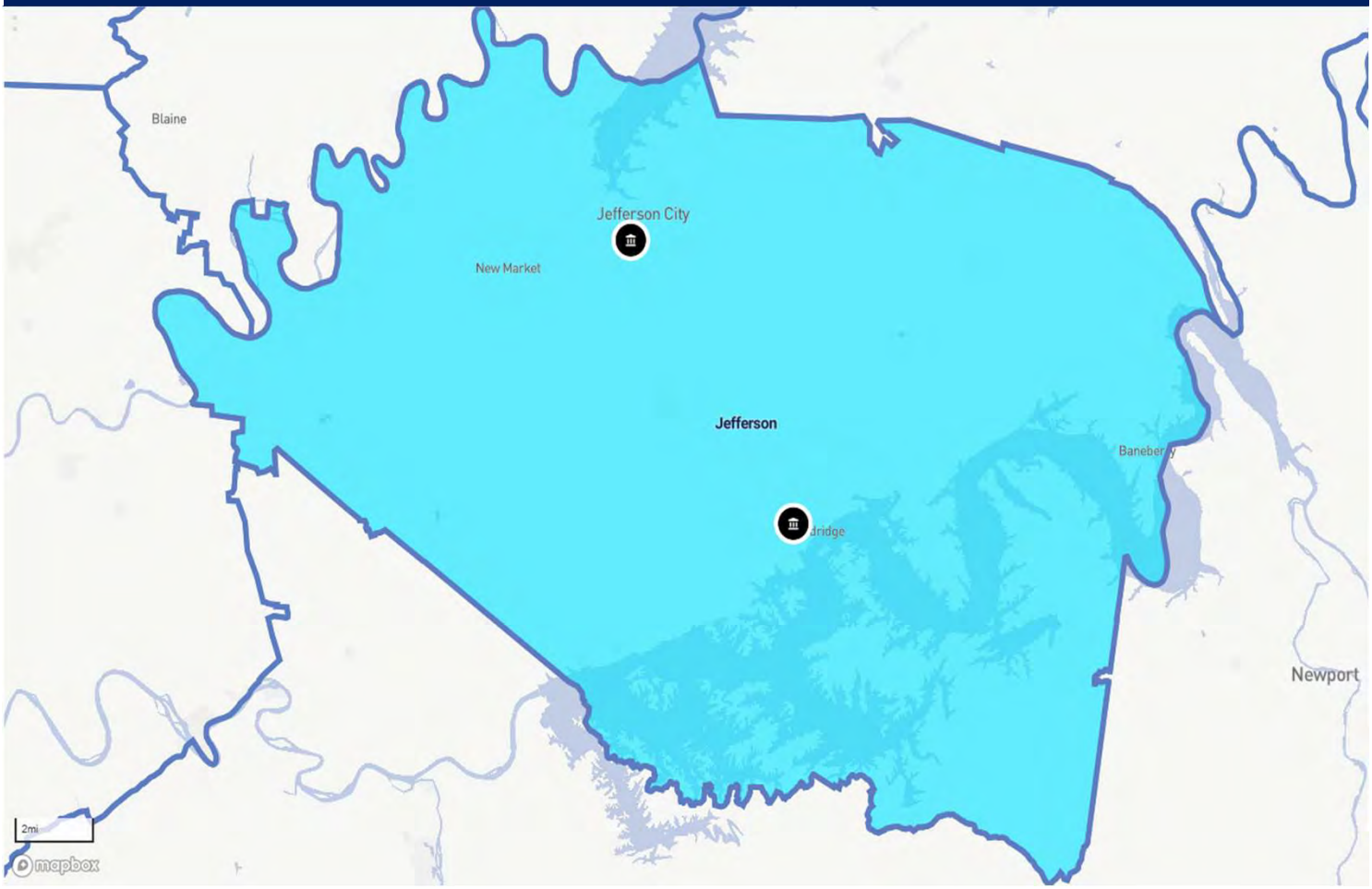
County Code	State Code	Tract Code	Tract Income Level
(157) Shelby	(47) TN	0108.20	Middle
(157) Shelby	(47) TN	0110.10	Moderate
(157) Shelby	(47) TN	0110.20	Moderate
(157) Shelby	(47) TN	0111.00	Low
(157) Shelby	(47) TN	0112.00	Low
(157) Shelby	(47) TN	0113.00	Middle
(157) Shelby	(47) TN	0114.01	Unknown
(157) Shelby	(47) TN	0114.02	Unknown
(157) Shelby	(47) TN	0115.00	Low
(157) Shelby	(47) TN	0116.00	Low
(157) Shelby	(47) TN	0117.00	Low
(157) Shelby	(47) TN	0118.00	Middle
(157) Shelby	(47) TN	0201.01	Moderate
(157) Shelby	(47) TN	0201.02	Middle
(157) Shelby	(47) TN	0202.10	Middle
(157) Shelby	(47) TN	0202.21	Middle
(157) Shelby	(47) TN	0202.22	Moderate
(157) Shelby	(47) TN	0203.01	Middle
(157) Shelby	(47) TN	0203.02	Moderate
(157) Shelby	(47) TN	0204.00	Middle
(157) Shelby	(47) TN	0205.11	Middle
(157) Shelby	(47) TN	0205.21	Low
(157) Shelby	(47) TN	0205.23	Low
(157) Shelby	(47) TN	0205.24	Moderate
(157) Shelby	(47) TN	0205.31	Moderate
(157) Shelby	(47) TN	0205.32	Moderate
(157) Shelby	(47) TN	0205.41	Middle
(157) Shelby	(47) TN	0205.42	Low
(157) Shelby	(47) TN	0205.43	Low
(157) Shelby	(47) TN	0205.44	Low
(157) Shelby	(47) TN	0206.10	Low
(157) Shelby	(47) TN	0206.21	Moderate
(157) Shelby	(47) TN	0206.22	Middle
(157) Shelby	(47) TN	0206.32	Upper
(157) Shelby	(47) TN	0206.33	Upper
(157) Shelby	(47) TN	0206.34	Upper
(157) Shelby	(47) TN	0206.35	Middle
(157) Shelby	(47) TN	0206.51	Middle
(157) Shelby	(47) TN	0206.52	Middle
(157) Shelby	(47) TN	0206.53	Upper
(157) Shelby	(47) TN	0206.54	Upper
(157) Shelby	(47) TN	0206.55	Upper
(157) Shelby	(47) TN	0206.56	Upper
(157) Shelby	(47) TN	0206.57	Upper
(157) Shelby	(47) TN	0206.58	Middle
(157) Shelby	(47) TN	0207.00	Upper
(157) Shelby	(47) TN	0208.33	Upper
(157) Shelby	(47) TN	0208.34	Upper
(157) Shelby	(47) TN	0208.35	Upper
(157) Shelby	(47) TN	0208.36	Upper
(157) Shelby	(47) TN	0208.37	Upper
(157) Shelby	(47) TN	0209.01	Upper
(157) Shelby	(47) TN	0209.02	Upper
(157) Shelby	(47) TN	0210.20	Upper
(157) Shelby	(47) TN	0210.21	Upper
(157) Shelby	(47) TN	0210.22	Middle
(157) Shelby	(47) TN	0210.23	Upper

