



## **PUBLIC DISCLOSURE**

May 22, 2023

### **COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION**

Woodforest National Bank  
Charter Number: 16892

1330 Lake Robbins Drive  
The Woodlands, TX 77380

Office of the Comptroller of the Currency

909 Fannin Street, Suite 1900  
Houston, TX 77010-3031

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

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## Overall CRA Rating

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

The following table indicates the performance level of Woodforest National Bank with respect to the Lending, Investment, and Service Tests:

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

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

The major factors that support this rating include:

- The Lending Test rating is based on excellent lending activity, excellent geographic and borrower distributions, and a substantial majority of loans in the assessment areas (AAs).
- The Investment Test rating is based on an overall excellent level of investments across all rating areas.
- The Service Test rating is based on overall excellent service activity across 21 of 25 rating areas.

### Lending in Assessment Area

A substantial majority of the bank’s loans are in its AAs.

The bank originated 93.3 percent of its total loans inside the bank’s AAs during the evaluation period. This analysis is performed at the bank, rather than the AA, level. This percentage does not include extensions of credit by affiliates that may be considered under the other performance criteria.

Lending Inside and Outside of the Assessment Area										
Loan Category	Number of Loans				Total #	Dollar Amount of Loans \$(000s)				Total \$(000s)
	Inside		Outside			Inside		Outside		
	#	%	#	%		\$	%	\$	%	
Small Business	12,322	95.6	563	4.4	12,885	510,039	92.1	43,952	7.9	553,991
Small Farm	90	92.8	7	7.2	97	1,247	98.7	16	1.3	1,263
Consumer	40,014	92.6	3,190	7.4	43,204	103,638	94.0	6,662	6.0	110,300
<b>Total</b>	<b>52,426</b>	<b>93.3</b>	<b>3,760</b>	<b>6.7</b>	<b>56,186</b>	<b>614,924</b>	<b>92.4</b>	<b>50,630</b>	<b>7.6</b>	<b>665,554</b>

## Description of Institution

Woodforest National Bank (WNB) is an interstate financial institution headquarter in The Woodlands, Texas. WNB was founded in 1980 and has become one of the largest independently owned banks in the Houston-The Woodlands, Texas Combined Statistical Area (CSA). As of December 31, 2022, assets totaled \$9.1 billion and WNB employed over 4,500 full-time employees. There are no legal or financial factors impeding WNB's ability to meet the credit and community development (CD) needs of its assessment areas (AAs). WNB was rated "Outstanding" at the last CRA evaluation dated June 24, 2019.

WNB is a subsidiary of Woodforest Financial Group, Inc. (WFG), also headquartered in The Woodlands, Texas. WFG also owns four non-bank subsidiaries including Allivate Impact Capital (AIC), Woodforest Financial Services, Inc. (WFS), Woodforest Leasing, Inc. (WLI), and Par Real Estate Holdings II LLC (Par Holdings II). AIC elevates the bank's level of innovative social impact to communities, alleviating poverty, and activating entrepreneurial ecosystems across asset classes. WFS provides non-deposit investment products such as mutual funds and annuities and provides comprehensive employee benefit plans to small- and medium-sized businesses. WFL provides capital and operating leases on leasehold improvements and equipment to the bank. Par II is a real estate asset holding company. No affiliate activity was considered in this performance evaluation. The activities of these subsidiaries do not adversely affect the bank's ability to meet the credit needs of the community.

As of December 31, 2022, the bank operated 775 branches, of which 236 were in low- and moderate-income (LMI) geographies throughout 25 rating areas. Rating areas include a total of 129 assessment areas (AAs) in 17 states (Alabama, Florida, Georgia, Illinois, Indiana, Kentucky, Louisiana, Maryland, Mississippi, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Texas, Virginia, West Virginia), as well as eight multistate combined statistical areas (Charleston, Charlotte, Chicago, Cincinnati, Louisville, Myrtle Beach, Virginia Beach, and Washington Multistate CSAs).

WNB branches are predominantly in retail stores (mostly inside of Walmart) with in-store branches, highly accessible, and open later than most of its competitors. The bank operates 738 in-store branches and 37 traditional branches. All traditional branches are located in Texas. During the evaluation period, the bank operated 923 automated teller machines (ATMs), of which 92 percent were in secured Walmart store lobbies making them highly accessible and available in a safe location even outside of branch banking hours. To increase access to banking services, WNB developed an innovative alternative delivery system (ADS) money transfer service called Cash in at Checkout. This ADS service provides customers with the convenience of initiating cash-in credit transfers to their WNB checking accounts using debit cards at cashier terminals located in any Walmart retail location. The service is available in all states but Vermont; however, WNB does not have a presence in this state. There is no charge to the customer for this convenience. WNB also offers online and mobile banking as an ADS to in-branch transactions.

### Flexible and Innovative Lending Products

*Consumer ReLi* – One of the bank's primary products is the unsecured Consumer ReLi Line of Credit (ReLi LOC), which ranges from \$500 to \$2,500 over a 24-month draw period at a fixed rate with no processing or annual fees. This product is considered an innovative small dollar loan product. This product offers alternative affordable financing to LMI consumers who might otherwise be interested in "pay day" and other types of predatory loan products. The ReLi product also offers customers an

opportunity to rebuild their credit as their performance on the LOC is reported to the credit bureaus. This product is considered under consumer loans.

*Business ReLi* – WNB also offers a responsive financing option for small business owners to meet their needs (e.g., seasonal cash flow, potential startup capital needs) with its unsecured Business ReLi LOC. This LOC ranges from \$500 to \$10,000 at a fixed rate with no fees. This product enables lending to startups by leveraging other underwriting criteria such as personal credit history when revenue information is not available. If an applicant applies as a new business, then reapplies for an increase, and the company is less than one-year old, financial documentation may be requested to verify revenues. These Business ReLi LOCs are reported as CRA small business loans. This product is considered responsive to small business needs of WNB business customers.

*Re-Starter* – The Re-Starter is a 12-month, no-fee, small dollar term loan counteroffer for denied loan applicants who have no FICO score but who otherwise meet underwriting criteria. It is a consumer term loan created to help customers with no FICO score establish good credit. Re-Starter is considered an innovative small dollar initiative.

*Community Development Lending* – Guided by consistent AA needs assessment, WNB originated flexible, responsive, and innovative CD loans to meet community needs during the evaluation period. Examples of these loans are detailed under the individual rating areas.

*Small Business Administration (SBA) Paycheck Protection Program (PPP)* – In 2020, the SBA established the PPP under the Coronavirus Aid, Relief, and Economic Security (CARES) Act in response to the COVID-19 pandemic. The goal of the program was to aid small businesses by funding payroll costs, mortgages, rent, and utilities. Despite not being an active SBA lender, WNB originated a total of 6,929 PPP loans totaling \$578 million. Of these loans, 6,822 loans totaling \$331.6 million were small loans to business and farms. The remaining 107 loans totaling \$236.5 million were loans greater than \$1 million, some of which qualified as CD loans. Out of all PPP loans, the median loan amount was \$15,000.

### **Bank-Wide Community Development Investments**

During the evaluation period, WNB launched three primary innovative, complex, and responsive investments. Descriptions of each investment is detailed below.

*Woodforest CEI-Boulos Opportunity Fund (WCBOF)*: In 2019, WNB created and became the sole investor in the WCBOF, a \$22 million impact investment fund that invests in high-impact Qualified Opportunity Zone (QOZ) projects across WNB’s 17-state footprint. The fund is managed by CEI-Boulos Capital Management, LLC, a joint-venture of CEI, one of the nation’s most successful and innovative *community development financial institutions* (CDFI) with over 40 years of experience in predominantly rural low-income communities, and The Boulos Company, Northern New England’s largest integrated commercial real estate firm.

*CDFI Community Investment Fund II, LLC*: In 2021, WNB invested \$5 million to launch the second round of the innovative CDFI Community Investment Fund (CCIF), a partnership with Opportunity Finance Network, to make subordinated equity equivalent investments (“EQ2”) in CDFIs across the WNB’s 17-state footprint. WNB invested in the first round during the last performance evaluation period.

*AIC CEI-Boulos Opportunity Fund* – In 2022, WNB invested \$25 million to capitalize the new AIC CEI-Boulos Opportunity Fund, which will make innovative CD investments in QOZs nationally, with an initial focus on WNB’s 17-state footprint. With the initial \$25 million investment, the fund is expected to raise a total of \$100 million from multiple investors. Investing across multiple asset types, this fund will target projects in QOZs that create jobs, develop/preserve affordable and workforce housing, revitalize downtown and historic areas, serve nonprofit organizations, and support environmentally friendly objectives and standards.

### **Bank-Wide Community Development Services – Financial Education Curriculums**

WNB offered up to five financial education courses throughout the AAs. Descriptions of each curriculum is detailed below.

*Building Wealth* – The Build Wealth program provides introductory guidance to individuals and families seeking help to develop plans for building personal wealth. The program includes modules for budgeting, saving, and investing, building credit and controlling debt, and protecting wealth. The Federal Reserve Bank of Dallas developed the program.

*New Beginnings* – WNB developed a customized New Beginnings financial literacy program for affiliates of Family Promise, a national organization that helps low-income individuals and families experiencing homelessness. While families are in the program, they receive education and individual assistance designed to assist with overcoming the causes that led to homelessness. The New Beginnings program provides a comprehensive approach to achieving financial sustainability from basic banking concepts to budgeting and managing credit. In 2019, the Independent Bankers Association of Texas presented WNB with a “Best of Community Banking Silver Award” for this customized curriculum.

*Junior Achievement* – WNB’s Junior Achievement curriculums are tailored for high school, middle school, and elementary school students focusing on entrepreneurship, small businesses, career planning, personal finance, investing, global marketplace, and basic economics and banking services. WNB performs Junior Achievement training primarily in schools where the majority of students receive free or reduced lunches.

*Money Smart (Personal)* – The Money Smart personal program was developed by the FDIC and is a comprehensive financial education curriculum designed to help LMI individuals enhance their financial skills. WNB uses several modules in the curriculum, which covers topics like deposit products, debit cards, overdrafts fees, borrowing basics, credit cards, financial recovery, insurance, avoiding predatory lending, budgeting, savings, building credit, home ownership, and other related banking services.

*Money Smart (Business)* – The Money Smart business program is designed for small business owners and introduces topics related to starting and managing a business. The FDIC and the SBA developed the program jointly. The curriculum includes thirteen modules, covering topics such as banking services, credit reporting, financial management, insurance, managing cash flow, organizational structure, business plans, recordkeeping, risk management, selling and succession planning, tax planning, and time management.

Financial education at WNB also includes support for entrepreneurs and small businesses. WNB launched the Woodforest Foundry (Foundry) program in 2017, which is considered innovative and responsive to small business owners. During the COVID-19 pandemic, WNB transitioned to virtual Foundry activities, which helped to increase accessibility for numerous entrepreneurs and small

businesses. Entrepreneurs facilitate the Foundry as mentors to enhance local entrepreneurial ecosystems, which revitalizes underserved communities and helps grow businesses. The initiative also enhances workforce development. Under the Foundry, WNB also provides the Entrepreneurship4All (E4All) program, which is an interactive event that “teaches participants the fundamentals of an entrepreneurial mindset.” WNB held a total of 50 E4Alls across the WNB footprint to inspire entrepreneurship and job creation in underserved communities and populations.

WNB also offers a free online financial education curriculum on its website called Banking GPS, which allows consumers to complete three online modules to earn a certificate of completion. This course covers banking basics, checking account tips, and debit card information to assist consumers in managing personal finances.

## **Scope of the Evaluation**

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

The evaluation period for the Lending, Investment, and Service tests is January 1, 2019, through December 31, 2022. As we evaluated WNB’s Lending Test performance, we gave the greatest weight to small business and consumer loans. Both products were given equal consideration during this evaluation. Consumer loans originated during the 2019-2021 evaluation period were compared to 2015 American Community Service (ACS) survey data. We performed a separate analysis for 2022 loans due to 2020 U.S. Census demographic changes. For small business loans originated during the 2019-2021 evaluation period, we compared WNB’s performance to peer performance using 2021 CRA Aggregate Data. For 2022, aggregate data was not available for comparison. There is no aggregate data available for analysis of consumer lending. We gave greater weight to loans originated during the 2019-2021 evaluation period, as it accounted for a majority of the full evaluation period. WNB does not originate home mortgages, so we did not analyze residential loans. WNB did not originate a sufficient volume of small loans to farms to perform a meaningful analysis for any rating area except for Texas.

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

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

### **Ratings**

The bank’s overall rating is a blend of the MMSA and state ratings. The rating for the states of North Carolina, Ohio, and Texas received the greatest emphasis in our analysis. We placed greater emphasis considering WNB’s deposit volume, branch presence, and loan volume in each state relative to the bank as a whole. The state of Texas represented 78 percent of deposits, 37 percent of loans originated and purchased, and 27 percent of WNB’s branch network. The state ratings are based on performance in all



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

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

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

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

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

## Multistate Metropolitan Statistical Area Rating

### Charleston-Huntington-Ashland WV-OH CSA (Charleston Multistate CSA)

**CRA rating for the Charleston Multistate CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

### Description of Institution's Operations in Charleston Multistate CSA

WNB delineates the entire Charleston Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Charleston Multistate CSA represents 0.21 percent of total bank deposits and is WNB's 23<sup>rd</sup> largest rating area. WNB operates four branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$18 million, which represented 0.11 percent market share and ranked the bank 41<sup>st</sup> of 54 institutions within the AA. The largest depository institutions were Truist Bank, City National Bank, and JP Morgan Chase Bank, which held a combined 40.33 percent market share in the AA.

### Community Contacts

We identified three community contacts in the Charleston Multistate CSA. Of the three organizations, one supported economic development and two helped provided community services to LMI individuals. The primary needs identified included small business loans, nonprofit partnership, and affordable housing.

The following tables provide information on the demographic composition of the Charleston Multistate CSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charleston-Huntington-Ashland WV-OH CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	150	5.3	22.0	50.0	22.0	0.7

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

Population by Geography	565,365	3.1	16.4	54.8	25.2	0.5
Housing Units by Geography	261,649	3.9	17.0	54.3	24.6	0.2
Owner-Occupied Units by Geography	161,491	1.6	14.2	56.5	27.7	0.0
Occupied Rental Units by Geography	67,271	8.1	21.7	48.7	20.7	0.7
Vacant Units by Geography	32,887	6.8	20.8	54.7	17.5	0.2
Businesses by Geography	35,561	7.8	12.5	50.1	29.4	0.3
Farms by Geography	897	3.2	11.4	56.1	29.3	0.0
Family Distribution by Income Level	146,545	22.9	16.5	19.0	41.5	0.0
Household Distribution by Income Level	228,762	26.6	15.5	16.2	41.7	0.0
Median Family Income MSA - 16620 Charleston, WV MSA	\$54,658	Median Housing Value			\$107,556	
Median Family Income MSA - 26580 Huntington-Ashland, WV-KY-OH MSA	\$54,584	Median Gross Rent			\$644	
Median Family Income Non-MSAs - OH	\$55,785	Families Below Poverty Level			14.0%	
Median Family Income Non-MSAs - WV	\$48,107					
<i>Source: 2015 ACS and 2021 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Charleston-Huntington-Ashland WV-OH CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	166	7.2	21.1	51.2	19.3	1.2
Population by Geography	539,622	4.7	18.6	54.4	21.5	0.8
Housing Units by Geography	263,079	4.9	19.1	54.2	20.8	1.0
Owner-Occupied Units by Geography	157,425	2.3	17.0	56.3	23.5	0.9
Occupied Rental Units by Geography	65,621	10.0	23.0	49.6	16.3	1.1
Vacant Units by Geography	40,033	6.8	21.4	53.6	17.1	1.1
Businesses by Geography	40,981	7.6	16.1	46.6	29.1	0.6
Farms by Geography	1,055	4.0	14.7	53.9	26.3	1.1
Family Distribution by Income Level	141,830	24.4	16.4	19.5	39.7	0.0
Household Distribution by Income Level	223,046	27.1	15.6	16.4	40.9	0.0
Median Family Income MSA - 16620 Charleston, WV MSA	\$60,682	Median Housing Value			\$118,244	
Median Family Income MSA - 26580 Huntington-Ashland, WV-KY-OH MSA	\$61,976	Median Gross Rent			\$717	
Median Family Income Non-MSAs - OH	\$66,684	Families Below Poverty Level			14.5%	
Median Family Income Non-MSAs - WV	\$55,205					
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Charleston Multistate CSA

The Charleston Multistate CSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLESTON MULTISTATE CSA

### LENDING TEST

The bank's performance under the Lending Test in Charleston Multistate CSA is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charleston Multistate CSA is excellent.

### Lending Activity

Lending levels reflect good responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charleston Multistate CSA	218	44	1	4	267	100	100

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charleston Multistate CSA	387	201	1	830	1,419	100	100

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Charleston Multistate CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.20 percent is greater than the bank's deposit market share of 0.11 percent.

Per 2021 peer data by number, WNB ranked 38<sup>th</sup> of 98 small business lenders in the AA. The five largest small business lenders held 45.99 percent of the market share. WNB's average small business loan totaled \$5,000 compared to the top five business lenders which ranged between \$4,000 and \$111,000.

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

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

***Small Loans to Businesses***

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

The distribution of small loans to businesses is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in moderate-income geographies. The bank did not make any small loans to businesses in low-income geographies primarily because the bank does not have any branches in low-income geographies. During 2022, there were not enough small business loans to perform a meaningful analysis.

***Consumer Loans***

Refer to Table U in the Charleston Multistate CSA section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in moderate-income geographies. The proportion of bank loans in low-income geographies was significantly lower than the proportion of households. During 2022, the proportion of banks loans significantly exceeded the proportion of households in low-income geographies and was near to households in moderate-income geographies.

***Lending Gap Analysis***

We evaluated the lending distribution in the Charleston Multistate CSA and did not identify any unexplained conspicuous gaps.

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

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

***Small Loans to Businesses***

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

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses but exceeded aggregate lending to small businesses. However, the bank reported a high percentage of loans made to businesses with unreported revenue. This was attributed in part to the bank's participation in PPP lending, which did not require collection of revenue information from businesses. Internal bank analysis shows without PPP loans, performance was excellent with 100 percent of the bank's loans originated to small businesses. In 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the Charleston Multistate CSA section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Charleston Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$830 thousand, which represented 53 percent of allocated tier 1 capital for the area. The allocations were for four loans from four different entities. Two of these provided opportunities for affordable housing and two for economic development. All of the CD loans were to partners that supported various community-development financial institutions (CDFI) across the WNB footprint. Examples of the more innovative or responsive projects are described below.

WNB allocated \$110,000 from a \$500,000 line of credit that provides rural small business lending capital to a leading West Virginia CDFI. This loan funds small businesses and farms in economically struggling communities. The loan amounts from \$5,000 to \$50,000 and support early-stage, often undercapitalized businesses. The CDFI also works with agencies such as the USDA and SBA to structure larger economic development loans up to \$4 million. At the time of this loan origination, the CDFI had deployed \$46.8 million in lending capital to support 257 companies in their creation of 4,500 jobs.

WNB allocated \$400,000 from a \$2 million loan that helped capitalize the CDFI's interest-free "Emergency Stabilization Fund" for member organizations and area businesses struggling during COVID-19 pandemic. This responsive loan is discussed in more detail in the state rating section for West Virginia.

WNB allocated \$250,000 from a \$12 million loan that enables this leading affordable housing syndicator to originate working capital loans for developments funded by the Low-Income Housing Tax Credit (LIHTC). This innovative loan is discussed in more detail in the state rating section for West Virginia.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## INVESTMENT TEST

The bank's performance under the Investment Test in the Charleston Multistate CSA is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charleston Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Charleston Multistate CSA	7	186	14	459	21	100	646	100
<b>Totals</b>	<b>7</b>	<b>186</b>	<b>14</b>	<b>459</b>	<b>23</b>	<b>100</b>	<b>646</b>	<b>100</b>

During the evaluation period, WNB made 11 investments totaling \$631,102 including seven prior period investments totaling \$186,102 and four current period investments totaling \$445,000. Additionally, 10 grants totaling \$14,433 were made for a total investment in the AA of \$645,535. WNB's total investments represented 41.18 percent of allocated tier 1 capital to the AA.

WNB's qualified investments in the area provide revitalization and/or stabilization, affordable housing, and economic development. Grants in the area were made to qualified CD organizations that provide economic development and community services.

## SERVICE TEST

The institution's performance under the Service Test in Charleston Multistate CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Charleston Multistate CSA is excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charleston Multistate CSA	100	4	100	0	50	25	25	4.7	18.6	54.2	20.8

While there were no branches in low-income geographies, the percentage of branches in moderate-income geographies significantly exceeds the population levels in those geographies. Additionally, the bank has a branch located in a distressed or underserved nonmetropolitan middle-income geography. Retail service delivery systems were enhanced using alternative delivery systems (ADS) for delivering services in LMI geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, particularly LMI individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

WNB provided 228 hours of financial education to 353 participants in this AA. This level of activity is excellent when considering the number of branches in this AA and limited staff within the in-store branches. The bank utilized the Building Wealth, Money Smart – business, and Money Smart – personal training modules. The bank’s training activities focused primarily on both Money Smart curriculums.

In addition to financial education, WNB employees worked with various organizations in support of CD needs, with a total of six employees serving on nine boards or committees in nine positions. Employees in these roles provided leadership and financial expertise in support of CD related needs. The organizations in which WNB is involved help support affordable housing and community services to LMI individuals. WNB provided leadership and financial expertise on boards or committees of regionally known organizations such as Rea of Hope, Good News Mountaineer Garage, and CommunityWorks in West Virginia. Examples of WNB’s leadership in providing CD services are summarized below.

- A bank employee was a board member of Rea of Hope, whose mission is to help West Virginia women suffering from alcohol and/or drug addiction by teaching the life skills and self-sufficiency required to reach sustained recovery while providing safe, affordable, and supportive housing for them and their children.



- A bank employee was a board member of Good News Mountaineer Garage, which provides vehicles for individuals and families that are transitioning from welfare to work, or other low-income persons needing transportation for employment or education.
- In December 2019, WNB assembled a panel of local small business capital experts to lead an “Access 2 Capital” workshop for aspiring and early-stage entrepreneurs in the AA. These experts provided 12 entrepreneurs with valuable information about alternative sources of capital, small-dollar capital, and building capacity and credit to become more loan-worthy as businesses grow.

## Charlotte-Concord NC-SC CSA (Charlotte Multistate CSA)

**CRA rating for the Charlotte Multistate CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

### Description of Institution's Operations in Charlotte Multistate AA

WNB delineates the Charlotte Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Charlotte Multistate CSA represents 1.56 percent of total bank deposits and is WNB's 5<sup>th</sup> largest rating area. WNB operates 26 branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$129.9 million, which represented 0.04 percent market share and ranked the bank 34<sup>th</sup> of 59 institutions within the AA. The largest depository institutions were Bank of America, Truist Bank, and Wells Fargo Bank, which held a combined 89.15 percent market share in the AA.

### Community Contacts

We identified three community contacts in the Charlotte Multistate AA. Of the three organizations identified, two were economic development organizations and one supported affordable housing. The primary needs identified included donations for affordable housing, home-ownership counseling, and affordable home mortgage loans.

The following tables provide information on the demographic composition of the Charlotte Multistate CSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Charlotte-Concord NC-SC CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	580	7.8	26.9	34.7	29.8	0.9
Population by Geography	2,522,691	6.4	25.2	36.1	32.1	0.3
Housing Units by Geography	1,044,029	6.6	25.8	36.5	31.1	0.1

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

Owner-Occupied Units by Geography	621,850	2.9	21.1	39.5	36.6	0.0
Occupied Rental Units by Geography	320,300	12.8	33.1	30.9	23.1	0.1
Vacant Units by Geography	101,879	9.7	31.7	35.9	22.6	0.1
Businesses by Geography	268,592	6.3	19.7	30.3	43.1	0.6
Farms by Geography	6,698	3.6	19.5	45.8	30.9	0.2
Family Distribution by Income Level	636,607	22.6	17.2	18.9	41.4	0.0
Household Distribution by Income Level	942,150	23.9	16.2	17.5	42.4	0.0
Median Family Income Non-MSAs - NC	\$47,217	Median Gross Rent				\$867
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA	\$64,187	Median Housing Value				\$178,086
		Families Below Poverty Level				11.6%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Charlotte-Concord NC-SC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	718	5.3	27.9	33.4	31.2	2.2
Population by Geography	2,822,352	4.3	26.9	34.7	33.2	1.0
Housing Units by Geography	1,134,119	4.7	28.4	34.4	31.4	1.0
Owner-Occupied Units by Geography	686,591	2.4	24.2	36.5	36.4	0.5
Occupied Rental Units by Geography	348,823	8.6	35.8	30.2	23.5	1.8
Vacant Units by Geography	98,705	6.9	32.0	34.3	25.1	1.8
Businesses by Geography	371,425	4.6	24.1	29.1	40.3	1.9
Farms by Geography	8,479	2.7	26.4	40.1	30.2	0.6
Family Distribution by Income Level	690,463	21.4	17.8	19.7	41.2	0.0
Household Distribution by Income Level	1,035,414	23.3	16.6	17.9	42.3	0.0
Median Family Income Non-MSAs - NC	\$57,962	Median Gross Rent				\$1,065
Median Family Income MSA - 16740 Charlotte-Concord-Gastonia, NC-SC MSA	\$80,486	Median Housing Value				\$230,124
		Families Below Poverty Level				8.4%

Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Charlotte Multistate CSA

The Charlotte Multistate CSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHARLOTTE MULTISTATE CSA

### LENDING TEST

The bank’s performance under the Lending Test in Charlotte Multistate CSA is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Charlotte Multistate CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charlotte Multistate CSA	1,306	377	0	16	1,699	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Charlotte Multistate CSA	2,709	11,596	0	3,957	18,261	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Charlotte Multistate CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.15 percent is greater than the bank's deposit market share of 0.04 percent.

Per 2021 peer data by number, WNB ranked 46<sup>th</sup> of 232 small business lenders in the AA. The five largest small business lenders held 51.02 percent of the market share. WNB's average small business loan totaled \$21,000 compared to the top five business lenders which ranged between \$13,000 and \$66,000.

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

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

#### *Small Loans to Businesses*

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

The distribution of small loans to businesses in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies.

***Consumer Loans***

Refer to Table U in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in LMI geographies.

***Lending Gap Analysis***

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

***Small Loans to Businesses***

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was significantly lower than the proportion of businesses but near aggregate lending to small businesses. Internal bank analysis shows without PPP loans, the bank’s performance exceeded demographics with 94 percent of the bank’s loans originated to small businesses. The performance in 2022 was stronger and exhibited excellent distribution of loans to small businesses.

***Consumer Loans***

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of LMI households in the AA.

**Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Charlotte Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$3.9 million in the Charlotte Multistate CSA, which represented 35 percent of allocated tier 1 capital for the area. The allocations were for sixteen

loans from nine different entities. Ten of these provided opportunities for affordable housing and five for economic development and one for revitalize and stabilize. Eight of the CD loans were to partners that supported various CDFIs, across the WNB footprint.

Of the affordable housing and economic development allocations eight were loans to various CDFI's that provide funds to affordable housing developers in the area or provide small business loans. Examples of the more innovative or responsive projects are described below.

The bank allocated \$1.1 million in 2021 and \$1 million to the AA. These allocations provided gap funding for the North Carolina COVID-19 Rapid Recovery Loan Program in 2021 and provided capital for funding the organization's Loan Participant Program (LPP) in 2022. These innovative and responsive loans are discussed in more detail in the state rating section for North Carolina.

The bank allocated \$660,000 to the AA. WNB originated seven participation loans in the Charlotte Multistate CSA that helped create 72 new multifamily units and 270 new senior units for households earning 30-60 percent of MFI. The purpose of the participations is to provide funding for affordable housing apartment complexes primarily funded by LIHTC equity. The organization combines member participation loans to create permanent gap financing. This organization has funded over \$450 million in loans for more than 400 properties in six states totaling 24,000 units for LMI working families and seniors. This loan is considered innovative.

### Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### INVESTMENT TEST

The bank's performance under the Investment Test in Charlotte Multistate CSA is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Charlotte Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Assessment Area	Qualified Investments							
	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Charlotte Multistate CSA	16	1,371	24	1,657	40	100	3,028	100
<b>Totals</b>	<b>16</b>	<b>1,371</b>	<b>26</b>	<b>1,697</b>	<b>40</b>	<b>100</b>	<b>3,028</b>	<b>100</b>

During the evaluation period, WNB made 23 investments totaling \$3 million including 16 prior period investments totaling \$1.4 million and seven current period investments totaling \$1.6 million. Additionally, WNB provided 17 grants totaling \$56,849. WNB's total investments represented 26.7 percent of allocated tier 1 capital to the AA.

WNB's qualified investments in the AA provide affordable housing, revitalization and/or stabilization, and economic development. Grants in the AA were made to qualified CD organizations that provide economic development, community services, and revitalization and/or stabilization.

## SERVICE TEST

The institution's performance under the Service Test in Charlotte Multistate CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Charlotte Multistate CSA is excellent.

## Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Charlotte Multistate CSA	100	26	100	0	38.5	34.6	23.1	4.3	26.9	34.7	33.2

While there were no branches in low-income geographies, the percentage of branches in moderate-income geographies exceeded the population levels in those geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings								
Assessment Area	Branch Openings/Closings							
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)					N/A
			Low	Mod	Mid	Upp		
Charlotte Multistate CSA	5	1	0	3	0	0	0	1

The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened five branches and closed one branch in the AA during the evaluation period, which resulted in three new branches in moderate-income geographies and one in a geography that has not been assigned an income category. The one branch closing was in a moderate-income CT

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches offer

convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

The institution is a leader in providing CD services.

In the Charlotte Multistate CSA, WNB provided 1,305 hours of financial education to 2,019 participants. The bank utilized the Building Wealth, New Beginnings, Junior Achievement, Money Smart – business, and Money Smart – personal modules for financial education in this AA. The majority of the bank’s training activities in this AA focused on Money Smart – personal and Money Smart – business programs. Bank employees provided a significant number of hours training the Money Smart programs with 309 hours for the personal curriculum and 931 hours for the business curriculum.

In addition to financial education, WNB employees worked with various organizations in support of CD needs, with a total of 34 employees serving on 24 boards or committees in 46 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs for organizations that provide various CD related services to LMI families and individuals and promote financial literacy and affordable housing. WNB provided leadership and financial expertise on boards or committees of regionally and nationally known organizations such as Habitat for Humanity, Feeding Kids Cleveland County, and Kershaw Area Resource Exchange. Examples of WNB’s leadership in providing CD services are summarized below.

- One bank employee provided financial expertise and guidance to the board of Feeding Kids Cleveland County, which combats food insecurity for LMI youth.
- One bank employee provided direct financial guidance to a participant of Kershaw Area Resource Exchange. The organization provides crisis assistance and financial literacy to LMI individuals and families.



## Chicago-Naperville IL-IN CSA (Chicago Multistate CSA)

**CRA rating for the Chicago Multistate CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

### Description of Institution's Operations in Chicago Multistate CSA

WNB delineates the Chicago Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Chicago Multistate CSA represents 0.82 percent of total bank deposits and is WNB's 12<sup>th</sup> largest rating area. WNB operates 19 branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$68.2 million, which represented 0.01 percent market share and ranked the bank 178<sup>th</sup> of 307 institutions within the AA. The largest depository institutions were JP Morgan Chase Bank, BMO Harris Bank, and Bank of America, which held a combined 45.13 percent market share in the AA.

### Community Contacts

We identified six community contacts in the Chicago Multistate CSA. Of the six organizations identified, there were four economic development organizations, one affordable housing organization, and two organizations that help support community services to LMI individuals. The primary needs identified included financial literacy and job training, financing programs for economic development, and affordable housing assistance.

The following tables provide information on the demographic composition of the Chicago Multistate CSA for both evaluation periods.

<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2,222	14.0	23.4	29.4	32.2	1.0
Population by Geography	9,500,223	9.7	23.0	32.1	35.0	0.2

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

Housing Units by Geography	3,795,567	10.1	21.9	32.1	35.5	0.3
Owner-Occupied Units by Geography	2,230,034	4.4	17.1	35.5	42.8	0.1
Occupied Rental Units by Geography	1,211,103	17.2	29.1	27.7	25.3	0.6
Vacant Units by Geography	354,430	22.0	27.5	25.8	24.2	0.4
Businesses by Geography	834,878	6.2	16.6	29.3	47.5	0.4
Farms by Geography	14,005	3.7	14.5	38.4	43.4	0.1
Family Distribution by Income Level	2,268,331	23.2	16.3	18.7	41.8	0.0
Household Distribution by Income Level	3,441,137	25.1	15.2	17.0	42.6	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL	\$75,024	Median Housing Value			\$235,214	
Median Family Income MSA - 20994 Elgin, IL	\$80,899	Median Gross Rent			\$1,032	
Median Family Income MSA - 23844 Gary, IN	\$64,075	Families Below Poverty Level			10.6%	
Median Family Income MSA - 28100 Kankakee, IL MSA	\$63,716					
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI	\$87,137					
Median Family Income MSA - 33140 Michigan City-La Porte, IN MSA	\$58,424					
Median Family Income Non-MSAs - IL	\$59,323					
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Table A – Demographic Information of the Assessment Area****Assessment Area: Chicago-Naperville IL-IN CSA**

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	2,336	11.4	22.8	32.3	32.0	1.5
Population by Geography	9,579,227	8.5	22.2	34.6	34.1	0.6
Housing Units by Geography	3,848,143	9.0	21.9	34.6	34.1	0.5
Owner-Occupied Units by Geography	2,296,102	4.3	17.9	37.7	39.8	0.3
Occupied Rental Units by Geography	1,239,187	15.1	28.1	30.6	25.4	0.8
Vacant Units by Geography	312,854	18.8	26.2	27.8	26.4	0.8
Businesses by Geography	1,064,732	5.9	17.1	32.1	44.4	0.5
Farms by Geography	16,358	3.8	17.0	38.5	40.3	0.4
Family Distribution by Income Level	2,280,259	22.7	16.6	19.4	41.3	0.0
Household Distribution by Income Level	3,535,289	25.0	15.3	17.0	42.7	0.0
Median Family Income MSA - 16984 Chicago-Naperville-Evanston, IL	\$92,622	Median Housing Value			\$270,608	
Median Family Income MSA - 20994 Elgin, IL	\$97,326	Median Gross Rent			\$1,210	
Median Family Income MSA - 23844 Gary, IN	\$75,625	Families Below Poverty Level			8.2%	
Median Family Income MSA - 28100 Kankakee, IL MSA	\$73,857					
Median Family Income MSA - 29404 Lake County-Kenosha County, IL-WI	\$105,876					
Median Family Income MSA - 33140 Michigan City-La Porte, IN MSA	\$70,726					

Median Family Income Non-MSAs - IL	\$68,958		
Source: 2020 U.S. Census and 2022 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.			

## Scope of Evaluation in Chicago Multistate CSA

The Chicago Multistate CSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CHICAGO MULTISTATE CSA

### LENDING TEST

The bank's performance under the Lending Test in the Chicago Multistate CSA is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Chicago Multistate CSA is excellent.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Chicago Multistate CSA	909	241	2	10	1,162	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Chicago Multistate CSA	1,921	2,711	21	6,643	11,296	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Chicago Multistate CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.03 percent is greater than the bank's deposit market share of 0.01 percent.

Per 2021 peer data by number, WNB ranked 89<sup>th</sup> of 344 small business lenders in the AA. The five largest small business lenders held 55.49 percent of the market share. WNB's average small business loan totaled \$9,000 compared to the top five business lenders which ranged between \$13,000 and \$26,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies. The 2022 performance significantly exceeded the proportion of businesses in low-income geographies and was near demographics in moderate-income geographies.

### ***Consumer Loans***

Refer to Table U in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in LMI geographies. During the 2022 evaluation period, the proportion of bank loans in low-income CTs was near to the proportion of households in those geographies. The proportion of banks loans in moderate-income CTs significantly exceeded the proportion of households in those geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses but exceeded aggregate lending to small businesses. Internal bank analysis shows without PPP loans, the performance was excellent with 97 percent of the bank’s loans originated to small businesses. Bank performance in 2022 exceeded demographics.

## ***Consumer Loans***

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

## **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Chicago Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$8.4 million, which represented 141 percent of allocated tier 1 capital for the area. The allocations were for eleven loans from ten different entities. Three of these provided opportunities for affordable housing, four for revitalize and stabilize, one for community services, and two for economic development. There was also one PPP loan that qualified for CD credit in the amount of \$1.8 million for economic development. Of the affordable housing and economic development allocations, eight were loans to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Examples of the more innovative or responsive projects are described below.

The bank allocated \$4 million to the AA in 2021 and \$1.5 million in 2022. The total loan amounts were for a \$5 million line of credit in 2021 and a \$1.5 million term loan in 2022. The line of credit was for capital of the organization’s “Construction Loan Program”. This entity is a CDFI. The program is for affordable housing investors to rehabilitate naturally occurring affordable housing (NOAH) in their home LMI neighborhoods. These investors are local entrepreneurs who best know their LMI neighborhoods and networks of local contractors. The loan amounts range from \$150,000 to \$250,000. The \$1.5 million term loan to this entity further supported revitalization and stabilization in Chicago’s LMI neighborhoods. These loans are considered innovative and responsive.

The bank allocated \$550,000 to the AA. The total loan amounts were for \$250,000 line of credit in 2019 and a renewal with \$50,000 increase in 2022. The line of credit was to provide lending capital primarily to real estate secured projects in LMI communities in the AA. This entity is a CDFI. This entity partners with small, midsize, and emerging developers on their first community development and affordable housing projects. Approximately 95 percent of this entity’s loans serve LMI areas in the AA. This entity has originated 32 loans for \$23.5 million, helped create and retain 300 jobs, created or retained 300 units of affordable housing, and added 300,000 square feet of commercial retail and community facility space. This loan is considered responsive.

The bank allocated \$155,000 to the AA. The total loan amount was for a \$3 million term loan. This loan was to a CDFI which originates flexible, long term real estate loans to meet the needs of low-income and special needs populations. This entity has financed non-profit sectors for projects including health

care, charter schools, childcare, disability services, and arts organizations. It also provides support for housing developers. This CD loan is considered responsive.

**Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

**INVESTMENT TEST**

The bank’s performance under the Investment Test in Chicago Multistate CSA is rated Outstanding.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Chicago Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$
Chicago Multistate CSA	9	673	27	1,774	36	100	2,447	100
Totals	9	673	27	1,774	36	100	2,447	100

During the evaluation period, WNB made 13 investments totaling \$2.387 million including nine prior period investments totaling \$672,933 and four current period investments totaling \$1.715 million. Additionally, 23 grants totaling \$58,804 were made for a total investment in the AA of \$2.4 million. WNB’s total investments represented 41.05 percent of allocated tier 1 capital to the AA.

WNB’s qualified investments in the AA provide affordable housing, revitalization and/or stabilization, and economic development. Grants in the AA were made to qualified CD organizations that provide economic development, community services, and affordable housing.

**SERVICE TEST**

The institution’s performance under the Service Test in Chicago Multistate CSA is rated Outstanding.

Based on a full-scope review, the institution’s performance in the Chicago Multistate CSA is excellent.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Chicago Multistate CSA	100	19	100	0	15.8	52.6	31.6	8.5	22.2	34.6	34.1

There were no branches in low-income geographies but the percentage of branches in moderate-income geographies was near to the population levels in those geographies. The bank, however, has six branches located directly next to moderate-income geographies. Thus nine of nineteen, or 47.3 percent, of all AA branches are either in or are near to LMI geographies. Retail service delivery systems were also enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Chicago Multistate CSA	0	2	0	0	-1	-1

The institution’s opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. WNB closed two branches in the AA during the evaluation period, including one branch in a middle-income geography and one branch in an upper-income geography.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

### Community Development Services

The institution is a leader in providing CD services.

WNB provided 1094 hours of financial education to 1,554 participants. The bank utilized the five core modules for financial education, which included: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The majority of the bank’s training activities focused on the Money Smart programs with 219 hours for the personal course and 827 hours for the business courses.