County Code	State Code	Tract Code	Tract Income Level
(157) Shelby	(47) TN	0211.11	Moderate
(157) Shelby	(47) TN	0211.12	Moderate
(157) Shelby	(47) TN	0211.13	Upper
(157) Shelby	(47) TN	0211.21	Middle
(157) Shelby	(47) TN	0211.22	Moderate
(157) Shelby	(47) TN	0211.24	Middle
(157) Shelby	(47) TN	0211.25	Middle
(157) Shelby	(47) TN	0211.26	Middle
(157) Shelby	(47) TN	0211.35	Middle
(157) Shelby	(47) TN	0211.36	Upper
(157) Shelby	(47) TN	0211.38	Upper
(157) Shelby	(47) TN	0211.39	Upper
(157) Shelby	(47) TN	0211.40	Upper
(157) Shelby	(47) TN	0211.41	Middle
(157) Shelby	(47) TN	0211.42	Upper
(157) Shelby	(47) TN	0211.43	Upper
(157) Shelby	(47) TN	0211.44	Middle
(157) Shelby	(47) TN	0212.00	Unknown
(157) Shelby	(47) TN	0213.11	Upper
(157) Shelby	(47) TN	0213.12	Upper
(157) Shelby	(47) TN	0213.20	Upper
(157) Shelby	(47) TN	0213.31	Upper
(157) Shelby	(47) TN	0213.33	Upper
(157) Shelby	(47) TN	0213.34	Upper
(157) Shelby	(47) TN	0213.41	Upper
(157) Shelby	(47) TN	0213.51	Upper
(157) Shelby	(47) TN	0213.52	Upper
(157) Shelby	(47) TN	0213.54	Middle
(157) Shelby	(47) TN	0213.55	Upper
(157) Shelby	(47) TN	0213.56	Upper
(157) Shelby	(47) TN	0213.57	Upper
(157) Shelby	(47) TN	0214.10	Upper
(157) Shelby	(47) TN	0214.20	Upper
(157) Shelby	(47) TN	0214.30	Upper
(157) Shelby	(47) TN	0215.30	Upper
(157) Shelby	(47) TN	0215.41	Upper
(157) Shelby	(47) TN	0215.42	Upper
(157) Shelby	(47) TN	0215.43	Upper
(157) Shelby	(47) TN	0215.44	Upper
(157) Shelby	(47) TN	0215.45	Upper
(157) Shelby	(47) TN	0215.46	Upper
(157) Shelby	(47) TN	0215.47	Middle
(157) Shelby	(47) TN	0215.48	Upper
(157) Shelby	(47) TN	0216.11	Upper
(157) Shelby	(47) TN	0216.12	Upper
(157) Shelby	(47) TN	0216.13	Upper
(157) Shelby	(47) TN	0216.20	Middle
(157) Shelby	(47) TN	0217.10	Low
(157) Shelby	(47) TN	0217.21	Moderate
(157) Shelby	(47) TN	0217.24	Moderate
(157) Shelby	(47) TN	0217.25	Low
(157) Shelby	(47) TN	0217.31	Moderate
(157) Shelby	(47) TN	0217.44	Middle
(157) Shelby	(47) TN	0217.45	Upper
(157) Shelby	(47) TN	0217.46	Moderate
(157) Shelby	(47) TN	0217.47	Moderate
(157) Shelby	(47) TN	0217.51	Upper

County Code	State Code	Tract Code	Tract Income Level
(157) Shelby	(47) TN	0217.52	Middle
(157) Shelby	(47) TN	0217.53	Middle
(157) Shelby	(47) TN	0217.54	Moderate
(157) Shelby	(47) TN	0217.55	Moderate
(157) Shelby	(47) TN	0217.56	Middle
(157) Shelby	(47) TN	0217.57	Low
(157) Shelby	(47) TN	0217.58	Moderate
(157) Shelby	(47) TN	0217.59	Middle
(157) Shelby	(47) TN	0217.60	Moderate
(157) Shelby	(47) TN	0219.00	Middle
(157) Shelby	(47) TN	0220.23	Moderate
(157) Shelby	(47) TN	0220.24	Moderate
(157) Shelby	(47) TN	0220.25	Low
(157) Shelby	(47) TN	0220.26	Low
(157) Shelby	(47) TN	0221.11	Middle
(157) Shelby	(47) TN	0221.21	Middle
(157) Shelby	(47) TN	0221.22	Middle
(157) Shelby	(47) TN	0221.30	Moderate
(157) Shelby	(47) TN	0221.31	Moderate
(157) Shelby	(47) TN	0221.32	Moderate
(157) Shelby	(47) TN	0222.10	Moderate
(157) Shelby	(47) TN	0222.20	Moderate
(157) Shelby	(47) TN	0223.10	Low
(157) Shelby	(47) TN	0223.21	Moderate
(157) Shelby	(47) TN	0223.22	Moderate
(157) Shelby	(47) TN	0223.30	Moderate
(157) Shelby	(47) TN	0224.10	Middle
(157) Shelby	(47) TN	0225.00	Moderate
(157) Shelby	(47) TN	0226.00	Moderate
(157) Shelby	(47) TN	0227.00	Moderate
(157) Shelby	(47) TN	9801.00	Unknown
(157) Shelby	(47) TN	9802.00	Unknown
(157) Shelby	(47) TN	9803.00	Unknown
(157) Shelby	(47) TN	9804.01	Unknown
(157) Shelby	(47) TN	9804.02	Unknown

34100 Morristown, TN

County: Jefferson (089)



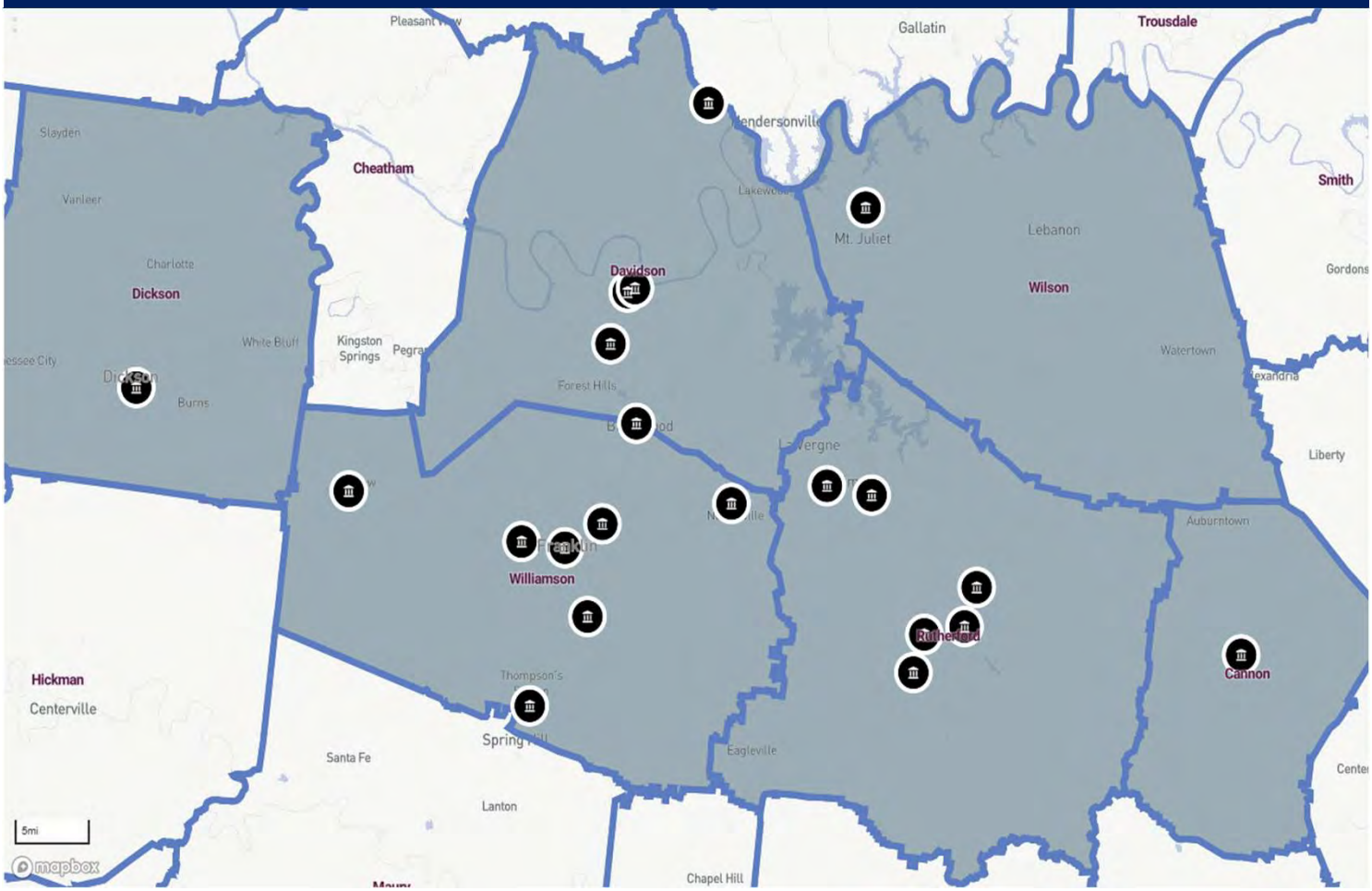
MSA: 34100 - Morristown, TN

Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(089) Jefferson	(47) TN	0701.01	Middle
(089) Jefferson	(47) TN	0701.02	Upper
(089) Jefferson	(47) TN	0702.00	Middle
(089) Jefferson	(47) TN	0703.00	Middle
(089) Jefferson	(47) TN	0704.00	Middle
(089) Jefferson	(47) TN	0705.00	Middle
(089) Jefferson	(47) TN	0706.00	Middle
(089) Jefferson	(47) TN	0707.01	Upper
(089) Jefferson	(47) TN	0707.02	Middle
(089) Jefferson	(47) TN	0708.01	Middle
(089) Jefferson	(47) TN	0708.02	Middle
(089) Jefferson	(47) TN	0709.00	Middle

34980 Nashville-Davidson-Murfreesboro-Franklin, TN

Counties: Cannon (015), Davidson (037), Dickson (043), Rutherford (149), Williamson (187), Wilson (189)



MSA: 34980 - Nashville, TN
Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level
(015) Cannon	(47) TN	9601.00	Moderate
(015) Cannon	(47) TN	9602.01	Moderate
(015) Cannon	(47) TN	9602.02	Middle
(015) Cannon	(47) TN	9603.00	Middle
(015) Cannon	(47) TN	9999.99	Moderate
(037) Davidson	(47) TN	0101.03	Middle
(037) Davidson	(47) TN	0101.04	Middle
(037) Davidson	(47) TN	0101.05	Middle
(037) Davidson	(47) TN	0101.06	Middle
(037) Davidson	(47) TN	0102.01	Middle
(037) Davidson	(47) TN	0102.02	Middle
(037) Davidson	(47) TN	0103.01	Middle
(037) Davidson	(47) TN	0103.02	Middle
(037) Davidson	(47) TN	0103.03	Moderate
(037) Davidson	(47) TN	0104.01	Moderate
(037) Davidson	(47) TN	0104.03	Low
(037) Davidson	(47) TN	0104.04	Moderate
(037) Davidson	(47) TN	0105.01	Middle
(037) Davidson	(47) TN	0105.02	Middle
(037) Davidson	(47) TN	0106.01	Moderate
(037) Davidson	(47) TN	0106.02	Moderate
(037) Davidson	(47) TN	0107.01	Middle
(037) Davidson	(47) TN	0107.02	Moderate
(037) Davidson	(47) TN	0108.01	Middle
(037) Davidson	(47) TN	0108.02	Middle
(037) Davidson	(47) TN	0109.01	Middle
(037) Davidson	(47) TN	0109.03	Low
(037) Davidson	(47) TN	0109.04	Low
(037) Davidson	(47) TN	0110.01	Moderate
(037) Davidson	(47) TN	0110.02	Middle
(037) Davidson	(47) TN	0111.00	Upper
(037) Davidson	(47) TN	0112.00	Middle
(037) Davidson	(47) TN	0113.00	Moderate
(037) Davidson	(47) TN	0114.00	Moderate
(037) Davidson	(47) TN	0115.00	Middle
(037) Davidson	(47) TN	0116.00	Middle
(037) Davidson	(47) TN	0117.00	Upper
(037) Davidson	(47) TN	0118.00	Moderate
(037) Davidson	(47) TN	0119.00	Low
(037) Davidson	(47) TN	0121.00	Upper
(037) Davidson	(47) TN	0122.00	Upper
(037) Davidson	(47) TN	0126.00	Moderate
(037) Davidson	(47) TN	0127.01	Moderate
(037) Davidson	(47) TN	0127.02	Moderate
(037) Davidson	(47) TN	0128.01	Low
(037) Davidson	(47) TN	0128.02	Middle
(037) Davidson	(47) TN	0130.01	Unknown
(037) Davidson	(47) TN	0130.02	Unknown
(037) Davidson	(47) TN	0131.00	Middle
(037) Davidson	(47) TN	0132.01	Middle
(037) Davidson	(47) TN	0132.02	Middle
(037) Davidson	(47) TN	0133.00	Middle
(037) Davidson	(47) TN	0134.00	Upper
(037) Davidson	(47) TN	0135.00	Upper