In addition to financial education, WNB employees worked with various organizations in support of CD needs, with a total of 30 employees serving on 22 boards or committees in 35 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs for organizations

that provide various CD related services to LMI families and individuals and promote financial literacy and affordable housing. WNB provided leadership and financial expertise on boards or committees of regionally and nationally known organizations such as Habitat for Humanity, Salvation Army, and Northern Illinois Food Bank, Food Bank of Northwest Indiana, and the Foundry. Examples of WNB's leadership in providing CD services are summarized below.

- Habitat for Humanity is a nationally recognized organization that provides affordable housing for LMI families. Two bank employees assisted the organization in two counties within the AA by providing fundraising and marketing guidance, as well as teaching financial literacy classes and assisting with home repairs.
- Nine bank employees provided financial assistance and literacy training to three affiliates of the Salvation Army in the AA. The Salvation Army is a national organization focused on poverty.
- Four employees provided financial assistance to two food banks in the AA.
- WNB hosted a virtual Foundry cohort for aspiring entrepreneurs and existing microbusinesses in the AA between April and October 2019.



## Cincinnati-Wilmington-Maysville OH-KY-IN CSA (Cincinnati Multistate CSA)

**CRA rating for the Cincinnati Multistate CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

### Description of Institution's Operations in Cincinnati Multistate CSA

WNB delineates the Cincinnati Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Cincinnati Multistate CSA represents 0.32 percent of total bank deposits and is WNB's 19<sup>th</sup> largest rating area. WNB operates 11 branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$26.8 million, which represented 0.02 percent market share and ranked the bank 65<sup>th</sup> of 89 institutions within the AA. The largest depository institutions were US Bank, Fifth Third Bank, and First Financial Bank, which held a combined 81 percent market share in the AA.

### Community Contacts

We identified four community contacts in the Cincinnati Multistate CSA. Of the four organizations identified, there was one CD listening session, one housing authority, and two economic development organizations. The primary needs identified included financial literacy and job training, small business lending for economic development specifically SBA, and affordable housing assistance.

The following tables provide information on the demographic composition of the Cincinnati Multistate CSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Cincinnati-Wilmington-Maysville OH-KY-IN CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	428	12.9	22.4	37.1	25.7	1.9
Population by Geography	1,824,226	8.1	19.5	39.1	32.0	1.4
Housing Units by Geography	788,129	10.1	20.8	39.3	29.2	0.6

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

Owner-Occupied Units by Geography	464,286	3.6	15.9	42.8	37.5	0.1
Occupied Rental Units by Geography	242,099	18.2	28.7	34.4	17.5	1.2
Vacant Units by Geography	81,744	22.6	25.4	34.0	16.6	1.4
Businesses by Geography	128,503	6.7	18.8	35.2	38.2	1.1
Farms by Geography	3,960	2.8	15.2	49.6	32.1	0.2
Family Distribution by Income Level	458,588	22.2	16.6	19.8	41.4	0.0
Household Distribution by Income Level	706,385	25.5	15.5	16.9	42.1	0.0
Median Family Income Non-MSAs - OH	\$55,785	Median Gross Rent				\$759
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA	\$69,949	Median Housing Value				\$157,109
		Families Below Poverty Level				10.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cincinnati-Wilmington-Maysville OH-KY-IN CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	462	10.4	23.2	36.6	26.6	3.2
Population by Geography	1,901,383	7.2	22.0	38.5	30.7	1.6
Housing Units by Geography	804,417	8.1	23.7	38.4	28.1	1.7
Owner-Occupied Units by Geography	488,851	3.6	18.3	42.6	34.9	0.6
Occupied Rental Units by Geography	250,975	14.7	32.8	31.7	17.6	3.1
Vacant Units by Geography	64,591	16.8	28.5	32.2	17.9	4.7
Businesses by Geography	221,599	5.8	19.9	33.9	39.2	1.2
Farms by Geography	5,594	2.8	17.1	45.7	33.8	0.7
Family Distribution by Income Level	473,662	21.5	17.4	20.9	40.3	0.0
Household Distribution by Income Level	739,826	25.2	15.5	17.4	41.9	0.0
Median Family Income Non-MSAs - OH	\$66,684	Median Gross Rent				\$877
Median Family Income MSA - 17140 Cincinnati, OH-KY-IN MSA	\$84,990	Median Housing Value				\$185,116
		Families Below Poverty Level				8.2%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Cincinnati Multistate CSA

The Cincinnati Multistate CSA AA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN CINCINNATI MULTISTATE CSA

### LENDING TEST

The bank's performance under the Lending Test in the Cincinnati Multistate CSA is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Cincinnati Multistate CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cincinnati Multistate CSA	378	64	1	7	450	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cincinnati Multistate CSA	724	480	1	12,433	13,638	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Cincinnati Multistate CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.05 percent is greater than the bank's deposit market share of 0.02 percent.

Per 2021 peer data by number, WNB ranked 61st of 178 small business lenders in the AA. The five largest small business lenders held 56.2 percent of the market share. WNB's average small business loan totaled \$8,000 compared to the top five business lenders which ranged between \$13,000 and \$105,000.

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

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

#### *Small Loans to Businesses*

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies. There were not enough small loans to businesses in 2022 to perform a meaningful analysis.

***Consumer Loans***

Refer to Table U in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans exceeded the proportion of households in low-income geographies and significantly exceeded households in moderate-income geographies.

***Lending Gap Analysis***

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

***Small Loans to Businesses***

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was significantly lower than the proportion of businesses and lower than the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, bank performance exceeded demographics with 96 percent of the bank’s loans originated to small businesses. There were not enough small loans to businesses in 2022 to perform a meaningful analysis.

***Consumer Loans***

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of households.

**Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Cincinnati Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$12.4 million, which represented 532 percent

of allocated tier 1 capital for the area. The allocations were for seven loans from six different entities. Two of these provided opportunities for affordable housing, one for revitalize and stabilize, one for community services and three for economic development. Of the affordable housing, revitalize and stabilize, and economic development allocations five were loans to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. One of these also provided community services through revitalization. Examples of the more innovative or responsive projects are described below.

The bank allocated \$10 million to the AA. This was part of a \$42 million participation term loan with the lead bank being a national leader in affordable housing finance. This entity is a CDFI. The loan proceeds were used to provide an acquisition bridge and rehab loan for a 379 multifamily affordable housing development. This facility houses tenants earning 60 percent or less of MFI in Cincinnati. This loan was innovative and responsive.

The bank allocated \$2 million to the AA. The bank offered this entity one loan during the evaluation period totaling \$12 million. This loan enables this leading affordable housing syndicator to originate working capital loans for LIHTC-funded developments. This frees up funds for developers to pursue additional new affordable housing developments (pre-construction costs). This entity serves Ohio, Kentucky, West Virginia, and western Pennsylvania. This company has contributed to the creation or preservation of 50,000 units of affordable housing. This loan is considered innovative and responsive.

The bank allocated \$200,000 to the AA. The total loan was for a \$2 million term loan renewal. This loan was to a CDFI to provide business lending capital. This entity has invested more than \$411 million into projects throughout Ohio and Indiana's LMI communities over the past 14 years. This entity has contributed to the creation of nearly 20,000 permanent jobs and 17,000 affordable housing units. It has also helped finance 4 million square feet of manufacturing space, 298,000 square feet of healthy food retail space, and 10 million square feet of community facility space serving over 74,000 students and 227,000 patients. This CD loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in Cincinnati Multistate CSA is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Cincinnati Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Cincinnati Multistate CSA	8	454	15	485	23	100	939	100
<b>Totals</b>	<b>8</b>	<b>454</b>	<b>17</b>	<b>485</b>	<b>23</b>	<b>100</b>	<b>939</b>	<b>100</b>

During the evaluation period, WNB made 12 investments totaling \$928,932 including eight prior period investments totaling \$453,932 and four current period investments totaling \$475,000. Additionally, 11 grants totaling \$9,790 were made for a total investment in the AA of \$938,722. WNB's total investments represented 40.15 percent of allocated tier 1 capital to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### SERVICE TEST

The institution's performance under the Service Test in Cincinnati Multistate CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Cincinnati Multistate CSA is excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cincinnati Multistate CSA	100	11	100	0	18.2	54.5	27.3	7.2	22.0	38.5	30.7

While there were no branches in low-income geographies, the percentage of branches in moderate-income geographies was near to population levels in those geographies. WNB does have six branches located directly next to moderate-income geographies. Of all branches, eight or 73 percent are either in or are near to LMI geographies. Retail service delivery systems were also enhanced using ADS for effectively delivering services in LMI geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies.

Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

In the Cincinnati Multistate CSA, WNB provided 560 hours of financial education to 1,428 participants. The bank utilized the five core modules for financial education in this AA, which included: 1) Building Wealth; 2) New Beginnings; 3) Junior Achievement; 4) Money Smart – business; and 5) Money Smart – personal. The majority of training activities in this AA focused on the Money Smart curriculums with 138 hours of Money Smart – personal and 407 hours of the Money Smart – business.

In addition to financial education, WNB employees worked with various organizations in support of CD needs, with a total of 18 employees serving on 16 boards or committees in 20 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs. WNB's board involvement supported affordable housing and community services to LMI individuals. WNB provided leadership and financial expertise on boards or committees of regionally known organizations such as Shared Harvest Food Bank, Franklin Area Community Services, and Second Chance Center of Hope. Examples of WNB's leadership in providing CD services are summarized below.

- A bank employee served on a board for the region's leading food insecurity nonprofit, Shared Harvest Food Bank. During the 2020 pandemic, with the help of the OH National Guard, the foodbank distributed 11 million pounds of food throughout the AA. The board also devised a strategy to utilize local food trucks to deliver large quantities of food to distant LMI populations in the region who faced transportation barriers.
- A bank employee provided financial guidance for the board of Franklin Area Community Services, which provides emergency food, shelter, and utility assistance to provide the time clients need to arrange long-term solutions through agencies, friends, and family.
- A bank employee provided financial guidance to the board of Second Chance Center of Hope, which helps the homeless, victims of domestic abuse, and low-to-moderate risk probation clients transition into positive, productive, and self-sufficient livelihoods.

**Louisville-Jefferson County-Elizabethtown-Bardstown KY-IN CSA (Louisville Multistate CSA)**

**CRA rating for the Louisville Multistate CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- A good geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

**Description of Institution’s Operations in Louisville Multistate CSA**

WNB delineates the Louisville Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Louisville Multistate CSA represents 0.23 percent of total bank deposits and is WNB’s 21<sup>st</sup> largest rating area. WNB operates six branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$19 million, which represented 0.04 percent market share and ranked the bank 50<sup>th</sup> of 57 institutions within the AA. The largest depository institutions were PNC Bank, JP Morgan Chase Bank, and Stock Yards Bank and Trust, which held a combined 47.23 percent market share in the AA.

**Community Contacts**

We identified three community contacts in the Louisville Multistate CSA. Of the three organizations identified, two supported economic development and one supported community services to LMI individuals. The primary needs identified included financial literacy and job training specifically daycare services that allow for career advancement and increased broadband access.

The following tables provide information on the demographic composition of the Louisville Multistate CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Louisville KY-IN CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	260	11.9	20.8	37.3	28.5	1.5
Population by Geography	1,072,170	8.8	18.0	42.1	30.6	0.4

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



Housing Units by Geography	466,238	9.4	19.4	41.6	29.1	0.5
Owner-Occupied Units by Geography	274,982	4.2	15.1	44.5	36.2	0.1
Occupied Rental Units by Geography	146,206	16.4	26.1	37.5	19.0	0.9
Vacant Units by Geography	45,050	18.7	24.1	37.5	18.4	1.3
Businesses by Geography	111,680	7.1	15.3	34.0	40.2	3.5
Farms by Geography	3,243	3.4	11.1	48.1	36.7	0.8
Family Distribution by Income Level	269,017	21.6	17.3	20.0	41.1	0.0
Household Distribution by Income Level	421,188	24.8	15.9	17.6	41.6	0.0
Median Family Income MSA - 21060 Elizabethtown-Fort Knox, KY MSA	\$59,273	Median Housing Value				\$160,916
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA	\$64,965	Median Gross Rent				\$752
		Families Below Poverty Level				11.0%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Louisville KY-IN CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	300	9.3	24.3	39.0	24.3	3.0
Population by Geography	1,113,694	6.2	23.0	42.6	27.2	1.0
Housing Units by Geography	478,575	7.0	23.6	42.3	25.7	1.3
Owner-Occupied Units by Geography	283,879	3.1	19.1	45.3	32.1	0.4
Occupied Rental Units by Geography	152,257	12.1	30.5	38.3	16.4	2.8
Vacant Units by Geography	42,439	15.2	29.6	36.6	16.6	1.9
Businesses by Geography	125,826	6.0	17.5	39.6	35.3	1.6
Farms by Geography	3,544	2.3	16.6	45.6	34.8	0.6
Family Distribution by Income Level	273,034	21.1	18.1	20.2	40.6	0.0
Household Distribution by Income Level	436,136	23.5	16.7	18.4	41.4	0.0
Median Family Income MSA - 21060 Elizabethtown-Fort Knox, KY MSA	\$71,446	Median Housing Value				\$189,877
Median Family Income MSA - 31140 Louisville/Jefferson County, KY-IN MSA	\$77,584	Median Gross Rent				\$880
		Families Below Poverty Level				8.9%

Source: 2020 U.S. Census and 2022 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.

### Scope of Evaluation in Louisville Multistate CSA

The Louisville Multistate CSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISVILLE MULTISTATE CSA

## LENDING TEST

The bank's performance under the Lending Test in the Louisville Multistate CSA is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Louisville Multistate CSA is excellent.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Louisville Multistate CSA	323	72	0	4	399	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Louisville Multistate CSA	635	334	0	720	1,689	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Louisville Multistate CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.10 percent is greater than the bank's deposit market share of 0.04 percent.

Per 2021 peer data by number, WNB ranked 49<sup>th</sup> of 153 small business lenders in the AA. The five largest small business lenders held 53.35 percent of the market share. WNB's average small business loan totaled \$7,000 compared to the top five business lenders which ranged between \$13,000 and \$159,000.

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

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

#### *Small Loans to Businesses*

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and

aggregate lending in low-income geographies. The proportion of bank loans was lower than the proportion of businesses and aggregate lending in moderate-income geographies, but still at an adequate level. There were not enough small loans to businesses in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table U in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans exceeded the proportion of households in LMI geographies. The performance in 2022 was weaker in low-income geographies but consistent with performance in moderate-income geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses but significantly exceeded the aggregate distribution of loans to small businesses. There were not enough small loans to businesses in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Louisville Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$720 thousand, which represented 43 percent of allocated tier 1 capital for the area. The allocations were for four loans from four different entities. Two of these provided opportunities for affordable housing and two for economic development. Of the affordable housing and economic development allocations, all were loans to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Examples of the more innovative or responsive projects are described below.

The bank allocated \$500,000 to the AA. The bank offered this entity one loan during the evaluation period. The loan was for \$12 million. This loan enables this leading affordable housing syndicator in the US to originate working capital loans for LIHTC-funded developments. This frees up funds for developers to pursue additional new affordable housing developments (pre-construction costs). This entity serves Kentucky, West Virginia, and western Pennsylvania. This company has contributed to the creation or preservation of 50,000 units of affordable housing. This loan is considered innovative and responsive.

The bank allocated \$50,000 to the AA. The total loan was for a \$50,000 term loan. This loan was to a CDFI to provide business lending capital for LMI and minority entrepreneurs. At the time of the loan's origination in 2019, this entity had only been a CDFI for one year. In that time, it had originated 46 small business loans for \$461,000 (average loan size: \$10,022), 13 working capital lines of credit for \$151,000 and 2 small developer loans for \$60,000. This CD loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Louisville Multistate CSA is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Louisville Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Louisville Multistate CSA	6	327	14	349	20	100	676	100
<b>Totals</b>	<b>6</b>	<b>327</b>	<b>14</b>	<b>349</b>	<b>20</b>	<b>100</b>	<b>676</b>	<b>100</b>

During the evaluation period, WNB made nine investments totaling \$652,295 including six prior period investments totaling \$327,295 and three current period investments totaling \$325,000. Additionally, 11 grants totaling \$24,092 were made for a total investment in the AA of \$676,387. WNB's total investments represented 40.54 percent of allocated tier 1 capital to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization, economic development, and community services. Grants in the AA were made to qualified CD organizations that provide economic development, community services, and affordable housing.

## SERVICE TEST

The institution's performance under the Service Test in Louisville Multistate CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Louisville Multistate CSA is excellent.

## Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Louisville Multistate CSA	100	6	100	0	0	50	33.3	6.2	23.0	42.6	27.2

WNB does not have any branches in LMI geographies; however, 50 percent of the bank's branches in the AA are located directly next to moderate-income geographies. Retail service delivery systems were also enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings							
Assessment Area	Branch Openings/Closings						
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				
			Low	Mod	Mid	Upp	
Louisville Multistate CSA	0	1	0	0	-1	0	

The institution's opening and closing of branches has not affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed branch in a middle-income geography during the third quarter of 2022.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

The institution is a leader in providing CD services.

In the Louisville Multistate CSA, WNB provided 273 hours of financial education to 365 participants. The bank utilized the Money Smart – business curriculum, with 273 hours provided. In addition to financial education, WNB employees worked with various organizations in support of CD needs, with a total of 12 employees serving on 12 boards or committees in 14 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs. The organizations in which WNB is involved provide various CD related services to LMI families and individuals and promote financial literacy, food insecurity, and affordable housing. WNB provided leadership and financial expertise on boards or committees of nationally and regionally known organizations such as Habitat for Humanity, Coalition for the Homeless, Feeding America Kentucky's Heartland, and the Foundry. Examples of WNB's leadership in providing CD services are summarized below.

- Habitat for Humanity is a nationally recognized organization that provides affordable housing for LMI families. One bank employee served as a member of the finance committee.
- A bank employee provided financial guidance for the board of Coalition for the Homeless, which combats homelessness with shelter, housing, healthcare, food, outreach, and education.
- Two bank employees provided financial assistance to the board, along with general volunteering with Feeding America Kentucky's Heartland, which is a regional foodbank.
- WNB hosted and facilitated a Foundry cohort of aspiring early-stage entrepreneurs between April and August of 2019. Following the Foundry initiative, 10 of 16 graduates started in small business incubation programs, while 14 of 16 attended additional entrepreneur workshops, conferences, and networking events.

## Myrtle Beach-Conway SC-NC CSA (Myrtle Beach Multistate CSA)

**CRA rating for the Myrtle Beach Multistate CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans and qualified CD investments and grants;
- A relatively high level of CD services; and
- Readily accessible service delivery systems.

### Description of Institution's Operations in Myrtle Beach Multistate CSA

WNB delineates the entire Myrtle Beach Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Myrtle Beach Multistate CSA represents 0.23 percent of total bank deposits and is WNB's 22<sup>nd</sup> largest rating area. WNB operates four branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$19 million, which represented 0.14 percent market share and ranked the bank 24 institutions within the AA. The largest depository institutions were Truist Bank, The Conway National Bank, and Bank of America, which held a combined 35.23 percent market share in the CSA.

### Community Contacts

We identified two community contacts in the Myrtle Beach Multistate CSA that supported economic development. The primary needs identified included affordable housing and small business loans.

The following tables provide information on the demographic composition of the Myrtle Beach Multistate CSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Myrtle Beach-Conway SC-NC CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	105	1.9	19.0	56.2	19.0	3.8
Population by Geography	406,656	1.5	19.0	63.6	15.7	0.2
Housing Units by Geography	271,514	1.5	14.4	60.7	23.2	0.1
Owner-Occupied Units by Geography	119,389	0.4	16.1	64.9	18.4	0.2

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

Occupied Rental Units by Geography	48,542	3.6	20.6	61.7	13.9	0.2
Vacant Units by Geography	103,583	1.7	9.5	55.5	33.2	0.1
Businesses by Geography	36,447	3.7	15.8	57.6	22.4	0.5
Farms by Geography	1,168	0.9	24.1	60.4	14.0	0.5
Family Distribution by Income Level	110,740	20.1	18.4	21.2	40.3	0.0
Household Distribution by Income Level	167,931	23.1	16.4	19.1	41.4	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	\$53,695	Median Housing Value				\$194,604
		Families Below Poverty Level				12.8%
		Median Gross Rent				\$849

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Myrtle Beach-Conway SC-NC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	122	3.3	14.8	55.7	24.6	1.6
Population by Geography	487,722	3.2	16.1	60.5	20.3	0.0
Housing Units by Geography	302,532	2.6	12.5	55.7	29.2	0.0
Owner-Occupied Units by Geography	148,662	1.7	12.8	61.5	23.9	0.0
Occupied Rental Units by Geography	46,973	6.3	23.4	55.6	14.7	0.0
Vacant Units by Geography	106,897	2.2	7.2	47.6	43.1	0.0
Businesses by Geography	60,656	5.7	16.0	53.4	24.8	0.0
Farms by Geography	1,703	3.1	15.0	64.8	17.2	0.0
Family Distribution by Income Level	128,181	19.4	18.4	21.9	40.2	0.0
Household Distribution by Income Level	195,635	22.6	16.8	19.6	41.1	0.0
Median Family Income MSA - 34820 Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	\$65,152	Median Housing Value				\$223,589
		Families Below Poverty Level				9.0%
		Median Gross Rent				\$984

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Myrtle Beach Multistate CSA

The Myrtle Beach Multistate CSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MYRTLE BEACH MULTISTATE CSA

### LENDING TEST

The bank's performance under the Lending Test in Myrtle Beach Multistate CSA is rated Outstanding.



## Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Myrtle Beach Multistate CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Myrtle Beach Multistate CSA	132	40	0	7	179	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Myrtle Beach Multistate CSA	272	708	0	1,328	2,308	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Myrtle Beach Multistate CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.08 percent is less than the bank's deposit market share of 0.14 percent.

Per 2021 peer data by number, WNB ranked 51<sup>st</sup> of 122 small business lenders in the AA. The five largest small business lenders held 50.24 percent of the market share. WNB's average small business loan totaled \$25,000 compared to the top five business lenders which ranged between \$11,000 and \$106,000.

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

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

#### *Small Loans to Businesses*

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

The distribution of small loans to businesses in LMI geographies is good. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses and aggregate lending in LMI geographies. The proportion of bank loans exceeded the proportion of businesses and aggregate lending in LMI geographies. In 2022, there were not enough loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table U in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is good. During the 2019-2021 evaluation period, the bank did not make any loans in low-income geographies; however, only 1.3 percent of households were located in low-income geographies. The proportion of bank loans significantly exceeded the proportion of households in moderate-income geographies. In 2022, the proportion of bank loans significantly exceeded the proportion of households in low-income geographies but was lower in moderate-income geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, the bank’s performance exceeded demographics with 95 percent of the bank’s loans originated to small businesses. In 2022, there were not enough loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Myrtle Beach Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$1.3 million, which represented 80 percent of allocated tier 1 capital for the area. These seven allocations were from six different entities. Of the total allocations, four provided opportunities for affordable housing, two supported economic development, and one supported revitalization and/or stabilization. Of the affordable housing and economic development allocations, six were loans to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Examples of the more innovative or responsive projects are described below.

The bank allocated \$50,000 to the AA from a project that provides funding for affordable housing apartment complexes primarily funded by LIHTC equity. WNB originated one of these participation loans in the Myrtle Beach Multistate CSA that helped create 58 new multifamily units with 56 of these units having Section 8 rental assistance through the Myrtle Beach Housing Authority. This innovative loan is also discussed in more detail in the state rating section for North Carolina.

The bank allocated \$500,000 to the AA from a large loan to an economic development center. The loan provided gap emergency relief funding for the North Carolina COVID-19 Rapid Recovery Loan Program in 2021 and capital funding for the organization's Loan Participant Program (LPP) in 2022. This innovative loan is discussed in more detail in the state rating section for North Carolina.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## **INVESTMENT TEST**

The bank's performance under the Investment Test in Myrtle Beach Multistate CSA is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Myrtle Beach Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Myrtle Beach Multistate CSA	6	197	15	854	21	100	1,051	100
<b>Totals</b>	<b>6</b>	<b>197</b>	<b>15</b>	<b>854</b>	<b>21</b>	<b>100</b>	<b>1,051</b>	<b>100</b>

During the evaluation period, WNB made 12 investments totaling \$1.05 million including six prior period investments totaling \$196,933 and six current period investments totaling \$850,000. Additionally, WNB provided nine grants totaling \$4,132. WNB’s total investments represented 63.2 percent of allocated tier 1 capital to the AA.

WNB’s qualified investments in the AA provide revitalization and/or stabilization, economic development, and affordable housing. Grants in the AA were made to qualified CD organizations that provide economic development.

**SERVICE TEST**

The institution’s performance under the Service Test in Myrtle Beach Multistate CSA is rated High Satisfactory.

Based on a full-scope review, the institution’s performance in the Myrtle Beach Multistate CSA is good.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Myrtle Beach Multistate CSA	100	4	100	25	0	75	0	3.2	16.1	60.5	20.3

The percentage of branches in low-income geographies significantly exceeds the population levels in those geographies, while the percentage of branches in moderate-income geographies was below the population levels in those geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Myrtle Beach Multistate CSA	1	0	1	0	0	0

The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed zero branches and opened one branch in a low-income geography of the AA during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution provides a significant level of CD services.

In the Myrtle Beach Multistate CSA, WNB provided 111 hours of financial education to 92 participants in this AA. The bank's training activities focused primarily on the Money Smart – business curriculum. In addition to financial education, WNB employees worked with various organizations in support of CD needs, with a total of five employees serving on three boards or committees in five positions. The organizations in which WNB is involved provide various CD related services to LMI individuals and promote financial literacy, food insecurity, and affordable housing. WNB provided leadership and financial expertise on boards or committees of nationally and regionally known organizations such as Habitat for Humanity, Smart Start of Brunswick County, and Hope Harbor Home. Examples of WNB's leadership in providing CD services are summarized below.

- Habitat for Humanity is a nationally recognized organization that provides affordable housing for LMI families. One bank employee served as a member of the finance committee.
- Three bank employees provided financial guidance for the board of Smart Start of Brunswick County, which focuses of early childhood education for LMI youth.
- One bank employee provided financial guidance to the board of Hope Harbor Home, which provides shelter for victims of domestic violence.

## Virginia Beach-Norfolk VA-NC CSA (Virginia Beach Multistate CSA)

**CRA rating for the Virginia Beach Multistate CSA<sup>1</sup>: Outstanding**

**The Lending Test is rated: Outstanding**

**The Investment Test is rated: Outstanding**

**The Service Test is rated: Outstanding**

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

### Description of Institution's Operations in Virginia Beach Multistate CSA

WNB delineates the entire Virginia Beach Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Virginia Beach Multistate CSA represents 0.57 percent of total bank deposits and is WNB's the 15<sup>th</sup> largest rating area. WNB operates 16 branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$47.8 million, which represented 0.10 percent market share and ranked the bank 29<sup>th</sup> of 45 institutions within the AA. The largest depository institutions were Towne Bank, Truist Bank, and Wells Fargo Bank, which held a combined 53.13 percent market share in the CSA.

### Community Contacts

We identified one community contact in the Virginia Beach Multistate CSA that helped support small business development. The primary needs identified included small business micro-lending. WNB is exceptionally responsive to this need with the Business ReLi LOC product.

The following tables provide information on the demographic composition of the Virginia Beach Multistate CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Virginia Beach-Norfolk VA-NC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	423	7.3	26.2	35.5	28.1	2.8
Population by Geography	1,720,841	5.7	25.7	35.9	32.3	0.3
Housing Units by Geography	702,376	5.7	25.7	36.5	31.8	0.4
Owner-Occupied Units by Geography	389,822	2.4	17.3	39.0	41.1	0.2

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

Occupied Rental Units by Geography	246,018	10.4	38.2	33.1	17.9	0.5
Vacant Units by Geography	66,536	8.1	28.5	34.4	28.0	1.0
Businesses by Geography	178,131	4.4	22.9	35.9	35.8	1.1
Farms by Geography	4,254	2.2	15.8	37.4	44.2	0.4
Family Distribution by Income Level	428,223	21.2	17.4	20.2	41.1	0.0
Household Distribution by Income Level	635,840	22.7	16.6	18.9	41.7	0.0
Median Family Income MSA - 47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	\$69,773	Median Housing Value				\$234,943
		Median Gross Rent				\$1,092
Median Family Income Non-MSAs - NC	\$47,217	Families Below Poverty Level				9.6%

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

Table A – Demographic Information of the Assessment Area						
Assessment Area: Virginia Beach-Norfolk VA-NC CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	480	7.5	25.2	33.5	30.0	3.8
Population by Geography	1,775,488	6.2	24.2	35.4	33.0	1.1
Housing Units by Geography	723,693	6.2	24.5	35.8	32.3	1.2
Owner-Occupied Units by Geography	408,480	2.5	17.5	38.5	41.0	0.6
Occupied Rental Units by Geography	252,666	11.8	34.7	32.7	18.8	2.0
Vacant Units by Geography	62,547	8.0	28.7	31.0	30.3	2.0
Businesses by Geography	220,067	4.6	23.9	35.9	34.0	1.6
Farms by Geography	4,927	2.7	18.4	39.7	38.3	1.0
Family Distribution by Income Level	437,470	20.1	18.0	21.4	40.5	0.0
Household Distribution by Income Level	661,146	22.6	16.5	18.8	42.0	0.0
Median Family Income MSA - 47260 Virginia Beach-Norfolk-Newport News, VA-NC MSA	\$83,421	Median Housing Value				\$253,275
		Median Gross Rent				\$1,198
Median Family Income Non-MSAs - NC	\$57,962	Families Below Poverty Level				7.7%

Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Virginia Beach Multistate CSA

The Virginia Beach Multistate CSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA BEACH MULTISTATE CSA

### LENDING TEST

The bank's performance under the Lending Test in Virginia Beach Multistate CSA is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Virginia Beach Multistate CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Virginia Beach Multistate CSA	689	161	0	11	861	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Virginia Beach Multistate CSA	1,262	1,130	0	2,480	4,872	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Virginia Beach-Norfolk VA-NC CSA AA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.16 percent is greater than the bank's deposit market share of 0.10 percent.

Per 2021 peer data by number, WNB ranked 34<sup>th</sup> of 161 small business lenders in the AA. The five largest small business lenders held 53.44 percent of the market share. WNB's average small business loan totaled \$8,000 compared to the top five business lenders which ranged between \$13,000 and \$135,000.

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

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

#### *Small Loans to Businesses*

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and the aggregate distribution of loans in LMI geographies. The bank's 2022 performance was slightly lower than the proportion of businesses in low-income geographies but exceeded demographics in moderate-income geographies.



***Consumer Loans***

Refer to Table U in the “MMSA” section of appendix D for the facts and data used to evaluate the geographic distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in those geographies.

***Lending Gap Analysis***

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

***Small Loans to Businesses***

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, the bank’s performance exceeded demographics. The 2022 performance was excellent with the proportion of bank loans exceeding the level of small businesses.

***Consumer Loans***

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

**Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Virginia Beach Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$2.5 million, which represented 59 percent of allocated tier 1 capital for the area. The allocations were from eleven loans to seven different entities.

Six of these provided opportunities for affordable housing and five for economic development. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Examples of the more innovative or responsive projects are described below.

The bank allocated amounts from two loans to one entity totaling \$636,700. WNB renewed a \$750,000 loan in 2019 and a \$1.5 million loan in 2022. This entity is a CDFI which utilizes both the Housing Catalyst Fund, a program backed by the U.S. Department of Treasury's Capital Magnet Fund, and an affordable housing fund managed by the entity. Through these programs, the entity offers low rates for acquisition and construction loans, as well as bridge, gap, and mini-perm financing. They also provide LIHTC financing, including predevelopment, construction, and bridge loans. The \$1.5 million loan supports a fund used to provide low-cost financing for businesses owned by women and minorities. These loans were responsive.

The bank allocated \$500,000 to the AA. The total loan amount was for a \$5 million debt investment. The purpose of this loan was to support many CDFI's financing of affordable housing and community facilities in communities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The loan entity is a special purpose entity owned and managed by two WNB existing partners: One is a U.S. Treasury designated CDFI and another is the largest CDFI association in the U.S. This loan created a new source of capital for small CDFIs. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations. This loan was considered innovative.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **INVESTMENT TEST**

The bank's performance under the Investment Test in Virginia Beach Multistate CSA is rated Outstanding.

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Virginia Beach Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Virginia Beach Multistate CSA	2	98	14	1,273	16	100	1,371	100

<b>Totals</b>	<b>2</b>	<b>98</b>	<b>14</b>	<b>1,273</b>	<b>16</b>	<b>100</b>	<b>1,371</b>	<b>100</b>
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During the evaluation period, WNB made seven investments totaling \$1.36 million including two prior period investments totaling \$98,262 and five current period investments totaling \$1.26 million. Additionally, nine grants totaling \$8,651 were made for a total investment in the AA of \$1.37 million. WNB's total investments represented 32.78 percent of allocated tier 1 capital to the AA.

WNB's qualified investments in the AA provide community services, economic development, and affordable housing. Grants in the AA were made to qualified CD organizations that provide economic development.

## SERVICE TEST

The institution's performance under the Service Test in Virginia Beach Multistate CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Virginia Beach Multistate CSA is excellent.

## Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Virginia Beach Multistate CSA	100	16	100	6.3	31.3	37.5	25	6.2	24.2	35.4	33.0

The bank's the percentage of branches in low-income geographies exceeds the population levels in those geographies. Similarly, the percentage of branches in moderate-income geographies exceeded the population levels in those geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Virginia Beach Multistate CSA	1	1	0	1	0	-1

The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch in a moderate-income geography and closed one branch in an upper-income geography of the AA during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

The institution is a leader in providing CD services.

WNB provided 998 hours of financial education to 1,041 participants. The bank utilized the four core modules for financial education in this AA including 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal.

In addition to financial education, WNB employees worked with various organizations in support of CD needs with a total of 20 employees serving on 14 boards or committees in 21 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs. The organizations in which WNB is involved provide various CD related services to LMI families and individuals and promote business development, food insecurity, and affordable housing. WNB provided leadership and financial expertise on boards or committees of nationally and regionally known organizations such as Foodbank of Southeastern Virginia, Virginia Peninsula Foodbank, Habitat for Humanity, Natasha House. Examples of WNB's leadership in providing CD services are summarized below.

- Two employees assisted organizations focused on addressing food insecurity in the AA. The Bank employee's service on the board of Foodbank of Southeastern Virginia and the Eastern Shore involved providing financial education, loan reviews, and philanthropy efforts. Similarly, the Bank's service on the Virginia Peninsula Foodbank Advisory Council involved fundraising, youth financial education, and a family focus on budgeting and financial counselling.
- Habitat for Humanity is a nationally recognized organization that provides affordable housing for LMI families. One bank employee served as a member of the finance committee.
- Four employees provided various board assistance for Natasha House, which provides shelter, resources, and support to homeless women and children in the AA.

## **Washington-Baltimore-Arlington DC-MD-VA-WV-PA CSA (Washington Multistate CSA)**

**CRA rating for the Washington Multistate CSA<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

### **Description of Institution's Operations in Washington Multistate CSA**

WNB delineates the entire Washington Multistate CSA as its AA, which we identified for full-scope review. Please refer to appendix A for a complete listing of areas within the multistate CSA.

The Washington Multistate CSA represents 0.68 percent of total bank deposits and is WNB's 13<sup>th</sup> largest rating area. WNB operates 17 branches throughout the AA. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$56.5 million, which represented 0.01 percent market share and ranked the bank 149<sup>th</sup> of 216 institutions within the AA. The largest depository institutions were Navy Federal Credit Union, Bank of America, and Truist Bank, which held a combined 42.72 percent market share in the AA.

### **Community Contacts**

We identified eight community contacts in the Washington Multistate CSA. Of the eight organizations identified in Washington Multistate CSA, there were five economic development organizations, two affordable housing organizations, and one organization that helps support community services to LMI individuals. The primary needs identified included financial literacy and job training, financing programs for economic development, and affordable housing assistance specifically down payment assistance.

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

The following tables provide information on the demographic composition of the Washington Multistate CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Washington-Baltimore-Arlington DC-MD-VA-WV-PA CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2,071	10.8	22.4	35.2	30.0	1.6
Population by Geography	8,985,609	8.8	21.5	37.3	31.8	0.7
Housing Units by Geography	3,547,547	9.6	21.9	37.3	30.9	0.4
Owner-Occupied Units by Geography	2,099,194	4.1	17.3	40.4	38.0	0.1
Occupied Rental Units by Geography	1,178,240	17.0	29.2	32.9	20.1	0.7
Vacant Units by Geography	270,113	19.6	25.4	32.4	21.9	0.6
Businesses by Geography	1,082,705	5.5	18.9	37.3	37.7	0.5
Farms by Geography	20,243	3.2	16.7	44.1	35.9	0.1
Family Distribution by Income Level	2,150,812	22.3	17.0	20.2	40.6	0.0
Household Distribution by Income Level	3,277,434	23.9	16.3	18.4	41.5	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA		\$87,788	Median Gross Rent			\$1,404
Median Family Income MSA - 15680 California-Lexington Park, MD MSA		\$98,260	Families Below Poverty Level			6.6%
Median Family Income MSA - 16540 Chambersburg-Waynesboro, PA MSA		\$64,527	Median Housing Value			\$354,148
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD		\$112,655				
Median Family Income MSA - 25180 Hagerstown-Martinsburg, MD-WV MSA		\$64,343				
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV		\$106,105				
Median Family Income MSA - 49020 Winchester, VA-WV MSA		\$69,817				
<i>Source: 2015 ACS and 2021 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Washington-Baltimore-Arlington DC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	2,261	9.2	22.5	35.9	30.4	2.0
Population by Geography	9,506,416	7.4	22.6	37.8	31.2	0.9
Housing Units by Geography	3,665,936	8.4	22.9	37.8	30.3	0.6
Owner-Occupied Units by Geography	2,204,058	3.8	18.4	41.0	36.5	0.2
Occupied Rental Units by Geography	1,212,544	15.0	30.2	33.0	20.6	1.2
Vacant Units by Geography	249,334	16.7	26.6	32.6	22.7	1.5

Businesses by Geography	1,266,862	5.2	20.4	37.9	35.7	0.8
Farms by Geography	22,828	2.9	17.7	44.6	34.4	0.3
Family Distribution by Income Level	2,220,067	21.7	17.1	20.8	40.4	0.0
Household Distribution by Income Level	3,416,602	23.6	16.2	18.9	41.2	0.0
Median Family Income MSA - 12580 Baltimore-Columbia-Towson, MD MSA	\$104,637	Median Housing Value				\$405,152
Median Family Income MSA - 15680 California-Lexington Park, MD MSA	\$110,946	Median Gross Rent				\$1,582
Median Family Income MSA - 16540 Chambersburg-Waynesboro, PA MSA	\$75,297	Families Below Poverty Level				5.6%
Median Family Income MSA - 23224 Frederick-Gaithersburg-Rockville, MD	\$129,092					
Median Family Income MSA - 25180 Hagerstown-Martinsburg, MD-WV MSA	\$77,963					
Median Family Income MSA - 47894 Washington-Arlington-Alexandria, DC-VA-MD-WV	\$126,224					
Median Family Income MSA - 49020 Winchester, VA-WV MSA	\$83,355					
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i> <i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

**Scope of Evaluation in Washington Multistate CSA**

The Washington Multistate CSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

**CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WASHINGTON MULTISTATE CSA**

**LENDING TEST**

The bank’s performance under the Lending Test in Washington Multistate CSA is rated Outstanding.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full scope review, the bank’s performance in the Washington Multistate CSA is excellent.

**Lending Activity**

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Washington Multistate CSA	782	204	1	12	999	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Washington Multistate CSA	1,595	3,297	9	24,767	29,668	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Washington Multistate CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.03 percent is greater than the bank's deposit market share of 0.01 percent.