County Code	State Code	Tract Code	Tract Income Level
(037) Davidson	(47) TN	0136.00	Low
(037) Davidson	(47) TN	0137.01	Moderate
(037) Davidson	(47) TN	0137.02	Unknown
(037) Davidson	(47) TN	0138.00	Moderate
(037) Davidson	(47) TN	0139.00	Low
(037) Davidson	(47) TN	0142.00	Low
(037) Davidson	(47) TN	0143.00	Low
(037) Davidson	(47) TN	0144.00	Low
(037) Davidson	(47) TN	0148.00	Low
(037) Davidson	(47) TN	0151.00	Middle
(037) Davidson	(47) TN	0152.00	Middle
(037) Davidson	(47) TN	0153.00	Middle
(037) Davidson	(47) TN	0154.01	Middle
(037) Davidson	(47) TN	0154.02	Middle
(037) Davidson	(47) TN	0154.04	Moderate
(037) Davidson	(47) TN	0154.05	Middle
(037) Davidson	(47) TN	0155.01	Middle
(037) Davidson	(47) TN	0155.02	Moderate
(037) Davidson	(47) TN	0156.09	Middle
(037) Davidson	(47) TN	0156.13	Moderate
(037) Davidson	(47) TN	0156.14	Middle
(037) Davidson	(47) TN	0156.15	Moderate
(037) Davidson	(47) TN	0156.17	Middle
(037) Davidson	(47) TN	0156.18	Moderate
(037) Davidson	(47) TN	0156.19	Middle
(037) Davidson	(47) TN	0156.20	Moderate
(037) Davidson	(47) TN	0156.22	Middle
(037) Davidson	(47) TN	0156.23	Moderate
(037) Davidson	(47) TN	0156.24	Middle
(037) Davidson	(47) TN	0156.25	Middle
(037) Davidson	(47) TN	0156.26	Low
(037) Davidson	(47) TN	0156.27	Moderate
(037) Davidson	(47) TN	0156.28	Moderate
(037) Davidson	(47) TN	0156.29	Moderate
(037) Davidson	(47) TN	0156.30	Moderate
(037) Davidson	(47) TN	0156.32	Moderate
(037) Davidson	(47) TN	0156.33	Upper
(037) Davidson	(47) TN	0156.34	Middle
(037) Davidson	(47) TN	0156.35	Upper
(037) Davidson	(47) TN	0156.36	Middle
(037) Davidson	(47) TN	0156.37	Moderate
(037) Davidson	(47) TN	0157.00	Moderate
(037) Davidson	(47) TN	0158.04	Moderate
(037) Davidson	(47) TN	0158.05	Low
(037) Davidson	(47) TN	0158.06	Moderate
(037) Davidson	(47) TN	0159.00	Middle
(037) Davidson	(47) TN	0160.00	Low
(037) Davidson	(47) TN	0161.00	Moderate
(037) Davidson	(47) TN	0162.00	Moderate
(037) Davidson	(47) TN	0163.00	Unknown
(037) Davidson	(47) TN	0164.00	Upper
(037) Davidson	(47) TN	0165.00	Middle
(037) Davidson	(47) TN	0166.00	Middle
(037) Davidson	(47) TN	0167.00	Upper
(037) Davidson	(47) TN	0168.00	Upper
(037) Davidson	(47) TN	0169.00	Upper
(037) Davidson	(47) TN	0170.00	Upper

County Code	State Code	Tract Code	Tract Income Level
(037) Davidson	(47) TN	0171.00	Upper
(037) Davidson	(47) TN	0172.00	Moderate
(037) Davidson	(47) TN	0173.00	Moderate
(037) Davidson	(47) TN	0174.01	Moderate
(037) Davidson	(47) TN	0174.02	Middle
(037) Davidson	(47) TN	0175.00	Moderate
(037) Davidson	(47) TN	0177.01	Upper
(037) Davidson	(47) TN	0177.02	Upper
(037) Davidson	(47) TN	0178.00	Upper
(037) Davidson	(47) TN	0179.01	Upper
(037) Davidson	(47) TN	0179.02	Upper
(037) Davidson	(47) TN	0180.00	Upper
(037) Davidson	(47) TN	0181.01	Moderate
(037) Davidson	(47) TN	0181.02	Upper
(037) Davidson	(47) TN	0182.01	Upper
(037) Davidson	(47) TN	0182.03	Upper
(037) Davidson	(47) TN	0182.04	Moderate
(037) Davidson	(47) TN	0182.05	Upper
(037) Davidson	(47) TN	0183.02	Upper
(037) Davidson	(47) TN	0183.03	Middle
(037) Davidson	(47) TN	0183.04	Upper
(037) Davidson	(47) TN	0184.04	Upper
(037) Davidson	(47) TN	0184.05	Upper
(037) Davidson	(47) TN	0184.07	Upper
(037) Davidson	(47) TN	0184.08	Upper
(037) Davidson	(47) TN	0184.09	Middle
(037) Davidson	(47) TN	0184.10	Middle
(037) Davidson	(47) TN	0184.11	Middle
(037) Davidson	(47) TN	0184.12	Middle
(037) Davidson	(47) TN	0185.00	Upper
(037) Davidson	(47) TN	0186.01	Upper
(037) Davidson	(47) TN	0186.02	Upper
(037) Davidson	(47) TN	0187.00	Upper
(037) Davidson	(47) TN	0188.01	Upper
(037) Davidson	(47) TN	0188.03	Middle
(037) Davidson	(47) TN	0188.04	Upper
(037) Davidson	(47) TN	0189.01	Middle
(037) Davidson	(47) TN	0189.02	Middle
(037) Davidson	(47) TN	0189.04	Middle
(037) Davidson	(47) TN	0189.05	Middle
(037) Davidson	(47) TN	0190.03	Moderate
(037) Davidson	(47) TN	0190.04	Moderate
(037) Davidson	(47) TN	0190.07	Moderate
(037) Davidson	(47) TN	0190.08	Moderate
(037) Davidson	(47) TN	0191.05	Middle
(037) Davidson	(47) TN	0191.06	Middle
(037) Davidson	(47) TN	0191.08	Low
(037) Davidson	(47) TN	0191.09	Middle
(037) Davidson	(47) TN	0191.10	Moderate
(037) Davidson	(47) TN	0191.11	Moderate
(037) Davidson	(47) TN	0191.12	Middle
(037) Davidson	(47) TN	0191.15	Upper
(037) Davidson	(47) TN	0191.16	Middle
(037) Davidson	(47) TN	0191.17	Middle
(037) Davidson	(47) TN	0191.18	Moderate
(037) Davidson	(47) TN	0191.19	Upper
(037) Davidson	(47) TN	0191.20	Upper

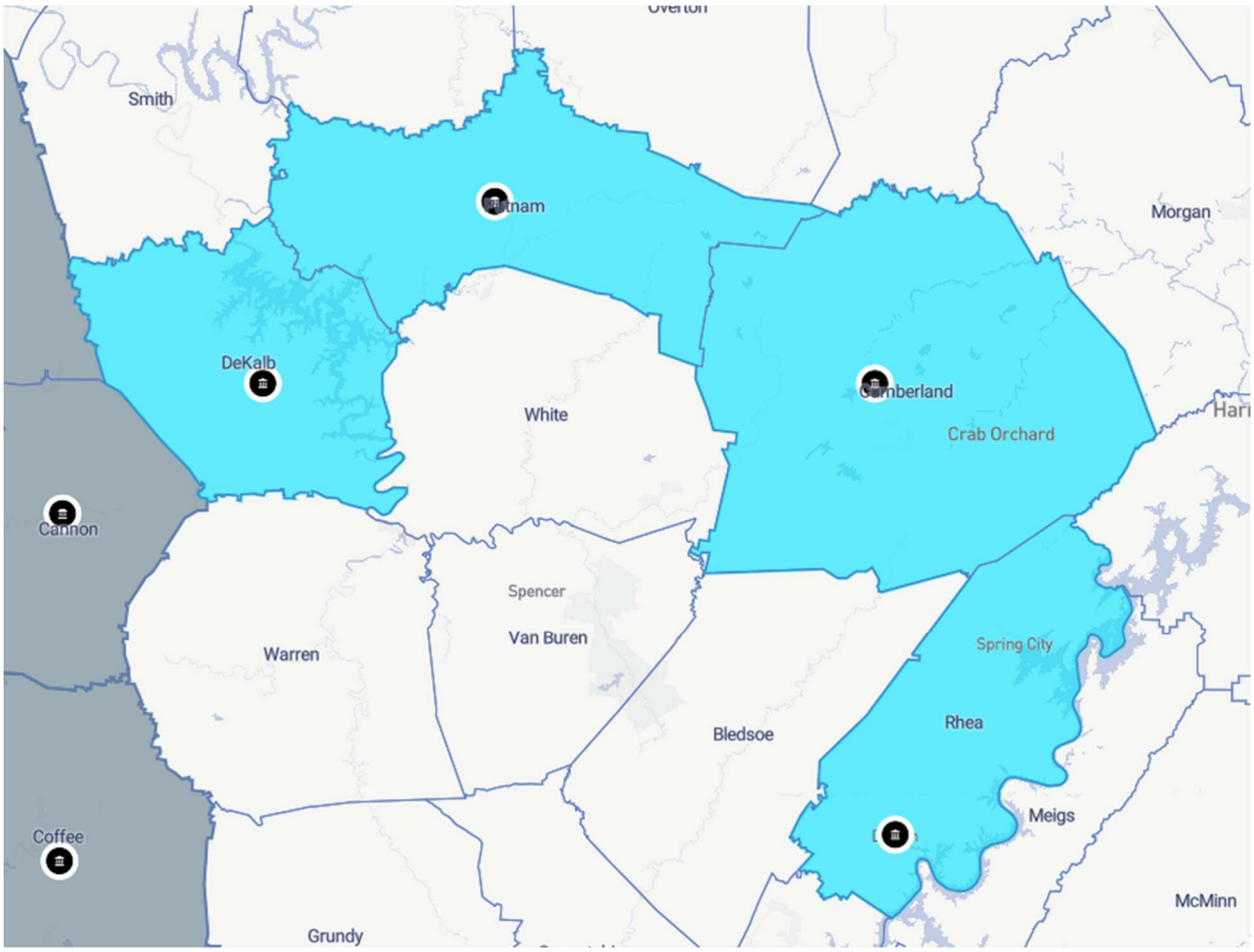
County Code	State Code	Tract Code	Tract Income Level
(037) Davidson	(47) TN	0191.21	Unknown
(037) Davidson	(47) TN	0192.00	Moderate
(037) Davidson	(47) TN	0193.00	Low
(037) Davidson	(47) TN	0194.01	Upper
(037) Davidson	(47) TN	0194.02	Upper
(037) Davidson	(47) TN	0195.01	Upper
(037) Davidson	(47) TN	0195.02	Upper
(037) Davidson	(47) TN	0195.03	Upper
(037) Davidson	(47) TN	0196.00	Moderate
(037) Davidson	(47) TN	9801.00	Unknown
(037) Davidson	(47) TN	9802.00	Unknown
(043) Dickson	(47) TN	0601.00	Moderate
(043) Dickson	(47) TN	0602.01	Middle
(043) Dickson	(47) TN	0602.02	Middle
(043) Dickson	(47) TN	0603.00	Middle
(043) Dickson	(47) TN	0604.01	Middle
(043) Dickson	(47) TN	0604.02	Middle
(043) Dickson	(47) TN	0605.01	Middle
(043) Dickson	(47) TN	0605.02	Middle
(043) Dickson	(47) TN	0606.01	Moderate
(043) Dickson	(47) TN	0606.02	Moderate
(043) Dickson	(47) TN	0607.00	Moderate
(149) Rutherford	(47) TN	0401.01	Middle
(149) Rutherford	(47) TN	0401.02	Middle
(149) Rutherford	(47) TN	0401.04	Moderate
(149) Rutherford	(47) TN	0401.05	Middle
(149) Rutherford	(47) TN	0401.06	Moderate
(149) Rutherford	(47) TN	0401.07	Middle
(149) Rutherford	(47) TN	0402.00	Middle
(149) Rutherford	(47) TN	0403.03	Moderate
(149) Rutherford	(47) TN	0403.04	Moderate
(149) Rutherford	(47) TN	0403.05	Moderate
(149) Rutherford	(47) TN	0403.07	Upper
(149) Rutherford	(47) TN	0403.08	Middle
(149) Rutherford	(47) TN	0403.09	Middle
(149) Rutherford	(47) TN	0403.10	Middle
(149) Rutherford	(47) TN	0403.11	Upper
(149) Rutherford	(47) TN	0403.12	Middle
(149) Rutherford	(47) TN	0404.04	Middle
(149) Rutherford	(47) TN	0404.05	Moderate
(149) Rutherford	(47) TN	0405.01	Middle
(149) Rutherford	(47) TN	0405.02	Middle
(149) Rutherford	(47) TN	0406.00	Middle
(149) Rutherford	(47) TN	0407.02	Middle
(149) Rutherford	(47) TN	0407.03	Middle
(149) Rutherford	(47) TN	0407.04	Middle
(149) Rutherford	(47) TN	0408.06	Upper
(149) Rutherford	(47) TN	0408.07	Upper
(149) Rutherford	(47) TN	0408.08	Upper
(149) Rutherford	(47) TN	0408.09	Middle
(149) Rutherford	(47) TN	0408.10	Middle
(149) Rutherford	(47) TN	0408.11	Upper
(149) Rutherford	(47) TN	0408.12	Middle
(149) Rutherford	(47) TN	0409.01	Moderate
(149) Rutherford	(47) TN	0409.04	Middle
(149) Rutherford	(47) TN	0409.06	Middle
(149) Rutherford	(47) TN	0409.07	Middle