Per 2021 peer data by number, WNB ranked 84<sup>th</sup> of 354 small business lenders in the AA. The five largest small business lenders held 54.62 percent of the market share. WNB's average small business loan totaled \$17,000 compared to the top five business lenders which ranged between \$13,000 and \$61,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and the aggregate distribution of loans in LMI geographies. The 2022 performance was consistent with 2019-2021 performance in low-income geographies and weaker than overall performance in moderate-income geographies.

#### ***Consumer Loans***

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

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in those geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.



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

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

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

Refer to Table R in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s origination and purchase of small loans to businesses.

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was significantly below the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, the bank’s performance exceeded demographics. The 2022 performance exceeded demographics.

### ***Consumer Loans***

Refer to Table V in the “MMSA” section of appendix D for the facts and data used to evaluate the borrower distribution of the bank’s consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

## **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Washington Multistate CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$24.8 million, which represented 501 percent of allocated tier 1 capital for the area. The allocations were for twelve loans from eleven different entities. Seven loans provided opportunities for affordable housing, one for community services, and four for economic development. Eight of the affordable housing and economic development allocations were for various CDFIs that provide funds to affordable housing developers in the area or provide small business loans to rural and underserved areas. Examples of the more innovative or responsive projects are described below.

The bank allocated \$8.2 million to the AA. This was the total loan participation amount. The purpose of the loan was to acquire a loan, with the proceeds used to combat gentrification. The loan helped purchase a cluster of five multi-family properties containing 66 units of naturally occurring affordable housing (NOAH) in the historically impoverished, predominantly Hispanic Chirilagua Neighborhood of Alexandria, VA. The rents are below 60% area median income. The project keeps rents affordable with a Land Use Restriction Agreement (LURA). This loan was innovative and responsive.

The bank allocated \$1 million to the AA for a multiple advance term loan. The purpose of the loan was to provide lending capital to the borrower's Baltimore business lending program. The entity is a CDFI that supports the revitalization and strengthening of underserved Baltimore neighborhoods through flexible financial assistance. The entity focuses on minority and women-owned businesses. During 2020, the entity funded \$5.6 million to real estate developers and small business owners who were unable to receive financing from a traditional bank. It also financed and provided technical assistance to 12 early-stage entrepreneurs and financed businesses that were 85 percent minority-owned and 45 percent women-owned. This loan was responsive.

The bank allocated \$150,000 from a \$5 million loan. The purpose of this loan was to support many CDFIs financing of affordable housing and community facilities in communities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The loan entity is a special purpose entity owned and managed by two WNB existing partners: One is a U.S. Treasury-designated CDFI and the other is the largest CDFI in the U.S. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations. This loan is considered innovative.

### Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### INVESTMENT TEST

The bank's performance under the Investment Test in Washington Multistate CSA is rated Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Washington Multistate CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Assessment Area	Qualified Investments							
	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Washington Multistate CSA	12	2,749	30	4,401	42	100	7,150	100
<b>Totals</b>	<b>12</b>	<b>2,749</b>	<b>30</b>	<b>4,401</b>	<b>42</b>	<b>100</b>	<b>7,150</b>	<b>100</b>

During the evaluation period, WNB made 16 investments totaling \$7.05 million including 12 prior period investments totaling \$2.75 million and four current period investments totaling \$4.3 million. Additionally, 26 grants totaling \$100,791 were made for a total investment in the AA of \$7.2 million. WNB's total investments represented 144.78 percent of allocated tier 1 capital in the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development, community services, affordable housing, and revitalization and/or stabilization.

## SERVICE TEST

The institution's performance under the Service Test in Washington Multistate CSA is rated Outstanding.

Based on a full-scope review, the institution's performance in the Washington Multistate CSA is excellent.

## Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Washington Multistate CSA	100	17	100	0	35.3	52.9	11.8	7.4	22.6	37.8	31.2

There were no branches in low-income geographies but the percentage of branches in moderate-income geographies exceeded the population levels in those geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	# of Branch Openings	# of Branch Closings	Branch Openings/Closings			
			Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Washington Multistate CSA	1	1	0	1	0	-1

The institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch in a moderate-income geography and closed one branch in an upper-income geography of the AA during the evaluation period.

Services, including where appropriate, business hours, (are tailored to the convenience and needs of the various portions of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

The institution is a leader in providing CD services.

WNB provided 1,022 hours of financial education to 1,923 participants. The bank utilized all five core modules for financial education in this AA. The majority of the bank's training activities in this AA focused on the Money Smart curriculums with 246 hours provided of the personal curriculum and 613 hours of the business curriculum. WNB employees also provided 124 hours of the Building Wealth program.

In addition to financial education, WNB employees worked with various organizations in support of CD needs with a total of 25 employees serving on 23 boards or committees in 29 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs for organizations that provide various CD related services to LMI families and individuals and promote financial literacy and affordable housing. WNB provided leadership and financial expertise on boards or committees of regionally and nationally known organizations such as Community Assistance Network, Laurel Advocacy and Referral Services, and Boys and Girls Club of Greater Washington.

## State Rating

### State of Alabama

**CRA rating for the State of Alabama<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

### Description of Institution's Operations in Alabama

WNB operates 41 branches throughout eight AAs. The AAs include the Anniston-Oxford AL MSA (Anniston MSA), Birmingham-Hoover-Talladega AL CSA (Birmingham CSA), Gadsden AL MSA (Gadsden MSA), Huntsville-Decatur AL CSA (Huntsville CSA), Mobile-Daphne-Fairhope AL CSA (Mobile CSA), Montgomery-Selma-Alexander City AL CSA (Montgomery CSA), Non-MSA AL (Alabama Non-MSA), and Tuscaloosa AL MSA (Tuscaloosa MSA).

The state of Alabama represents 1.10 percent of total bank deposits and is WNB's 9<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$92.3 million, which represented 0.05 percent deposit market share and ranked the bank 148<sup>th</sup> of 235 institutions within the state. The largest depository institutions were Regions Bank, PNC Bank, and Wells Fargo Bank, which held a combined 34.15 percent market share in the state.

We identified the Mobile CSA for full-scope review in Alabama. This AA includes Daphne MSA and Mobile MSA. WNB operates seven branches throughout the AA, which accounts for 19.6 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$18.1 million, which represented 0.10 percent market share and ranked the bank 38<sup>th</sup> of 42 institutions within the AA. The largest depository institutions were Regions Bank, PNC Bank, and Hancock Whitney Bank, which held a combined 50.86 percent market share in the AA.

### Community Contacts

We identified two community contacts in Alabama. Of the two organizations identified in the Mobile CSA, one was a housing authority and one was a rural cooperation organization. The primary needs identified included financial literacy and job training, financing programs for economic development, and affordable housing assistance.

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

The following tables provide information on the demographic composition of the Mobile CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Mobile-Daphne-Fairhope AL CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	147	12.9	22.4	38.8	23.8	2.0
Population by Geography	609,372	6.3	17.7	45.5	30.4	0.1
Housing Units by Geography	287,354	5.8	19.3	45.3	29.6	0.0
Owner-Occupied Units by Geography	155,605	3.7	14.9	47.5	33.8	0.0
Occupied Rental Units by Geography	72,687	9.3	24.0	41.4	25.3	0.0
Vacant Units by Geography	59,062	6.7	25.0	44.2	24.1	0.0
Businesses by Geography	48,091	4.3	19.8	42.3	33.4	0.1
Farms by Geography	1,230	2.0	14.9	52.5	30.7	0.0
Family Distribution by Income Level	153,830	22.9	16.3	19.6	41.2	0.0
Household Distribution by Income Level	228,292	25.7	15.4	16.8	42.1	0.0
Median Family Income MSA - 19300 Daphne-Fairhope-Foley, AL MSA	\$62,271	Median Gross Rent				\$821
		Median Housing Value				\$147,577
Median Family Income MSA - 33660 Mobile, AL MSA	\$54,139	Families Below Poverty Level				13.7%
<i>Source: 2015 ACS and 2021 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Mobile-Daphne-Fairhope AL CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	179	5.0	28.5	40.2	23.5	2.8
Population by Geography	646,576	2.1	22.8	47.5	26.8	0.8
Housing Units by Geography	301,068	2.5	23.2	46.8	25.6	2.0
Owner-Occupied Units by Geography	165,671	1.3	19.4	50.1	28.7	0.5
Occupied Rental Units by Geography	75,933	4.6	34.2	41.4	19.3	0.6
Vacant Units by Geography	59,464	3.1	19.6	44.5	24.9	7.9
Businesses by Geography	68,208	2.1	22.2	43.4	31.4	0.9
Farms by Geography	1,693	1.1	17.0	54.1	27.2	0.5
Family Distribution by Income Level	158,859	21.1	18.1	20.3	40.6	0.0
Household Distribution by Income Level	241,604	24.8	16.1	16.9	42.1	0.0
Median Family Income MSA - 19300 Daphne-Fairhope-Foley, AL MSA	\$79,907	Median Housing Value				\$184,353
		Median Gross Rent				\$917
Median Family Income MSA - 33660 Mobile, AL MSA	\$61,626	Families Below Poverty Level				10.7%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in Alabama

The Mobile CSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ALABAMA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Mobile CSA is excellent.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only product analyzed was small loans to businesses, as home mortgage loans were not a primary product.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Anniston MSA	58	12	0	4	74	3.71	3.37
Birmingham CSA	493	72	0	3	568	28.46	27.13
Gadsden MSA	21	0	0	1	22	1.10	0.57
Huntsville CSA	248	35	0	5	288	14.43	15.94
Mobile CSA	345	41	0	6	392	19.64	19.60
Montgomery CSA	232	45	0	5	282	14.13	13.19
Alabama Non-MSA	248	17	0	5	270	13.53	16.62
Tuscaloosa MSA	80	14	2	4	100	5.01	3.58

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Anniston MSA	114	105	0	140	359	3.63	3.37
Birmingham CSA	929	768	0	1,080	2,777	28.07	27.13
Gadsden MSA	37	0	0	20	57	0.58	0.57
Huntsville CSA	436	293	0	583	1,312	13.26	15.94
Mobile CSA	647	1,411	0	479	2,537	25.65	19.60
Montgomery CSA	448	383	0	562	1,393	14.08	13.19
Alabama Non-MSA	452	70	0	462	984	9.95	16.62
Tuscaloosa MSA	138	131	54	150	473	4.78	3.58

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Mobile CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.07 percent is less than the bank's deposit market share of 0.10 percent.

Per 2021 peer data by number, WNB ranked 66<sup>th</sup> of 144 small business lenders in the AA. The five largest small business lenders held 37.43 percent of the market share. WNB's average small business loan totaled \$15,000 compared to the top five business lenders which ranged between \$9,000 and \$209,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and the aggregate distribution of loans in LMI geographies. The bank did not originate enough business loans in 2022 to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Alabama section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in LMI geographies. For 2022, the bank's performance was exceeded demographics in low-income CTs but was below in moderate-income CTs.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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



The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses and exceeded the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, the performance was excellent with 100 percent of the bank's loans originated to small businesses. The bank did not originate enough business loans in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Alabama section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Mobile CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$479,333 in the Mobile CSA, which represented 30 percent of allocated tier 1 capital for the area. The allocations were from six different entities. Three of these provided opportunities for affordable housing and three for economic development. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans to rural and underserved areas. Two of the more innovative projects are described below.

The bank allocated \$100,000 to the AA. The total loan amount was for a \$5 million debt investment. The purpose of this loan was to support many CDFI's financing of affordable housing and community facilities in communities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The loan entity is a special purpose entity owned and managed by two WNB existing partners: One is a U.S. Treasury designated CDFI, and another is the largest CDFI association in the U.S. This loan created a new source of capital for small CDFIs. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations.

The bank allocated \$200,000 to the AA. The total loan amount was for a \$1 million debt investment in the SOAR Fund, an LLC owned by Local Initiatives Support Corporation (LISC), a national CDFI. The loan provided capital for this fund. The purpose of the fund provides lending capital to address the small business needs of historically disenfranchised southern U.S. populations during the COVID-19 global pandemic. The facility is a partnership of 12 CDFIs working in tandem with national partners. The SOAR fund purchases 95 percent of each COVID-19 Recovery Loan originated by the participating CDFIs.

## Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Birmingham CSA, Huntsville CSA, and the Montgomery CSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance in Anniston MSA, Gadsden MSA, Alabama Non-MSA, and Tuscaloosa MSA is weaker than the bank's overall performance. In all AAs except the Anniston MSA, the consumer loan performance was excellent for geographic and borrower distribution. The Anniston MSA consumer loan performance was good for both geographic and borrower distribution. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating. Refer to Tables Q, R, U, and V in the state of Alabama section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Anniston MSA	2	706	13	295	15	10.71	1,001	8.03
Birmingham CSA	3	55	19	2,636	22	15.71	2,690	21.60
Gadsden MSA	0	0	10	293	10	7.14	293	2.35
Huntsville CSA	3	53	14	623	17	12.14	676	5.43
Mobile CSA	2	19	22	934	24	17.14	953	7.66
Montgomery CSA	1	10	17	5,799	18	12.86	5,809	46.65
Alabama Non-MSA	1	10	15	495	16	11.43	505	4.05
Tuscaloosa MSA	3	142	13	345	16	11.43	486	3.90
Statewide	0	0	2	40	2	1.43	40	0.32
<b>Totals</b>	<b>15</b>	<b>994</b>	<b>125</b>	<b>11,459</b>	<b>140</b>	<b>100</b>	<b>12,454</b>	<b>100</b>

During the evaluation period, WNB made 11 investments totaling \$934,404 including two prior period investments totaling \$19,000 and nine current period investments totaling \$915,000. Additionally, 13 grants totaling \$19,404 were made for a total investment in the AA of \$953,404. WNB's total investments represented 60.32 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide community services, revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Anniston MSA, Birmingham CSA, Gadsden MSA, Huntsville CSA, Montgomery CSA, Alabama Non-MSA, and Tuscaloosa MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

The bank's performance under the Service Test in Alabama is rate Outstanding.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Mobile CSA is rated excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	# of BANK Branches	% of Rated Area Branches in AA	Branches				Population			
	% of Rated Area Deposits in AA			Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Anniston MSA	3.4	2	4.9	0	0	50	50	2.0	20.8	56.4	19.9
Birmingham CSA	27.1	10	24.4	10	30	40	20	6.1	21.5	36.3	34.7
Gadsden MSA	0.6	1	2.4	100	0	0	0	5.6	14.6	46.2	32.1
Huntsville CSA	15.9	6	14.6	16.7	33.3	50	0	9.4	18.4	39.6	32.2
Mobile CSA	19.6	7	17.1	0	42.9	57.1	0	2.1	22.8	47.5	26.8
Montgomery CSA	13.2	6	14.6	16.7	33.3	33.3	16.7	7.5	26.3	39.0	26.6
Alabama Non-MSA	16.6	7	17.1	0	14.3	71.4	14.3	1.3	10.0	64.8	23.5
Tuscaloosa MSA	3.6	2	4.9	0	50	50	0	5.7	13.8	45.6	30.9

In the Mobile CSA, there were no branches in low-income geographies but the percentage of branches in moderate-income geographies exceeded the population levels in those geographies. ADS were available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Anniston MSA	0	0	0	0	0	0
Birmingham CSA	1	0	1	0	0	0
Gadsden MSA	1	0	1	0	0	0
Huntsville CSA	0	2	0	0	-2	0
Mobile CSA	1	1	0	1	-1	0
Montgomery CSA	0	0	0	0	0	0
Alabama Non-MSA	0	0	0	0	0	0
Tuscaloosa MSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one new branch in a moderate-income geography and closed one branch in a middle-income geography of the Mobile CSA.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AAs, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### Mobile CSA

WNB provided an excellent level of CD services in the full-scope AA. Bank employees provided 288 hours of financial education to 357 participants in the AA. The majority of the bank's training activities in this AA focused on the Money Smart programs, with 58 hours of the personal curriculum and 188 hours of the business curriculum. In addition to financial education, nine WNB employees served on five boards or committees in nine member positions. WNB provided leadership and financial expertise on board or committees of regionally known organizations such as Penelope House, Lifelines Counseling Services, and Family Promise of Costal Alabama.

### Statewide

The bank provided 2,268 hours of financial education to 3,647 participants. The bank utilized the five core modules for financial education in the Birmingham AA including 1) Building Wealth 2) New Beginnings 3) Junior Achievement 4) Money Smart – business 5) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 63 employees in Alabama serving on 44 boards or committees in 68 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Birmingham CSA, Huntsville CSA, Montgomery CSA, and Alabama Non-MSA is consistent with the bank's overall performance in the full-scope AA. The bank's performance in the Tuscaloosa MSA was weaker but still high satisfactory. The bank's performance in the Anniston MSA and Gadsden MSA is weaker than the bank's overall performance in the full-scope AA but is still satisfactory.

## State of Florida

**CRA rating for the State of Florida<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Florida

WNB operates 10 branches throughout three AAs. The AAs include Jacksonville-St Mary's-Palatka FL CSA (Jacksonville CSA), Orlando-Lakeland-Deltona FL CSA (Orlando CSA), and Tampa-St Petersburg-Clearwater FL MSA (Tampa MSA). In the Orlando CSA, WNB opened one new branch in September 2022 and one new branch in December 2022. In the Tampa MSA, WNB opened one new branch in September 2022. There was less than six months of CRA data available in 2022; therefore, we did not analyze these two AAs.

The state of Florida represents 0.08 percent of total bank deposits and is WNB's smallest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$6.4 million, which represented a negligible deposit market share within the state. The largest depository institutions were Bank of America, Wells Fargo Bank, and Truist Bank, which held a combined 38.82 percent market share in the state.

We identified the Jacksonville CSA for full-scope review in Florida. This AA includes the Jacksonville MSA. WNB operates seven branches throughout the AA, which accounts for 100 percent of rated area deposits as of June 30, 2022. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$6.4 million, which represented 0.01 percent market share and ranked the bank 37<sup>th</sup> of 38 institutions within the AA. The largest depository institutions were Bank of America, TIAA Bank, and Vystar Bank, which held a combined 79.83 percent market share in the AA.

## Community Contacts

We identified one community contact in the Jacksonville CSA that supported both economic development and community services geared toward LMI individuals. The primary needs in the AA included micro loans at lower interest rates.

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

The following tables provide information on the demographic composition of the Jacksonville CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Jacksonville-St Mary’s-Palatka FL CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	174	11.5	30.5	33.9	23.6	0.6
Population by Geography	890,673	8.1	28.1	39.4	24.4	0.0
Housing Units by Geography	393,571	9.1	28.3	37.4	25.2	0.0
Owner-Occupied Units by Geography	200,029	5.8	23.6	39.8	30.8	0.0
Occupied Rental Units by Geography	137,871	11.0	33.9	36.1	19.0	0.0
Vacant Units by Geography	55,671	16.1	31.3	31.7	20.9	0.0
Businesses by Geography	166,356	6.5	25.8	33.8	33.9	0.0
Farms by Geography	3,613	6.0	25.0	40.1	28.8	0.0
Family Distribution by Income Level	209,958	25.1	18.1	19.7	37.2	0.0
Household Distribution by Income Level	337,900	26.4	17.6	17.5	38.5	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA	\$64,042	Median Housing Value				\$151,543
		Families Below Poverty Level				13.4%
		Median Gross Rent				\$954

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Jacksonville-St Mary’s-Palatka FL CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	219	10.0	31.5	33.3	23.3	1.8
Population by Geography	995,567	7.9	31.6	35.9	23.7	0.9
Housing Units by Geography	413,084	8.7	32.0	34.3	24.2	0.9
Owner-Occupied Units by Geography	211,163	5.8	25.2	36.8	31.4	0.7
Occupied Rental Units by Geography	158,541	11.1	39.8	32.1	15.9	1.2
Vacant Units by Geography	43,380	13.7	36.0	30.1	19.4	0.7
Businesses by Geography	194,955	6.9	26.8	36.5	27.0	2.7
Farms by Geography	4,125	7.2	27.8	37.9	24.9	2.1
Family Distribution by Income Level	225,060	24.5	19.7	19.8	36.1	0.0
Household Distribution by Income Level	369,704	26.0	18.0	19.1	36.9	0.0
Median Family Income MSA - 27260 Jacksonville, FL MSA	\$76,537	Median Housing Value				\$199,982
		Median Gross Rent				\$1,109
		Families Below Poverty Level				10.7%

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Florida

The Jacksonville CSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN FLORIDA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Jacksonville CSA is excellent.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*						
Assessment Area	Consumer	Small Business	Community Development	Total	% State Loans	% State Deposits
Jacksonville CSA	115	26	4	145	97.32	100.00
Statewide	0	0	4	4	2.68	0.00

Dollar Volume of Loans*						
Assessment Area	Consumer	Small Business	Community Development	Total	% State Loans	% State Deposits
Jacksonville CSA	209	232	535	976	36.16	100.00
Statewide	0	0	1,723	1,723	63.84	0.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Jacksonville CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.03 percent is greater than the bank's deposit market share of 0.01 percent.

Per 2021 peer data by number, WNB ranked 74<sup>th</sup> of 164 small business lenders in the AA. The five largest small business lenders held 53.02 percent of the market share. WNB's average small business loan totaled \$19,000 compared to the top five business lenders which ranged between \$9,000 and \$25,000.



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

The bank exhibits an excellent geographic distribution of loans in the AA.

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies during 2019-2021.

### ***Consumer Loans***

Refer to Table U in the state of Florida section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans significantly exceeded the proportion of households in those geographies for 2019-2022.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is good. During the evaluation period, the proportion of bank loans was below the proportion of businesses and significantly exceeded the aggregate distribution of loans to small businesses during 2019-2021. The bank did not originate enough business loans in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Florida section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During the evaluation period (2019-2022), the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households within the AA.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Jacksonville CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$535,000, which represented 95 percent of allocated tier 1 capital for the area. The allocations were from five different entities. Three of these provided opportunities for affordable housing and two for economic development. All except one of the CD loans were to partners that supported various CDFIs across the WNB footprint. The one exception was to an entity for affordable multifamily apartments. Two of the more innovative projects are described below.

The bank allocated \$200,000 to the AA. The total loan amount was for a \$5 million debt investment. The purpose of this loan was to support many CDFI's financing of affordable housing and community facilities in communities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The loan entity is a special purpose entity owned and managed by two WNB existing partners: One is a U.S. Treasury designated CDFI, and another is the largest CDFI association in the U.S. This loan created a new source of capital for small CDFIs. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations.

The bank allocated \$250,000 to the AA. The total loan amount was for a \$5 million single-advance term loan for 36 months. The borrowing entity is a CDFI. The capital will be used by the entity to make small business loans in the WNB footprint, in the states of Texas, Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania and Virginia. Most of the clients have little access to capital. Since this entity's inception, they have served 142,500 clients, disbursed 692,930 loans totaling over \$2.1 billion and created 149,600 jobs.

The bank also made one loan for \$108 thousand multi-family loan to provide 36 units of affordable housing in the AA. This is a Low-Income Housing Tax Credit (LIHTC) funded development.

The remaining two entities WNB originated CD loans to were both CDFIs. One providing affordable housing and one providing small business loans that promote economic development.

### **Broader Statewide**

During the evaluation period, the bank originated one statewide CD loan.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## INVESTMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Jacksonville CSA	1	10	16	819	17	68.0	829	70.4
Statewide	0	0	8	348	8	32.0	348	29.6
<b>Totals</b>	<b>1</b>	<b>10</b>	<b>24</b>	<b>1,166</b>	<b>25</b>	<b>100</b>	<b>1,176</b>	<b>100</b>

During the evaluation period, WNB made four investments totaling \$810,000 including one prior period investments totaling \$10,000 and three current period investments totaling \$800,000. Additionally, 13 grants totaling \$18,790 were made for a total investment in the AA of \$828,790. WNB's total investments represented 146.51 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development, community services, and affordable housing.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on a limited-scope review, the bank's performance under the Investment Test in Orlando CSA and Tampa MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

## SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Jacksonville CSA is rated excellent.

## Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Jacksonville CSA	100	7	70	0	71.4	28.6	0	7.9	31.6	35.9	23.7
Orlando CSA	0	2	20	0	100	0	0	4.3	31.1	32.0	31.2
Tampa MSA	0	1	10	0	100	0	0	5.9	24.1	33.3	35.6

WNB does not have any branches in low-income geographies, however, 71.4 percent of the bank's branches were in moderate-income geographies and significantly exceeded the population levels in those geographies. ADS were available and effective for delivering services in LMI geographies. While we did not analyze the Orlando CSA and Tampa MSA, we included the distribution in the table above to note branch locations.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Jacksonville CSA	4	0	0	2	2	0
Orlando CSA	2	0	0	2	0	0
Tampa MSA	1	0	0	1	0	0

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened four branches in the Jacksonville CSA including two branches in moderate-income geographies and two branches in middle-income geographies. WNB did not close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

WNB provided 220 hours of financial education to 212 participants. The bank utilized four

modules for financial education in this AA including 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had four employees in Florida serving on six boards or committees in seven positions. Employees in these roles provide leadership and financial expertise in support of CD related needs.

The majority of the training activities in the Jacksonville CSA focused on the Money Smart programs, with 39 hours of the personal curriculum and 151 hours of the business curriculum. In addition to financial education, three WNB employees served on five boards or committees in six member positions. WNB provided leadership and financial expertise on board or committees of nationally known organizations such as Family Foundations of Northeast Florida, Northeast Florida Women Veterans, Family Promise, Lutheran Social Services of Northeast Florida, and the Northeast Florida Long Term Recovery Organization.

## State of Georgia

**CRA rating for the State of Georgia<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Georgia

WNB operates 11 branches throughout one AA. The only AA is the Atlanta-Sandy Springs GA CSA (Atlanta CSA).

The state of Georgia represents 0.36 percent of total bank deposits and is WNB's 18<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$30.2 million, which represented 0.01 percent deposit market share and ranked the bank 230<sup>th</sup> of 283 institutions within the state. The largest depository institutions were Truist Bank, Bank of America, and Wells Fargo, which held a combined 46.74 percent market share in the state.

As the only AA, we identified the Atlanta CSA for full-scope review in Georgia. This AA includes the Atlanta MSA. WNB operates 11 branches throughout the AA, which accounts for 100 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$30.2 million, which represented 0.01 percent market share and ranked the bank 84<sup>th</sup> of 99 institutions within the AA. The largest depository institutions were Truist Bank, Bank of America, and Wells Fargo Bank, which held a combined 59.07 percent market share in the AA.

## Community Contacts

We identified one community contact in the Atlanta CSA that supported economic development. The primary needs identified include financial literacy workshops, which WNB provides extensively through the FDIC Money-Smart programs, as well as the Foundry program for new entrepreneurs.

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

The following tables provide information on the demographic composition of the Atlanta CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Atlanta--Sandy Springs GA CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	732	13.1	25.8	25.4	34.6	1.1
Population by Geography	4,222,139	9.2	25.6	29.9	35.0	0.4
Housing Units by Geography	1,697,103	10.2	26.1	28.3	35.2	0.2
Owner-Occupied Units by Geography	916,757	4.1	19.5	32.5	43.9	0.0
Occupied Rental Units by Geography	596,361	16.9	34.3	23.3	25.1	0.3
Vacant Units by Geography	183,985	19.2	32.5	23.9	24.3	0.2
Businesses by Geography	851,592	7.3	23.7	27.8	40.8	0.5
Farms by Geography	11,927	5.8	22.5	33.3	38.3	0.2
Family Distribution by Income Level	994,938	23.3	16.3	17.7	42.7	0.0
Household Distribution by Income Level	1,513,118	23.8	16.4	17.3	42.5	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA	\$67,322	Median Housing Value				\$192,312
		Median Gross Rent				\$1,013
		Families Below Poverty Level				12.3%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Atlanta-Sandy Springs GA CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,167	8.9	23.0	28.0	35.7	4.4
Population by Geography	4,598,872	7.5	24.1	30.1	35.5	2.9
Housing Units by Geography	1,784,430	8.3	23.9	28.8	35.8	3.2
Owner-Occupied Units by Geography	1,003,777	3.5	18.4	32.4	44.0	1.6
Occupied Rental Units by Geography	641,251	14.4	31.8	24.5	24.1	5.2
Vacant Units by Geography	139,402	14.8	27.6	22.4	30.3	4.9
Businesses by Geography	1,035,687	6.4	22.9	27.2	40.1	3.5
Farms by Geography	13,841	5.2	22.8	34.3	35.6	2.0
Family Distribution by Income Level	1,064,454	21.9	16.8	19.1	42.2	0.0
Household Distribution by Income Level	1,645,028	23.7	16.2	17.9	42.2	0.0
Median Family Income MSA - 12060 Atlanta-Sandy Springs-Alpharetta, GA MSA	\$84,791	Median Housing Value				\$261,385
		Families Below Poverty Level				8.5%
		Median Gross Rent				\$1,243

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Georgia

The Atlanta CSA received a full-scope review, as it is the only AA in the state. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN GEORGIA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Atlanta CSA is excellent.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Atlanta CSA	467	230	0	10	707	100.00	100.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Atlanta CSA	951	3,208	0	16,524	20,683	100.00	100.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Atlanta CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.04 percent is greater than the bank's deposit market share of 0.01 percent.

Per 2021 peer data by number, WNB ranked 72<sup>nd</sup> of 299 small business lenders in the AA. The five largest small business lenders held 59.07 percent of the market share. WNB's average small business loan totaled \$16,000 compared to the top five business lenders which ranged between \$14,000 and \$24,000.

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

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



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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies during 2019-2021. In 2022, the bank had good distribution of loans in low-income geographies and excellent in moderate-income geographies.

### ***Consumer Loans***

Refer to Table U in the state of Georgia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in those geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans was below the proportion of businesses and significantly exceeded the aggregate distribution of loans to small businesses during 2019-2021.

### ***Consumer Loans***

Refer to Table V in the state of Georgia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households within the AA.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Atlanta CSA had a significantly positive impact on the Lending Test performance in this AA. The bank provided 10 CD loans from eight different entities totaling \$16.5 million, which represented 626 percent of allocated tier 1 capital for the area. Seven of these provided opportunities for affordable housing and three supported economic development. All except three of the CD loans were to partners that supported various CDFIs across the WNB footprint. Two of the exceptions were to a CDC that utilizes federal home grants to construct and renovate homes within LMI communities. The third exception was a PPP loan that supported economic development. The affordable housing and economic development allocations made to various CDFIs provided funds to affordable housing developers in the area or provide small business loans to rural and underserved areas. Two of the more responsive projects are described below.

*Affordable Housing* - The bank allocated \$12.5 million to the AA from one entity. The total loan amount was part of a \$50 million syndicated warehouse loan. The purpose of this loan was to provide a bridge loan for the funding of state LIHTC affordable housing credits to developer sponsors with projects throughout the state of Georgia to fund development costs until a tax credit investor is identified and secured to replenish these utilized project funds.

*Affordable Housing* - The bank allocated \$1.3 million to the AA. This was one loan to a CDFI as part of an Atlanta neighborhood development partnership. The company acquires, renovates, and resells single-family homes in Atlanta. The loan provides capital that helps the organization to overcome the appraisal risk in low-income CTs, where appraisals tend to undervalue properties. Since 2008, this organization has renovated and repopulated over 500 vacant homes and assisted over 800 homebuyers connected to down payment assistance. Since its inception, the organization has supported the creation of more than 8,000 units of housing to LMI persons.

## **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## **INVESTMENT TEST**

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

## **Conclusions for Area Receiving a Full-Scope Review**

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Atlanta CSA	2	102	26	1,697	28	93.33	1,799	97.80
Statewide	0	0	2	40	2	6.67	40	2.20
<b>Totals</b>	<b>2</b>	<b>102</b>	<b>28</b>	<b>1,737</b>	<b>30</b>	<b>100</b>	<b>1,839</b>	<b>100</b>

During the evaluation period, WNB made nine investments totaling \$1.8 million including two prior period investments totaling \$101,818 and seven current period investments totaling \$1.66 million. Additionally, 19 grants totaling \$37,040 were made for a total investment in the AA of \$1.79 million. WNB's total investments represented 68.19 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization, economic development, and community services. Grants in the AA were made to qualified CD organizations that provide economic development, community services, and affordable housing.

**SERVICE TEST**

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

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the Atlanta CSA is rated excellent.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Atlanta CSA	100	11	100	9.1	18.2	54.5	0	7.5	24.1	30.1	35.5

In the Atlanta CSA, the percentage of branches in low-income geographies exceeds the population levels in those geographies, while the percentage of branches in moderate-income geographies was near to the population levels in those geographies. The use of ADS allows customers access to effective banking services in LMI geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

The institution is a leader in providing CD services.

WNB provided 723 hours of financial education to 1,027 participants in the Atlanta AA. WNB utilized four of the bank's financial education courses in this AA including 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. The majority of the bank's educational training in the Atlanta AA focused on the Money Smart programs with 235 hours of the personal curriculum and 385 hours of the business curriculum. WNB employees also provided 65 hours of the Building Wealth program and 38 hours of the New Beginnings course.

In addition to financial education services, WNB employees worked with various organizations in support of CD needs with a total of 19 employees serving on 14 boards or committees in 23 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs for organizations that provide various CD related services to LMI individuals and promote financial literacy, small business lending, and affordable housing. WNB provided leadership and financial expertise on boards or committees of regionally and nationally known organizations such as Habitat for Humanity, Atlanta Neighborhood Development Partnership, and Hearts to Nourish Hope.

## State of Illinois

**CRA rating for the State of Illinois<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Illinois

WNB operates 27 branches throughout 12 AAs. The AAs include Bloomington-Pontiac IL CSA (Bloomington, IL CSA), Carbondale-Marion IL MSA (Carbondale MSA), Champaign-Urbana IL MSA (Champaign MSA), Danville IL MSA (Danville MSA), Davenport-Moline IL CSA (Davenport CSA), Decatur IL MSA (Decatur MSA), Dixon-Sterling IL CSA (Dixon CSA), Non-MSA IL (Illinois Non-MSA), Peoria IL MSA (Peoria MSA), Rockford-Freeport-Rochelle IL CSA (Rockford CSA), Springfield-Jacksonville-Lincoln IL CSA (Springfield CSA), and St Louis-St Charles-Farmington IL CSA (St Louis CSA).

The state of Illinois represents 1.04 percent of total bank deposits and is WNB's 10<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$87.2 million, which represented 0.08 percent deposit market share and ranked the bank 153<sup>rd</sup> of 268 institutions within the state. The top depository institutions were Citizens Equity First, Busey Bank, State Farm, JP Morgan Chase, Morton Community Bank, PNC Bank, First Mid Bank and Trust, U.S. Bank, Regions Bank, and United Community Bank, which held a combined 39.87 percent market share in the state.

We identified the Champaign MSA for full-scope review in Illinois. This AA includes the Champaign MSA. WNB operates three branches throughout the AA, which accounts for 11.71 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$10.2 million, which represented 0.11 percent market share and ranked the bank 33<sup>rd</sup> of 37 institutions within the AA. The largest depository institutions were Busey Bank, JP Morgan Chase Bank, and Credit Union 1, which held a combined 58.06 percent market share in the AA.

## Community Contacts

We identified one community contact in the Champaign CSA that supported affordable housing. The primary needs identified were affordable housing, specifically to historically marginalized communities.

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

The following tables provide information on the demographic composition of the Champaign CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Champaign-Urbana IL MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	43	18.6	16.3	39.5	20.9	4.7
Population by Geography	205,766	14.3	16.8	43.6	20.0	5.4
Housing Units by Geography	88,981	15.1	17.6	46.7	18.7	1.9
Owner-Occupied Units by Geography	43,897	5.5	12.1	57.6	24.7	0.1
Occupied Rental Units by Geography	36,015	25.4	23.1	34.8	12.7	4.0
Vacant Units by Geography	9,069	20.7	22.0	41.6	13.4	2.3
Businesses by Geography	13,446	10.9	18.3	42.0	26.4	2.3
Farms by Geography	715	3.1	6.9	67.0	22.9	0.1
Family Distribution by Income Level	42,424	22.5	16.6	20.4	40.5	0.0
Household Distribution by Income Level	79,912	28.9	14.5	15.2	41.5	0.0
Median Family Income MSA - 16580 Champaign-Urbana, IL MSA	\$70,634	Median Housing Value				\$137,528
		Median Gross Rent				\$838
		Families Below Poverty Level				10.6%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Champaign-Urbana IL MSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	48	14.6	16.7	20.8	37.5	10.4
Population by Geography	205,865	13.6	19.8	22.2	37.1	7.3
Housing Units by Geography	93,679	14.8	22.2	23.9	33.4	5.7
Owner-Occupied Units by Geography	44,088	5.0	21.3	28.4	44.7	0.7
Occupied Rental Units by Geography	38,971	23.1	23.6	18.5	24.1	10.7
Vacant Units by Geography	10,620	25.3	20.7	25.1	20.9	8.0
Businesses by Geography	15,573	11.0	18.9	24.5	39.8	5.8
Farms by Geography	768	3.4	9.9	43.6	42.1	1.0
Family Distribution by Income Level	42,618	23.4	16.4	19.8	40.4	0.0
Household Distribution by Income Level	83,059	28.0	14.5	15.6	41.8	0.0
Median Family Income MSA - 16580 Champaign-Urbana, IL MSA	\$83,169	Median Housing Value				\$141,762
		Median Gross Rent				\$878
		Families Below Poverty Level				8.8%

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Illinois

The Champaign MSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN ILLINOIS

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bloomington IL CSA	80	9	0	2	91	4.85	4.23
Carbondale MSA	91	17	2	4	114	6.08	9.43
Champaign MSA	160	38	0	5	203	10.83	11.71
Danville MSA	46	7	0	3	56	2.99	5.20
Davenport CSA	81	20	0	3	104	5.55	5.64
Decatur MSA	28	5	0	4	37	1.97	2.63
Dixon CSA	66	7	0	2	75	4.00	4.02
Illinois Non-MSA	253	47	0	5	305	16.27	18.56
Peoria MSA	159	20	0	5	184	9.81	9.62
Rockford CSA	126	21	0	4	151	8.05	7.55
Springfield CSA	287	29	2	4	322	17.17	10.73
St Louis CSA	209	21	0	3	233	12.43	10.68

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bloomington IL CSA	151	30	0	135	316	4.08	4.23
Carbondale MSA	171	64	2	200	437	5.64	9.43
Champaign MSA	289	346	0	490	1,125	14.51	11.71
Danville MSA	90	37	0	225	352	4.54	5.20
Davenport CSA	151	96	0	160	407	5.25	5.64
Decatur MSA	51	77	0	250	378	4.88	2.63

Dixon CSA	129	9	0	170	308	3.97	4.02
Illinois Non-MSA	474	164	0	515	1,153	14.87	18.56
Peoria MSA	301	61	0	460	822	10.60	9.62
Rockford CSA	245	35	0	320	600	7.74	7.55
Springfield CSA	507	133	12	475	1,127	14.54	10.73
St Louis CSA	383	108	0	237	728	9.39	10.68

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Champaign MSA, the bank originated a good volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.37 percent is greater than the bank's deposit market share of 0.11 percent.

Per 2021 peer data by number, WNB ranked 28<sup>th</sup> of 78 small business lenders in the AA. The five largest small business lenders held 52.39 percent of the market share. WNB's average small business loan totaled \$16,000 compared to the top five business lenders which ranged between \$6,000 and \$128,000.

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

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

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

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

The distribution of small loans to businesses in moderate-income geographies is excellent. The distribution of small loans to businesses in low-income geographies is weaker than the moderate-income performance. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in moderate-income geographies. There were not enough business loan originations in 2022 to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Illinois section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in moderate-income geographies but below the proportion of households in low-income geographies. In 2022, performance significantly exceeded the proportion of households for LMI geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.



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

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

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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. There were not enough business loans originated in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Illinois section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

## **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Champaign MSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$490,000, which represented 55 percent of allocated tier 1 capital for the area. The allocations were from five different entities. Two of these provided opportunities for affordable housing, two for economic development, and one for revitalization/stabilization. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans to rural and underserved areas. The revitalize/stabilization allocation was also to a CDFI that provides services to LMI and affordable housing opportunities. Three of the more innovative or responsive projects are described below.