County Code	State Code	Tract Code	Tract Income Level
(149) Rutherford	(47) TN	0409.08	Middle
(149) Rutherford	(47) TN	0409.09	Middle
(149) Rutherford	(47) TN	0409.10	Middle
(149) Rutherford	(47) TN	0409.11	Upper
(149) Rutherford	(47) TN	0410.00	Upper
(149) Rutherford	(47) TN	0411.02	Middle
(149) Rutherford	(47) TN	0411.03	Middle
(149) Rutherford	(47) TN	0411.04	Upper
(149) Rutherford	(47) TN	0412.01	Middle
(149) Rutherford	(47) TN	0412.02	Upper
(149) Rutherford	(47) TN	0413.01	Upper
(149) Rutherford	(47) TN	0413.02	Middle
(149) Rutherford	(47) TN	0414.01	Middle
(149) Rutherford	(47) TN	0414.04	Moderate
(149) Rutherford	(47) TN	0414.05	Moderate
(149) Rutherford	(47) TN	0414.06	Middle
(149) Rutherford	(47) TN	0414.07	Middle
(149) Rutherford	(47) TN	0415.00	Unknown
(149) Rutherford	(47) TN	0416.01	Moderate
(149) Rutherford	(47) TN	0416.02	Unknown
(149) Rutherford	(47) TN	0417.00	Moderate
(149) Rutherford	(47) TN	0418.00	Moderate
(149) Rutherford	(47) TN	0419.00	Moderate
(149) Rutherford	(47) TN	0420.00	Moderate
(149) Rutherford	(47) TN	0421.01	Low
(149) Rutherford	(47) TN	0421.02	Low
(149) Rutherford	(47) TN	0422.00	Middle
(149) Rutherford	(47) TN	0423.01	Middle
(149) Rutherford	(47) TN	0423.02	Middle
(187) Williamson	(47) TN	0501.02	Upper
(187) Williamson	(47) TN	0501.03	Upper
(187) Williamson	(47) TN	0501.04	Upper
(187) Williamson	(47) TN	0501.05	Upper
(187) Williamson	(47) TN	0502.04	Upper
(187) Williamson	(47) TN	0502.05	Upper
(187) Williamson	(47) TN	0502.06	Upper
(187) Williamson	(47) TN	0502.07	Upper
(187) Williamson	(47) TN	0502.09	Upper
(187) Williamson	(47) TN	0502.10	Upper
(187) Williamson	(47) TN	0502.11	Upper
(187) Williamson	(47) TN	0502.12	Upper
(187) Williamson	(47) TN	0503.03	Upper
(187) Williamson	(47) TN	0503.04	Upper
(187) Williamson	(47) TN	0503.05	Upper
(187) Williamson	(47) TN	0503.06	Upper
(187) Williamson	(47) TN	0503.07	Middle
(187) Williamson	(47) TN	0504.03	Upper
(187) Williamson	(47) TN	0504.04	Upper
(187) Williamson	(47) TN	0504.05	Upper
(187) Williamson	(47) TN	0504.06	Upper
(187) Williamson	(47) TN	0505.02	Upper
(187) Williamson	(47) TN	0505.03	Middle
(187) Williamson	(47) TN	0505.04	Middle
(187) Williamson	(47) TN	0506.01	Upper
(187) Williamson	(47) TN	0506.03	Upper
(187) Williamson	(47) TN	0506.04	Upper
(187) Williamson	(47) TN	0507.01	Middle

County Code	State Code	Tract Code	Tract Income Level
(187) Williamson	(47) TN	0507.02	Upper
(187) Williamson	(47) TN	0508.01	Moderate
(187) Williamson	(47) TN	0508.02	Upper
(187) Williamson	(47) TN	0509.04	Middle
(187) Williamson	(47) TN	0509.05	Upper
(187) Williamson	(47) TN	0509.06	Upper
(187) Williamson	(47) TN	0509.07	Upper
(187) Williamson	(47) TN	0509.08	Upper
(187) Williamson	(47) TN	0509.09	Upper
(187) Williamson	(47) TN	0510.01	Upper
(187) Williamson	(47) TN	0510.02	Upper
(187) Williamson	(47) TN	0511.00	Upper
(187) Williamson	(47) TN	0512.03	Middle
(187) Williamson	(47) TN	0512.04	Upper
(187) Williamson	(47) TN	0512.05	Upper
(187) Williamson	(47) TN	0512.06	Upper
(187) Williamson	(47) TN	0512.07	Middle
(187) Williamson	(47) TN	0512.08	Upper
(189) Wilson	(47) TN	0301.02	Middle
(189) Wilson	(47) TN	0301.03	Middle
(189) Wilson	(47) TN	0301.04	Upper
(189) Wilson	(47) TN	0301.05	Middle
(189) Wilson	(47) TN	0302.02	Middle
(189) Wilson	(47) TN	0302.03	Upper
(189) Wilson	(47) TN	0302.05	Upper
(189) Wilson	(47) TN	0302.06	Upper
(189) Wilson	(47) TN	0302.07	Upper
(189) Wilson	(47) TN	0303.03	Upper
(189) Wilson	(47) TN	0303.04	Middle
(189) Wilson	(47) TN	0303.05	Upper
(189) Wilson	(47) TN	0303.08	Upper
(189) Wilson	(47) TN	0303.09	Upper
(189) Wilson	(47) TN	0303.10	Upper
(189) Wilson	(47) TN	0303.11	Upper
(189) Wilson	(47) TN	0304.01	Moderate
(189) Wilson	(47) TN	0304.02	Moderate
(189) Wilson	(47) TN	0305.00	Moderate
(189) Wilson	(47) TN	0306.00	Middle
(189) Wilson	(47) TN	0307.00	Low
(189) Wilson	(47) TN	0308.00	Moderate
(189) Wilson	(47) TN	0309.04	Middle
(189) Wilson	(47) TN	0309.05	Upper
(189) Wilson	(47) TN	0309.06	Upper
(189) Wilson	(47) TN	0309.07	Middle
(189) Wilson	(47) TN	0309.08	Upper
(189) Wilson	(47) TN	0310.00	Middle

99999 East TN Non-MSA

Counties: Cumberland (035), DeKalb (041), Putnam (141), Rhea (143)



FirstBank

MSA: 99999 - East TN Non-MSA

Facility-Based Assessment Area
Geographical Information

County Code	State Code	Tract Code	Tract Income Level	Tract Minority %
(035) Cumberland	(47) TN	9701.01	Upper	6.87
(035) Cumberland	(47) TN	9701.03	Middle	7.41
(035) Cumberland	(47) TN	9701.04	Middle	5.85
(035) Cumberland	(47) TN	9702.01	Middle	5.78
(035) Cumberland	(47) TN	9702.02	Upper	5.85
(035) Cumberland	(47) TN	9703.01	Middle	7.82
(035) Cumberland	(47) TN	9703.02	Middle	8.26
(035) Cumberland	(47) TN	9704.01	Moderate	15.08
(035) Cumberland	(47) TN	9704.02	Middle	7.19
(035) Cumberland	(47) TN	9705.01	Middle	9.64
(035) Cumberland	(47) TN	9705.02	Moderate	12.73
(035) Cumberland	(47) TN	9706.01	Upper	7.79
(035) Cumberland	(47) TN	9706.02	Middle	6.03
(035) Cumberland	(47) TN	9706.03	Middle	5.61
(035) Cumberland	(47) TN	9707.01	Middle	7.94
(035) Cumberland	(47) TN	9707.02	Middle	6.34
(035) Cumberland	(47) TN	9708.00	Middle	5.17
(041) DeKalb	(47) TN	9201.01	Upper	7.58
(041) DeKalb	(47) TN	9201.02	Middle	10.67
(041) DeKalb	(47) TN	9202.01	Moderate	17.74
(041) DeKalb	(47) TN	9202.02	Middle	16.80
(041) DeKalb	(47) TN	9203.00	Middle	10.42
(041) DeKalb	(47) TN	9999.99	Middle	12.72
(141) Putnam	(47) TN	0001.00	Middle	21.29
(141) Putnam	(47) TN	0002.01	Middle	12.57
(141) Putnam	(47) TN	0002.02	Middle	11.34
(141) Putnam	(47) TN	0003.01	Middle	10.52
(141) Putnam	(47) TN	0003.03	Middle	25.64
(141) Putnam	(47) TN	0003.04	Moderate	36.10
(141) Putnam	(47) TN	0003.05	Middle	21.86
(141) Putnam	(47) TN	0004.00	Upper	12.76
(141) Putnam	(47) TN	0005.00	Middle	13.91
(141) Putnam	(47) TN	0006.00	Upper	16.22
(141) Putnam	(47) TN	0007.00	Middle	24.63
(141) Putnam	(47) TN	0008.00	Moderate	28.87
(141) Putnam	(47) TN	0009.00	Middle	11.27
(141) Putnam	(47) TN	0010.00	Middle	6.84
(141) Putnam	(47) TN	0011.00	Middle	9.80
(141) Putnam	(47) TN	0012.01	Middle	12.22
(141) Putnam	(47) TN	0012.02	Middle	12.04
(141) Putnam	(47) TN	0013.00	Upper	9.25
(143) Rhea	(47) TN	9750.00	Middle	7.36
(143) Rhea	(47) TN	9751.00	Middle	7.35
(143) Rhea	(47) TN	9752.00	Upper	9.98
(143) Rhea	(47) TN	9753.00	Middle	14.00
(143) Rhea	(47) TN	9754.01	Moderate	21.36
(143) Rhea	(47) TN	9754.02	Upper	14.56

99999 Mid-South TN Non-MSA

Counties: Bedford (003), Coffee (031), Franklin (051),

(085), Lincoln (103), Moore (127)