The bank allocated \$100,000 from a \$5 million debt investment. The purpose of this loan was to support many CDFIs' financing of affordable housing and community facilities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The entity is a special purpose entity owned and managed by two WNB existing partners: One is a U.S. Treasury designated CDFI and the other is the largest CDFI association in the U.S. This loan created a new source of capital for small CDFIs. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations. This CD loan is considered innovative.

The bank allocated \$115,000 from a \$3 million term loan. This loan was to a CDFI that originates flexible, long-term real estate loans to meet the needs of low-income and special needs populations. This entity has financed non-profit sectors for projects including health care, charter schools, childcare, disability services, and arts organizations. It also provides support for housing developers. This CD loan is considered responsive.

The bank allocated \$100,000 from a \$5 million term loan. The borrowing entity is a CDFI that will use the capital to make small business loans in the states of Texas, Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, and Virginia. Most of the clients have little access to capital. Since the entity's inception, they have served 142,500 clients, disbursed 692,930 loans totaling over \$2.1 billion, and created 149,600 jobs. This CD loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Illinois Non-MSA and Springfield CSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance for consumer loans in the Carbondale MSA, Dixon CSA, Peoria MSA, Rockford CSA, and St Louis CSA is also consistent with the full-scope consumer performance. There were not enough small business loans in these areas for a meaningful analysis. The bank's performance in the Bloomington CSA, Danville MSA, and Davenport CSA is weaker than the bank's overall performance. There were not enough small business or consumer loans in the Decatur MSA for a meaningful analysis. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating.

Refer to Tables Q, R, U, and V in the state of Illinois section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Bloomington IL CSA	3	101	10	69	13	8.13	170	5.50
Carbondale MSA	2	61	12	154	14	8.75	215	6.97
Champaign MSA	3	98	13	196	16	10.00	294	9.51
Danville MSA	1	256	10	69	11	6.88	325	10.51
Davenport CSA	3	112	10	79	13	8.13	191	6.17
Decatur MSA	1	9	10	128	11	6.88	138	4.45
Dixon CSA	2	92	10	79	12	7.50	171	5.52
Illinois Non-MSA	6	172	10	195	16	10.00	367	11.88
Peoria MSA	2	86	11	144	13	8.13	230	7.44
Rockford CSA	2	40	11	155	13	8.13	195	6.33
Springfield CSA	2	83	10	154	12	7.50	236	7.65
St Louis CSA	2	279	11	230	13	8.13	509	16.47
Statewide	1	9	2	40	3	1.88	50	1.61
<b>Totals</b>	<b>30</b>	<b>1,397</b>	<b>130</b>	<b>1,692</b>	<b>160</b>	<b>100</b>	<b>3,089</b>	<b>100</b>

During the evaluation period, WNB made six investments totaling \$288,066 including three prior period investments totaling \$98,066 and three current period investments totaling \$190,000. Additionally, 10 grants totaling \$5,528 were made for a total investment in the AA of \$293,593. WNB's total investments represented 32.90 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Bloomington CSA, Carbondale MSA, Danville MSA, Davenport CSA, Decatur MSA, Dixon CSA, Illinois Non-MSA, Peoria MSA, Rockford CSA, Springfield CSA, and St Louis CSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

## Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bloomington IL CSA	4.2	1	3.7	0	0	100	0	1.1	20.8	52.4	19.0
Carbondale MSA	9.4	2	7.4	0	0	0	100	4.2	26.2	37.2	26.5
Champaign MSA	11.7	3	11.1	0	100	0	0	13.6	19.8	22.2	37.1
Danville MSA	5.2	1	3.7	0	0	100	0	8.9	10.1	51.1	28.1
Davenport CSA	5.6	2	7.4	0	100	0	0	4.7	24.7	58.1	12.5
Decatur MSA	2.6	1	3.7	0	0	100	0	7.2	21.9	51.6	18.5
Dixon CSA	4.0	1	3.7	0	0	100	0	0	13.0	57.4	29.6
Illinois Non-MSA	18.6	5	18.5	0	80	20	0	0	27.9	57.0	12.6
Peoria MSA	9.6	3	11.1	0	0	33.3	66.7	4.9	19.4	51.1	24.6
Rockford CSA	7.5	2	7.4	0	50	50	0	6.3	23.3	41.8	27.5
Springfield CSA	10.7	3	11.1	0	66.7	33.3	0	11.2	22.1	32.8	33.9
St Louis CSA	10.7	3	11.1	0	0	100	0	7.1	25.7	44.2	22.6

WNB does not have any branches in low-income geographies; however, 100 percent of the bank's branches in the Champaign MSA were in moderate-income geographies and significantly exceeded the population levels in those geographies. ADS were also available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bloomington IL CSA	0	0	0	0	0	0
Carbondale MSA	0	0	0	0	0	0
Champaign MSA	0	0	0	0	0	0
Danville MSA	0	0	0	0	0	0
Davenport CSA	0	0	0	0	0	0
Decatur MSA	0	0	0	0	0	0
Dixon CSA	0	1	0	0	-1	0
Illinois Non-MSA	0	0	0	0	0	0
Peoria MSA	0	0	0	0	0	0
Rockford CSA	0	0	0	0	0	0
Springfield CSA	0	0	0	0	0	0
St Louis CSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. WNB did not open or close branches during the evaluation period in the Champaign MSA but did close one branch in the Dixon CSA.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### Champaign MSA

WNB provided an excellent level of CD services in the Champaign MSA. Bank employees provided 286 hours of financial education to 291 participants throughout the Champaign MSA. The majority of the bank's training in this AA focused on the Money Smart programs with 100 hours of personal curriculum and 150 hours of the business curriculum. The bank also provided 20 hours of the Building Wealth curriculum and 16 hours of the customized New Beginnings program. In addition to financial education, four WNB employees served on four boards or committees in five member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Habitat for Humanity, Eastern Illinois Food Bank, Big Brother and Big Sister, Camargo Township District Library, and the Foundry.

Statewide

WNB provided 1,555 service hours and had 1,946 participants for financial education. The bank utilized the four core modules for financial education, which included 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 42 employees in Illinois serving on 42 boards or committees in 47 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Illinois Non-MSA, Springfield CSA, and St Louis CSA is consistent with the bank's overall performance in the full scope AA. The bank's performance under the Service Test in the Carbondale MSA, Davenport CSA, Peoria MSA, and Rockford CSA is weaker than the full-scope AA but still high satisfactory. The bank's performance in the Bloomington CSA, Danville MSA, Decatur MSA, and Dixon CSA is weaker than the bank's overall performance in the full-scope AA but still satisfactory.

## State of Indiana

**CRA rating for the State of Indiana<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Indiana

WNB operates 39 branches throughout eight AAs. The AAs include Bloomington-Bedford IN CSA (Bloomington, IN CSA), Evansville IN MSA (Evansville MSA), Fort Wayne-Huntington-Auburn IN CSA (Fort Wayne CSA), Indianapolis-Carmel-Muncie IN CSA (Indianapolis CSA), Lafayette-West Lafayette-Frankfort IN CSA (Lafayette, IN CSA), Non-MSA IN (Indiana Non-MSA), South Bend-Elkhart-Mishawaka IN CSA (South Bend CSA), and Terre Haute IN MSA (Terre Haute MSA).

The state of Indiana represents 1.23 percent of total bank deposits and is WNB's 8<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$103 million, which represented 0.06 percent deposit market share and ranked the bank 143<sup>rd</sup> of 275 institutions within the state. The top depository institutions were JP Morgan Chase Bank, PNC Bank, Fifth Third, Old National Bank, and Merchants Bank of Indiana, which held a combined 38.43 percent market share in the state.

We identified the South Bend CSA for full-scope review in Indiana. This AA includes the Elkhart-Goshen MSA, South Bend MSA, and non-metro counties of Kosciusko and Marshall. WNB operates five branches throughout the AA, which accounts for 14.18 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$14.6 million which represented 0.07 percent market share and ranked the bank 32<sup>nd</sup> of 36 institutions within the AA. The largest depository institutions were 1st Source Bank, Teachers Bank, and Lake City Bank, which held a combined 54.16 percent market share in the AA.

## Community Contacts

We identified one community contact in the South Bend CSA that supported economic development. The primary needs identified included affordable housing; however, the contact did indicate that constructions costs are typically higher in the area.

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

The following tables provide information on the demographic composition of the South Bend CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: South Bend-Elkhart-Mishawaka IN CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	142	8.5	20.4	49.3	21.8	0.0
Population by Geography	592,876	4.4	16.3	53.9	25.4	0.0
Housing Units by Geography	250,597	5.4	16.1	56.3	22.1	0.0
Owner-Occupied Units by Geography	154,751	2.3	12.1	56.8	28.8	0.0
Occupied Rental Units by Geography	64,603	10.9	23.7	55.0	10.4	0.0
Vacant Units by Geography	31,243	9.5	20.4	56.7	13.4	0.0
Businesses by Geography	51,010	5.9	16.7	53.9	23.5	0.0
Farms by Geography	2,044	1.3	7.1	60.9	30.8	0.0
Family Distribution by Income Level	148,870	19.2	17.4	22.1	41.3	0.0
Household Distribution by Income Level	219,354	22.0	16.6	19.0	42.4	0.0
Median Family Income MSA - 21140 Elkhart-Goshen, IN MSA	\$55,551	Median Housing Value				\$119,996
Median Family Income MSA - 43780 South Bend-Mishawaka, IN-MI MSA	\$57,692	Median Gross Rent				\$708
Median Family Income Non-MSAs - IN	\$55,715	Families Below Poverty Level				11.8%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: South Bend-Elkhart-Mishawaka IN CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	160	7.5	20.6	43.8	27.5	0.6
Population by Geography	606,294	5.2	18.9	47.8	27.8	0.3
Housing Units by Geography	255,589	5.3	20.3	49.0	25.0	0.3
Owner-Occupied Units by Geography	158,416	2.9	14.5	50.5	31.9	0.2
Occupied Rental Units by Geography	67,218	10.1	31.8	45.6	12.0	0.4
Vacant Units by Geography	29,955	7.7	24.7	49.1	18.0	0.5
Businesses by Geography	58,610	5.0	20.3	46.5	27.8	0.3
Farms by Geography	2,278	2.0	9.3	57.4	31.2	0.1
Family Distribution by Income Level	147,395	19.2	17.7	22.4	40.7	0.0
Household Distribution by Income Level	225,634	22.7	16.7	18.6	42.0	0.0
Median Family Income MSA - 21140 Elkhart-Goshen, IN MSA	\$70,610	Median Housing Value				\$140,104
Median Family Income MSA - 43780 South Bend-Mishawaka, IN-MI MSA	\$70,437	Median Gross Rent				\$804
Median Family Income Non-MSAs - IN	\$67,032	Families Below Poverty Level				9.3%

*Source: 2020 U.S. Census and 2022 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.



## Scope of Evaluation in Indiana

The South Bend CSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN INDIANA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the South Bend CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bloomington IN CSA	59	6	0	7	72	3.21	4.91
Evansville MSA	192	22	0	7	221	9.85	7.59
Ft Wayne CSA	265	52	0	8	325	14.48	11.66
Indianapolis CSA	733	148	1	13	895	39.88	42.59
Lafayette IN CSA	36	11	0	6	53	2.36	2.40
Indiana Non-MSA	191	14	0	8	213	9.49	11.19
South Bend CSA	304	53	0	8	365	16.27	14.18
Terre Haute MSA	80	12	1	7	100	4.46	5.48

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bloomington IN CSA	111	33	0	314	458	2.72	4.91
Evansville MSA	368	90	0	284	742	4.41	7.59
Ft Wayne CSA	538	241	0	646	1,425	8.46	11.66
Indianapolis CSA	1,408	2,333	1	6,935	10,677	63.43	42.59
Lafayette IN CSA	69	59	0	194	322	1.91	2.40
Indiana Non-MSA	370	45	0	859	1,274	7.57	11.19
South Bend CSA	600	419	0	446	1,465	8.70	14.18
Terre Haute MSA	144	84	10	234	472	2.80	5.48

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the South Bend CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.13 percent is greater than the bank's deposit market share of 0.07 percent.

Per 2021 peer data by number, WNB ranked 40<sup>th</sup> of 122 small business lenders in the AA. The five largest small business lenders held 59.6 percent of the market share. WNB's average small business loan totaled \$12,000 compared to the top five business lenders which ranged between \$13,000 and \$165,000.

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

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

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

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

The distribution of small loans to businesses moderate-income geographies is excellent. The distribution of small loans to businesses in low-income geographies is weaker than the moderate-income performance. During the evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in moderate-income geographies during 2019-2021. The bank did not originate enough business loans in 2022 to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Indiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the evaluation period, the proportion of bank loans significantly exceeded the proportion of households in LMI geographies for 2019-2022.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate lending to small businesses. Internal bank analysis shows without PPP loans, the bank's performance exceeded demographics. The bank did not originate enough business loans in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Indiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the South Bend CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$445,750 in the South Bend-Elkhart-Mishawaka CSA which represented 35 percent of allocated Tier 1 Capital for the area. The allocations were from five different entities. Three of these provided opportunities for affordable housing and two for economic development. All of the CD loans were to partners that supported various CDFIs, across the WNB footprint.

The affordable housing and economic development allocations were all to various CDFI's that provide funds to affordable housing developers in the area or provide small business loans. Two of the more innovative or responsive projects are described below.

The bank allocated \$100,000 to the AA. The total loan amount was for a \$2 million term loan. The purpose of this loan was to originate two loans to a CDFI totaling \$5 million which served as a required match for \$2.5 million in City of Indianapolis tax incentive program to provide funds to purchase and refinance mortgages at risk of foreclosure during the pandemic. Later in 2022, this term loan also served as a match to continue preventing evictions and bolstered the CDFI's mortgage program, which carries a 3 percent fixed rate for LMI borrowers. This loan is considered innovative.

The bank allocated \$165,000 to the AA. The total loan amount was for a \$500 thousand revolving line of credit (RLOC). This loan was to a CDFI to provide lending capital to bolster its micro and PPP lending capacity. This entity provides loans to small businesses through micro loans until the businesses are ready for more traditional funding sources. This line of credit helped provide PPP lending and supported minority and female-owned businesses through lending and technical assistance. This loan is considered responsive.

## Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Evansville MSA, Fort Wayne CSA, and Indianapolis CSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's performance for consumer loans in the Indiana Non-MSA and Terre Haute MSA is also consistent with the full-scope consumer performance. There were not enough small business loans in these areas for a meaningful analysis. The bank's performance in the Bloomington CSA and Lafayette IN CSA is weaker than the bank's overall performance, but still at a good level. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating. Refer to Tables Q, R, U, and V in the state of Indiana section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the South Bend-Elkhart-Mishawaka IN CSA AA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Bloomington CSA	2	57	11	129	13	7.93	186	2.77
Evansville MSA	2	111	11	429	13	7.93	540	8.04
Fort Wayne CSA	10	452	12	136	22	13.41	588	8.75
Indianapolis CSA	28	671	15	3,396	43	26.22	4,067	60.55
Lafayette CSA	3	45	13	109	16	9.76	154	2.29
Indiana Non-MSA	8	381	11	83	19	11.59	464	6.91
South Bend CSA	6	355	15	139	21	12.80	495	7.36
Terre Haute MSA	3	102	12	81	15	9.15	183	2.72
Statewide	0	0	2	40	2	1.22	40	0.60
<b>Totals</b>	<b>62</b>	<b>2,174</b>	<b>102</b>	<b>4,542</b>	<b>164</b>	<b>100</b>	<b>6,717</b>	<b>100</b>

During the evaluation period, WNB made eight investments totaling \$480,230 including six prior period investments totaling \$355,230 and two current period investments totaling \$125,000. Additionally, 13 grants totaling \$14,367 were made for a total investment in the AA of \$494,597. WNB’s total investments represented 38.75 percent of tier 1 capital allocated to the AA.

WNB’s qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development, community services, and affordable housing.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank’s performance under the Investment Test in Bloomington CSA, Evansville MSA, Fort Wayne CSA, Indianapolis CSA, Lafayette IN CSA, Indiana Non-MSA, and Terre Haute MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

**SERVICE TEST**

The bank’s performance under the Service Test in Indiana is rated Outstanding.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the South Bend CSA is rated excellent.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bloomington CSA	4.9	2	5.1	0	0	50	50	4.8	16.2	40.9	29.1
Evansville MSA	7.6	3	7.7	0	66.7	33.3	0	8.3	21.4	34.7	35.3
Fort Wayne CSA	11.7	4	10.3	0	50	50	0	4.2	18.3	48.8	28.3
Indianapolis CSA	42.6	16	41.0	0	37.5	37.5	25	8.0	21.8	40.6	28.2
Lafayette CSA	2.4	1	2.6	0	0	0	100	5.3	19.8	43.6	23.3
Indiana Non-MSA	11.2	6	15.4	0	0	66.7	33.3	1.2	12.4	69.3	17.2
South Bend CSA	14.2	5	12.8	20	20	60	0	5.2	18.9	47.8	27.8
Terre Haute MSA	5.5	2	5.1	0	0	50	50	5.6	18.8	40.7	31.8

In the South Bend CSA, the percentage of branches in low- and moderate-income geographies exceeded the population levels in those geographies. ADS were also available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bloomington CSA	0	0	0	0	0	0
Evansville MSA	0	0	0	0	0	0
Fort Wayne CSA	0	1	0	0	-1	0
Indianapolis CSA	3	0	0	0	3	0
Lafayette CSA	0	0	0	0	0	0
Indiana Non-MSA	0	1	0	0	-1	0
South Bend CSA	0	0	0	0	0	0
Terre Haute MSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open or close branches in the South Bend CSA during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### South Bend CSA

WNB provided an excellent level of CD services in the full scope South Bend CSA. Bank employees provided 262 hours of financial education to 208 participants. The majority of the bank's educational training in this AA focused on the Money Smart programs with 76 hours of the personal curriculum and 171 hours of the business curriculum. The bank also provided 12 hours of the customized New Beginning financial education program, as well as three hours of Building Wealth. In addition to financial education, eight WNB employees served on six boards or committees in nine member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Habitat for Humanity, Food Bank of Northern Indiana, The Window, Inc., and Michiana Five for the Homeless.

## Statewide

Statewide, WNB provided 1,863 service hours to 2,053 participants for financial education. The bank utilized the four core modules for financial education, which included 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 57 employees in Indiana serving on 51 boards or committees in 67 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Fort Wayne CSA, Indianapolis CSA, and Indiana Non-MSA is consistent with the bank's overall performance in the full-scope AA. The bank's performance in the Bloomington CSA, Evansville MSA and Terre Haute MSA is weaker than the bank's overall performance in the full-scope AA but still high satisfactory. The bank's performance in the Lafayette CSA is weaker but still satisfactory.

## State of Kentucky

**CRA rating for the State of Kentucky<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Kentucky

WNB operates 19 branches throughout four AAs. These AAs include the Bowling Green-Glasgow KY CSA (Bowling Green CSA), Lexington-Fayette-Richmond-Frankfort KY CSA (Lexington CSA), Non-MSA KY (Kentucky Non-MSA), and Owensboro KY MSA (Owensboro MSA).

The state of Kentucky represents 0.53 percent of total bank deposits and is WNB's 16<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$44.6 million, which represented 0.10 percent deposit market share and ranked the bank 90<sup>th</sup> of 115 institutions within the state. The largest depository institutions were JP Morgan Chase, Central Bank and Trust, U.S. Bank, Truist Bank, Independence Bank of KY, PNC Bank, Fifth Third Bank, and Community Trust Bank, which held a combined 38.98 percent market share in the state.

We identified the Kentucky Non-MSA for full-scope review in Kentucky. This AA includes the non-metro counties of Adair, Boyle, Caldwell, Calloway, Fleming, Garrard, Green, Hopkins, Knox, Laurel, Lincoln, Logan, McCracken, Marion, Marshall, Mercer, Muhlenberg, Rockcastle, Rowan, Taylor, Washington, and Whitley. WNB operates 10 branches throughout the AA, which accounts for 58.93 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$26.3 million, which represented 0.18 percent market share and ranked the bank 55<sup>th</sup> of 70 institutions within the AA. The largest depository institutions were Community Financial Services Bank, US Bank National, and Community Trust Bank, which held a combined 20.14 percent market share in the AA.

## Community Contacts

We identified one community contact in the Kentucky Non-MSA that supported affordable housing. The primary needs identified included small business lending programs.

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



The following tables provide information on the demographic composition of the Kentucky Non-MSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA KY</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	150	0.7	16.0	60.7	22.7	0.0
Population by Geography	613,472	0.3	13.8	60.9	25.0	0.0
Housing Units by Geography	277,271	0.3	14.3	60.7	24.7	0.0
Owner-Occupied Units by Geography	168,412	0.1	12.1	60.3	27.4	0.0
Occupied Rental Units by Geography	71,765	0.7	18.8	60.7	19.9	0.0
Vacant Units by Geography	37,094	0.4	15.6	62.7	21.3	0.0
Businesses by Geography	43,041	0.4	11.1	60.0	28.5	0.0
Farms by Geography	2,896	0.1	7.1	62.6	30.1	0.0
Family Distribution by Income Level	161,844	21.6	15.9	18.8	43.6	0.0
Household Distribution by Income Level	240,177	24.4	15.0	16.4	44.2	0.0
Median Family Income Non-MSAs - KY		\$45,986	Median Housing Value			\$102,086
			Families Below Poverty Level			16.1%
			Median Gross Rent			\$582

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA KY</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	170	2.4	17.1	45.9	33.5	1.2
Population by Geography	590,342	1.8	13.7	47.6	36.4	0.5
Housing Units by Geography	270,577	2.6	14.2	46.8	35.8	0.6
Owner-Occupied Units by Geography	163,555	1.5	11.7	47.0	39.3	0.4
Occupied Rental Units by Geography	67,130	4.2	19.0	45.9	30.3	0.6
Vacant Units by Geography	39,892	4.5	16.4	47.2	30.6	1.3
Businesses by Geography	46,005	1.3	15.0	43.8	38.8	1.0
Farms by Geography	3,100	0.6	8.7	47.3	42.9	0.5
Family Distribution by Income Level	152,089	20.4	16.2	18.6	44.7	0.0
Household Distribution by Income Level	230,685	24.5	14.7	15.6	45.2	0.0
Median Family Income Non-MSAs - KY		\$54,327	Median Housing Value			\$118,990
			Families Below Poverty Level			13.9%
			Median Gross Rent			\$651

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Kentucky

The Kentucky Non-MSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN KENTUCKY

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bowling Green CSA	86	13	0	4	103	9.34	9.68
Lexington CSA	236	34	1	7	278	25.20	28.40
Kentucky Non-MSA	595	82	1	6	684	62.01	58.93
Owensboro MSA	31	5	0	2	38	3.45	3.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Bowling Green CSA	166	36	0	142	344	3.42	9.68
Lexington CSA	434	106	1	4,544	5,085	50.56	28.40
Kentucky Non-MSA	1,055	327	2	2,824	4,208	41.85	58.93
Owensboro MSA	60	10	0	350	420	4.18	3.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Kentucky Non-MSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.21 percent is greater than the bank's deposit market share of 0.18 percent.

Per 2021 peer data by number, WNB ranked 39<sup>th</sup> of 118 small business lenders in the AA. The five largest small business lenders held 52.05 percent of the market share. WNB's average small business

loan totaled \$7,000 compared to the top five business lenders which ranged between \$4,000 and \$40,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies during 2019-2021. The bank did not originate enough business loans in 2022 to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Kentucky section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in moderate-income geographies is excellent. During the evaluation period, the proportion of bank loans significantly exceeded the proportion of households in those geographies for 2019-2021. The proportion of bank loans in low-income geographies was lower than the proportion of households, but still at an adequate level. The 2022 performance in both LMI geographies was consistent with the performance in moderate-income CTs.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is excellent. During the evaluation period, the proportion of bank loans exceeded the proportion of businesses and the aggregate distribution of loans to small businesses during 2019-2021. The bank did not originate enough business loans in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Kentucky section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During the evaluation period (2019-2022), the proportion of bank loans to LMI borrowers exceeded the proportion of households in the AA.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Kentucky Non-MSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$2.8 million, which represented 123 percent of allocated tier 1 capital for the area. The allocations were for six loans from five different entities. Three of these provided opportunities for affordable housing and three for economic development. All of the CD loans were to partners that supported various CDFIs, across the WNB footprint.

The affordable housing and economic development allocations were all to various CDFI's that provide funds to affordable housing developers in the area or provide small business loans. Two of the more responsive projects are described below.

The bank allocated \$1 million to the AA. The total loan amount was for a \$2 million term loan. This loan was to one of Kentucky's first community development corporations who later became one of the state's first CDFIs. This CDFI offers highly flexible, low-cost microbusiness and small business loans tailored for the region's rural economic challenges. This CDFI also offers specialized products for two of the critical industries in the AA: 1) healthy food and 2) freight transportation. This loan provided critical lending capital in the aftermath of COVID-19, when financing for small businesses in LMI communities was scarce.

The bank allocated \$1,250,000 to the AA. The bank offered this entity two loans during the evaluation period. One was for \$2 million, with \$250,000 allocated to the full-scope AA and another loan for \$1 million, with 100 percent of this loan allocated to the AA. These loans helped capitalize the Kentucky-based CDFI's interest-free "Emergency Stabilization Fund" for member organizations and area businesses struggling during the Pandemic. The organization offers two clusters of loan products. One for its network of more than 50 community development non-profit member organizations and another for community developments. In addition, WNB provided the organization with a \$3,000 grant in both 2021 and 2022.

## Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s overall performance under the Lending Test in the Lexington CSA is consistent with the bank’s overall performance under the Lending Test in the full-scope area. There were not enough small business loans in the Bowling Green and Owensboro MSA to perform a meaningful analysis. In the Bowling Green CSA, consumer loan performance was weaker than the overall performance but still at a good level. In the Owensboro MSA, the consumer loan performance was consistent with the full-scope area.

CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating. There was one Responsive CD loan in the Lexington CSA totaling \$3 million. Funds were used to develop a mixed-use affordable housing, grocery store, and retail shopping development in an economically distressed urban corridor of downtown Lexington. This was also part of a state-approved revitalization plan, which delivered Tax Increment Finance funding. It is also consistent with the local “East End Lexington Revitalization Plan,” located in a Qualified Opportunity Zone, an SBA HUBZone, and a USDA-designated food desert.

Refer to Tables Q, R, U, and V in the state of Kentucky section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank’s performance under the Investment Test in Kentucky is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Kentucky Non-MSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Bowling Green CSA	2	16	12	130	14	18.42	147	10.28
Lexington-Fayette CSA	3	274	13	207	16	21.05	481	33.73
Kentucky Non-MSA	14	366	15	244	29	38.16	610	42.80

Owensboro MSA	3	42	12	105	15	19.74	148	10.36
Statewide	0	0	2	40	2	2.63	40	2.84
<b>Totals</b>	<b>22</b>	<b>698</b>	<b>54</b>	<b>727</b>	<b>76</b>	<b>100</b>	<b>1,425</b>	<b>100</b>

During the evaluation period, WNB made 17 investments totaling \$590,700 including 14 prior period investments totaling \$365,700 and three current period investments totaling \$225,000. Additionally, 12 grants totaling \$19,200 were made for a total investment in the AA of \$609,900. WNB’s total investments represented 26.54 percent of tier 1 capital allocated to the AA.

WNB’s qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and affordable housing.

**Conclusions for Areas Receiving Limited-Scope Review**

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Bowling Green CSA, Lexington CSA, and Owensboro MSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

**SERVICE TEST**

The bank’s performance under the Service Test in Kentucky is rated Outstanding.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Kentucky Non-MSA is rated excellent.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Bowling Green CSA	9.7	2	10.5	0	50	50	0	2.6	23.7	39.2	32.4
Lexington-Fayette CSA	28.4	6	31.6	0	16.7	50	33.3	4.9	17.7	40.1	36.0
Kentucky Non-MSA	58.9	10	52.6	10	20	50	20	1.8	13.7	47.6	36.4
Owensboro MSA	3.0	1	5.3	0	0	100	0	0	21.1	55.3	21.7

In the Kentucky Non-MSA, the percentage of branches in low-income geographies significantly exceeds the population levels in those geographies. Similarly, the percentage of branches in moderate-income

geographies exceeded the population levels in those geographies. ADS were also available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Bowling Green CSA	1	0	0	1	0	0
Lexington-Fayette CSA	0	0	0	0	0	0
Kentucky Non-MSA	0	0	0	0	0	0
Owensboro MSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. WNB closed no branches and opened one new branch in a moderate-income geography of the limited scope Bowling Green CSA.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### Kentucky Non-MSA

WNB provided an excellent level of CD services in the full scope Kentucky Non-MSA. Bank employees provided 543 hours of financial education to 625 participants. The majority of the bank's educational training in this AA focused on the Money Smart programs with 110 hours of the personal curriculum and 408 hours of the business curriculum. The bank also provided five hours of the customized New Beginnings and 11 hours of Building Wealth curriculums in bank branches and local non-profit community service organizations. In addition to financial education, 22 WNB employees served on 16 boards or committees in 23 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Lake Cumberland Area Development District, Habitat for Humanity, and Community Ventures.

### Statewide

WNB provided 1,098 hours of financial services education to 2,023 participants. The bank utilized the four core modules for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 38 employees

in Kentucky serving on 28 boards or committees in 31 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Lexington CSA is consistent with the bank's overall performance in the full-scope AA. The bank's performance in the Bowling Green CSA is weaker than the full-scope AA but still high satisfactory. The bank's performance in the Owensboro MSA is weaker than the bank's overall performance in the full-scope AA but is still satisfactory.



## State of Louisiana

**CRA rating for the State of Louisiana<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans and qualified CD investments and grants;
- A relatively high level of CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Louisiana

WNB operates 21 branches throughout eight AAs. These AAs include Alexandria LA MSA (Alexandria MSA), Baton Rouge LA MSA (Baton Rouge MSA), Houma-Thibodaux LA MSA (Houma MSA), Lafayette-Opelousas-Morgan City LA CSA (Lafayette, LA CSA), Lake Charles-Jennings LA CSA (Lake Charles CSA), Monroe-Ruston LA CSA (Monroe CSA), New Orleans-Metairie-Hammond LA CSA (New Orleans CSA), and Shreveport-Bossier City-Minden LA CSA (Shreveport CSA).

The state of Louisiana represents 0.63 percent of total bank deposits and is WNB's 14<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$52.2 million, which represented 0.03 percent deposit market share and ranked the bank 157<sup>th</sup> of 278 institutions within the state. The largest depository institutions were JP Morgan Chase, Capital One, and Hancock Whitney Bank, which held a combined 43.37 percent market share in the state.

We identified the New Orleans CSA for full-scope review in Louisiana. This AA includes the Hammond and New Orleans MSAs. WNB operates nine branches throughout the AA, which accounts for 40.78 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$21.3 million, which represented 0.04 percent market share and ranked the bank 46<sup>th</sup> of 77 institutions within the AA. The largest depository institutions were Capital One, Hancock Whitney Bank, and JP Morgan Chase, which held a combined 60.90 percent market share in the AA.

## Community Contacts

We identified two community contacts in Louisiana. Both of the two organizations identified in the New Orleans CSA supported economic development. The primary needs identified included loans to small businesses with a focus on local minority- and women-owned small businesses, as well as affordable housing unit as lower-income households appear to have suffered the most in the current economic climate. WNB originated a number of innovative CD loans that specifically addressed lending needs to

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

minority and women-owned businesses.

The following tables provide information on the demographic composition of the New Orleans CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: New Orleans-Metairie-Hammond LA CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	409	15.9	24.7	28.9	26.7	3.9
Population by Geography	1,319,934	9.3	24.2	35.8	29.9	0.8
Housing Units by Geography	585,536	11.0	24.5	33.8	29.8	0.9
Owner-Occupied Units by Geography	310,574	5.1	19.6	39.4	35.5	0.4
Occupied Rental Units by Geography	193,449	17.7	30.5	27.9	22.6	1.4
Vacant Units by Geography	81,513	18.0	29.0	26.2	25.2	1.5
Businesses by Geography	197,546	8.7	20.6	30.7	38.8	1.1
Farms by Geography	3,224	5.5	19.1	41.9	32.9	0.6
Family Distribution by Income Level	314,327	25.1	15.8	17.3	41.9	0.0
Household Distribution by Income Level	504,023	26.6	15.0	15.4	43.1	0.0
Median Family Income MSA - 25220 Hammond, LA MSA		\$52,864	Median Housing Value			\$191,080
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$61,124	Median Gross Rent			\$913
			Families Below Poverty Level			14.8%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: New Orleans-Metairie-Hammond LA CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	444	11.5	26.6	26.6	30.4	5.0
Population by Geography	1,361,295	8.8	25.6	31.4	32.8	1.3
Housing Units by Geography	597,140	9.0	26.6	30.7	32.1	1.7
Owner-Occupied Units by Geography	331,343	5.4	21.4	34.9	37.3	0.9
Occupied Rental Units by Geography	187,207	14.2	35.4	25.7	22.5	2.2
Vacant Units by Geography	78,590	11.3	27.4	24.7	33.0	3.6
Businesses by Geography	219,261	7.3	23.4	29.9	37.6	1.7
Farms by Geography	3,685	5.2	21.2	38.4	34.0	1.1
Family Distribution by Income Level	310,921	25.0	15.3	18.1	41.6	0.0
Household Distribution by Income Level	518,550	27.1	14.4	15.5	43.0	0.0
Median Family Income MSA - 25220 Hammond, LA MSA		\$62,373	Median Housing Value			\$228,171
Median Family Income MSA - 35380 New Orleans-Metairie, LA MSA		\$72,053	Median Gross Rent			\$1,027
			Families Below Poverty Level			12.6%

Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Louisiana

The New Orleans CSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN LOUISIANA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the New Orleans CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Alexandria MSA	31	2	1	1	35	3.59	3.33
Baton Rouge MSA	88	29	0	4	121	12.40	11.58
Houma MSA	35	6	0	4	45	4.61	4.83
Lafayette LA CSA	122	24	0	3	149	15.27	14.37
Lake Charles CSA	54	6	0	5	65	6.66	10.90
Monroe CSA	102	17	0	4	123	12.60	8.80
New Orleans CSA	293	75	0	9	377	38.63	40.78
Shreveport CSA	48	9	0	4	61	6.25	5.41

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Alexandria MSA	59	5	1	40	105	0.50	3.33
Baton Rouge MSA	156	198	0	13,237	13,591	65.21	11.58
Houma MSA	60	22	0	177	259	1.24	4.83
Lafayette LA CSA	205	231	0	153	589	2.82	14.37
Lake Charles CSA	93	716	0	194	1,003	4.81	10.90
Monroe CSA	166	605	0	265	1,036	4.97	8.80

New Orleans CSA	529	1,713	0	1,114	3,356	16.10	40.78
Shreveport CSA	80	693	0	130	903	4.33	5.41

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the New Orleans CSA, the bank originated a good volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.06 percent is greater than the bank's deposit market share of 0.04 percent.

Per 2021 peer data by number, WNB ranked 59<sup>th</sup> of 159 small business lenders in the AA. The five largest small business lenders held 52.82 percent of the market share. WNB's average small business loan totaled \$20,000 compared to the top five business lenders which ranged between \$7,000 and \$145,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies. There were not enough small business loans in 2022 to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Louisiana section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in those geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate lending to small businesses. Internal bank analysis shows without PPP loans, the bank's performance exceeded demographics. There were not enough small business loans in 2022 to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Louisiana section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the New Orleans CSA had a significantly positive impact on the Lending Test performance. The bank allocated \$1.1 million in CD loans, which represented 60 percent of allocated tier 1 capital for the area. The allocations were from eight different entities. Four of these provided opportunities for affordable housing and four supported economic development. The allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Three of the more innovative or responsive projects are described below.

The bank allocated \$350,000 from a \$5 million loan that supports many CDFIs' financing of affordable housing and community facilities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The loan entity is a special purpose entity owned and managed by two WNB existing partners: a U.S. Treasury-designated CDFI and the largest CDFI association in the U.S. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations. This loan is considered innovative.

The bank allocated \$50,000 from a \$1 million loan in the SOAR Fund, an LLC owned by Local Initiatives Support Corporation (LISC), a national CDFI. The purpose of the fund is to provide lending capital to address the small business needs of historically disenfranchised southern U.S. populations during the COVID-19 pandemic. The facility is a partnership of 12 CDFIs working in tandem with national partners. The SOAR fund purchases 95 percent of each COVID-19 Recovery Loan originated by the participating CDFIs. This loan is considered innovative.

The bank allocated \$250,000 from a \$5 million loan. The borrowing entity is a CDFI. The capital will be used by the entity to make small business loans in the states of Texas, Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, and Virginia. Most of the clients have little access to capital. Since this entity's inception, they have served 142,500 clients, disbursed 692,930 loans totaling over \$2.1 billion and created 149,600 jobs. This loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Baton Rouge MSA, Houma MSA, Monroe CSA, and Shreveport CSA is consistent with the bank's overall performance for consumer loans under the Lending Test in the full-scope area. The bank's performance in the Lafayette CSA and Lake Charles CSA is weaker than the bank's overall performance, but still at an adequate level. There were not enough small business or consumer loans in the Alexandria MSA for a meaningful analysis, while there were not enough small business loans only in the Houma, Lake Charles, Monroe, and Shreveport AAs for a meaningful analysis. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating. The Baton Rouge MSA had one innovative and responsive CD loan for \$13 million to a CDFI organization to finance the acquisition of a seven-acre site and the construction of a new facility for a science and technology charter school. The population served by this school has 72 percent of students eligible for free or reduced lunch and has 97 percent minorities in the student population. This is a high performing and free tuition charter school.

Refer to Tables Q, R, U, and V in the state of Louisiana section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank's performance in the New Orleans CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Alexandria MSA	3	98	13	196	16	9.88	294	3.52
Baton Rouge MSA	2	19	18	547	20	12.35	566	6.79
Houma MSA	2	40	14	245	16	9.88	284	3.41
Lafayette CSA	6	212	17	4,578	23	14.20	4,789	57.44
Lake Charles CSA	3	70	15	296	18	11.11	365	4.38
Monroe CSA	5	329	16	201	21	12.96	530	6.36
New Orleans CSA	6	502	21	632	27	16.67	1,134	13.60
Shreveport CSA	3	127	14	196	17	10.49	322	3.86
Statewide	2	12	2	40	4	2.47	53	0.63
<b>Totals</b>	<b>32</b>	<b>1,408</b>	<b>130</b>	<b>6,930</b>	<b>162</b>	<b>100</b>	<b>8,338</b>	<b>100</b>

During the evaluation period, WNB made 12 investments totaling \$1.117 million including six prior period investments totaling \$502,182 and six current period investments totaling \$615,000. Additionally, 15 grants totaling \$16,980 were made for a total investment in the AA of \$1.134 million. WNB's total investments represented 60.97 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide community services, revitalization and/or stabilization, and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Alexandria MSA, Baton Rouge MSA, Houma MSA, Lafayette, LA CSA, Lake Charles CSA, Monroe CSA, and Shreveport CSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

The bank's performance under the Service Test in Louisiana is rated High Satisfactory

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the New Orleans CSA is good.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Alexandria MSA	3.3	1	4.8	0	100	0	0	5.3	21.2	35.6	37.7
Baton Rouge MSA	11.6	2	9.5	0	0	100	0	15.8	18.0	31.8	31.0
Houma MSA	4.8	1	4.8	0	0	100	0	3.9	15.2	47.8	30.7
Lafayette, LSA CSA	14.4	3	14.3	0	33.3	66.7	0	7.3	25.6	29.9	36.5
Lake Charles CSA	10.9	2	9.5	50	0	0	50	8.7	14.8	38.1	37.2
Monroe CSA	8.8	2	9.5	0	0	50	50	16.1	18.2	29	36.7
New Orleans CSA	40.8	9	42.9	22.2	33.3	22.2	11.1	8.8	25.6	31.4	32.8
Shreveport CSA	5.4	1	4.8	0	100	0	0	6.2	25.7	29.3	36.8

In the New Orleans CSA, the percentage of branches in low-income geographies significantly exceeds the population levels in those geographies, Similarly, the percentage of branches in moderate-income geographies exceeded the population levels in those geographies. ADS were also available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Alexandria MSA	0	0	0	0	0	0
Baton Rouge MSA	0	0	0	0	0	0
Houma MSA	0	0	0	0	0	0
Lafayette, LA CSA	1	0	0	1	0	0
Lake Charles CSA	0	0	0	0	0	0
Monroe CSA	0	0	0	0	0	0
New Orleans CSA	2	0	2	0	0	0
Shreveport CSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened two branches in the New Orleans CSA in low-income geographies.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.



## **Community Development Services**

The institution provides a significant level of CD services.

### New Orleans CSA

WNB provided an excellent level of CD services in the New Orleans CSA. Bank employees provided 532 hours of financial education to 751 participants through four core training modules including 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. The majority of the bank’s educational training in this AA focused on the Money Smart programs with 150 hours of Money Smart – personal curriculum and 353 hours of the Money Smart – business curriculum. In addition to financial education, 12 WNB employees served on 14 boards or committees in 15 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as St Tammany Council on Aging, Community Christian Concern, and The New Orleans Family Justice Center.

### Statewide

WNB provided 1,050 hours of financial education to 1,364 participants. WNB personnel utilized the five core modules for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Junior Achievement 4) Money Smart – business 5) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 28 employees in Louisiana serving on 31 boards or committees in 33 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank’s performance under the Service Test in the Baton Rouge MSA, Lafayette, LA CSA, Lake Charles CSA, and Monroe CSA is weaker than the bank’s overall performance in the full-scope AA but is still high satisfactory. The bank’s performance under the Service Test in the Alexandria MSA, Houma MSA, and Shreveport CSA was also weaker than the bank’s overall performance in the full-scope AA but still satisfactory.

## State of Maryland

**CRA rating for the State of Maryland<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Maryland

WNB operates three branches throughout one AA. We identified the only AA in the state for full-scope review. The Salisbury-Cambridge MD CSA (Salisbury CSA) includes the Salisbury MSA.

The state of Maryland represents 0.14 percent of total bank deposits and is the 24<sup>th</sup> largest rating area. WNB operates three branches throughout the AA, which accounts for 100 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$11.7 million, which represented 0.21 percent market share and ranked the bank 15<sup>th</sup> of 17 institutions within the AA. The largest depository institutions were PNC Bank, Calvin B. Taylor Banking Company, and Hebron Savings Bank, which held a combined 38.56 percent market share in the AA.

## Community Contacts

We identified two community contacts in Maryland. Both of the two organizations identified in the Maryland CSA supported economic development. The primary needs identified included affordable housing, as well as support to nonprofits help support small businesses.

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

The following tables provide information on the demographic composition of the Salisbury CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Salisbury-Cambridge MD CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	44	2.3	20.5	40.9	27.3	9.1
Population by Geography	178,681	1.8	24.1	41.7	29.9	2.5
Housing Units by Geography	108,615	1.6	17.1	45.4	35.9	0.0
Owner-Occupied Units by Geography	44,124	1.6	14.2	46.5	37.6	0.0
Occupied Rental Units by Geography	22,023	2.7	40.7	40.4	16.1	0.0
Vacant Units by Geography	42,468	1.1	7.8	46.7	44.3	0.0
Businesses by Geography	18,028	1.1	15.4	50.7	32.8	0.1
Farms by Geography	812	0.6	15.8	47.0	36.2	0.4
Family Distribution by Income Level	43,154	22.1	17.3	20.1	40.5	0.0
Household Distribution by Income Level	66,147	25.5	16.6	16.8	41.1	0.0
Median Family Income MSA - 41540 Salisbury, MD-DE MSA	\$63,091	Median Housing Value				\$217,196
		Median Gross Rent				\$961
		Families Below Poverty Level				11.1%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Salisbury-Cambridge MD CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	46	6.5	15.2	50.0	19.6	8.7
Population by Geography	180,668	6.0	16.3	51.8	23.9	1.9
Housing Units by Geography	110,413	4.4	15.0	49.6	29.6	1.4
Owner-Occupied Units by Geography	45,165	2.3	11.1	58.2	28.3	0.0
Occupied Rental Units by Geography	24,147	11.6	23.1	46.3	14.1	4.9
Vacant Units by Geography	41,101	2.6	14.6	42.1	40.0	0.7
Businesses by Geography	20,758	4.6	13.7	51.7	28.7	1.3
Farms by Geography	884	4.1	11.8	56.0	27.6	0.6
Family Distribution by Income Level	44,423	23.5	16.4	21.7	38.4	0.0
Household Distribution by Income Level	69,312	26.4	16.5	18.1	39.0	0.0
Median Family Income MSA - 41540 Salisbury, MD-DE MSA	\$76,095	Median Housing Value				\$228,238
		Median Gross Rent				\$1,015
		Families Below Poverty Level				8.9%

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Maryland

The Salisbury CSA received a full-scope review, as it is the only AA in the state. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MARYLAND

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Salisbury CSA is excellent.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salisbury CSA	100	20	0	2	122	100	100

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Salisbury CSA	192	80	0	1,250	1,522	100	100

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Salisbury CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business lending market share in the AA of 0.12 percent is less than the bank's deposit market share of 0.21 percent.

Per 2021 peer data by number, WNB ranked 49<sup>th</sup> of 88 small business lenders in the AA. The five largest small business lenders held 45.43 percent of the market share. WNB's average small business loan totaled \$6,000 compared to the top five business lenders which ranged between \$9,000 and \$19,000.

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

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

***Small Loans to Businesses***

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

There were not enough small business loans during either evaluation period to conduct a meaningful analysis.

***Consumer Loans***

Refer to Table U in the state of Maryland section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in those geographies. During 2022, the proportion of bank loans in low-income geographies was lower than the proportion of households but still at an adequate level. Performance in moderate-income geographies was consistent with the performance for 2019-2021.

***Lending Gap Analysis***

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

***Small Loans to Businesses***

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

There were not enough small business loans during either evaluation period to conduct a meaningful analysis.

***Consumer Loans***

Refer to Table V in the state of Maryland section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of households.

**Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Salisbury CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$1.3 million, which represented 122 percent of allocated tier 1 capital for the area. The allocations were for two loans from one entity that provided opportunities for affordable housing. The responsive nature of the CD loans is described below.

The bank allocated \$250 thousand in 2019 and an additional \$1 million in 2022, for a total of \$1.3 million. This CDFI provides financing to non-profit and for-profit corporations interested in delivering affordable housing, neighborhood revitalization, and community facilities in the Delmarva Peninsula. The flexible products offered by the CDFI are used to finance predevelopment, acquisition, construction, bridge/gap loans, and guarantees.

**Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

**INVESTMENT TEST**

The bank’s performance under the Investment Test in Maryland is rated Outstanding.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Salisbury CSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000’s)	#	\$(000’s)	#	% of Total #	\$(000’s)	% of Total \$
Salisbury CSA	2	403	11	232	13	86.67	635	94.02
Statewide	0	0	2	40	2	13.33	40	5.98
<b>Totals</b>	<b>2</b>	<b>403</b>	<b>13</b>	<b>272</b>	<b>15</b>	<b>100</b>	<b>675</b>	<b>100</b>

During the evaluation period, WNB made four investments totaling \$627,642 including two prior period investments totaling \$402,642 and two current period investments totaling \$225,000. Additionally, nine

grants totaling \$7,028 were made for a total investment in the AA of \$634,670. WNB’s total investments represented 62.13 percent of tier 1 capital allocated to the AA.

WNB’s qualified investments in the AA provide affordable housing, revitalization and/or stabilization, and economic development. Grants in the AA were made to qualified CD organizations that provide economic development.

**SERVICE TEST**

The bank’s performance under the Service Test in Maryland is rated Outstanding.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Salisbury CSA is rated excellent.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits		Branches					Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Salisbury CSA	100.0	3	100.0	0	33.3	66.7	0	6.0	16.3	51.8	23.9

There were no branches in low-income geographies; however, the percentage of branches in moderate-income geographies significantly exceeds the population levels in those geographies. ADS were also available and effective for delivering services in LMI geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

**Community Development Services**

The institution is a leader in providing CD services.

In the Salisbury CSA, the bank provided 201 hours of financial education to 280 participants. WNB personnel utilized the three core modules for financial education in this state including 1) Building

Wealth 2) Money Smart – business 3) Money Smart – personal. The majority of the bank’s educational training in this AA focused on the Money Smart programs with 68 hours of Money Smart – personal curriculum and 129 hours of the Money Smart – business curriculum. In addition to financial education, WNB employees worked with various organizations in support of CD needs, with a total of four employees serving on four boards or committees in five positions. WNB provided leadership and financial expertise on boards or committees of regionally and nationally known organizations such as Habitat for Humanity, The Samaritan Shelter, and Fruitland Community Center.



## State of Mississippi

**CRA rating for the State of Mississippi<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Mississippi

WNB operates 28 branches throughout seven AAs. The AAs include the Cleveland-Indianola MS CSA (Cleveland, MS CSA), Columbus-West Point MS CSA (Columbus CSA), Gulfport-Biloxi-Pascagoula MS MSA (Gulfport MSA), Jackson-Vicksburg-Brookhaven MS CSA (Jackson CSA), Memphis-Forrest City MS CSA (Memphis CSA), Non-MSA MS (Mississippi Non-MSA), and Tupelo-Corinth MS CSA (Tupelo CSA).

The state of Mississippi represents 0.98 percent of total bank deposits and was WNB's 11<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$81.6 million, which represented 0.10 percent deposit market share and ranked the bank 88<sup>th</sup> of 153 institutions within the state. The largest depository institutions were Regions Bank, Trustmark National Bank, and Cadence Bank, which held a combined 34.76 percent market share in the state.

We identified the Mississippi Non-MSA for full-scope review in Mississippi. This AA includes the non-metro counties of Coahoma, Grenada, Humphreys, Kemper, Lafayette, Lauderdale, Lawrence, Leflore, Monroe, Noxubee, Oktibbeha, Panola, Pike, Tallahatchie, Union, and Washington. WNB operates nine branches throughout the AA, which accounts for 31 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$25.4 million, which represented 0.19 percent market share and ranked the bank 39<sup>th</sup> of 51 institutions within the AA. The largest depository institutions were Regions Bank, Renasant Bank, and Cadence Bank, which held a combined 29.73 percent market share in the AA.

## Community Contacts

We identified two community contacts in Mississippi. Of the two organizations identified in the Mississippi Non-MSA, both supported economic development. The primary needs identified include in the AA include both financial literacy for high school seniors and workforce training.

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

The following tables provide information on the demographic composition of the Mississippi Non-MSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA MS</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	120	9.2	27.5	40.8	21.7	0.8
Population by Geography	504,226	5.6	21.9	45.0	26.2	1.3
Housing Units by Geography	221,406	5.8	21.7	44.9	27.2	0.4
Owner-Occupied Units by Geography	115,810	3.4	18.1	49.1	29.3	0.0
Occupied Rental Units by Geography	65,652	9.8	27.6	37.4	24.3	0.8
Vacant Units by Geography	39,944	6.1	22.2	45.2	25.6	0.9
Businesses by Geography	35,328	5.5	22.6	41.4	29.9	0.5
Farms by Geography	1,850	2.4	21.6	54.3	21.5	0.2
Family Distribution by Income Level	116,927	25.0	16.2	16.9	41.9	0.0
Household Distribution by Income Level	181,462	27.7	14.8	15.5	42.0	0.0
Median Family Income Non-MSAs - MS	\$43,897	Median Housing Value				\$97,791
		Median Gross Rent				\$647
		Families Below Poverty Level				21.7%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA MS</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	148	10.8	20.9	41.2	24.3	2.7
Population by Geography	484,143	8.5	19.2	43.5	27.5	1.3
Housing Units by Geography	227,326	9.4	20.0	43.3	26.2	1.1
Owner-Occupied Units by Geography	115,578	6.2	17.1	46.2	29.3	1.2
Occupied Rental Units by Geography	67,003	14.1	24.0	37.5	23.4	1.0
Vacant Units by Geography	44,745	10.9	21.5	44.6	22.4	0.7
Businesses by Geography	35,749	11.5	18.4	41.1	28.0	1.0
Farms by Geography	1,912	7.2	14.9	53.4	23.9	0.6
Family Distribution by Income Level	113,622	25.7	16.2	17.7	40.5	0.0
Household Distribution by Income Level	182,581	29.1	14.6	15.4	40.9	0.0
Median Family Income Non-MSAs - MS	\$53,003	Median Housing Value				\$118,180
		Median Gross Rent				\$733
		Families Below Poverty Level				18.9%

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Mississippi

The Mississippi Non-MSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN MISSISSIPPI

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland, MS CSA	0	3	0	4	7	2.95	2.27
Columbus CSA	0	23	0	3	26	10.97	10.89
Gulfport MSA	0	43	0	7	50	21.10	19.13
Jackson CSA	0	32	0	7	39	16.46	18.11
Memphis CSA	0	5	0	3	8	3.38	4.12
Mississippi Non-MSA	1	71	1	5	78	32.49	31.12
Tupelo CSA	2	25	2	3	32	12.66	14.36

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland, MS CSA	0	12	0	374	386	5.19	2.27
Columbus CSA	0	135	0	405	540	7.26	10.89
Gulfport MSA	0	237	0	620	857	11.52	19.13
Jackson CSA	0	178	0	3,422	3,600	48.41	18.11
Memphis CSA	0	49	0	170	219	2.94	4.12
Mississippi Non-MSA	2	519	2	810	1,333	17.90	31.12
Tupelo CSA	2	170	2	332	506	6.78	14.36

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Mississippi Non-MSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.27 percent is greater than the deposit market share of 0.19 percent.

Per 2021 peer data by number, WNB ranked 40<sup>th</sup> of 111 small business lenders in the AA. The five largest small business lenders held 38.46 percent of the market share. WNB's average small business loan totaled \$8,000 compared to the top five business lenders which ranged between \$7,000 and \$59,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is adequate. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses and aggregate lending in LMI geographies. During 2022, there were not enough small business loans to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Mississippi section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in those geographies. During 2022, the performance was consistent with overall performance in low-income geographies and lower in moderate-income geographies, but still at a good level.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate lending to small businesses. Internal bank analysis shows without PPP loans, the bank's performance exceeded demographics. During 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Mississippi section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Mississippi Non-MSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$810,333, which represented 37 percent of allocated tier 1 capital for the area. The allocations were for five loans from four different entities. Two of these provided opportunities for affordable housing and three supported economic development. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Two of the more responsive projects are described below.

The bank allocated \$75,000 from a \$405,963 term loan. The purpose of this loan was to provide small business lending capital to a CDFI serving LMI communities of the Mississippi Delta Region. This entity is comprised of a regional credit union, a CDFI loan fund, and a policy center. This CDFI has provided financial services that have benefited more than 1 million residents in one of the nation's most persistently impoverished regions. According to its 2021 fourth quarter report, the entity has made a total of 2,360 small business loans totaling over \$85 million in economic development impact across the mid-south. Approximately 71 percent of these loans were classified as "high impact" meaning they were originated in U.S. CTs where the poverty rate is at least 20 percent or where the MFI is at or below 80 percent of the AMI. These loans included businesses owned by women or minorities or to nonprofits for community facilities. This loan is considered responsive.

The bank allocated \$150,000 in 2019 and \$432,000 in 2020 from a total loan amount of \$2.5 million. This was for a term loan that was renewed and increased in 2020, which provided the entity with small business lending capital, which proved timely in the wake of the pandemic. The mission of this CDFI is to provide support through financial assistance and development services, which facilitates the development of communities that provide safe quality housing for the residents of Mississippi and creates economic opportunities that will add/retain jobs in the community. This loan is considered responsive.

## Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank’s overall performance under the Lending Test in the Gulfport CSA and Jackson CSA is consistent with the bank’s overall performance. The overall consumer performance under the Lending Test for the Cleveland, MS CSA, Columbus CSA, and Memphis CSA was also consistent with the full-scope area; however, there were not enough small business loans to perform a meaningful analysis. The Tupelo CSA reflected weaker small business performance but still at an adequate level, with consumer loan performance consistent with the full-scope area.

CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating. There was one particularly responsive revitalization/stabilization project in the Jackson CSA. This \$2.8 million term loan to a CDFI was to finance the conversion of an extended stay hotel into a multifamily apartment complex located in a moderate-income geography. In this area, 46 percent of tract residents were living below the federal poverty line. The CDFI converted the hotel into 90 studio and 30 two-bedroom workforce housing apartment units. This was consistent with the “Redevelopment and Neighborhood Revitalization” priorities of the city of Jackson’s 2020-2024 Five Year Consolidated Plan. This project will replace transient hotel occupants with permanent residents while also restoring one of the hotels buildings that recently burned.

Refer to Tables Q, R, U, and V in the state of Mississippi section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

The bank’s performance under the Investment Test in Mississippi is rated Outstanding.

## Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank’s performance in the Mississippi Non-MSA is excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Assessment Area	Qualified Investments							
	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Cleveland, MS CSA	3	128	13	186	16	11.85	314	7.98

Columbus CSA	2	100	14	347	16	11.85	447	11.38
Gulfport MSA	3	156	20	601	23	17.04	758	19.30
Jackson CSA	6	156	16	423	22	16.30	579	14.76
Memphis CSA	3	47	13	220	16	11.85	266	6.78
Mississippi Non-MSA	3	110	19	1,044	22	16.30	1,154	29.38
Tupelo CSA	5	182	13	186	18	13.33	369	9.39
Statewide	0	0	2	40	2	1.48	40	1.03
<b>Totals</b>	<b>25</b>	<b>879</b>	<b>110</b>	<b>3,048</b>	<b>135</b>	<b>100</b>	<b>3,927</b>	<b>100</b>

During the evaluation period, WNB made 10 investments totaling \$1.14 million including three prior period investments totaling \$109,512 and seven current period investments totaling \$1.03 million. Additionally, 12 grants totaling \$14,297 were made for a total investment in the AA of \$1.154 million. WNB’s total investments represented 51.99 percent of tier 1 capital allocated to the AA.

WNB’s qualified investments in the AA provide revitalization and/or stabilization, economic development, and affordable housing. Grants in the AA were made to qualified CD organizations that provide economic development.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank’s performance under the Investment Test in the Cleveland, MS CSA, Columbus CSA, Gulfport MSA, Jackson CSA, Memphis CSA, and Tupelo CSA is consistent with the bank’s overall performance under the Investment Test in the full-scope area.

**SERVICE TEST**

The bank’s performance under the Service Test in Mississippi is rated Outstanding.

**Conclusions for Area Receiving a Full-Scope Review**

Based on a full-scope review, the bank’s performance in the Mississippi Non-MSA is rated excellent.

**Retail Banking Services**

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod		Upp
Cleveland, MS CSA	2.3	1	3.6	0	0	100	0	9.8	43.7	29.2	17.3
Columbus CSA	10.9	2	7.1	0	0	100	0	8.9	10.4	29.5	47.6

Gulfport MSA	19.1	6	21.4	16.7	33.3	33.3	16.7	6.1	16.1	41.1	34.7
Jackson CSA	18.1	4	14.3	0	50	25	25	15.5	27.8	36.5	19.6
Memphis CSA	4.1	1	3.6	0	0	100	0	0.0	16.5	38.7	44.8
Mississippi Non-MSA	31.1	9	32.1	0	22.2	33.3	44.4	8.5	19.2	43.5	27.5
Tupelo CSA	14.4	5	17.9	0	0	60	20	1.3	3.6	63.7	29.9

In the Mississippi Non-MSA, there were no branches in low-income geographies but the percentage of branches in moderate-income geographies exceeded the population levels in those geographies. ADS were available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cleveland, MS CSA	0	0	0	0	0	0
Columbus CSA	0	0	0	0	0	0
Gulfport MSA	0	0	0	0	0	0
Jackson CSA	0	0	0	0	0	0
Memphis CSA	0	0	0	0	0	0
Mississippi Non-MSA	1	0	0	0	0	1
Tupelo CSA	1	0	0	0	1	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch in an upper-income geography of the Mississippi Non-MSA and one branch in a middle-income geography of the Tupelo CSA.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### Mississippi Non-MSA

Bank employees provided 360 hours of financial education to 595 participants. The majority of the bank's training activities focused on the Money Smart programs with 21 hours of the personal curriculum and 320 hours of the business curriculums. In addition to financial education, 10 WNB employees served on 8 boards or committees in 12 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Habitat for Humanity, Pike County Fuller Center for Housing, and The Boys and Girls Club.



Statewide

WNB provided 1,410 hours of financial education to 1,878 participants. WNB personnel utilized the five core modules for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Junior Achievement 4) Money Smart – business 5) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 41 employees in Mississippi serving on 35 boards or committees in 47 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Gulfport MSA and Jackson CSA is consistent with the bank's overall performance in the full-scope AA. The bank's performance in the Columbus CSA and Tupelo CSA is weaker than the bank's overall performance in the full-scope AA but still high satisfactory. The bank's performance in the Cleveland, MS CSA and Memphis CSA is weaker than the bank's overall performance in the full-scope AA but is still satisfactory.

## State of New York

**CRA rating for the State of New York<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans and qualified CD investments and grants;
- A relatively high level of CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in New York

WNB operates 15 branches throughout eight AAs. The AAs include the Albany-Schenectady NY CSA (Albany CSA), Buffalo-Cheektowaga-Olean NY CSA (Buffalo CSA), Elmira-Corning NY CSA (Elmira CSA), Rochester-Batavia-Seneca Falls NY CSA (Rochester CSA), Syracuse-Auburn NY CSA (Syracuse CSA), Non-MSA NY (New York Non-MSA), Utica-Rome NY MSA (Utica MSA), and Watertown-Fort Drum NY MSA (Watertown MSA).

The state of New York represents 0.51 percent of total bank deposits and is WNB's 17<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$42.4 million, which represented a negligible deposit market share within the state. The largest depository institutions were JP Morgan Chase Bank, Goldman Sachs Bank, and Morgan Stanley Private Bank, which held a combined 47 percent market share in the state.

We identified the Buffalo CSA for full-scope review in New York. This AA includes the Buffalo MSA and non-metro Cattaraugus County. WNB operates three branches throughout the AA, which accounts for 28.4 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$12 million, which represented 0.02 percent market share and ranked the bank 66<sup>th</sup> of 88 institutions within the AA. The largest depository institutions were Manufactures and Traders Trust Company, KeyBank, and Bank of America, which held a combined 74.54 percent market share in the AA.

## Community Contacts

We identified four community contacts in New York. Of the four organizations identified in the Buffalo CSA, all four were CD listening sessions or CRA coalitions. The primary needs identified included economic development and affordable housing.

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

The following tables provide information on the demographic composition of the Buffalo CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Buffalo-Cheektowaga-Olean NY CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	320	14.7	17.5	42.5	21.9	3.4
Population by Geography	1,214,696	11.9	13.4	43.0	30.4	1.3
Housing Units by Geography	560,986	13.2	14.8	44.1	27.7	0.2
Owner-Occupied Units by Geography	333,743	6.4	11.1	47.1	35.4	0.0
Occupied Rental Units by Geography	168,545	22.6	20.1	39.0	17.9	0.4
Vacant Units by Geography	58,698	25.0	20.5	41.5	12.7	0.4
Businesses by Geography	96,050	10.0	12.4	38.0	35.8	3.8
Farms by Geography	2,642	3.3	4.8	51.5	39.2	1.2
Family Distribution by Income Level	304,814	22.3	16.8	20.4	40.5	0.0
Household Distribution by Income Level	502,288	26.0	15.5	16.6	41.9	0.0
Median Family Income Non-MSAs - NY		\$59,570	Median Gross Rent			\$720
Median Family Income MSA - 15380 Buffalo-Cheektowaga, NY MSA		\$67,108	Median Housing Value			\$122,848
			Families Below Poverty Level			10.8%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Buffalo-Cheektowaga-Olean NY CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	351	13.1	20.2	41.3	21.4	4.0
Population by Geography	1,243,944	10.8	16.9	43.9	26.9	1.5
Housing Units by Geography	571,928	10.7	17.8	45.6	25.1	0.8
Owner-Occupied Units by Geography	342,336	5.0	13.9	49.7	31.0	0.4
Occupied Rental Units by Geography	172,595	19.1	24.0	38.4	17.3	1.2
Vacant Units by Geography	56,997	19.8	22.1	43.0	13.4	1.7
Businesses by Geography	99,016	8.2	15.2	42.7	31.1	2.8
Farms by Geography	2,710	2.5	9.7	52.8	34.2	0.8
Family Distribution by Income Level	303,926	22.2	17.1	21.0	39.7	0.0
Household Distribution by Income Level	514,931	25.5	15.6	16.9	42.0	0.0
Median Family Income MSA - 15380 Buffalo-Cheektowaga, NY MSA		\$79,486	Median Housing Value			\$155,855
			Median Gross Rent			\$831
Median Family Income Non-MSAs - NY		\$69,021	Families Below Poverty Level			9.6%

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in New York

The Buffalo CSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NEW YORK

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Buffalo CSA is excellent.

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only product analyzed was small loans to businesses, as home mortgage loans were not a primary product.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Albany CSA	99	18	0	4	121	8.78	9.47
Buffalo CSA	361	65	0	6	432	31.35	28.39
Elmira CSA	53	6	0	3	62	4.50	5.06
New York Non-MSA	92	14	0	3	109	7.91	8.52
Rochester CSA	343	37	0	5	385	27.94	32.16
Syracuse CSA	26	1	1	5	33	2.39	0.00
Utica MSA	161	23	0	3	187	13.57	10.87
Watertown MSA	40	5	1	3	49	3.56	5.53

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Albany CSA	195	144	0	1,951	2,290	29.41	9.47
Buffalo CSA	698	346	0	485	1,529	19.64	28.39
Elmira CSA	97	19	0	425	541	6.95	5.06
New York Non-MSA	170	109	0	250	529	6.79	8.52
Rochester CSA	600	179	0	585	1,364	17.52	32.16
Syracuse CSA	47	1	21	348	417	5.35	0.00
Utica MSA	311	331	0	195	837	10.75	10.87
Watertown MSA	80	54	1	145	280	3.60	5.53

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Buffalo CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.08 percent is greater than the bank's deposit market share of 0.02 percent.

Per 2021 peer data by number, WNB ranked 52<sup>nd</sup> of 126 small business lenders in the AA. The five largest small business lenders held 54.2 percent of the market share. WNB's average small business loan totaled \$4,000 compared to the top five business lenders which ranged between \$12,000 and \$97,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies. During 2022, there were not enough small business loans to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of New York section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households for LMI geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate

distribution of loans to small businesses. During 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of New York section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Buffalo CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$485,000, which represented 46 percent of allocated tier 1 capital for the area. The allocations were from six different entities. Five of these provided opportunities for affordable housing and one supported economic development. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Two of the more innovative or responsive projects are described below.

The bank allocated \$200,000 from a \$5 million loan. The purpose of this loan was to support many CDFIs financing of affordable housing and community facilities in communities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The loan entity is a special purpose entity owned and managed by two WNB existing partners: One is a U.S. Treasury-designated CDFI and the other is the largest CDFI in the U.S. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations. This CD Loan is considered innovative.

The bank allocated \$100,000 from a \$5 million term loan. The borrowing entity is a CDFI, that will use the funds to make small business loans in the states of Texas, Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, and Virginia. Most of the clients have little access to capital. Since this entity's inception, they have served 142,500 clients, disbursed 692,930 loans totaling over \$2.1 billion and created 149,600 jobs. This CD loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Albany CSA, Elmira CSA, New York Non-MSA, Syracuse CSA, and Watertown MSA is consistent with the bank's overall performance for consumer loans under the Lending Test in the full-scope area, but there were not enough small business loans to perform a meaningful analysis. The bank's performance for consumer loans in the Rochester CSA and the Utica MSA is also consistent with the full-scope consumer loan performance; however, small business loan performance was weaker than the overall performance but still at a good level. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating. The CD loans for the limited-scope areas included one PPP loan totaling \$1.5 million in the Albany CSA that supported economic development.

Refer to Tables Q, R, U, and V in the state of New York section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Albany CSA	1	24	13	219	14	11.20	243	6.71
Buffalo CSA	2	45	18	511	20	16.00	556	15.34
Elmira CSA	2	46	12	94	14	11.20	140	3.86
New York Non-MSA	2	102	12	94	14	11.20	196	5.41
Rochester CSA	2	102	16	1,849	18	14.40	1,951	53.85
Syracuse CSA	1	12	12	129	13	10.40	141	3.89
Utica MSA	2	62	13	129	15	12.00	191	5.29
Watertown MSA	2	45	13	119	15	12.00	165	4.54
Statewide	0	0	2	40	2	1.60	40	1.12
<b>Totals</b>	<b>14</b>	<b>438</b>	<b>111</b>	<b>3,185</b>	<b>125</b>	<b>100</b>	<b>3,623</b>	<b>100</b>

During the evaluation period, WNB made seven investments totaling \$544,770 including two prior period investments totaling \$44,770 and five current period investments totaling \$500,000. Additionally, 13 grants totaling \$10,852 were made for a total investment in the AA of \$555,622. WNB's total investments represented 52.80 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Albany CSA, Elmira CSA, New York Non-MSA, Rochester CSA, Syracuse CSA, Utica MSA, and Watertown MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

The bank's performance under the Service Test in New York is rated High Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

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

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Albany CSA	9.5	2	13.3	0	0	0	100	11.3	17.5	44.1	24.8
Buffalo CSA	28.4	3	20.0	0	0	66.7	33.3	10.8	16.9	43.9	26.9
Elmira CSA	5.1	1	6.7	0	0	100	0	12.7	13.4	53.3	18.9
New York Non-MSA	32.2	5	33.3	0	20	80	0	9.5	18.8	40.4	30.4
Rochester CSA	0.0	0	0.0	0	0	0	0	1.8	33.6	56.5	8.1
Syracuse CSA	8.5	1	6.7	0	0	100	0	1.9	18.6	74.2	5.3
Utica MSA	10.9	2	13.3	0	0	100	0	7.6	17.3	48.2	21.3
Watertown MSA	5.5	1	6.7	0	0	100	0	0	22.8	56.0	21.0



WNB does not have branches in LMI geographies of the Buffalo CSA; however, two of the AA's three branches are located directly next to moderate-income geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Albany CSA	0	0	0	0	0	0
Buffalo CSA	0	0	0	0	0	0
Elmira CSA	0	0	0	0	0	0
New York Non-MSA	0	0	0	0	0	0
Rochester CSA	0	0	0	0	0	0
Syracuse CSA	0	1	0	0	-1	0
Utica MSA	0	0	0	0	0	0
Watertown MSA	0	0	0	0	0	0

The bank did not open or close branches during the evaluation period in the Buffalo CSA. During the fourth quarter of 2020, WNB exited the Syracuse CSA market by closing the only branch in the limited scope AA.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution provides a significant level of CD services.

### Buffalo CSA

WNB provided an excellent level of CD services in the full scope Buffalo CSA. Bank employees provided 238 hours of financial education to 201 participants. The bank's training activities focused on the Money Smart – business curriculum with 238 hours of financial education. In addition to financial education, 18 WNB employees served on 12 boards or committees in 20 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Isaiah 61 Project, Southtowns Rural Preservation Company, Inc., Genesis House of Olean, Inc., and the Salvation Army of Hudson Service Center.

### Statewide

WNB provided 884 hours of financial education to 889 participants. WNB personnel utilized the four core courses for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. In addition to financial education initiatives, WNB

employees also work with various organizations in support of CD needs. WNB had 17 employees in New York serving on 19 boards or committees in 21 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the New York MSA is consistent with the bank's performance in the full-scope AA. The bank's performance in the Utica MSA is weaker than the full-scope AA and is high satisfactory. The bank's performance in the Albany CSA, Elmira CSA, Rochester CSA, Syracuse CSA, and Watertown MSA is weaker than the bank's overall performance in the full-scope AA and is considered satisfactory.

## State of North Carolina

**CRA rating for the State of North Carolina<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in North Carolina

WNB operates 67 branches throughout 11 AAs. The AAs include the Asheville-Marion-Brevard NC CSA (Asheville CSA), Fayetteville-Sanford-Lumberton NC CSA (Fayetteville CSA), Goldsboro NC MSA (Goldsboro MSA), Greensboro--Winston-Salem--High Point NC CSA (Greensboro CSA), Greenville-Kinston-Washington NC CSA (Greenville CSA), Hickory-Lenoir-Morganton NC MSA (Hickory MSA), Jacksonville NC MSA (Jacksonville, NC MSA), New Bern-Morehead City NC CSA (New Bern CSA), Non-MSA NC (North Carolina Non-MSA), Raleigh-Durham-Cary NC CSA (Raleigh CSA), and Rocky Mount-Wilson-Roanoke Rapids NC CSA (Rocky Mount CSA).

The state of North Carolina represents 3.69 percent of total bank deposits and is WNB's 2<sup>nd</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$307.7 million in North Carolina, which represented 0.13 percent deposit market share and ranked the bank 49<sup>th</sup> of 110 institutions within the state. These deposits do not include deposits that are located in a multistate AA. The largest depository institutions were Truist Bank, First Citizen's, Wells Fargo, and Bank of America, which held a combined 44.39 percent market share in the state.

We identified the Raleigh CSA for full-scope review in North Carolina. This AA includes Durham-Chapel Hill MSA, Raleigh MSA, and non-metro Vance County. WNB operates 12 branches throughout the AA, which accounts for 19.8 of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$60.9 million, which represented 0.04 percent market share and ranked the bank 41<sup>st</sup> of 55 institutions within the AA. The largest depository institutions were State Employees, First-Citizens Bank & Trust Company, and Wells Fargo Bank, which held a combined 56.68 percent market share in the AA.

## Community Contacts

We identified one community contact in the Raleigh CSA that helped support economic and workforce development. The primary needs identified included small business lending, specifically to minority-

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

and women-owned businesses.

The following tables provide information on the demographic composition of the Raleigh CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Raleigh-Durham-Cary NC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	335	8.7	25.1	28.4	35.8	2.1
Population by Geography	1,756,432	7.2	27.0	32.2	33.0	0.6
Housing Units by Geography	720,635	7.1	26.7	33.0	33.2	0.0
Owner-Occupied Units by Geography	420,254	3.0	23.1	35.2	38.7	0.0
Occupied Rental Units by Geography	241,238	13.4	31.8	29.5	25.3	0.0
Vacant Units by Geography	59,143	10.3	31.4	31.2	27.0	0.0
Businesses by Geography	212,768	4.9	22.0	32.9	39.8	0.5
Farms by Geography	5,528	4.1	23.8	42.6	29.5	0.1
Family Distribution by Income Level	434,552	22.4	17.1	18.7	41.8	0.0
Household Distribution by Income Level	661,492	23.6	16.6	17.5	42.3	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$68,020	Median Housing Value			\$222,221
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$78,057	Median Gross Rent			\$919
Median Family Income Non-MSAs - NC		\$47,217	Families Below Poverty Level			9.5%
<i>Source: 2015 ACS and 2021 D&amp;B Data, Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Raleigh-Durham-Cary NC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	440	9.1	21.6	33.2	33.2	3.0
Population by Geography	2,006,374	8.1	20.4	35.5	34.2	1.8
Housing Units by Geography	799,803	8.2	20.9	35.9	33.7	1.3
Owner-Occupied Units by Geography	472,835	4.4	18.9	36.9	39.0	0.9
Occupied Rental Units by Geography	264,927	14.3	24.1	34.5	25.4	1.8
Vacant Units by Geography	62,041	11.8	23.1	33.9	29.4	1.8
Businesses by Geography	285,493	6.5	17.7	35.3	39.3	1.3
Farms by Geography	6,885	7.1	21.2	39.7	30.8	1.2
Family Distribution by Income Level	480,783	22.0	16.6	20.2	41.2	0.0
Household Distribution by Income Level	737,762	23.4	16.6	17.7	42.3	0.0
Median Family Income MSA - 20500 Durham-Chapel Hill, NC MSA		\$84,764	Median Housing Value			\$275,059
Median Family Income MSA - 39580 Raleigh-Cary, NC MSA		\$96,929	Median Gross Rent			\$1,137

Median Family Income Non-MSAs - NC	\$57,962	Families Below Poverty Level	6.9%
Source: 2020 U.S. Census and 2022 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.			

## Scope of Evaluation in North Carolina

The Raleigh CSA received a full-scope review given lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Raleigh CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Asheville CSA	132	20	0	7	159	3.20	4.78
Fayetteville CSA	434	84	0	6	524	10.54	10.09
Goldsboro MSA	154	37	0	8	199	4.00	4.77
Greensboro CSA	1,409	296	2	11	1,718	34.56	33.43
Greenville CSA	58	17	0	6	81	1.63	1.15
Hickory MSA	404	80	2	5	491	9.88	8.38
Jacksonville MSA	53	12	0	4	69	1.39	1.26
New Bern CSA	154	29	0	5	188	3.78	3.98
North Carolina Non-MSA	344	67	3	6	420	8.45	7.93
Raleigh CSA	597	186	3	19	805	16.19	19.78
Rocky Mount CSA	252	57	1	7	317	6.38	4.44

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Asheville CSA	242	377	0	1,232	1,851	5.08	4.78

Fayetteville CSA	820	537	0	1,575	2,932	8.05	10.09
Goldsboro MSA	286	440	0	1,224	1,950	5.36	4.77
Greensboro CSA	2,673	2,614	4	3,094	8,385	23.03	33.43
Greenville CSA	109	111	0	733	953	2.62	1.15
Hickory MSA	755	681	12	1,193	2,641	7.25	8.38
Jacksonville MSA	95	229	0	303	627	1.72	1.26
New Bern CSA	289	169	0	884	1,342	3.69	3.98
North Carolina Non-MSA	649	459	46	1,497	2,651	7.28	7.93
Raleigh CSA	1,158	2,212	20	7,409	10,799	29.66	19.78
Rocky Mount CSA	441	501	2	1,333	2,277	6.25	4.44

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Raleigh CSA AA, the bank originated a good volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.11 percent is greater than the bank's deposit market share of 0.04 percent.

Per 2021 peer data by number, WNB ranked 54<sup>th</sup> of 204 small business lenders in the AA. The five largest small business lenders held 52.4 percent of the market share. WNB's average small business loan totaled \$13,000 compared to the top five business lenders which ranged between \$13,000 and \$69,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded both the proportion of businesses and the aggregate distribution of loans in LMI geographies. During 2022, performance was near to the proportion of businesses in low-income geographies and significantly exceeded the proportion of businesses in moderate-income geographies.

#### ***Consumer Loans***

Refer to Table U in the state of North Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in LMI geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was significantly below the proportion of businesses but was near the aggregate lending to small businesses. Internal bank analysis shows without PPP loans, small business lending performance exceeded demographics with 99 percent of the bank's loans originated to small businesses. During 2022, performance was excellent with 100 percent of the bank's loans originated to small businesses.

#### ***Consumer Loans***

Refer to Table V in the state of North Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Raleigh CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$7.4 million, which represented 139 percent of allocated tier 1 capital for the area. The allocations were for nineteen loans from nine different entities. Of these allocations, 14 provided opportunities for affordable housing, four supported economic development, and one supported revitalization/stabilization of LMI areas. There was one PPP loan totaling \$2.6 million that supported economic development, which is included in the total allocations. Of the affordable housing, economic development, and revitalization/stabilization allocations, six were loans to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Three of the more innovative or responsive projects are described below.

The bank allocated \$1 million in 2021 to the AA that helped provide gap funding for the North Carolina COVID-19 Rapid Recovery Loan Program in 2021 and provided capital for funding the organization's Loan Participant Program (LPP) in 2022. This loan was time sensitive and WNB funded the loan in less than 30 days. The organization also enlisted 12 CDFIs and nonprofit financial institutions to help originate and service the emergency relief loans. At the time of this loan, there were still 75 small business Relief loan commitments that had not been funded. The program ensures that job-creating small business loans are originated through the entire state. This program is a coordinated effort with the state of North Carolina and the North Carolina Rural Center to support rural economic development. This allocation is considered innovative and responsive.