FirstBank

MSA: 99999 - Mid-South TN Non-MSA

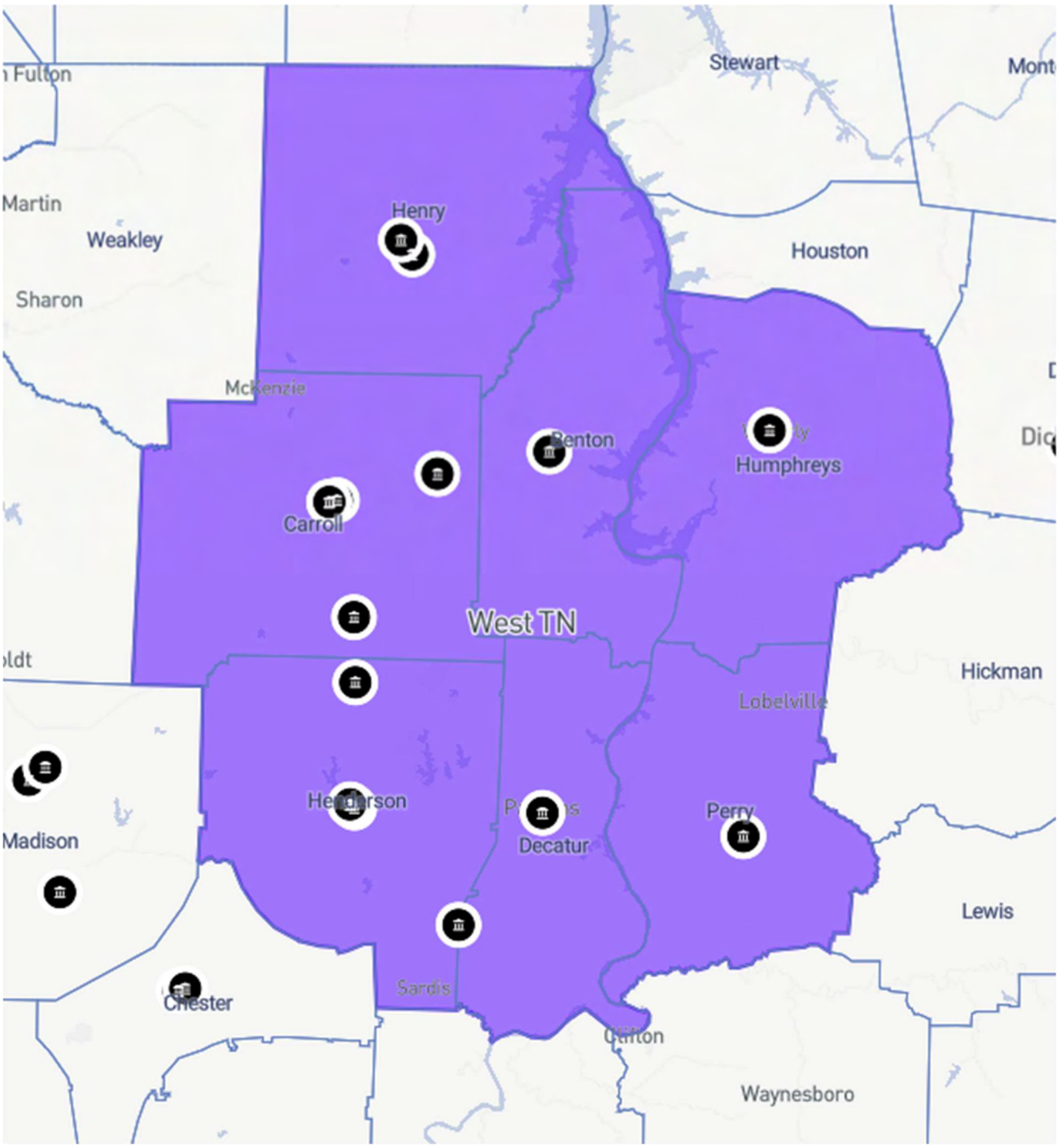
Facility-Based Assessment Area

Geographical Information

County Code	State Code	Tract Code	Tract Income Level	Tract Minority %
(003) Bedford	(47) TN	9501.00	Upper	12.32
(003) Bedford	(47) TN	9502.01	Upper	11.34
(003) Bedford	(47) TN	9502.02	Middle	11.18
(003) Bedford	(47) TN	9503.00	Middle	12.51
(003) Bedford	(47) TN	9504.01	Upper	34.04
(003) Bedford	(47) TN	9504.02	Moderate	37.08
(003) Bedford	(47) TN	9505.00	Middle	41.80
(003) Bedford	(47) TN	9506.00	Middle	43.75
(003) Bedford	(47) TN	9507.00	Middle	11.40
(003) Bedford	(47) TN	9508.00	Upper	8.09
(031) Coffee	(47) TN	9701.00	Middle	9.83
(031) Coffee	(47) TN	9702.01	Moderate	9.62
(031) Coffee	(47) TN	9702.02	Middle	10.38
(031) Coffee	(47) TN	9703.00	Upper	7.79
(031) Coffee	(47) TN	9704.01	Upper	7.59
(031) Coffee	(47) TN	9704.02	Middle	23.10
(031) Coffee	(47) TN	9705.01	Moderate	16.43
(031) Coffee	(47) TN	9705.02	Upper	19.25
(031) Coffee	(47) TN	9706.00	Middle	14.51
(031) Coffee	(47) TN	9707.00	Middle	10.71
(031) Coffee	(47) TN	9708.01	Upper	16.87
(031) Coffee	(47) TN	9708.03	Upper	11.94
(031) Coffee	(47) TN	9708.04	Upper	14.99
(031) Coffee	(47) TN	9709.00	Moderate	26.91
(031) Coffee	(47) TN	9710.01	Middle	18.38
(031) Coffee	(47) TN	9710.02	Middle	15.80
(031) Coffee	(47) TN	9801.00	Unknown	100.00
(051) Franklin	(47) TN	9601.00	Middle	13.07
(051) Franklin	(47) TN	9602.01	Middle	8.53
(051) Franklin	(47) TN	9602.02	Middle	10.30
(051) Franklin	(47) TN	9603.00	Upper	11.05
(051) Franklin	(47) TN	9604.01	Middle	20.36
(051) Franklin	(47) TN	9604.02	Upper	15.51
(051) Franklin	(47) TN	9605.00	Middle	23.06
(051) Franklin	(47) TN	9606.00	Middle	13.69
(051) Franklin	(47) TN	9607.00	Upper	14.32
(051) Franklin	(47) TN	9608.00	Middle	12.66
(103) Lincoln	(47) TN	9750.00	Upper	8.88
(103) Lincoln	(47) TN	9751.00	Upper	9.87
(103) Lincoln	(47) TN	9752.00	Upper	7.07
(103) Lincoln	(47) TN	9753.00	Middle	28.70
(103) Lincoln	(47) TN	9754.00	Middle	18.58
(103) Lincoln	(47) TN	9755.00	Middle	11.97
(103) Lincoln	(47) TN	9756.01	Upper	15.09
(103) Lincoln	(47) TN	9756.02	Middle	13.31
(103) Lincoln	(47) TN	9757.00	Upper	8.26
(127) Moore	(47) TN	9301.00	Upper	5.35
(127) Moore	(47) TN	9302.00	Upper	10.06
(127) Moore	(47) TN	9999.99	Upper	7.15

99999 West TN Non-MSA

Counties: Benton (005), Carroll (017), Decatur (039), Henderson (077), Henry (079), Humphreys (085), Perry (135)



FirstBank

MSA: 99999 - West TN Non-MSA

Facility-Based Assessment Area

Geographical Information

County Code	State Code	Tract Code	Tract Income Level	Tract Minority %
(005) Benton	(47) TN	9630.00	Middle	6.95
(005) Benton	(47) TN	9631.00	Middle	8.47
(005) Benton	(47) TN	9632.00	Middle	8.43
(005) Benton	(47) TN	9633.00	Middle	13.47
(005) Benton	(47) TN	9634.00	Middle	8.48
(005) Benton	(47) TN	9999.99	Middle	9.37
(017) Carroll	(47) TN	9620.00	Middle	12.14
(017) Carroll	(47) TN	9621.01	Middle	16.01
(017) Carroll	(47) TN	9621.02	Upper	20.78
(017) Carroll	(47) TN	9622.01	Middle	23.89
(017) Carroll	(47) TN	9622.02	Upper	14.90
(017) Carroll	(47) TN	9623.00	Middle	18.07
(017) Carroll	(47) TN	9624.00	Upper	10.49
(017) Carroll	(47) TN	9625.00	Middle	14.94
(017) Carroll	(47) TN	9801.00	Unknown	0.00
(017) Carroll	(47) TN	9999.99	Middle	16.51
(039) Decatur	(47) TN	9550.01	Middle	5.70
(039) Decatur	(47) TN	9550.03	Middle	8.75
(039) Decatur	(47) TN	9550.04	Middle	13.17
(039) Decatur	(47) TN	9551.01	Middle	11.45
(039) Decatur	(47) TN	9551.02	Middle	5.16
(039) Decatur	(47) TN	9999.99	Middle	8.51
(041) DeKalb	(47) TN	9201.01	Upper	7.58
(041) DeKalb	(47) TN	9201.02	Middle	10.67
(041) DeKalb	(47) TN	9202.01	Moderate	17.74
(041) DeKalb	(47) TN	9202.02	Middle	16.80
(041) DeKalb	(47) TN	9203.00	Middle	10.42
(041) DeKalb	(47) TN	9999.99	Middle	12.72
(077) Henderson	(47) TN	9750.00	Upper	8.05
(077) Henderson	(47) TN	9751.00	Middle	16.98
(077) Henderson	(47) TN	9752.00	Middle	7.82
(077) Henderson	(47) TN	9753.01	Middle	16.83
(077) Henderson	(47) TN	9753.02	Middle	16.43
(077) Henderson	(47) TN	9754.00	Moderate	26.60
(077) Henderson	(47) TN	9755.00	Middle	6.11
(077) Henderson	(47) TN	9999.99	Middle	14.19
(079) Henry	(47) TN	9690.01	Middle	6.63
(079) Henry	(47) TN	9690.02	Upper	5.16
(079) Henry	(47) TN	9691.00	Middle	8.87
(079) Henry	(47) TN	9692.00	Middle	9.95
(079) Henry	(47) TN	9693.00	Moderate	39.34
(079) Henry	(47) TN	9694.00	Middle	31.01
(079) Henry	(47) TN	9695.01	Middle	14.44
(079) Henry	(47) TN	9695.02	Middle	17.62
(079) Henry	(47) TN	9696.01	Middle	14.46
(079) Henry	(47) TN	9696.02	Upper	9.29
(079) Henry	(47) TN	9697.00	Middle	10.11
(079) Henry	(47) TN	9698.00	Middle	14.98
(085) Humphreys	(47) TN	1301.00	Middle	7.47
(085) Humphreys	(47) TN	1302.00	Middle	7.91
(085) Humphreys	(47) TN	1303.00	Middle	12.92
(085) Humphreys	(47) TN	1304.00	Middle	10.42
(085) Humphreys	(47) TN	1305.00	Middle	9.44
(085) Humphreys	(47) TN	9999.99	Middle	9.94
(135) Perry	(47) TN	9301.00	Middle	6.36
(135) Perry	(47) TN	9302.01	Middle	9.87
(135) Perry	(47) TN	9302.02	Upper	8.11
(135) Perry	(47) TN	9999.99	Middle	7.96

* Distressed or Under-served Tracts

CRA Disclosure Statements may be obtained on the Federal Financial Institutions Examination Council's website at *https://www.ffiec.gov/craadweb/DisRptMain.aspx* .

HMDA Disclosure Statements may be obtained on the Consumer Financial

Protection Bureau's website at *Home Mortgage Disclosure Act (HMDA) Data | Consumer Financial Protection Bureau*.