The bank allocated \$800,000 to the AA. During the evaluation periods, WNB offered this entity ten participation loans throughout the AA. The purpose of the participations is to provide funding for affordable housing apartment complexes primarily funded by LIHTC equity. The organization combines member participation loans to create permanent gap financing and has funded over \$450 million in loans for more than 400 properties in six states. WNB originated ten of these participation loans in the Raleigh CSA, which helped create 464 new multifamily units and 180 new senior units for households earning 30-60 percent of AMI. These loans are considered responsive.

The bank allocated \$2.3 million to the AA, which was a participation from a \$4.5 million LIHTC deal. The purpose of the loan was to build a 72-unit multifamily apartment complex. The residents are earning between 30-80 percent of AMI. The project is in Benson, North Carolina, which has a population of less than 4,000. Of all households in the town, 40 percent earn less than \$25,000 annually and 52 percent earn less than \$50,000 annually. This loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Asheville CSA, Fayetteville CSA, Greensboro CSA, Hickory MSA, New Bern CSA, and Rocky Mount CSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Goldsboro MSA, Greenville CSA, Jacksonville MSA, and North Carolina Non-MSA is weaker than the bank's overall performance under the Lending Test in the full-scope area. These areas were weaker primarily because of weaker consumer lending but was still deemed adequate.

Refer to Tables Q, R, U, and V in the state of North Carolina section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

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



## Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Assessment Area	Qualified Investments							
	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Asheville CSA	2	119	15	306	17	7.80	424	3.74
Fayetteville CSA	3	89	17	3,316	20	9.17	3,406	29.99
Goldsboro MSA	1	32	15	419	16	7.34	451	3.97
Greensboro CSA	9	470	19	2,055	28	12.84	2,524	22.23
Greenville CSA	2	55	14	265	16	7.34	320	2.82
Hickory MSA	4	160	15	440	19	8.72	600	5.29
Jacksonville MSA	1	59	13	264	14	6.42	323	2.84
New Bern CSA	4	171	16	173	20	9.17	345	3.03
North Carolina Non-MSA	2	40	16	665	18	8.26	705	6.21
Raleigh CSA	14	1,561	19	409	33	15.14	1,970	17.35
Rocky Mount CSA	1	28	14	218	15	6.88	246	2.17
Statewide	0	0	2	40	2	0.92	40	0.36
<b>Totals</b>	<b>43</b>	<b>2,785</b>	<b>175</b>	<b>8,569</b>	<b>218</b>	<b>100</b>	<b>11,354</b>	<b>100</b>

During the evaluation period, WNB made 33 investments totaling \$1.97 million in the Raleigh CSA including 14 prior period investments totaling \$1.56 million and four current period investments totaling \$385,000. Additionally, 15 grants totaling \$24,337 were made for a total investment in the AA of \$1.97 million. WNB's total investments represented 37.04 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development, community services, revitalization and/or stabilization, and affordable housing.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Asheville CSA, Fayetteville CSA, Goldsboro MSA, Greensboro CSA, Greenville MSA, Hickory MSA, Jacksonville MSA, New Bern CSA, North Carolina Non-MSA, and Rock Mount CSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

## SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Asheville CSA	4.8	5	7.5	0	60	40	0	1	18.1	60.2	20.5
Fayetteville CSA	10.1	8	11.9	0	37.5	37.5	25	1.7	25.6	42.6	29.5
Goldsboro MSA	4.8	3	4.5	0	0	100	0	5.7	19.1	48.5	24.5
Greensboro CSA	33.4	20	29.9	10	35	40	15	6.6	19.9	45.2	27.9
Greenville CSA	1.2	1	1.5	0	0	0	100	4.3	15.6	47.1	26.9
Hickory MSA	8.4	4	6.0	0	50	0	50	0.6	16.7	60.1	22.6
Jacksonville MSA	1.3	1	1.5	0	100	0	0	0.2	19.3	47.2	25.1
New Bern CSA	4.0	3	4.5	0	0	66.7	33.3	0	13.5	39.8	43.7
North Carolina Non-MSA	7.9	5	7.5	0	60	40	0	1.8	21.7	70.2	5.0
Raleigh CSA	19.8	12	17.9	25	25	50	0	8.1	20.4	35.5	34.2
Rocky Mount CSA	4.4	5	7.5	0	20	80	0	3.0	26.6	45.8	23.3

In the Raleigh CSA, the percentage of branches located in both low-income and moderate-income geographies exceeds the population levels in those geographies. ADS were available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Asheville CSA	1	0	0	0	1	0
Fayetteville CSA	1	0	0	0	1	0
Goldsboro MSA	0	0	0	0	0	0
Greensboro CSA	0	0	0	0	0	0
Greenville CSA	0	0	0	0	0	0
Hickory MSA	0	0	0	0	0	0
Jacksonville MSA	0	0	0	0	0	0
New Bern CSA	0	0	0	0	0	0
North Carolina Non-MSA	0	0	0	0	0	0
Raleigh CSA	0	3	0	0	-2	-1
Rocky Mount CSA	1	0	0	0	1	0
Asheville CSA	1	0	0	0	1	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank closed two branches in middle-income geographies and one branch in an upper-income geography.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### Raleigh CSA

WNB provided an excellent level of CD services in the full scope Raleigh CSA. Bank employees provided 926 hours of financial education to 1,321 participants. The majority of the bank's training activities focused on the Money Smart programs with 232 hours of the personal curriculum and 628 hours of the business curriculum. In addition to financial education, 18 WNB employees served on 12 boards or committees in 20 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Habitat for Humanity, Military Missions in Action, The Boys and Girls Club, and TMT Youth Community Foundation.

Statewide

WNB provided 3,474 hours of financial education to 4,698 participants. WNB personnel utilized the five core modules for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Junior Achievement 4) Money Smart – business 5) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 107 employees in North Carolina serving on 83 boards or committees in 124 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Asheville CSA, Fayetteville CSA, Greensboro CSA, Hickory MSA, and North Carolina Non-MSA is consistent with the bank's overall excellent performance in the full-scope area. The bank's performance in the Goldsboro MSA, New Bern CSA, and Rocky Mount CSA is weaker than the bank's overall performance in the full-scope AA but is still high satisfactory. The bank's performance in the Greenville CSA and Jacksonville MSA is weaker than the bank's overall performance in the full scope area but still satisfactory. All limited-scope AAs that were weaker than the full-scope AA was primarily because of lower CD activity levels.

## State of Ohio

**CRA rating for the State of Ohio<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Ohio

WNB operates 66 branches throughout nine AAs. The AAs include the Cleveland-Akron-Canton OH CSA (Cleveland CSA), Columbus-Marion-Zanesville OH CSA (Columbus CSA), Dayton-Springfield-Kettering OH CSA (Dayton CSA), Lima-Van Wert-Celina OH CSA (Lima CSA), Mansfield-Ashland-Bucyrus OH CSA (Mansfield CSA), Non-MSA OH (Ohio Non-MSA), Toledo-Findlay-Tiffin OH CSA (Toledo CSA), Wheeling OH MSA (Wheeling MSA), and Youngstown-Warren OH CSA (Youngstown CSA).

The state of Ohio represents 2.43 percent of total bank deposits and was WNB's 3<sup>rd</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$203 million, which represented 0.06 percent deposit market share and ranked the bank 106<sup>th</sup> of 329 institutions within the state. The largest depository institutions were Huntington National Bank, KeyBank, and JP Morgan Chase Bank, which held a combined 48.31 percent market share in the state.

We identified the Cleveland CSA for full-scope review in Ohio. This AA includes the Akron MSA, Canton MSA, Cleveland MSA, and non-metro counties of Ashtabula, Erie, Huron, Tuscarawas, and Wayne. WNB operates 16 branches throughout the AA, which accounts for 26 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$52.8 million, which represented 0.03 percent market share and ranked the bank 83<sup>rd</sup> of 143 institutions within the AA. The largest depository institutions were KeyBank, Huntington National Bank, and PNC Bank, which held a combined 57.18 percent market share in the AA.

## Community Contacts

We identified four community contacts in Ohio. All but one of the organizations help support affordable housing, while the remaining organizations support economic development. The primary needs included financing for affordable housing, financial literacy for first-time homebuyers, and low or no minimum checking accounting to encourage banking the underbanked.

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

The following tables provide information on the demographic composition of the Cleveland CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cleveland-Akron-Canton OH CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,005	15.6	21.2	38.8	22.8	1.6
Population by Geography	3,586,129	9.9	18.7	42.4	28.7	0.3
Housing Units by Geography	1,629,447	11.3	20.6	41.6	26.0	0.4
Owner-Occupied Units by Geography	967,557	5.2	15.4	45.8	33.5	0.1
Occupied Rental Units by Geography	485,200	18.9	28.6	36.5	15.1	0.9
Vacant Units by Geography	176,690	23.6	27.5	32.6	15.4	0.9
Businesses by Geography	263,778	7.9	15.7	39.1	36.5	0.8
Farms by Geography	8,086	3.0	10.1	50.7	36.1	0.1
Family Distribution by Income Level	914,990	21.6	17.2	20.2	40.9	0.0
Household Distribution by Income Level	1,452,757	25.1	15.6	17.3	42.1	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$65,716	Median Housing Value			\$134,185
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$59,302	Median Gross Rent			\$745
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$65,821	Families Below Poverty Level			11.2%
Median Family Income Non-MSAs - OH		\$55,785				

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Cleveland-Akron-Canton OH CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,015	11.9	20.6	38.9	25.5	3.1
Population by Geography	3,607,241	8.2	18.0	41.7	30.9	1.2
Housing Units by Geography	1,642,239	9.9	20.1	40.7	27.8	1.4
Owner-Occupied Units by Geography	988,225	4.7	15.1	44.9	34.7	0.5
Occupied Rental Units by Geography	500,862	17.2	28.1	34.7	17.4	2.7
Vacant Units by Geography	153,152	19.1	26.4	33.7	17.7	3.0
Businesses by Geography	489,176	10.0	14.8	32.3	41.1	1.9
Farms by Geography	12,151	6.8	11.5	44.8	36.5	0.4
Family Distribution by Income Level	904,993	21.2	17.6	20.5	40.7	0.0
Household Distribution by Income Level	1,489,087	24.5	15.9	17.4	42.2	0.0
Median Family Income MSA - 10420 Akron, OH MSA		\$76,842	Median Housing Value			\$150,186
Median Family Income MSA - 15940 Canton-Massillon, OH MSA		\$70,028	Median Gross Rent			\$834
Median Family Income MSA - 17460 Cleveland-Elyria, OH MSA		\$76,766	Families Below Poverty Level			9.6%

Median Family Income Non-MSAs - OH	\$66,684		
Source: 2020 U.S. Census and 2022 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.			

## Scope of Evaluation in Ohio

The Cleveland CSA received a full-scope review based on lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN OHIO

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Cleveland CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland CSA	806	152	4	7	969	24.56	25.99
Columbus CSA	699	126	0	7	832	21.09	20.36
Dayton CSA	398	61	0	5	464	11.76	9.02
Lima CSA	179	28	2	4	213	5.40	5.50
Mansfield CSA	107	17	1	4	129	3.27	4.48
Ohio Non-MSA	283	34	2	4	323	8.19	6.25
Toledo CSA	514	115	0	6	635	16.10	17.29
Wheeling MSA	44	4	0	3	51	1.29	2.56
Youngstown CSA	275	49	0	5	329	8.34	8.54

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Cleveland CSA	1,549	2,400	43	3,617	7,609	17.52	25.99
Columbus CSA	1,369	910	0	22,637	24,916	57.36	20.36
Dayton CSA	749	473	0	625	1,847	4.25	9.02
Lima CSA	365	206	13	346	930	2.14	5.50

Mansfield CSA	219	129	21	370	739	1.70	4.48
Ohio Non-MSA	559	249	30	450	1,288	2.97	6.25
Toledo CSA	1,044	816	0	2,520	4,380	10.08	17.29
Wheeling MSA	76	25	0	310	411	0.95	2.56
Youngstown CSA	556	209	0	555	1,320	3.04	8.54

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Cleveland CSA, the bank originated a good volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.07 percent is greater than the bank's deposit market share of 0.03 percent.

Per 2021 peer data by number, WNB ranked 57<sup>th</sup> of 214 small business lenders in the AA. The five largest small business lenders held 52.61 percent of the market share. WNB's average small business loan totaled \$19,000 compared to the top five business lenders which ranged between \$12,000 and \$128,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During both evaluation periods, the distribution of small loans to businesses in LMI geographies significantly exceeded the proportion of businesses and aggregate lending in LMI geographies.

#### ***Consumer Loans***

Refer to Table U in the state of Ohio section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in LMI geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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



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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, the performance was excellent with 100 percent of the bank's loans originated to small businesses. During 2022, performance was excellent and consistent with the 2019-2021 performance without PPP loans.

### ***Consumer Loans***

Refer to Table V in the state of Ohio section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Cleveland CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$3.6 million, which represented 78 percent of allocated tier 1 capital for the area. These seven allocations were from six different entities. Of the allocations, four provided opportunities for affordable housing, two supported economic development, and one supported revitalization/stabilization. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. The revitalize and stabilize allocation was also to a CDFI that provides services to LMI and affordable housing opportunities. Three of the more innovative or responsive projects are described below.

The bank allocated \$2 million to the AA. The bank offered this entity one loan during the evaluation period. The loan was for \$12 million. This loan enables this leading affordable housing syndicator in the US to originate working capital loans for LIHTC-funded developments. This frees up funds for developers to pursue additional new affordable housing developments (pre-construction costs). This entity serves Ohio, Kentucky, West Virginia, and Western Pennsylvania. This company has contributed to the creation or preservation of 50,000 units of affordable housing. This loan is considered innovative and responsive.

The bank allocated \$500,000 to the AA. The total loan amount was for a \$1.5 million RLOC. The purpose of the loan was to make equity bridge loans to LIHTC recipient housing developers to pre-develop additional affordable housing projects. This RLOC helped meet the needs of a national

affordable housing syndication leader whom, through its partnership network, has contributed to the creation or preservation of 12,780 units of affordable housing. This CD Loan is considered innovative and responsive.

The bank allocated \$615,000 to the AA. The total loan amount was for a \$2.3 million term loan. This loan was to a CDFI that originates flexible, long term real estate loans to meet the needs of low-income and special needs populations. This entity has financed non-profit sectors for projects including health care, charter schools, childcare, disability services, and arts organizations. It also provides support for housing developers. This CD loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall performance under the Lending Test in the Ohio Non-MSA is consistent with the bank's overall performance under the Lending Test in the full-scope area. The bank's consumer lending performance in the Columbus CSA, Dayton CSA, Toledo CSA, and Youngstown CSA is also consistent with the full-scope consumer performance. The bank's consumer performance in the Lima CSA, Mansfield CSA, and Wheeling MSA is weaker than the full-scope area but still good.

There were not enough small business loans in the Mansfield CSA and Wheeling MSA to perform a meaningful analysis. The bank's small business lending performance in the Columbus CSA, Dayton CSA, Lima CSA, Toledo CSA, and Youngstown CSA is weaker than the bank's overall performance but still good. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating.

Refer to Tables Q, R, U, and V in the state of Ohio section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Cleveland CSA	17	662	14	545	31	18.90	1,207	21.39
Columbus CSA	2	147	11	881	13	7.93	1,028	18.21
Dayton CSA	10	328	13	281	23	14.02	609	10.78
Lima CSA	8	379	10	83	18	10.98	462	8.19
Mansfield CSA	3	94	11	154	14	8.54	248	4.40
Ohio Non-MSA	3	83	11	204	14	8.54	287	5.09
Toledo CSA	1	47	15	949	16	9.76	996	17.64
Wheeling MSA	3	141	10	69	13	7.93	210	3.71
Youngstown CSA	8	381	12	176	20	12.20	557	9.86
Statewide	0	0	2	40	2	1.22	40	0.72
<b>Totals</b>	<b>55</b>	<b>2,262</b>	<b>109</b>	<b>3,382</b>	<b>164</b>	<b>100</b>	<b>5,644</b>	<b>100</b>

During the evaluation period, WNB made 19 investments totaling \$1.19 million including 17 prior period investments totaling \$661,709 and two current period investments totaling \$525,000. Additionally, 12 grants totaling \$20,410 were made for a total investment in the AA of \$1.2 million. WNB's total investments represented 26.15 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Columbus CSA, Dayton CSA, Lima CSA, Mansfield CSA, Ohio Non-MSA, Toledo CSA, Wheeling MSA, and Youngstown CSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Cleveland CSA is rated excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Cleveland CSA	26.0	16	24.2	18.8	12.5	56.3	12.5	8.2	18.0	41.7	30.9
Columbus CSA	20.4	16	24.2	12.5	31.3	50	6.3	9.0	21.2	40.9	27.4
Dayton CSA	9.0	8	12.1	0	25	62.5	12.5	7.8	19.7	40.4	31.5
Lima CSA	5.5	4	6.1	0	0	100	0	3.9	14.5	49.7	31.9
Mansfield CSA	4.5	2	3.0	0	0	100	0	6.1	11.6	61.6	17.8
Ohio Non-MSA	6.2	4	6.1	0	25	75	0	0	18.3	67.0	14.1
Toledo CSA	17.3	11	16.7	0	27.3	45.5	27.3	6.5	15.7	42.7	31.6
Wheeling MSA	2.6	1	1.5	0	0	0	100	0	24.6	53.5	22.0
Youngstown CSA	8.5	4	6.1	0	0	50	50	5.5	18.2	55.5	20.1

In the Cleveland CSA, the percent of branches in low-income geographies significantly exceeds the population levels in those geographies, while the percentage of branches in moderate-income geographies was near to the population levels in those geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Cleveland CSA	1	1	0	0	1	-1
Columbus CSA	3	0	1	0	2	0
Dayton CSA	0	0	0	0	0	0
Lima CSA	0	0	0	0	0	0
Mansfield CSA	0	0	0	0	0	0
Ohio Non-MSA	0	2	0	-1	-1	0
Toledo CSA	0	0	0	0	0	0
Wheeling MSA	0	0	0	0	0	0
Youngstown CSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened one branch in a middle-income geography and closed one branch in an upper-income geography of the Cleveland CSA. In limited-scope areas, WNB opened four new branches and closed three, which netted one new branch in a low-income geography and one less in a moderate-income geography.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

The institution is a leader in providing CD services.

### Cleveland CSA

WNB provided an excellent level of CD services in the full scope Cleveland CSA. WNB employees provided 900 hours of financial education to 1,110 participants using the Building Wealth, New Beginnings, Money Smart – business, and Money Smart – personal education programs. The majority of the bank’s training activities in this AA focused on the Money Smart programs with 698 devoted to the business curriculum and 181 devoted to the personal curriculum. In addition to financial education, 20 WNB employees served on 17 boards or committees in 24 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Family Promise of Summit County, Akron Canton Regional Foodbank, Genesis House, and The National Alliance of Community Economic Development Associations.

### Statewide

Statewide, the bank provided 3,548 hours of financial education to 5,783 participants. The bank utilized five core modules for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Junior Achievement 4) Money Smart – business 5) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 95 employees in Ohio serving on 72 boards or committees in 109 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank’s performance under the Service Test in the Columbus CSA, Dayton CSA, Ohio Non-MSA, Toledo CSA, and Youngstown CSA is consistent with the bank’s overall excellent performance in the full-scope area. The bank’s performance in the Lima CSA, Mansfield CSA, and Wheeling MSA is weaker than the bank’s overall performance in the full-scope area but still high satisfactory.

## State of Pennsylvania

**CRA rating for the State of Pennsylvania<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Pennsylvania

WNB operates 37 branches throughout 12 AAs. The AAs include the Altoona-Huntingdon PA CSA (Altoona CSA), Bloomsburg-Berwick-Sunbury PA CSA (Bloomsburg CSA), East Stroudsburg PA MSA (East Stroudsburg MSA), Erie-Meadville PA CSA (Erie CSA), Harrisburg-York-Lebanon PA CSA (Harrisburg CSA), Johnstown-Somerset PA CSA (Johnstown CSA), Lancaster PA MSA (Lancaster MSA), Newark PA MD (Newark MD), Non-MSA PA (Pennsylvania Non-MSA), Philadelphia-Reading-Camden PA CSA (Philadelphia CSA), Pittsburgh-New Castle-Weirton PA CSA (Pittsburg CSA), and Scranton-Wilkes-Barre-Hazleton PA MSA (Scranton MSA).

The state of Pennsylvania represents 1.71 percent of total bank deposits and was WNB's 4<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$142.9 million, which represented 0.03 percent deposit market share and ranked the bank 154<sup>th</sup> of 413 institutions within the state. The largest depository institutions were PNC Bank, Wells Fargo Bank, the Bank of New York Mellon, and Citizens Bank, which held a combined 42.45 percent market share in the state.

We identified the Pennsylvania Non-MSA for full-scope review in Pennsylvania. This AA includes the non-metro counties of Clarion, Greene, Schuylkill, Venango, Warren, and Wayne. WNB operates four branches throughout the AA, which accounts for 13.5 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$19.3 million, which represented 0.20 percent market share and ranked the bank 36<sup>th</sup> of 38 institutions within the AA. The largest depository institutions were Northwest Bank, The Dime Bank, Manufactures and Traders Trust Company, which held a combined 25.69 percent market share in the AA.

## Community Contacts

We identified two community contacts in the Pennsylvania Non-MSA that supported economic development. The primary needs identified included financial literacy for small business, as well as

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

affordable housing opportunities.

The following tables provide information on the demographic composition of the Pennsylvania Non-MSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA PA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	102	0.0	12.7	75.5	11.8	0.0
Population by Geography	370,262	0.0	10.7	75.4	13.9	0.0
Housing Units by Geography	188,135	0.0	11.3	76.7	12.0	0.0
Owner-Occupied Units by Geography	110,825	0.0	8.7	76.6	14.7	0.0
Occupied Rental Units by Geography	36,501	0.0	19.6	70.8	9.6	0.0
Vacant Units by Geography	40,809	0.0	11.0	82.1	6.8	0.0
Businesses by Geography	26,163	0.0	12.5	71.4	16.1	0.0
Farms by Geography	1,207	0.0	1.9	75.9	22.2	0.0
Family Distribution by Income Level	96,934	18.4	18.6	21.8	41.2	0.0
Household Distribution by Income Level	147,326	23.1	16.9	17.7	42.2	0.0
Median Family Income Non-MSAs - PA		\$56,172	Median Housing Value			\$110,380
			Median Gross Rent			\$634
			Families Below Poverty Level			9.3%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA PA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	112	1.8	9.8	74.1	12.5	1.8
Population by Geography	356,440	2.2	7.2	76.6	13.2	0.7
Housing Units by Geography	190,907	2.5	8.2	74.9	13.8	0.7
Owner-Occupied Units by Geography	110,885	1.8	6.1	77.9	13.8	0.4
Occupied Rental Units by Geography	36,359	4.4	12.0	72.3	9.6	1.7
Vacant Units by Geography	43,663	2.9	10.2	69.2	17.1	0.6
Businesses by Geography	29,555	1.9	6.5	76.7	13.1	1.8
Farms by Geography	1,345	0.1	2.2	79.4	17.7	0.7
Family Distribution by Income Level	95,843	19.0	18.0	22.0	41.0	0.0
Household Distribution by Income Level	147,244	23.5	16.1	17.8	42.6	0.0
Median Family Income Non-MSAs - PA		\$65,202	Median Housing Value			\$121,500
			Median Gross Rent			\$689
			Families Below Poverty Level			8.7%

Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Pennsylvania

The Pennsylvania Non-MSA received a full-scope review based on lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN PENNSYLVANIA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Altoona CSA	86	6	0	4	96	4.10	2.01
Bloomsburg CSA	125	15	1	4	145	6.20	6.41
East Stroudsburg MSA	74	32	0	4	110	4.70	8.20
Erie CSA	181	31	0	3	215	9.19	5.14
Harrisburg CSA	222	46	0	4	272	11.63	13.40
Johnstown CSA	101	10	1	3	115	4.92	2.55
Lancaster MSA	47	6	0	3	56	2.39	1.66
Newark MD	25	7	0	3	35	1.50	2.97
Pennsylvania Non-MSA	250	39	0	5	294	12.57	13.48
Philadelphia CSA	221	34	0	10	265	11.33	12.99
Pittsburgh CSA	479	86	0	5	570	24.37	24.81
Scranton MSA	139	23	0	4	166	7.10	6.37

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Altoona CSA	191	37	0	410	638	4.17	2.01



Bloomsburg CSA	260	155	10	500	925	6.05	6.41
East Stroudsburg MSA	183	264	0	535	982	6.42	8.20
Erie CSA	356	74	0	565	995	6.51	5.14
Harrisburg CSA	425	265	0	565	1,255	8.21	13.40
Johnstown CSA	188	30	21	360	599	3.92	2.55
Lancaster MSA	92	33	0	393	518	3.38	1.66
Newark MD	55	102	0	430	587	3.84	2.97
Pennsylvania Non-MSA	486	1,466	0	926	2,878	18.82	13.48
Philadelphia CSA	446	464	0	904	1,814	11.86	12.99
Pittsburgh CSA	962	993	0	1,300	3,255	21.28	24.81
Scranton MSA	253	80	0	515	848	5.54	6.37

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Pennsylvania Non-MSA, the bank originated a good volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.14 percent is less than the bank's deposit market share of 0.20 percent.

Per 2021 peer data by number, WNB ranked 56<sup>th</sup> of 107 small business lenders in the AA. The five largest small business lenders held 40.63 percent of the market share. WNB's average small business loan totaled \$36,000 compared to the top five business lenders which ranged between \$5,000 and \$11,000.

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

The bank exhibits a good geographic distribution of loans in its AA. During the 2019-2021 evaluation period, there were no low-income CTs, so our analysis focused on moderate-income CTs.

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

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

The distribution of small loans to businesses in moderate-income geographies is excellent. During the 2019-2022 evaluation period, the distribution of small loans to businesses in moderate-income geographies significantly exceeded the proportion of businesses and the aggregate distribution of loans. During 2022, there were not enough small loans to businesses to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is good. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in moderate-income geographies. During 2022, the proportion of bank loans significantly exceeded the proportion of

households in low-income geographies but the proportion of bank loans in moderate-income geographies was below the proportion of households.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, the performance was excellent with 100 percent of the bank's loans originated to small businesses. During 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Pennsylvania section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Pennsylvania Non-MSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$926,000, which represented 55 percent of allocated tier 1 capital for the area. The five allocations represented five different entities. Of total allocations, two provided opportunities for affordable housing and three supported economic development. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Three of the more innovative or responsive projects are described below.

The bank allocated \$200,000 to the AA from a \$1.5 million RLOC. The purpose of the loan was to make equity bridge loans to LIHTC recipient housing developers to pre-develop additional affordable housing projects. This RLOC helped meet the needs of a national affordable housing syndication leader whom, through its partnership network, has contributed to the creation or preservation of 12,780 units of affordable housing. This CD loan is considered innovative and responsive.

The bank allocated \$300,000 to the AA from a \$3 million term loan. This loan was to a CDFI that provides small business lending capital in places where it is not usually available. Since 1992, this entity has originated \$355 million in loans, which created 20,551 jobs. Of those loans, 71 percent were to minorities, 43 percent to women-owned businesses, and 32 percent to start-up businesses. This CD loan is considered responsive.

The bank allocated \$300,000 to the AA from a \$1 million term loan. This loan was to a CDFI that provides small business lending capital in underserved areas. Throughout Pennsylvania, the entity has made \$208 million in loans and \$167 million in investments located in low-income communities. These efforts have created or retained 19,671 jobs. This CD loan is considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance for consumer loans in the Bloomsburg CSA, Harrisburg CSA, Lancaster MSA, Philadelphia CSA, Pittsburgh CSA, and Scranton CSA is consistent with the full-scope consumer performance. The bank's consumer performance in the Altoona CSA, East Stroudsburg MSA, Erie CSA, and Johnstown CSA is weaker than the bank's overall consumer loan performance but still good. There were not enough consumer loans in the Newark MSA to perform a meaningful analysis.

The bank's small business performance in the East Stroudsburg MSA, Erie CSA, Harrisburg CSA, Philadelphia CSA, and Pittsburgh CSA is weaker than the bank's overall small business performance but still good. There were not enough small business loans in the Altoona CSA, Bloomsburg CSA, Johnstown CSA, Lancaster MSA, Newark MSA, and Scranton CSA to perform a meaningful analysis. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating.

Refer to Tables Q, R, U, and V in the state of Pennsylvania section of appendix D for the facts and data that support these conclusions.

### **INVESTMENT TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Altoona CSA	2	77	10	79	12	5.11	156	2.22
Bloomsburg CSA	3	60	11	179	14	5.96	238	3.41
East Stroudsburg MSA	2	46	13	234	15	6.38	280	4.00
Erie CSA	4	104	12	120	16	6.81	224	3.20
Harrisburg CSA	7	237	14	202	21	8.94	440	6.28
Johnstown CSA	2	77	11	104	13	5.53	181	2.59
Lancaster MSA	5	121	12	85	17	7.23	206	2.95
Newark MD	3	63	10	79	13	5.53	142	2.02
Pennsylvania Non-MSA	8	227	13	211	21	8.94	437	6.25
Philadelphia CSA	15	579	26	2,197	41	17.45	2,777	39.67
Pittsburgh CSA	12	471	20	972	32	13.62	1,443	20.62
Scranton MSA	2	63	13	244	15	6.38	307	4.38
Statewide	3	128	2	40	5	2.13	168	2.40
<b>Totals</b>	<b>68</b>	<b>2,253</b>	<b>167</b>	<b>4,746</b>	<b>235</b>	<b>100</b>	<b>6,998</b>	<b>100</b>

During the evaluation period, WNB made 11 investments totaling \$426,504 including eight prior period investments totaling \$226,504 and three current period investments totaling \$200,000. Additionally, 10 grants totaling \$10,980 were made for a total investment in the AA of \$437,485. WNB's total investments represented 25.99 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Altoona CSA, Bloomsburg CSA, East Stroudsburg MSA, Erie CSA, Harrisburg CSA, Johnstown CSA, Lancaster MSA, Newark MD, Philadelphia CSA, Pittsburgh CSA, and Scranton MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

## SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Pennsylvania Non-MSA AA is rated excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Altoona CSA	2.0	1	2.7	0	0	100	0	1.9	20.1	58.0	20.0
Bloomsburg CSA	6.4	2	5.4	0	0	100	0	0	12.3	63.5	21.6
East Stroudsburg MSA	8.2	2	5.4	0	0	100	0	0	7.5	76.8	14.6
Erie CSA	5.1	2	5.4	0	0	0	100	6.2	18.7	48.4	25.4
Harrisburg CSA	13.4	6	16.2	0	0	83.3	16.7	6.0	13.3	56.5	23.8
Johnstown CSA	2.6	1	2.7	0	0	0	100	3.8	10.6	61.3	24.3
Lancaster MSA	1.7	1	2.7	0	0	100	0	2.9	12.8	71.4	12.9
Newark MD	3.0	1	2.7	0	0	100	0	2.4	63.3	34.3	0
Pennsylvania Non-MSA	13.5	4	10.8	0	0	75	25	2.2	7.2	76.6	13.2
Philadelphia CSA	13.0	5	13.5	0	60	40	0	7.8	24.3	38.5	28.0
Pittsburgh CSA	24.8	9	24.3	0	11.1	33.3	55.6	5.0	21.0	42.7	30.5
Scranton MSA	6.4	3	8.1	0	33.3	66.7	0	3.1	27.3	43.0	26.0

WNB does not have branches in LMI geographies of the Pennsylvania Non-MSA; however, approximately 90 percent of the AAs geographies and geographic population distribution were classified as either middle- or upper-income, resulting in limited branch opportunities in LMI geographies. The probability of the bank's in-store branches being in LMI geographies is also low due to the rural geography of the AA. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Altoona CSA	0	0	0	0	0	0
Bloomsburg CSA	0	0	0	0	0	0
East Stroudsburg MSA	0	0	0	0	0	0
Erie CSA	0	0	0	0	0	0
Harrisburg CSA	0	0	0	0	0	0
Johnstown CSA	0	0	0	0	0	0
Lancaster MSA	0	0	0	0	0	0
Newark MD	0	0	0	0	0	0
Pennsylvania Non-MSA	0	0	0	0	0	0
Philadelphia CSA	0	1	0	0	-1	0
Pittsburgh CSA	0	0	0	0	0	0
Scranton MSA	0	1	0	0	-1	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open or close branches in the Pennsylvania Non-MSA during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### Pennsylvania Non-MSA

WNB provided an excellent level of CD services in the full scope Pennsylvania Non-MSA. Bank employees provided 288 hours of financial education to 317 participants. The majority of the bank's training activities focused on the Money Smart programs with employees providing 64 hours of the personal curriculum and 212 hours of the business curriculum. WNB employees also provided 10 hours of the Building Wealth curriculum. In addition to financial education, 6 WNB employees served on 6 boards or committees in 7 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Corner Cupboard Foodbank, Open Arms Ministry, Hope House of Warren County, and the Foundry.

Statewide

Statewide, the bank provided 2,261 hours of financial education to 2,525 participants. The bank utilizes five modules for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Junior Achievement 4) Money Smart – business 5) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 66 employees in Pennsylvania serving on 45 boards or committees in 80 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Harrisburg CSA, Philadelphia CSA, and Pittsburgh CSA is consistent with the bank's overall excellent performance in the full-scope AA. The bank's performance in the Altoona CSA, East Stroudsburg MSA, Erie CSA, and Scranton MSA is weaker than the bank's overall performance in the full-scope AA but still high satisfactory. The bank's performance in the Bloomsburg CSA, Johnstown CSA, Lancaster MSA, and Newark MD is weaker than the bank's overall performance in the full-scope AA but still satisfactory.

## State of South Carolina

**CRA rating for the State of South Carolina<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in South Carolina

WNB operates 39 branches throughout seven AAs. The AAs include the Augusta-Richmond County SC MSA (Augusta MSA), Charleston-North Charleston SC MSA (Charleston MSA), Columbia-Orangeburg-Newberry SC CSA (Columbia CSA), Florence SC MSA (Florence MSA), Greenville-Spartanburg-Anderson SC CSA (Greenville CSA), Hilton Head Island-Bluffton SC MSA (Hilton Head Island MSA), and Non-MSA SC (South Carolina Non-MSA).

The state of South Carolina represents 1.29 percent of total bank deposits and was WNB's 7<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$107.9 million, which represented 0.09 percent deposit market share and ranked the bank 67<sup>th</sup> of 106 institutions within the state. The total deposit includes some deposits that are considered in the multistate AAs. The largest depository institutions were Bank of America, Wells Fargo, and Truist Bank, which held a combined 43 percent market share in the state.

We identified the Greenville CSA for full-scope review in South Carolina. This AA includes the Greenville MSA, Spartanburg MSA, and non-metro counties of Cherokee, Greenwood, Oconee, and Union. WNB operates 18 branches throughout the AA, which accounts for 50.68 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$54.7 million, which represented 0.15 percent market share and ranked the bank 44<sup>th</sup> of 54 institutions within the AA. The largest depository institutions were Truist Bank, Wells Fargo Bank, and Bank of America, which held a combined 40.20 percent market share in the AA.

## Community Contacts

We identified three community contacts that all supported economic development. The primary needs identified included access to capital for small businesses and micro lending programs.

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



The following tables provide information on the demographic composition of the Greenville CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Greenville-Spartanburg-Anderson SC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	315	7.0	24.4	42.9	25.7	0.0
Population by Geography	1,372,579	4.7	21.7	43.7	30.0	0.0
Housing Units by Geography	599,122	5.1	22.2	44.2	28.5	0.0
Owner-Occupied Units by Geography	358,575	2.6	18.2	46.0	33.3	0.0
Occupied Rental Units by Geography	164,462	9.5	29.0	40.8	20.7	0.0
Vacant Units by Geography	76,085	7.3	26.4	43.1	23.2	0.0
Businesses by Geography	90,086	4.7	18.0	40.5	36.8	0.0
Farms by Geography	2,724	2.0	17.1	50.0	30.9	0.0
Family Distribution by Income Level	355,550	22.3	17.1	18.7	42.0	0.0
Household Distribution by Income Level	523,037	24.4	15.8	16.8	43.0	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA	\$58,097	Median Housing Value				\$132,814
Median Family Income MSA - 43900 Spartanburg, SC MSA	\$53,959	Median Gross Rent				\$718
Median Family Income Non-MSAs - SC	\$44,609	Families Below Poverty Level				13.4%
<i>Source: 2015 ACS and 2021 D&amp;B Data. Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Greenville-Spartanburg-Anderson SC CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	382	5.0	22.5	45.3	25.9	1.3
Population by Geography	1,487,610	3.8	18.9	46.2	30.3	0.8
Housing Units by Geography	633,129	4.0	20.0	46.5	28.7	0.8
Owner-Occupied Units by Geography	392,201	2.4	15.9	48.5	32.6	0.5
Occupied Rental Units by Geography	170,218	7.4	27.5	41.6	21.9	1.6
Vacant Units by Geography	70,710	4.6	24.5	46.9	23.1	0.8
Businesses by Geography	158,747	3.5	16.8	40.7	38.0	1.0
Farms by Geography	4,464	2.2	16.7	50.3	30.0	0.7
Family Distribution by Income Level	372,956	20.4	17.9	20.2	41.5	0.0
Household Distribution by Income Level	562,419	23.7	16.3	17.6	42.4	0.0
Median Family Income MSA - 24860 Greenville-Anderson, SC MSA	\$71,958	Median Housing Value				\$168,729
Median Family Income MSA - 43900 Spartanburg, SC MSA	\$65,214	Median Gross Rent				\$856
Median Family Income Non-MSAs - SC	\$53,588	Families Below Poverty Level				9.8%
<i>Source: 2020 U.S. Census and 2022 D&amp;B Data. Due to rounding, totals may not equal 100.0%</i>						
<i>(*) The NA category consists of geographies that have not been assigned an income classification.</i>						

## Scope of Evaluation in South Carolina

The Greenville CSA received a full-scope review based on lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN SOUTH CAROLINA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full scope review, the bank's performance in the Greenville CSA is excellent.

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Augusta MSA	72	5	0	3	80	4.38	6.64
Charleston MSA	126	31	0	6	163	8.92	9.89
Columbia CSA	293	86	0	10	389	21.29	19.05
Florence MSA	42	7	0	3	52	2.85	0.97
Greenville CSA	732	121	0	12	865	47.35	50.68
Hilton Head Island MSA	23	4	0	2	29	1.59	2.31
South Carolina Non-MSA	213	32	0	4	249	13.63	10.46

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Augusta MSA	144	12	0	260	416	2.01	6.64
Charleston MSA	235	4,144	0	783	5,162	24.97	9.89
Columbia CSA	578	461	0	7,431	8,470	40.98	19.05
Florence MSA	75	165	0	380	620	3.00	0.97
Greenville CSA	1,331	904	0	2,501	4,736	22.91	50.68
Hilton Head Island MSA	44	85	0	225	354	1.71	2.31

South Carolina Non-MSA	345	177	0	388	910	4.40	10.46
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\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Greenville CSA, the bank originated a good volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.12 percent is near to the bank's deposit market share of 0.15 percent.

Per 2021 peer data by number, WNB ranked 44<sup>th</sup> of 176 small business lenders in the AA. The five largest small business lenders held 46.62 percent of the market share. WNB's average small business loan totaled \$10,000 compared to the top five business lenders which ranged between \$14,000 and \$60,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies. During 2022, there were not enough small business loans to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of South Carolina section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. During 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of South Carolina section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Greenville CSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$2.5 million, which represented 52 percent of allocated tier 1 capital for the area. These 12 allocations were from four different entities. Of these allocations, 10 these provided opportunities for affordable housing, one supported economic development, and one supported revitalization and/or stabilization of LMI areas. All but one of the allocations for affordable housing were to a large regional affordable housing consortium. Of the affordable housing and economic development allocations, two were allocations to CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Examples of the more innovative or responsive projects are described below.

The bank allocated \$560,000 to the AA through nine participation loans to a large regional affordable housing consortium. These participations helped provide \$12.3 million in total loan balances. The participations were to provide funding for affordable housing apartment complexes primarily funded by LIHTC equity. The organization combines member participation loans to create permanent gap financing. Since inception, this organization has funded over \$450 million in loans for more than 400 properties in six states. WNB originated nine of these participation loans in the Greenville CSA which helped create 200 new multifamily units and 173 new senior units for households earning 30-60 percent of AMI. These loans are considered innovative.

The bank allocated \$125,000 to the AA from a \$300,000 RLOC. The purpose of the loan was to provide lending capital to a Greenville-based CDFI. This CDFI provides affordable housing and small business loans, as well as loans for community facilities. Since its founding in 2008, the entity has facilitated

approximately \$70 million in home purchases for 609 new homes or units, \$5 million in small business loans, \$9 million in PPP loans, \$11 million in community loans, 1,351 financial literacy sessions, and 226 business consultations. This loan is considered responsive.

The bank allocated \$50,000 to the AA from a \$600,000 line of credit, which increased to a \$1.6 million term loan. The CDFI used this to provide business capital for LMI, minority, and female entrepreneurs. The CDFI has three regional offices across South Carolina and in 2020, funded 20 loans totaling \$10.4 million that helped create or retain 444 jobs. This loan was considered responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall consumer loan performance under the Lending Test in the Augusta MSA, Charleston MSA, Columbia CSA, and Hilton Head Island MSA is consistent with the bank's overall consumer loan performance under the Lending Test in the full-scope area. The consumer loan performance in the Florence MSA and South Carolina Non-MSA is weaker than overall consumer loan performance but still good.

In the Charleston MSA, Columbia CSA, and the South Carolina Non-MSA, the small business performance was weaker than small business performance in the full-scope area but still at a good level. There were not enough small business loans in the Augusta MSA, Florence MSA, or Hilton Head Island MSA to perform a meaningful analysis. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating.

Refer to Tables Q, R, U, and V in the state of South Carolina section of appendix D for the facts and data that support these conclusions.

## **INVESTMENT TEST**

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

### **Conclusions for Area Receiving a Full-Scope Review**

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Augusta MSA	3	125	15	97	18	11.69	222	3.61
Charleston MSA	3	170	19	311	22	14.29	481	7.84
Columbia CSA	2	72	21	794	23	14.94	867	14.12
Florence MSA	0	0	12	204	12	7.79	204	3.33
Greenville CSA	15	907	19	2,826	34	22.08	3,733	60.84
Hilton Head Island MSA	2	13	19	202	21	13.64	215	3.50
South Carolina Non-MSA	6	125	16	249	22	14.29	373	6.09
Statewide	0	0	2	40	2	1.30	40	0.66
<b>Totals</b>	<b>31</b>	<b>1,411</b>	<b>123</b>	<b>4,724</b>	<b>154</b>	<b>100</b>	<b>6,135</b>	<b>100</b>

During the evaluation period, WNB made 19 investments totaling \$3.71 million including 15 prior period investments totaling \$906,649 and four current period investments totaling \$2.800 million. Additionally, 15 grants totaling \$26,325 were made for a total investment in the AA of \$3.73 million. WNB's total investments represented 78.09 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization and economic development. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Augusta MSA, Charleston MSA, Columbia CSA, Florence MSA, Hilton Head Island MSA, South Carolina Non-MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the Greenville CSA is rated excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Augusta MSA	6.6	2	5.1	0	0	100	0	3.1	21.0	53.1	21.7
Charleston MSA	9.9	5	12.8	20	60	0	20	6.0	25.0	33.8	34.3
Columbia CSA	19.1	6	15.4	0	33.3	16.7	50	3.5	23.6	41.0	29.1
Florence MSA	1.0	3	7.7	0	33.3	33.3	33.3	2.3	23.7	44.0	29.9
Greenville CSA	50.7	18	46.2	5.6	27.8	38.9	27.8	3.8	18.9	46.2	30.3
Hilton Head Island MSA	2.3	1	2.6	0	0	100	0	1.7	18.8	51.5	27.0
South Carolina Non-MSA	10.5	4	10.3	0	50	50	0	0	36.3	57.7	3.7

In the Greenville CSA, the percentage of branches in low-income geographies exceeded the population levels in those geographies, while the percentage of branches in moderate-income geographies significantly exceeded the population levels in those geographies. ADS were also available and effective for delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Augusta MSA	0	0	0	0	0	0
Charleston MSA	1	0	0	0	0	1
Columbia CSA	1	1	0	0	-1	0
Florence MSA	3	0	0	1	1	1
Greenville CSA	2	0	0	1	1	0
Hilton Head Island MSA	0	0	0	0	0	0
South Carolina Non-MSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank opened two branches in the Greenville CSA including one in a moderate-income geography and one in a middle-income geography. While the Florence MSA was limited scope, WNB opened an additional branch in moderate-income geography.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

The institution is a leader in providing CD services.

### Greenville CSA

WNB provided an excellent level of CD services in the full scope Greenville CSA. Bank employees provided 995 hours of financial education to 1,171 participants. The majority of the bank's training programs in this AA focused on the Money Smart and New Beginnings curriculums, with 249 hours of Money Smart – personal training, 642 hours of Money Smart - business training, and 49 hours of the New Beginnings programs. Further, employees provided 48 hours of the Building Wealth program and seven hours to Junior Achievement. In addition to financial education, 24 WNB employees served on 21 boards or committees in 35 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as CommunityWorks, Greer Soup Kitchen, Clemson Community Care, and Ride to Work Ministries.

### Statewide

WNB provided 2,121 hours of financial education to 2,892 participants. The bank utilized all five core modules for financial education in this state. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 54 employees in South Carolina serving on 49 boards or committees in 72 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Charleston MSA, Columbia CSA and South Carolina Non-MSA was consistent with the full-scope area. The bank's performance under the Service Test in the Augusta MSA and Florence MSA was weaker but still high satisfactory. The bank's performance under the Service Test in the Hilton Head MSA is weaker than the bank's overall performance in the full-scope AA but still satisfactory.



## State of Texas

**CRA rating for the State of Texas<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Texas

WNB operates 212 branches throughout 13 AAs, which are delineated at the CSA level, when applicable. The AAs include the Amarillo-Pampa-Borger TX CSA (Amarillo CSA), Austin-Round Rock TX MSA (Austin MSA), Beaumont-Port Arthur TX MSA (Beaumont MSA), Brownsville-Harlingen-Raymondville TX CSA (Brownsville CSA), Dallas-Fort Worth TX CSA (Dallas CSA), Houston-The Woodlands TX CSA (Houston CSA), Kerrville-Fredericksburg TX CSA (Kerrville CSA), Longview TX MSA (Longview MSA), Texas Non-MSA, San Antonio-New Braunfels-Pearsall TX CSA (San Antonio CSA), Texarkana TX MSA (Texarkana MSA), Tyler-Jacksonville TX CSA (Tyler CSA), and Victoria-Port Lavaca TX CSA (Victoria CSA).

The state of Texas is WNB's largest rating area. The bank's operations in Texas comprise 78 percent of total bank deposits and 27 percent of total branches. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$6.5 billion, which represented 0.35 percent deposit market share and ranked the bank 30<sup>th</sup> of 893 institutions within the state. The largest depository institutions were Charles Schwab Bank, JP Morgan Chase Bank, and Bank of America, which held a combined 48.33 percent market share in the state.

We identified the Dallas CSA for full-scope review in Texas. This AA includes Dallas-Plano-Irving MD, Fort Worth-Arlington MD, Sherman MSA, and the non-metro counties of Cooke, Henderson, and Navarro. WNB operates 46 branches throughout the AA, which accounts for 4.77 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$310.7 million, which represented 0.03 percent market share and ranked the bank 93<sup>rd</sup> of 230 institutions within the AA. The largest depository institutions were Charles Schwab Bank, Bank of America, and JP Morgan Chase Bank, which held a combined 70.27 percent market share in the AA.

We identified the Houston CSA for full-scope review in Texas. This AA includes Houston-The Woodlands-Sugar Land MSA and non-metro counties of Matagorda, Walker, Washington, and Wharton. WNB operates 111 branches throughout the AA, which accounts for 90.11 percent of rated

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

area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$5.8 billion, which represented 1.45 percent market share and ranked the bank 11<sup>th</sup> of 196 institutions within the AA. The largest depository institutions were JP Morgan Chase Bank, Wells Fargo Bank, and Bank of America, which held a combined 61.95 percent market share in the AA

## Community Contacts

We identified eight community contacts in Texas. Of the six organizations identified in the Dallas CSA, there were three affordable housing organizations, two economic development organizations, and one organization that helps support community services to LMI individuals. The primary needs identified included financial literacy and job training, financing programs for economic development, and affordable housing assistance. Of the two organizations identified in the Houston CSA, one was a local CD listening event, and one was an economic development organization. The primary needs identified included financial literacy programs and small business lending assistance.

The following tables provide information on the demographic composition of the Dallas CSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dallas-Fort Worth TX CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,293	12.6	26.1	28.4	32.4	0.5
Population by Geography	6,632,545	10.7	25.3	30.2	33.8	0.1
Housing Units by Geography	2,550,515	11.0	24.0	31.0	33.9	0.2
Owner-Occupied Units by Geography	1,396,217	4.9	19.5	32.2	43.4	0.1
Occupied Rental Units by Geography	948,531	18.3	30.0	29.5	21.8	0.3
Vacant Units by Geography	205,767	18.3	27.0	29.8	24.7	0.3
Businesses by Geography	778,093	6.7	18.1	27.5	47.0	0.7
Farms by Geography	14,059	4.2	15.7	32.7	46.9	0.4
Family Distribution by Income Level	1,619,807	23.4	16.6	18.1	42.0	0.0
Household Distribution by Income Level	2,344,748	23.8	16.5	17.7	42.0	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX		\$71,149	Median Housing Value			\$174,322
Median Family Income MSA - 43300 Sherman-Denison, TX MSA		\$60,873	Families Below Poverty Level			11.6%
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX		\$69,339	Median Gross Rent			\$974
Median Family Income Non-MSAs - TX		\$52,198				

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Dallas-Fort Worth TX CSA</b>						

Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,733	8.9	26.0	31.2	32.6	1.4
Population by Geography	7,701,194	8.3	25.2	32.0	33.8	0.8
Housing Units by Geography	2,868,552	8.8	25.0	32.7	32.6	0.8
Owner-Occupied Units by Geography	1,581,688	4.1	19.9	34.3	41.4	0.3
Occupied Rental Units by Geography	1,068,462	15.0	32.0	30.6	20.9	1.4
Vacant Units by Geography	218,402	12.9	28.0	31.3	26.2	1.6
Businesses by Geography	1,160,667	4.5	17.7	31.5	45.3	0.9
Farms by Geography	19,979	3.1	16.6	35.7	44.2	0.5
Family Distribution by Income Level	1,829,204	21.9	17.5	19.3	41.3	0.0
Household Distribution by Income Level	2,650,150	22.9	16.9	18.0	42.2	0.0
Median Family Income MSA - 19124 Dallas-Plano-Irving, TX	\$88,315	Median Housing Value				\$242,459
Median Family Income MSA - 23104 Fort Worth-Arlington-Grapevine, TX	\$82,649	Median Gross Rent				\$1,217
Median Family Income MSA - 43300 Sherman-Denison, TX MSA	\$71,649	Families Below Poverty Level				8.3%
Median Family Income Non-MSAs - TX	\$61,785					

Source: 2020 U.S. Census and 2022 D&B Data, Due to rounding, totals may not equal 100.0%  
 (\*) The NA category consists of geographies that have not been assigned an income classification.

The following tables provide information on the demographic composition of the Houston CSA for both evaluation periods.

Table A – Demographic Information of the Assessment Area						
Assessment Area: Houston-The Woodlands TX CSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts)	1,110	14.3	28.9	26.2	29.4	1.2
Population by Geography	6,528,081	11.3	25.8	28.5	34.1	0.4
Housing Units by Geography	2,479,291	11.8	25.2	27.8	35.0	0.2
Owner-Occupied Units by Geography	1,353,940	5.1	21.1	29.9	43.9	0.1
Occupied Rental Units by Geography	875,462	20.4	30.4	25.0	23.6	0.5
Vacant Units by Geography	249,889	18.3	28.6	25.9	26.9	0.2
Businesses by Geography	688,112	9.0	17.9	23.4	49.5	0.2
Farms by Geography	11,204	4.7	16.0	31.3	48.0	0.1
Family Distribution by Income Level	1,570,259	24.3	16.1	17.1	42.5	0.0
Household Distribution by Income Level	2,229,402	24.9	15.9	16.7	42.4	0.0
Median Family Income Non-MSAs - TX	\$52,198	Median Gross Rent				\$967
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA	\$69,373	Median Housing Value				\$171,168
		Families Below Poverty Level				12.9%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Houston-The Woodlands TX CSA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	1,652	13.1	24.9	27.1	31.7	3.2
Population by Geography	7,312,270	10.3	23.9	29.2	35.0	1.6
Housing Units by Geography	2,727,065	11.0	24.1	28.6	34.5	1.8
Owner-Occupied Units by Geography	1,508,021	4.8	19.9	31.2	43.3	0.8
Occupied Rental Units by Geography	964,956	19.6	30.4	24.7	22.3	3.0
Vacant Units by Geography	254,088	14.8	25.7	27.9	28.7	2.8
Businesses by Geography	1,039,614	8.5	19.1	24.9	45.5	2.1
Farms by Geography	15,407	5.5	17.4	30.7	45.0	1.4
Family Distribution by Income Level	1,743,458	23.5	16.6	17.9	41.9	0.0
Household Distribution by Income Level	2,472,977	24.6	15.9	16.9	42.6	0.0
Median Family Income Non-MSAs - TX		\$61,785	Median Gross Rent			\$1,162
Median Family Income MSA - 26420 Houston-The Woodlands-Sugar Land, TX MSA		\$81,859	Median Housing Value			\$226,705
			Families Below Poverty Level			10.7%

*Source: 2020 U.S. Census and 2022 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.*

## Scope of Evaluation in Texas

We identified both the Houston and Dallas CSAs for full-scope review, as they are the most significant areas based on lending and deposit levels. We gave more weight to the Houston CSA as it is the most significant AA to WNB and represented 52 percent of branches and 90 percent of deposits in the state of Texas. The Dallas CSA represented 22 percent of branches and 5 percent of deposits in the state of Texas.

The rating for Texas was based on both full- and limited-scope reviews. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN TEXAS

### LENDING TEST

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

### Conclusions for Areas Receiving Full-Scope Reviews

Based on full-scope reviews, the bank's performance in the Dallas CSA and Houston CSA is excellent.

## Lending Activity

Lending levels reflect good responsiveness to AA credit needs. We analyzed small business and consumer loans for all AAs, but also analyzed farm loans for the Houston CSA.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Amarillo CSA	52	6	0	5	63	0.32	0.13
Austin MSA	407	133	1	9	550	2.78	1.24
Beaumont MSA	91	16	0	5	112	0.57	0.18
Brownsville CSA	489	42	0	5	536	2.71	0.19
Dallas CSA	1,781	582	3	22	2,388	12.07	4.77
Houston CSA	7,628	5,645	30	47	13,350	67.48	90.11
Kerrville CSA	43	12	0	4	59	0.30	0.11
Longview MSA	227	34	0	5	266	1.34	0.39
Texas Non-MSA	598	119	4	7	728	3.68	1.02
San Antonio CSA	1,163	300	0	12	1,475	7.46	1.59
Texarkana MSA	51	3	0	4	58	0.29	0.05
Tyler CSA	119	21	0	4	144	0.73	0.16
Victoria CSA	38	11	0	3	52	0.26	0.08
Statewide	0	0	0	2	2	0.01	0.00

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Amarillo CSA	101	61	0	198	360	0.05	0.13
Austin MSA	1,840	7,924	2	4,953	14,719	2.03	1.24
Beaumont MSA	192	791	0	248	1,231	0.17	0.18
Brownsville CSA	891	344	0	1,420	2,655	0.37	0.19
Dallas CSA	4,216	22,094	30	65,636	91,976	12.68	4.77
Houston CSA	39,185	400,010	778	129,805	569,778	78.55	90.11
Kerrville CSA	96	46	0	135	277	0.04	0.11
Longview MSA	443	298	0	1,417	2,158	0.30	0.39
Texas Non-MSA	1,482	4,574	44	1,816	7,916	1.09	1.02
San Antonio CSA	2,517	6,525	0	9,633	18,675	2.57	1.59
Texarkana MSA	103	7	0	75	185	0.03	0.05
Tyler CSA	230	120	0	255	605	0.08	0.16
Victoria CSA	83	211	0	205	499	0.07	0.08
Statewide	0	0	0	14,350	14,350	1.98	0.00

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

Houston CSA

The bank originated an adequate volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy in the AA. By number, the bank's small business market share in the Houston CSA of 0.76 percent is less than the bank's deposit market share of 1.45 percent.

Per 2021 peer data by number, WNB ranked 22<sup>nd</sup> of 332 small business lenders in the Houston CSA. The five largest small business lenders held 56.88 percent of the market share. WNB's average small business loan totaled \$70,000 compared to the top five business lenders which ranged between \$14,000 and \$23,000.

Dallas CSA

In the Dallas CSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the Dallas CSA of 0.10 percent is greater than the bank's deposit market share of 0.03 percent.

Per 2021 peer data by number, WNB ranked 70<sup>th</sup> of 353 small business lenders in the Dallas CSA. This small business ranking is better than the bank's deposit market share ranking. The five largest small business lenders held 56.3 percent of the market share. WNB's average small business loan totaled \$35,000 compared to the top five business lenders which ranged between \$7,000 and \$23,000.

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

The bank exhibits an excellent geographic distribution of loans in its AAs.

***Small Loans to Businesses***

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

The overall geographic distribution of small business loans is excellent.

Houston CSA

In the Houston CSA, the distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses and the aggregate distribution of loans in low-income geographies. In moderate-income CTs, the proportion of bank loans exceeded the proportion of businesses and met the aggregate distribution of loans in those geographies. Moderate-income geographies contained greater lending opportunities to small businesses; therefore, carried more weight in assessing the bank's performance. Internal bank analysis shows without PPP loans, performance was slightly higher than the overall performance in LMI geographies. During the 2022 evaluation period, performance was consistent with the 2019-2021 evaluation period.

Dallas CSA

In the Dallas CSA, the distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and the aggregate distribution of loans in LMI geographies. During the 2022 evaluation period, performance was consistent with the 2019-2021 evaluation period.

***Consumer Loans***

Refer to Table U in the state of Texas section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The overall geographic distribution of small business loans is excellent.

Houston CSA

In the Houston CSA, the distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of households in low-income CTs but significantly exceeded the proportion of households in moderate-income CTs. During the 2022 evaluation period, the proportion of bank loans significantly exceeded the proportion of households in LMI geographies.

Dallas CSA

In the Dallas CSA, the distribution of consumer loans in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of households in low-income CTs but significantly exceeded the proportion of households in moderate-income CTs. During the 2022 evaluation period, the proportion of bank loans exceeded the proportion of households in low-income CTs and significantly exceeded the proportion of households in moderate-income CTs.

***Lending Gap Analysis***

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

***Small Loans to Businesses***

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

The overall borrower distribution of small businesses is good.

Houston CSA

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was significantly lower than the proportion of businesses and the aggregate distribution of loans to small businesses. This analysis included PPP loans, which did not require the collection of revenue information. Internal bank analysis shows without PPP loans, the performance approached demographics with 81 percent of the bank's loans originated to small businesses. During the 2022 evaluation period, the proportion of bank loans was slightly lower than the proportion of businesses.

Dallas CSA

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was significantly lower than the proportion of businesses and lower than the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, small business lending performance exceeded demographics with 94 percent of the bank's loans originated to small businesses. During the 2022 evaluation period, the proportion of bank loans was slightly lower than the proportion of businesses.

***Small Loans to Farms***

Refer to Table T in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's originations and purchases of small loans to businesses.

The overall borrower distribution of farms is poor.

Houston CSA

In the Houston CSA, the distribution of loans to farms by revenue is poor. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of farms and the aggregate distribution of loans to farms. This analysis included PPP loans, which did not require the collection of revenue information. Internal bank analysis shows without PPP loans, there were not enough loans to perform a meaningful analysis. During the 2022 evaluation period, there were not enough loans to perform a meaningful analysis.

Dallas CSA

In the Dallas CSA, there were not enough loans to farms to perform a meaningful analysis for either evaluation period.

***Consumer Loans***

Refer to Table V in the state of Texas section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The overall borrower distribution of consumer loans is good.



Houston CSA

In the Houston CSA, the distribution of consumer loans to LMI borrowers was excellent. During both the 2019-2021 and 2022 evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

Dallas CSA

In the Dallas CSA, the distribution of consumer loans to LMI borrowers was excellent. During both the 2019-2021 and 2022 evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

**Community Development Lending**

The institution is a leader in making CD loans.

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

Houston CSA

The volume of CD loans in the Houston CSA had a significantly positive impact on the Lending Test performance in this AA. WNB allocated \$129.8 million, which represented 25 percent of allocated tier 1 capital in the AA. There were 26 allocations from 23 different entities. Of these allocations, 12 supported affordable housing, five supported economic development, six supported community services to LMI individuals, and three supported revitalization/stabilization of LMI areas. Of the total 26 allocations, 10 were provided to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. There were also 21 PPP loans that supported economic development. Three of the more innovative or responsive projects are described below.

*Economic Development* – WNB allocated \$250,000 of a \$2 million term loan to a CDFI that will provide small business lending capital and technical assistance to traditionally underserved LMI communities in the AA. One specific program under the CDFI is to equip Houston's underserved entrepreneurs with coaching, connections, and access to capital to scale up and build businesses.

*Economic Development* – As previously discussed in the Dallas-Fort Worth CSA, WNB also allocated \$1 million from a \$3 million facility to provide minority small business lending capital during and after the COVID-19 Pandemic to a CDFI. The borrower is the largest Latino-focused CDFI in the nation.

*Affordable Housing* – WNB participated \$650,000 of a \$2.4 million loan to a downtown Houston affordable housing complex for seniors. This loan was critically important in preserving the 222-unit complex in Houston's upper-income central business district, where affordable housing is extremely scarce.

Dallas CSA

The volume of CD loans in the Dallas CSA had a significantly positive impact on the Lending Test performance in this AA. WNB allocated \$65.6 million, which represented 215 percent of allocated tier 1 capital for the area. There were 22 allocations from 18 different entities. Of these allocations, nine supported affordable housing, seven supported economic development, and one supported community services to LMI individuals. There were also five PPP loans totaling \$10.3 million that supported economic development. Of the total 22 allocations, eight were provided to various CDFI's that provide funds to affordable housing developers in the area or provide small business loans. Three of the more innovative or responsive projects are described below.

*Affordable Housing* – WNB allocated \$20 million from two loans to finance working capital, acquisition, and rehabilitation of a 236-unit affordable housing complex. Under a long-term land use agreement, the entire complex is reserved for residents earning no more than 60 percent of MFI income. The complex itself is located in a low-income CT, where the MFI is only 30 percent of the MSA MFI.

*Affordable Housing* – WNB allocated \$12.5 million from two loans to finance construction of a 300-unit multifamily housing complex. Under a long-term land use agreement, 50 percent of the complex is reserved for residents earning no more than 80 percent of the area median income. The complex itself is located in a low-income CT, where the MFI is only 37 percent of the MSA MFI.

*Economic Development* – WNB allocated \$613,000 to the Dallas-Fort Worth CSA from a \$3 million facility to provide minority small business lending capital during and after the COVID-19 Pandemic to a CDFI. The borrower is the largest Latino-focused CDFI in the nation.

Statewide

WNB originated one CD loan totaling \$350,000 in the 2019-2021 evaluation period and one CD totaling \$14 million in the 2022 evaluation period. Both of these CD loans helped support affordable housing for LMI residents.

In 2021, WNB sponsored and administered highly responsive pass-through grants from the Federal Home Loan Bank of Dallas to meet disaster recovery and affordable housing needs in Texas. Woodforest received no income in this effort, voluntarily managing a detailed grant administration and draw down process for 61 recipients. This administration included 52 Disaster Rebuilding Assistance (DRA) grants that funded repair and rehabilitation of LMI homes damaged during federally declared disaster events, eight Special Needs Assistance Program (SNAP) grants that funded repair and rehabilitation of homes inhabited by special needs individuals including disabled and elderly residents on fixed incomes, and one Homebuyer Equity Leverage Partnership (HELP) program that funded down payment or loan closing costs for LMI first-time homebuyers.

**Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Lending Test in the Amarillo CSA, Austin MSA, Longview MSA, Texas Non-MSA, San Antonio CSA, and Tyler CSA is consistent with the bank's overall lending performance under the Lending Test in the full-scope areas. There were not enough small business loans for a meaningful analysis in the Beaumont MSA, Brownsville CSA, Kerrville CSA, Texarkana MSA, or Victoria CSA; however, consumer lending in these limited-scope areas was consistent with the full-scope areas.

Refer to Tables Q, R, U, and V in the state of Texas section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Dallas-Fort Worth CSA and the Houston-The Woodlands CSA was excellent.

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

## Number and Amount of Qualified Investments

Assessment Area	Qualified Investments							
	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Amarillo CSA	3	243	17	287	20	4.3	530	0.3
Austin MSA	2	103	33	10,758	35	7.6	10,861	5.3
Beaumont MSA	5	573	18	4,404	23	5.0	4,976	2.4
Brownsville CSA	1	10	25	901	26	5.6	911	0.4
Dallas CSA	44	7,618	38	24,917	82	17.7	32,535	15.9
Houston CSA	48	29,041	63	88,473	111	24.0	117,514	57.3
Kerrville CSA	2	33	16	311	18	3.9	345	0.2
Longview MSA	4	359	18	525	22	4.8	884	0.4
Texas Non-MSA	6	378	19	1,599	25	5.4	1,977	1.0
San Antonio CSA	3	2,236	40	30,870	43	9.3	33,106	16.1
Texarkana MSA	3	105	15	286	18	3.9	390	0.2
Tyler CSA	3	107	16	437	19	4.1	544	0.3

Victoria CSA	2	55	17	363	19	4.1	418	0.2
Statewide	0	0	2	40	2	0.4	40	0.0
<b>Totals</b>	<b>126</b>	<b>40,861</b>	<b>337</b>	<b>164,170</b>	<b>463</b>	<b>100</b>	<b>205,031</b>	<b>100</b>

### Houston CSA

In the Houston CSA, WNB provided 111 total investment allocations totaling \$117.5 million or 23 percent of allocated tier 1 capital. These allocations including 48 prior period investments totaling \$29 million, 27 current period investments totaling \$70.6 million, and 36 grants totaling \$17.8 million. WNB's qualified investments in the AA supported affordable housing, community services for LMI individuals, economic development, and revitalization/stabilization of LMI areas. Examples of more innovative or responsive investments are described below.

*Economic Development* – WNB purchased \$500,000 of common stock in a new minority-owned bank in the Houston CSA, which will provide necessary tier 1 capital to open the institution.

*Community Services to LMI Individuals* – WNB contributed \$31 million to seven independent school districts in the Houston CSA where a majority of students were economically disadvantaged.

### Dallas CSA

In the Dallas CSA, WNB provided 82 total investment allocations totaling \$32.5 million or 120 percent of allocated tier 1 capital. These allocations included 44 prior period investments totaling \$7.6 million, 15 current period investments totaling \$24.8 million, and 23 grants totaling \$86,614. WNB's qualified investments in the AA supported affordable housing, community services for LMI individuals, economic development, and revitalization/stabilization of LMI areas. Examples of more innovative or responsive investments are described below.

*Economic Development* – WNB allocated \$100,000 to the Dallas CSA from a \$5 million 12 CFR Part 24 fund, which makes equity investments in CDFIs that provide capital and leverage to finance small businesses and affordable housing.

*Community Services to LMI Individuals* – WNB contributed \$22.3 million to five independent school districts in the Dallas CSA where a majority of students were economically disadvantaged.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's performance under the Investment Test in the Amarillo CSA, Austin MSA, Beaumont MSA, Brownsville CSA, Kerrville CSA, Longview MSA, Texas non-MSA, San Antonio CSA, Texarkana MSA, Tyler CSA, and Victoria CSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

## **SERVICE TEST**

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

## Conclusions for Area Receiving a Full-Scope Review

Based on full-scope reviews, the bank's performance in the Dallas and Houston CSAs is rated excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Amarillo CSA	0.1	2	0.9	0	50	0	50	5.2	24.7	31.9	38.2
Austin MSA	1.2	12	5.7	8.3	25	58.3	0	6.4	23.5	36.6	31.1
Beaumont MSA	0.2	2	0.9	0	50	50	0	7.5	30.5	23.7	31.2
Brownsville CSA	0.2	3	1.4	0	33.3	0	66.7	2.1	26.4	39.5	31.1
Dallas CSA	4.8	46	21.7	0	21.74	39.1	39.1	8.3	25.2	32.0	33.8
Houston CSA	90.1	111	52.4	8.11	19.82	37.8	34.2	10.3	23.9	29.2	35.0
Kerrville CSA	0.1	1	0.5	0	0	100	0	0	0	45.8	54.2
Longview MSA	0.4	3	1.4	0	33.3	33.3	33.3	0	21.1	59.9	18.9
Texas Non-MSA	1.0	8	3.8	0	37.5	50	12.5	0.5	15.4	67.3	16.8
San Antonio CSA	1.6	20	9.4	5	35	45	15	5.9	27.8	31.9	34
Texarkana MSA	0.0	1	0.5	0	0	100	0	5.3	14.4	47.7	32.5
Tyler CSA	0.2	2	0.9	0	0	100	0	1.9	25.7	43	28.5
Victoria CSA	0.1	1	0.5	0	0	0	100	0	0	73.2	26.8

In the Houston CSA, the bank has nine branches in low-income geographies and 22 branches in moderate-income geographies. This branch distribution is near to the population distributions in these areas. In the Dallas CSA, the bank has no branches in low-income geographies and was below the population levels in those geographies. The bank had 10 branches in moderate-income geographies and was near to the population levels in those geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Amarillo CSA	0	0	0	0	0	0
Austin MSA	1	0	0	1	0	0
Beaumont MSA	0	0	0	0	0	0
Brownsville CSA	0	0	0	0	0	0
Dallas CSA	2	1	-1	0	1	1
Houston CSA	8	3	1	0	4	0
Kerrville CSA	0	0	0	0	0	0
Longview MSA	0	0	0	0	0	0
Texas Non-MSA	0	0	0	0	0	0
San Antonio CSA	1	1	0	1	0	-1
Texarkana MSA	0	0	0	0	0	0
Tyler CSA	0	0	0	0	0	0
Victoria CSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has not adversely affected the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. In the Houston CSA, the bank opened eight branches and closed three branches, resulting in one new branch in a low-income geography and four new branches in middle-income geographies. In the Dallas CSA, a host Walmart store shut down in 2019 causing the bank to close a branch in a low-income geography.

Services, including where appropriate, business hours are tailored to the convenience and needs of its AAs, particularly LMI geographies and/or individuals. The bank offers convenient operational hours in Walmart store lobbies, including ATM access, Monday through Saturday, with some branches open on Sunday. The bank has 37 additional traditional standalone branches that offer 24-hour ATM access seven days per week, as well as drive-through services. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

### Houston CSA

WNB is a leader in providing CD services in the Houston AA. Bank employees provided 6,117 hours of financial education to 12,420 consumers and small business owners in this AA. Most of the bank's training courses in this AA focused on the Junior Achievement and Money Smart programs. WNB devoted 978 hours to Junior Achievement courses in community organizations. WNB provided 4,107 hours to small businesses using the Money Smart – business curriculum and 742 hours on the Money Smart – personal curriculum. WNB provided 82 hours in the customized New Beginnings curriculum and 213 hours to the Building Wealth curriculum. In addition to financial education, 156 WNB employees served on 91 boards or committees in 187 member positions. WNB provided leadership and

financial expertise on board or committees of nationally and regionally known organizations such as LISC Houston, Interfaith of the Woodlands and Interfaith Community Clinic, SCORE Houston Women's Committee, the Foundry, and Houston Money Week.

#### Dallas CSA

WNB provides an excellent level of CD services in the Dallas AA. Bank employees provided 2,119 hours of financial education to 2,517 consumers and small businesses in this AA. The majority of financial educational courses in this AA focused on the Money Smart – personal and Money Smart – business programs. In addition to financial education, 58 WNB employees served on 48 boards or committees in 73 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as LiftFund, Southern Dallas Progress Community Development Corporation, Northside Inter-Community Agency, and the Foundry.

#### Statewide

WNB identified financial literacy and small business development as needs within Texas. WNB has responded in a significant way by providing 10,858 hours of financial and small business education to 18,834 participants in Texas. WNB used all five core financial education programs. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 293 employees in Texas serving on 192 boards or committees in 369 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance in the Austin MSA, Texas Non-MSA, and San Antonio CSA is consistent with the bank's overall performance in the full scope areas. The bank's performance in the Beaumont MSA, Brownsville CSA, Longview MSA, and Tyler CSA is weaker than bank's overall performance in the full scope areas but still high satisfactory. The bank's performance in the Amarillo CSA, Kerrville CSA, Texarkana MSA, and Victoria CSA is weaker than bank's overall performance in the full-scope AAs but still considered satisfactory. All limited-scope AAs that were weaker than the full-scope AAs was due to lower levels of CD services.

## State of Virginia

**CRA rating for the State of Virginia<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** Outstanding

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, qualified CD investments and grants, CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in Virginia

WNB operates 32 branches throughout six AAs. The AAs include Blacksburg-Christiansburg-Radford VA MSA (Blacksburg MSA), Harrisonburg-Staunton VA CSA (Harrisonburg CSA), Lynchburg VA MSA (Lynchburg MSA), Non-MSA VA (Virginia Non-MSA), Richmond VA MSA (Richmond MSA), and Roanoke VA MSA (Roanoke MSA).

The state of Virginia represents 1.39 percent of total bank deposits and was WNB's 6<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$116.4 million, which represented 0.06 percent deposit market share and ranked the bank 61<sup>st</sup> of 102 institutions within the state. The largest depository institutions were Capital One Bank, Bank of America, and Truist Bank, which held a combined 68.29 percent market share in the state.

We identified the Virginia Non-MSA for full-scope review in Virginia. This AA includes the non-metro counties of Buckingham, Carroll, Charlotte, Cumberland, Henry, Lancaster, Lee, Louisa, Middlesex, Northumberland, Nottoway, Orange, Pittsylvania, Prince Edward, Smyth, Tazewell, Wise, and Wythe, as well as the cities of Danville, Galax, Martinsville, and Norton. WNB operates 10 branches throughout the AA, which accounts for 36 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$42.3 million, which represented 0.34 percent market share and ranked the bank 35<sup>th</sup> of 43 institutions within the AA. The largest depository institutions were Carter Bank & Trust, Truist Bank, and American National Bank and Trust, which held a combined 30.85 percent market share in the AA.

## Community Contacts

We identified five community contacts in Virginia. Of the five organizations identified in the Virginia Non-MSA, there were three economic development organizations, one affordable housing organization, and one organization that helps support community services to LMI individuals. The primary needs identified included micro lending for small businesses, loans to LMI consumers and households, and

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



financial literacy.

The following tables provide information on the demographic composition of the Virginia Non-MSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA VA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	146	0.7	20.5	58.2	16.4	4.1
Population by Geography	563,422	0.7	18.5	60.7	19.9	0.3
Housing Units by Geography	278,435	0.7	18.8	59.6	20.9	0.0
Owner-Occupied Units by Geography	161,951	0.3	17.1	60.8	21.8	0.0
Occupied Rental Units by Geography	63,907	1.4	23.8	59.8	15.0	0.0
Vacant Units by Geography	52,577	0.8	17.9	56.1	25.3	0.0
Businesses by Geography	38,757	0.3	15.7	57.8	26.0	0.2
Farms by Geography	2,397	0.0	9.1	62.5	28.4	0.0
Family Distribution by Income Level	150,206	22.4	17.5	20.7	39.4	0.0
Household Distribution by Income Level	225,858	25.5	16.2	17.4	40.9	0.0
Median Family Income Non-MSAs - VA		\$51,647	Median Housing Value			\$128,993
			Median Gross Rent			\$642
			Families Below Poverty Level			13.5%

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA VA</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	169	1.2	24.9	52.7	18.3	3.0
Population by Geography	546,660	1.0	23.6	55.4	20.0	0.0
Housing Units by Geography	281,210	1.1	24.4	54.3	20.1	0.0
Owner-Occupied Units by Geography	161,079	0.6	22.1	55.0	22.4	0.0
Occupied Rental Units by Geography	63,747	2.0	29.8	53.8	14.5	0.0
Vacant Units by Geography	56,384	1.7	25.1	53.1	20.1	0.0
Businesses by Geography	45,404	0.9	20.8	52.9	25.3	0.1
Farms by Geography	2,790	0.1	14.4	57.9	27.5	0.0
Family Distribution by Income Level	145,219	21.9	18.5	20.2	39.4	0.0
Household Distribution by Income Level	224,826	25.9	16.3	17.1	40.7	0.0
Median Family Income Non-MSAs - VA		\$60,947	Median Housing Value			\$141,281
			Median Gross Rent			\$675
			Families Below Poverty Level			12.4%

Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in Virginia

The Virginia Non-MSA received a full-scope review based on lending and deposit levels. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN VIRGINIA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Blacksburg MSA	68	10	0	8	86	4.48	3.71
Harrisonburg CSA	98	4	1	7	110	5.73	7.92
Lynchburg MSA	241	40	0	8	289	15.04	14.86
Virginia Non-MSA	616	102	3	9	730	38.00	36.30
Richmond MSA	415	108	1	7	531	27.64	25.97
Roanoke MSA	142	26	0	7	175	9.11	11.24

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Blacksburg MSA	121	13	0	279	413	3.68	3.71
Harrisonburg CSA	185	10	1	445	641	5.71	7.92
Lynchburg MSA	431	288	0	707	1,426	12.71	14.86
Virginia Non-MSA	1,128	1,254	8	1,960	4,350	38.77	36.30
Richmond MSA	809	1,131	1	1,557	3,498	31.18	25.97
Roanoke MSA	259	84	0	549	892	7.95	11.24

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the Virginia Non-MSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.42 percent is greater than the bank's deposit market share of 0.34 percent.

Per 2021 peer data by number, WNB ranked 29<sup>th</sup> of 112 small business lenders in the AA. The five largest small business lenders held 44.52 percent of the market share. WNB's average small business loan totaled \$15,000 compared to the top five business lenders which ranged between \$4,000 and \$52,000.

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

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

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

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

The distribution of small loans to businesses in LMI geographies is excellent. During the 2019-2021 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in LMI geographies. During 2022, there were not enough small business loans to perform a meaningful analysis.

#### ***Consumer Loans***

Refer to Table U in the state of Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During both evaluation periods, the proportion of bank loans significantly exceeded the proportion of households in those geographies.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is excellent. During the 2019-2021 evaluation period, the proportion of bank loans was below the proportion of businesses but exceeded the aggregate

distribution of loans to small businesses. During 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans is excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers significantly exceeded the proportion of LMI households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the Virginia Non-MSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$1.9 million, which represented 53 percent of allocated tier 1 capital for the area. These nine allocations were from six different entities. Of these allocations, five provided opportunities for affordable housing and four supported economic development. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans to rural and underserved areas. Examples of the more innovative projects are described below.

The bank allocated \$472,500 to the AA from two loans totaling \$2.3 million. This CDFI utilizes both the Housing Catalyst Fund, a program backed by the U.S. Department of Treasury's Capital Magnet Fund, and an affordable housing fund managed by the entity. Through these programs, the entity offers low rates for acquisition and construction loans, as well as bridge, gap, and mini-perm financing. They also provide LIHTC financing including predevelopment, construction, and bridge loans. Since its inception, the entity has made over \$809 million in loans and financed 1,200 projects with an almost \$2 billion overall impact. These loans are considered responsive.

The bank allocated \$300,000 from a \$5 million loan. The purpose of this loan was to support many CDFIs financing of affordable housing and community facilities in communities in Alabama, Florida, Illinois, Louisiana, New York, Pennsylvania, Virginia, and Washington D.C. The loan entity is a special purpose entity owned and managed by two WNB existing partners: One is a U.S. Treasury-designated CDFI and the other is the largest CDFI in the U.S. The fund prioritizes projects that are minority led, in native country, and/or serving rural populations. This loan is considered innovative.

The bank allocated \$220,000 to the AA from a \$1 million loan in the SOAR Fund, an LLC owned by Local Initiatives Support Corporation (LISC), a national CDFI. The fund provides lending capital to address the small business needs of historically disenfranchised southern U.S. populations during the COVID-19 global pandemic. The facility is a partnership of 12 CDFIs working in tandem with national partners. The SOAR fund purchases 95 percent of each COVID-19 Recovery Loan originated by the participating CDFIs. This loan is considered responsive.

## Product Innovation and Flexibility

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

## Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's overall consumer loan performance under the Lending Test in the Harrisonburg CSA, Richmond MSA, and Roanoke MSA is consistent with the bank's overall consumer loan performance under the Lending Test in the full-scope area. The consumer loan performance in the Blacksburg MSA and Lynchburg MSA is weaker than overall performance but still good.

The small business loan performance in the Lynchburg MSA and Richmond MSA is consistent with the overall small business loan performance. There were not enough small business loans in the Blacksburg MSA, Harrisonburg CSA, and Roanoke MSA to perform a meaningful analysis. CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating.

Refer to Tables Q, R, U, and V in the state of Virginia section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

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

## Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Blacksburg MSA	2	68	12	87	14	11.48	156	1.87
Harrisonburg CSA	5	184	12	100	17	13.93	284	3.42
Lynchburg VA MSA	2	145	13	286	15	12.30	431	5.19
Virginia Non-MSA	15	548	14	465	29	23.77	1,013	12.20
Richmond MSA	3	214	17	5,620	20	16.39	5,834	70.22
Roanoke MSA	3	187	16	147	19	15.57	334	4.02

Statewide	6	216	2	40	8	6.56	256	3.08
<b>Totals</b>	<b>36</b>	<b>1,563</b>	<b>86</b>	<b>6,746</b>	<b>122</b>	<b>100</b>	<b>8,308</b>	<b>100</b>

During the evaluation period, WNB made 20 investments totaling \$995,228 including 15 prior period investments totaling \$548,107 and five current period investments totaling \$447,121. Additionally, nine grants totaling \$18,164 were made for a total investment in the AA of \$1.01 million. WNB's total investments represented 27.43 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization, economic development, and community services. Grants in the AA were made to qualified CD organizations that provide economic development and community services.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Blacksburg MSA, Harrisonburg CSA, Lynchburg MSA, Richmond MSA, and Roanoke MSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

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

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the VA Non-MSA AA is rated excellent.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	Branches						Population			
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Blacksburg MSA	3.7	2	6.3	0	0	100	0	1.7	15.3	48.3	28.2
Harrisonburg CSA	7.9	3	9.4	0	0	100	0	0.0	17.5	70.7	11.8
Lynchburg VA MSA	14.9	4	12.5	0	25	75	0	1.8	12.8	59.5	22.7
Virginia Non-MSA	36.3	10	31.3	0	30	30	40	1.0	23.6	55.4	20.0
Richmond MSA	26.0	9	28.1	0	11.1	44.4	33.3	7.0	19.4	38.6	33.9
Roanoke MSA	11.2	4	12.5	0	25	0	75	4.3	23.4	39.7	32.6

In the Virginia Non-MSA, there were no branches in low-income geographies but the percentage of branches in moderate-income geographies exceeded the population levels in those geographies. Additionally, 30 percent of the bank's branches were in distressed or underserved nonmetropolitan

middle-income geographies. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

Distribution of Branch Openings/Closings						
Assessment Area	Branch Openings/Closings					
	# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)			
			Low	Mod	Mid	Upp
Blacksburg MSA	0	0	0	0	0	0
Harrisonburg CSA	0	0	0	0	0	0
Lynchburg VA MSA	0	0	0	0	0	0
Virginia Non-MSA	0	0	0	0	0	0
Richmond MSA	1	0	0	1	0	0
Roanoke MSA	0	0	0	0	0	0

To the extent changes have been made, the institution's opening and closing of branches has improved the accessibility of its delivery systems, particularly in LMI geographies and/or to LMI individuals. The bank did not open or close branches in the Virginia Non-MSA during the evaluation period. While the Richmond MSA received a limited-scope review, the bank opened a branch in a moderate-income geography.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## Community Development Services

The institution is a leader in providing CD services.

WNB provided an excellent level of CD services in Virginia, which had a positive impact on the overall Service Test rating.

### Virginia Non-MSA

WNB provided an excellent level of CD services in the full scope Virginia Non-MSA. Bank employees provided 591 hours of financial education to 678 participants. The majority of the bank's training activities focused on Money Smart programs with 475 hours of the business curriculum and 96 hours of the personal curriculum. In addition to financial education, 15 WNB employees served on 15 boards or committees in 19 member positions. WNB provided leadership and financial expertise on board or committees of nationally and regionally known organizations such as Appalachian Community Action & Development Agency, Inc., Habitat for Humanity, Boys and Girls Club, and Wytheville Redevelopment & Housing Authority.

Statewide

WNB provided 1,540 hours of financial education to 1729 participants. WNB utilized four core modules for financial education in this state including 1) Building Wealth 2) New Beginnings 3) Money Smart – business 4) Money Smart – personal. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had 51 employees in Virginia serving on 40 boards or committees in 60 positions. Employees in these roles provided leadership and financial expertise in support of CD related needs.

**Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Richmond MSA is consistent with the bank's overall performance in the full-scope AA. The bank's performance under the Service Test in the Blacksburg MSA, Harrisonburg CSA, Lynchburg MSA, and Roanoke MSA is weaker than the bank's overall performance in the full-scope AA but is still high satisfactory.



## State of West Virginia

**CRA rating for the State of West Virginia<sup>1</sup>:** Outstanding

**The Lending Test is rated:** Outstanding

**The Investment Test is rated:** Outstanding

**The Service Test is rated:** High Satisfactory

The major factors that support this rating include:

- Lending levels reflect excellent responsiveness to credit needs in its AAs;
- An excellent geographic distribution of loans;
- An excellent distribution of loans by the income level of the borrower;
- A significant level of CD loans, and qualified CD investments and grants;
- A relatively high level of CD services; and
- Readily accessible service delivery systems.

## Description of Institution's Operations in West Virginia

WNB operates five branches throughout three AAs. The AAs include Beckley WV MSA (Beckley MSA), Morgantown-Fairmont WV CSA (Morgantown CSA), and Non-MSA WV (West Virginia Non-MSA).

The state of West Virginia represents 0.24 percent of total bank deposits and was WNB's 20<sup>th</sup> largest rating area. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$20.4 million, which represented 0.21 percent deposit market share and ranked the bank 35<sup>th</sup> of 52 institutions within the state. The largest depository institutions were Truist Bank, First Community Bank, MVB Bank, JP Morgan Chase Bank, and City National Bank of WV, which held a combined 46 percent market share in the state.

We identified the West Virginia Non-MSA for full-scope review in West Virginia. This AA includes the non-metro counties of Barbour, Harrison, Mercer, Mingo, Nicholas, Randolph, Tucker, and Wyoming. WNB operates two branches throughout the AA, which accounts for 50.5 percent of rated area deposits. According to FDIC Deposit Market Share data as of June 30, 2022, WNB held deposits totaling \$10.3 million, which represented 0.17 percent market share and ranked the bank 34<sup>th</sup> of 38 institutions within the AA. The largest depository institutions were Truist Bank, First Community Bank, and Summit Community Bank, which held a combined 41.28 percent market share in the AA.

## Community Contacts

We identified one community contact in the West Virginia Non-MSA that supported economic development. The primary need identified was workforce development.

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

The following tables provide information on the demographic composition of the West Virginia Non-MSA for both evaluation periods.

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA WV</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	72	0.0	15.3	63.9	20.8	0.0
Population by Geography	258,684	0.0	12.3	65.0	22.7	0.0
Housing Units by Geography	125,316	0.0	12.6	65.0	22.4	0.0
Owner-Occupied Units by Geography	78,018	0.0	11.0	66.3	22.6	0.0
Occupied Rental Units by Geography	26,379	0.0	17.1	60.3	22.6	0.0
Vacant Units by Geography	20,919	0.0	12.8	66.1	21.1	0.0
Businesses by Geography	15,180	0.0	13.1	56.7	30.3	0.0
Farms by Geography	516	0.0	8.1	65.5	26.4	0.0
Family Distribution by Income Level	70,191	22.0	16.5	19.9	41.7	0.0
Household Distribution by Income Level	104,397	25.2	16.0	16.1	42.7	0.0
Median Family Income Non-MSAs - WV		\$48,107	Median Housing Value			\$91,890
			Families Below Poverty Level			15.1%
			Median Gross Rent			\$595

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

<b>Table A – Demographic Information of the Assessment Area</b>						
<b>Assessment Area: Non-MSA WV</b>						
<b>Demographic Characteristics</b>	<b>#</b>	<b>Low % of #</b>	<b>Moderate % of #</b>	<b>Middle % of #</b>	<b>Upper % of #</b>	<b>NA* % of #</b>
Geographies (Census Tracts)	76	1.3	19.7	55.3	23.7	0.0
Population by Geography	245,298	1.0	18.7	58.1	22.3	0.0
Housing Units by Geography	126,188	1.1	19.3	59.0	20.6	0.0
Owner-Occupied Units by Geography	75,179	0.7	18.8	57.6	23.0	0.0
Occupied Rental Units by Geography	26,887	1.9	19.2	58.7	20.3	0.0
Vacant Units by Geography	24,122	1.4	21.1	63.8	13.7	0.0
Businesses by Geography	17,117	1.2	16.2	55.8	26.8	0.0
Farms by Geography	584	0.7	9.6	62.2	27.6	0.0
Family Distribution by Income Level	66,694	21.0	17.4	20.4	41.3	0.0
Household Distribution by Income Level	102,066	24.9	15.4	17.9	41.9	0.0
Median Family Income Non-MSAs - WV		\$55,205	Median Housing Value			\$108,229
			Families Below Poverty Level			13.6%
			Median Gross Rent			\$671

*Source: 2020 U.S. Census and 2022 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.

## Scope of Evaluation in West Virginia

The West Virginia Non-MSA received a full-scope review, as it is the only AA in the multistate CSA. Refer to appendix A for a list of all AAs under review.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

### LENDING TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

#### Lending Activity

Lending levels reflect excellent responsiveness to AA credit needs. The only products analyzed were small business and consumer loans.

Number of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Beckley MSA	102	24	0	6	132	33.85	37.73
Morgantown CSA	27	8	0	9	44	11.28	11.73
West Virginia Non-MSA	169	37	3	5	214	54.87	50.54

Dollar Volume of Loans*							
Assessment Area	Consumer	Small Business	Small Farm	Community Development	Total	% State Loans	% State Deposits
Beckley MSA	194	1,545	0	945	2,684	8.17	37.73
Morgantown CSA	54	17	0	28,560	28,631	87.19	11.73
West Virginia Non-MSA	294	287	17	925	1,523	4.64	50.54

\*Tables reflect all lending activity, but only full-scope reviews are discussed in the narrative.

In the West Virginia Non-MSA, the bank originated an excellent volume of loans relative to its capacity based on deposits, competition, market presence, and business strategy. By number, the bank's small business market share in the AA of 0.41 percent is greater than the bank's deposit market share of 0.17 percent.

Per 2021 peer data by number, WNB ranked 36<sup>th</sup> of 82 small business lenders in the AA. The five largest small business lenders held 45.89 percent of the market share. WNB's average small business loan totaled \$9,000 compared to the top five business lenders which ranged between \$4,000 and \$82,000.

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

The bank exhibits an excellent geographic distribution of loans in its AA. During the 2019-2021 evaluation period, there were no low-income CTs, so we focused our analysis on moderate-income CTs.

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

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

The distribution of small loans to businesses in moderate-income geographies is excellent. During the 2019-2020 evaluation period, the proportion of bank loans significantly exceeded the proportion of businesses and aggregate lending in moderate-income geographies. During 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table U in the state of West Virginia section of appendix D for the facts and data used to evaluate the geographic distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans in LMI geographies is excellent. During 2019-2021, the proportion of bank loans was lower than the proportion of households in moderate-income geographies. During 2022, performance in both LMI geographies was excellent with the proportion of bank loans exceeding the proportion of households.

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

We evaluated the lending distribution in the AAs and did not identify any unexplained conspicuous gaps.

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

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

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

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

The distribution of small loans to businesses by revenue is good. During the 2019-2021 evaluation period, the proportion of bank loans was lower than the proportion of businesses but exceeded the aggregate distribution of loans to small businesses. Internal bank analysis shows without PPP loans, the performance was excellent with 100 percent of the bank's loans originated to small businesses. During 2022, there were not enough small business loans to perform a meaningful analysis.

### ***Consumer Loans***

Refer to Table V in the state of West Virginia section of appendix D for the facts and data used to evaluate the borrower distribution of the bank's consumer loan originations and purchases.

The distribution of consumer loans to LMI borrowers was excellent. During both evaluation periods, the proportion of bank loans to LMI borrowers exceeded the proportion of households.

### **Community Development Lending**

The institution is a leader in making CD loans.

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

The volume of CD loans in the West Virginia Non-MSA had a significantly positive impact on the Lending Test performance in this AA. The bank allocated \$925,000, which represented 103 percent of allocated tier 1 capital for the area. These five allocations were from five different entities. Of these allocations, three provided opportunities for affordable housing and two supported economic development. The affordable housing and economic development allocations were all to various CDFIs that provide funds to affordable housing developers in the area or provide small business loans. Examples of the more innovative or responsive projects are described below.

The bank allocated \$400,000 to the AA from a \$2 million loan. This loan helped capitalize the CDFI's interest-free "Emergency Stabilization Fund" for member organizations and area businesses struggling during the COVID-19 pandemic. The organization offers two clusters of loan products. One for its network of more than 50 community development non-profit member organizations and another for community developments. This loan is considered responsive.

The bank allocated \$250,000 to the AA from a \$12 million RLOC. This loan enables this leading affordable housing syndicator to originate working capital loans for LIHTC-funded developments, which frees up funds for developers to pursue additional new affordable housing developments (pre-construction costs). This entity serves Ohio, Kentucky, West Virginia, and western Pennsylvania. This company has contributed to the creation or preservation of 50,000 units of affordable housing. This loan is considered innovative and responsive.

### **Product Innovation and Flexibility**

The institution makes extensive use of innovative and/or flexible lending practices to serve AA credit needs. These include the ReLi LOC, the Business ReLi LOC, and the Re-Starter loan programs.

### **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited-scope reviews, the bank's overall consumer lending performance under the Lending Test in the Beckley MSA is weaker than the bank's overall performance under the Lending test but still good. There were not enough small loans in the Beckley MSA to perform a meaningful analysis. There

were not enough small business or consumer loans in the Morgantown-Fairmont CSA to perform a meaningful analysis.

CD loan performance was excellent in all AAs and had a significantly positive impact on the overall rating. There were two CD allocations to one entity in the Morgantown-Fairmont CSA that was both innovative and responsive. The first loan, totaling \$13 million, was used to construct a 231,600 square foot production and packaging facility for a local health beverage company. The second loan, totaling \$15 million, was to purchase the new industrial equipment for the facility. This start-up business will create 300 local jobs, which will help replace the 1,431 jobs lost due to a local manufacturing facility shutdown in 2021. The new facility borders a moderate-income CT and is located inside both a U.S. SBA HUBZone and U.S. Treasury New Market Tax Credit eligible zone.

Refer to Tables Q, R, U, and V in the state of West Virginia section of appendix D for the facts and data that support these conclusions.

## INVESTMENT TEST

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

### Conclusions for Area Receiving a Full-Scope Review

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

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

The institution exhibits excellent responsiveness to credit and community economic development needs. The institution makes extensive use of innovative and/or complex investments to support CD initiatives.

Qualified Investments								
Assessment Area	Prior Period*		Current Period		Total			
	#	\$(000's)	#	\$(000's)	#	% of Total #	\$(000's)	% of Total \$
Beckley MSA	3	82	11	180	14	29.79	261	21.23
Morgantown CSA	5	494	11	85	16	34.04	579	47.04
West Virginia Non-MSA	2	44	13	306	15	31.91	350	28.45
Statewide	0	0	2	40	2	4.26	40	3.28
<b>Totals</b>	<b>10</b>	<b>619</b>	<b>37</b>	<b>611</b>	<b>47</b>	<b>100</b>	<b>1,230</b>	<b>100</b>

During the evaluation period, WNB made six investments totaling \$343,762 including two prior period investments totaling \$43,762 and four current period investments totaling \$300,000. Additionally, nine grants totaling \$6,139 were made for a total investment in the AA of \$349,901. WNB's total investments represented 38.85 percent of tier 1 capital allocated to the AA.

WNB's qualified investments in the AA provide revitalization and/or stabilization, economic development, and affordable housing. Grants in the AA were made to qualified CD organizations that provide economic development and affordable housing.

### Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Investment Test in the Beckley MSA and Morgantown CSA is consistent with the bank's overall performance under the Investment Test in the full-scope area.

### SERVICE TEST

The bank's performance under the Service Test in West Virginia is rated High Satisfactory.

### Conclusions for Area Receiving a Full-Scope Review

Based on a full-scope review, the bank's performance in the West Virginia Non-MSA is rated good.

### Retail Banking Services

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

Distribution of Branch Delivery System											
Assessment Area	Deposits	# of BANK Branches	Branches				Population				
	% of Rated Area Deposits in AA		% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				% of Population within Each Geography			
				Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Beckley MSA	37.7	2	40.0	0	0	100	0	0.0	13.8	66.9	19.3
Morgantown CSA	11.7	1	20.0	0	0	0	100	1.9	11.2	43.1	43.8
West Virginia Non-MSA	50.5	2	40.0	0	0	50	50	1.0	18.7	58.1	22.3

WNB does not have branches in LMI geographies of the West Virginia Non-MSA; however, one of the AA's two branches is located directly next to a moderate-income geography. Retail service delivery systems were enhanced using ADS for effectively delivering services in LMI geographies.

The bank did not open or close branches during the evaluation period.

Services, including where appropriate, business hours, are tailored to the convenience and needs of its AA, particularly LMI geographies and/or individuals. All branches offer convenient operational hours Monday through Saturday and accessibility in Walmart store lobbies. Services include traditional banking services such as consumer and small business checking/savings accounts, loans, merchant services, and check cashing. The bank also offers online and mobile banking.

## **Community Development Services**

WNB provided a relatively high level of CD services in West Virginia, which had a positive impact on the overall Service Test rating.

### West Virginia Non-MSA

WNB provided a relatively high level of financial education services in the West Virginia Non-MSA. Bank employees provided 100 hours of financial education to 87 participants. The bank's training activities in this AA focused on the Money Smart – business program. In addition to financial education, two WNB employees served on two boards or committees in two member positions. WNB provided leadership and financial expertise on board or committees of nationally known organizations such as Homeownership Center Inc., and The Richwood Pantry.

### Statewide

WNB provided 205 hours of financial education to 197 participants. WNB utilized the Money Smart – business curriculum. In addition to financial education initiatives, WNB employees also work with various organizations in support of CD needs. WNB had six employees in West Virginia serving on five boards or committees in six positions. Employees in these roles provide leadership and financial expertise in support of CD related needs. The organizations in which WNB is involved provide various CD related services to LMI families and individuals and promote affordable housing and food access.

## **Conclusions for Areas Receiving Limited-Scope Reviews**

Based on limited scope reviews, the bank's performance under the Service Test in the Beckley MSA is consistent with the bank's overall performance in the full-scope AA. The bank's performance under the Service Test in the Morgantown CSA is weaker than the bank's overall performance in the full-scope AA but is still satisfactory.



## Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term “full-scope,” and those that received a less comprehensive review, designated by the term “limited-scope”.

<b>Time Period Reviewed:</b>	January 1, 2019 – December 31, 2022* *The Syracuse CSA in New York spans January 1, 2019 – October 9, 2020, as WNB exited the market with the closing of a singular branch.	
<b>Bank Products Reviewed:</b>	Small business loans Consumer loans CD loans, qualified investments, CD services	
<b>Affiliate(s)</b>	<b>Affiliate Relationship</b>	<b>Products Reviewed</b>
None		
<b>List of Assessment Areas and Type of Examination</b>		
<b>Rating and Assessment Areas</b>	<b>Type of Exam</b>	<b>Other Information</b>
<b>MMSA(s)</b>		
Charleston-Huntington-Ashland WV-OH CSA (Charleston Multistate CSA)	Full-Scope	OH: Huntington MSA (Lawrence County) and Non-Metro (Scioto County) WV: Charleston MSA (Boone, Kanawha, and Lincoln Counties); Huntington MSA (Cabell and Putnam Counties); and Non-Metro (Logan County)
Charlotte-Concord NC-SC CSA (Charlotte Multistate CSA)	Full-Scope	NC: Charlotte-Concord-Gastonia MSA (Anson, Cabarrus, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, and Union Counties) and Non-Metro (Cleveland and Stanly Counties) SC: Charlotte-Concord-Gastonia MSA (Chester, Lancaster, and York Counties)
Chicago-Naperville IL-IN CSA (Chicago Multistate CSA)	Full-Scope	IL: Chicago-Naperville-Arlington Heights MD (Cook, DuPage, McHenry, and Will Counties); Elgin MD (Kane and Kendall Counties); Kankakee MSA (Kankakee County); Lake County-Kenosha County MD (Lake County); and Non-Metro (LaSalle County) IN: Gary MD (Lake and Porter Counties); Michigan City-La Porte MSA (LaPorte County)
Cincinnati-Wilmington-Maysville OH-KY-IN CSA (Cincinnati Multistate CSA)	Full-Scope	IN: Cincinnati MSA (Dearborn County) KY: Cincinnati MSA (Campbell County) OH: Cincinnati MSA (Brown, Butler, Clermont, Hamilton, and Warren Counties), Non-Metro (Clinton County)
Louisville KY-IN CSA (Louisville Multistate CSA)	Full-Scope	IN: Louisville MSA (Harrison County) KY: Elizabethtown MSA (Hardin and Larue Counties); Louisville MSA (Bullitt, Henry, Jefferson, and Oldham Counties)
Myrtle Beach-Conway SC-NC CSA (Myrtle Beach Multistate CSA)	Full-Scope	NC: Myrtle Beach-Conway-North Myrtle Beach MSA (Brunswick County) SC: Myrtle Beach-Conway-North Myrtle Beach MSA (Horry County)
Virginia Beach-Norfolk VA-NC CSA (Virginia Beach Multistate CSA)	Full-Scope	NC: Virginia Beach-Norfolk-Newport News MSA (Camden County), Non-Metro (Pasquotank County)

		VA: Virginia Beach-Norfolk-Newport News MSA (Gloucester, Isle of Wight, James City, Mathews, and York Counties and the cities of Chesapeake, Hampton, Newport News, Norfolk, Poquoson, Portsmouth, Suffolk, Virginia Beach, and Williamsburg)
Washington-Baltimore-Arlington DC-MD-VA-WV-PA CSA (Washington Multistate CSA)	Full-Scope	DC: Washington-Arlington-Alexandria MD (District of Columbia County) MD: Baltimore MSA (Anne Arundel, Baltimore, Harford, and Howard Counties and the city of Baltimore); California-Lexington Park MSA (St. Mary's County); Hagerstown-Martinsburg MSA (Washington County); Frederick-Gaithersburg-Rockville MD (Frederick and Montgomery Counties); Washington-Arlington-Alexandria MD (Charles and Prince George's Counties) PA: Chambersburg-Waynesboro MSA (Franklin County) VA: Washington-Arlington-Alexandria MD (Arlington, Clarke, Fairfax, Fauquier, Loudoun, Prince William, Spotsylvania, Stafford, and Warren Counties, plus the cities of Alexandria, Fairfax, Falls Church, Fredericksburg, Manassas and Manassas Park) and Winchester MSA (Frederick County, plus the city of Winchester) WV: Hagerstown-Martinsburg MSA (Berkeley County); Washington-Arlington-Alexandria MD (Jefferson County);
<b>STATES</b>		
<b>Alabama</b>		
Anniston-Oxford AL MSA (Anniston MSA)	Limited-Scope	Anniston MSA (Calhoun County)
Birmingham-Hoover-Talladega AL CSA (Birmingham CSA)	Limited-Scope	Birmingham MSA (Blount, Chilton, Jefferson, and Shelby Counties); and Non-Metro (Cullman and Talladega Counties)
Gadsden AL MSA (Gadsden MSA)	Limited-Scope	Gadsden MSA (Etowah County)
Huntsville-Decatur AL CSA (Huntsville CSA)	Limited-Scope	Decatur MSA (Lawrence and Morgan Counties) and Huntsville MSA (Limestone and Madison Counties)
Mobile-Daphne-Fairhope AL CSA (Mobile CSA)	Full-Scope	Daphne MSA (Baldwin County) and Mobile MSA (Mobile County)
Montgomery-Selma-Alexander City AL CSA (Montgomery CSA)	Limited-Scope	Montgomery MSA (Autauga, Elmore, Lowndes, and Montgomery Counties) and Non-Metro (Dallas County)
Alabama Non-MSA	Limited-Scope	Non-Metro counties of Butler, Coffee, Covington, Escambia, Marshall, and Monroe Counties
Tuscaloosa AL MSA (Tuscaloosa MSA)	Limited-Scope	Tuscaloosa MSA (Pickens and Tuscaloosa Counties)
<b>Florida</b>		
Jacksonville-St Mary's-Palatka FL CSA (Jacksonville CSA)	Full-Scope	Jacksonville MSA (Duval County)
<b>Georgia</b>		
Atlanta-Sandy Springs GA CSA (Atlanta CSA)	Full-Scope	Atlanta MSA (Clayton, Cobb, Coweta, DeKalb, Douglas, Fayette, Fulton, Gwinnett, Henry, and Walton Counties)
<b>Illinois</b>		
Bloomington-Pontiac IL CSA (Bloomington IL CSA)	Limited-Scope	Bloomington MSA (McLean County) and Non-Metro (Livingston County)
Carbondale-Marion IL MSA (Carbondale MSA)	Limited-Scope	Carbondale MSA (Jackson and Williamson Counties)
Champaign-Urbana IL MSA (Champaign MSA)	Full-Scope	Champaign MSA (Champaign County)
Danville IL MSA (Danville MSA)	Limited-Scope	Danville MSA (Vermilion County)
Davenport-Moline IL CSA (Davenport CSA)	Limited-Scope	Davenport MSA (Henry and Rock Island Counties)

Decatur IL MSA (Decatur MSA)	Limited-Scope	Decatur MSA (Macon County)
Dixon-Sterling IL CSA (Dixon CSA)	Limited-Scope	Non-Metro (Lee and Whiteside Counties)
Illinois Non-MSA	Limited-Scope	Non-Metro counties of Coles, Jefferson, Knox, McDonough, and Saline Counties
Peoria IL MSA	Limited-Scope	Peoria MSA (Fulton, Peoria, Tazewell, and Woodford Counties)
Rockford-Freeport-Rochelle IL CSA (Rockford CSA)	Limited-Scope	Rockford MSA (Winnebago County) and Non-Metro (Ogle and Stephenson Counties)
Springfield-Jacksonville-Lincoln IL CSA (Springfield CSA)	Limited-Scope	Springfield MSA (Sangamon County) and Non-Metro (Morgan County)
St Louis-St Charles-Farmington IL CSA (St Louis CSA)	Limited-Scope	St. Louis MSA (Macoupin, Madison, and St. Clair Counties)
<b>Indiana</b>		
Bloomington-Bedford IN CSA (Bloomington IN CSA)	Limited-Scope	Bloomington MSA (Monroe County) and Non-Metro (Lawrence County)
Evansville IN MSA (Evansville MSA)	Limited-Scope	Evansville MSA (Posey, Vanderburgh, and Warrick counties)
Fort Wayne-Huntington-Auburn IN CSA (Fort Wayne CSA)	Limited-Scope	Fort Wayne MSA (Allen and Whitley Counties) and Non-Metro (Adams, DeKalb, Huntington, and Noble Counties)
Indianapolis-Carmel-Muncie IN CSA (Indianapolis CSA)	Limited-Scope	Columbus MSA (Bartholomew County); Indianapolis MSA (Boone, Brown, Hamilton, Hendricks, Johnson, Madison, Marion, Morgan, and Shelby Counties); Muncie MSA (Delaware County); and Non-MSA counties of Henry, Jackson, and Jennings Counties
Lafayette-West Lafayette-Frankfort IN CSA (Lafayette IN CSA)	Limited-Scope	Lafayette MSA (Tippecanoe County) and Non-Metro (Clinton County)
Indiana Non-MSA	Limited-Scope	Non-Metro counties of Daviess, Dubois, Gibson, Knox, Perry, Starke, Wabash, and Wells Counties
South Bend-Elkhart-Mishawaka IN CSA (South Bend CSA)	Full-Scope	Elkhart-Goshen MSA (Elkhart County); South Bend MSA (St. Joseph County) and Non-Metro (Kosciusko and Marshall Counties)
Terre Haute IN MSA (Terre Haute MSA)	Limited-Scope	Terre Haute MSA (Clay and Vigo Counties)
<b>Kentucky</b>		
Bowling Green-Glasgow KY CSA (Bowling Green CSA)	Limited-Scope	Bowling Green MSA (Warren County)
Lexington-Fayette-Richmond-Frankfort KY CSA (Lexington CSA)	Limited-Scope	Lexington MSA (Clark, Fayette, Jessamine, and Woodford Counties) and Non-Metro (Anderson, Bath, Franklin, Madison, and Montgomery Counties)
Kentucky Non-MSA	Full-Scope	Non-Metro counties of Adair, Boyle, Caldwell, Calloway, Fleming, Garrard, Green, Hopkins, Knox, Laurel, Lincoln, Logan, McCracken, Marion, Marshall, Mercer, Muhlenberg, Rockcastle, Rowan, Taylor, Washington, and Whitley counties
Owensboro KY MSA (Owensboro MSA)	Limited-Scope	Owensboro MSA (Daviess County)
<b>Louisiana</b>		
Alexandria LA MSA (Alexandria MSA)	Limited-Scope	Alexandria MSA (Rapides Parish)
Baton Rouge LA MSA (Baton Rouge MSA)	Limited-Scope	Baton Rouge MSA (East Baton Rouge and St. Helena Parishes)
Houma-Thibodaux LA MSA (Houma MSA)	Limited-Scope	Houma MSA (Lafourche and Terrebonne Parishes)
Lafayette-Opelousas-Morgan City LA CSA (Lafayette LA CSA)	Limited-Scope	Lafayette MSA (Acadia, Iberia, Lafayette, and St. Martin Parishes) and Non-Metro (St. Landry Parish)
Lake Charles-Jennings LA CSA (Lake Charles CSA)	Limited-Scope	Lake Charles MSA (Calcasieu Parish) and Non-Metro (Jefferson Davis Parish)

Monroe-Ruston LA CSA (Monroe CSA)	Limited-Scope	Monroe MSA (Morehouse, Ouachita, and Union Parishes)
New Orleans-Metairie-Hammond LA CSA (New Orleans CSA)	Full-Scope	Hammond MSA (Tangipahoa County) and New Orleans MSA (Jefferson, Orleans, St. Bernard, St. Charles, St. John the Baptist, and St. Tammany Parishes)
Shreveport-Bossier City-Minden LA CSA (Shreveport CSA)	Limited-Scope	Shreveport MSA (Bossier and Caddo Parishes)
<b>Maryland</b>		
Salisbury-Cambridge MD CSA (Salisbury CSA)	Full-Scope	Salisbury MSA (Somerset, Wicomico, and Worcester Counties)
<b>Mississippi</b>		
Cleveland-Indianola MS CSA (Cleveland MSA CSA)	Limited-Scope	Non-Metro counties of Bolivar and Sunflower Counties
Columbus-West Point MS CSA (Columbus CSA)	Limited-Scope	Non-Metro counties of Clay and Lowndes Counties
Gulfport-Biloxi-Pascagoula MS MSA (Gulfport CSA)	Limited-Scope	Gulfport MSA (Hancock, Harrison, and Jackson Counties)
Jackson-Vicksburg-Brookhaven MS CSA (Jackson CSA)	Limited-Scope	Jackson MSA (Copiah, Hinds, Holmes, and Yazoo Counties) and Non-Metro (Lincoln and Warren Counties)
Memphis-Forrest City MS CSA (Memphis CSA)	Limited-Scope	Memphis MSA (DeSoto and Tate Counties)
Mississippi Non-MSA	Full-Scope	Non-Metro counties of Coahoma, Grenada, Humphreys, Kemper, Lafayette, Lauderdale, Lawrence, Leflore, Monroe, Noxubee, Oktibbeha, Panola, Pike, Tallahatchie, Union, and Washington Counties
Tupelo-Corinth MS CSA (Tupelo CSA)	Limited-Scope	Non-Metro (Alcorn, Itawamba, Lee, Pontotoc, and Prentiss Counties)
<b>New York</b>		
Albany-Schenectady NY CSA (Albany CSA)	Limited-Scope	Albany MSA (Albany, Rensselaer, and Schenectady Counties) and Non-Metro (Montgomery County)
Buffalo-Cheektowaga-Olean NY CSA (Buffalo CSA)	Full-Scope	Buffalo MSA (Erie and Niagara Counties) and Non-Metro (Cattaraugus County)
Elmira-Corning NY CSA (Elmira CSA)	Limited-Scope	Elmira MSA (Chemung County)
New York Non-MSA	Limited-Scope	Non-Metro county of Allegany and Chautauqua Counties
Rochester-Batavia-Seneca Falls NY CSA (Rochester CSA)	Limited-Scope	Rochester MSA (Monroe, Ontario, Orleans, and Wayne Counties) and Non-Metro (Genesee County)
Syracuse-Auburn NY CSA (Syracuse CSA)*	Limited-Scope	Syracuse MSA (Oswego County) *The Syracuse CSA spans January 1, 2019 – October 9, 2020, as WNB exited the market with the closing of a singular branch.
Utica-Rome NY MSA (Utica CSA)	Limited-Scope	Utica MSA (Herkimer and Oneida Counties)
Watertown-Fort Drum NY MSA (Watertown MSA)	Limited-Scope	Watertown MSA (Jefferson County)
<b>North Carolina</b>		
Asheville-Marion-Brevard NC CSA (Asheville CSA)	Limited-Scope	Asheville MSA (Buncombe, Haywood, and Henderson Counties)
Fayetteville-Sanford-Lumberton NC CSA (Fayetteville CSA)	Limited-Scope	Fayetteville MSA (Cumberland, Harnett, and Hoke Counties) and Non-Metro (Lee, Moore, Robeson, and Scotland Counties)
Goldsboro NC MSA (Goldsboro MSA)	Limited-Scope	Goldsboro MSA (Wayne County)
Greensboro--Winston-Salem--High Point NC CSA (Greensboro CSA)	Limited-Scope	Burlington MSA (Alamance County); Greensboro MSA (Guilford, Randolph, and Rockingham Counties); Winston-Salem MSA (Davidson, Davie, Forsyth, Stokes, and Yadkin Counties); and Non-Metro (Surry County)
Greenville-Kinston-Washington NC CSA (Greenville CSA)	Limited-Scope	Greenville MSA (Pitt County)

Hickory-Lenoir-Morganton NC MSA (Hickory MSA)	Limited-Scope	Hickory MSA (Alexander, Burke, Caldwell, and Catawba Counties)
Jacksonville NC MSA (Jacksonville MSA)	Limited-Scope	Jacksonville MSA (Onslow County)
New Bern-Morehead City NC CSA (New Bern CSA)	Limited-Scope	New Bern MSA (Craven County) and Non-Metro (Carteret County)
North Carolina Non-MSA	Limited-Scope	Non-Metro counties of Bladen, Columbus, Duplin, Martin, Rutherford, Sampson, Warren, and Wilkes Counties
Raleigh-Durham-Cary NC CSA (Raleigh CSA)	Full-Scope	Durham-Chapel Hill MSA (Chatham, Durham, and Orange Counties); Raleigh MSA (Franklin, Johnston, and Wake Counties); and Non-Metro (Vance County)
Rocky Mount-Wilson-Roanoke Rapids NC CSA (Rocky Mount CSA)	Limited-Scope	Rocky Mount MSA (Edgecombe and Nash Counties) and Non-Metro (Halifax, Northampton, and Wilson Counties)
<b>Ohio</b>		
Cleveland-Akron-Canton OH CSA (Cleveland OH CSA)	Full-Scope	Akron MSA (Portage and Summit Counties); Canton MSA (Starke County); Cleveland MSA (Cuyahoga, Geauga, Lake, Lorain, and Medina Counties); and Non-Metro (Ashtabula, Erie, Huron, Tuscarawas, and Wayne Counties)
Columbus-Marion-Zanesville OH CSA (Columbus CSA)	Limited-Scope	Columbus MSA (Fairfield, Franklin, Licking, Madison, Pickaway, and Union Counties) and Non-Metro (Fayette, Guernsey, Knox, Logan, Muskingum, and Ross Counties)
Dayton-Springfield-Kettering OH CSA (Dayton CSA)	Limited-Scope	Dayton MSA (Greene, Miami, and Montgomery Counties); Springfield MSA (Clark County); and Non-Metro (Champaign County)
Lima-Van Wert-Celina OH CSA (Lima CSA)	Limited-Scope	Lima MSA (Allen County) and Non-Metro (Auglaize, Mercer, and Van Wert Counties)
Mansfield-Ashland-Bucyrus OH CSA (Mansfield CSA)	Limited-Scope	Mansfield MSA (Richland County) and Non-Metro (Ashland County)
Ohio Non-MSA	Limited-Scope	Non-Metro counties of Adams, Coshocton, Defiance, Hardin, Henry, Highland, Paulding, Preble, and Williams Counties
Toledo-Findlay-Tiffin OH CSA (Toledo CSA)	Limited-Scope	Toledo MSA (Fulton, Lucas, Ottawa, and Wood Counties) and Non-Metro (Hancock, Sandusky, and Seneca Counties)
Wheeling OH MSA (Wheeling MSA)	Limited-Scope	Wheeling MSA (Belmont County)
Youngstown-Warren OH CSA (Youngstown CSA)	Limited-Scope	Youngstown MSA (Mahoning and Trumbull Counties) and Non-Metro (Columbiana County)
<b>Pennsylvania</b>		
Altoona-Huntingdon PA CSA (Altoona CSA)	Limited-Scope	Altoona MSA (Blair County)
Bloomsburg-Berwick-Sunbury PA CSA (Bloomsburg CSA)	Limited-Scope	Non-Metro (Northumberland and Union Counties)
East Stroudsburg PA MSA (East Stroudsburg MSA)	Limited-Scope	East Stroudsburg MSA (Monroe County)
Erie-Meadville PA CSA (Erie CSA)	Limited-Scope	Erie MSA (Erie County) and Non-Metro (Crawford County)
Harrisburg-York-Lebanon PA CSA (Harrisburg CSA)	Limited-Scope	Gettysburg MSA (Adams County), Harrisburg-Carlisle MSA (Cumberland and Dauphin Counties), and York-Hanover MSA (York County)
Johnstown-Somerset PA CSA (Johnstown CSA)	Limited-Scope	Johnstown MSA (Cambria County)
Lancaster PA MSA (Lancaster MSA)	Limited-Scope	Lancaster MSA (Lancaster County)
Newark PA MD (Newark MD)	Limited-Scope	Newark PA MD (Pike County)
Pennsylvania Non-MSA	Full-Scope	Non-Metro counties of Clarion, Greene, Schuylkill, Venango, Warren, and Wayne Counties
Philadelphia-Reading-Camden PA CSA (Philadelphia CSA)	Limited-Scope	Philadelphia MSA (Bucks, Chester, Montgomery, and Philadelphia Counties), and Reading MSA (Berks County)
Pittsburgh-New Castle-Weirton PA CSA (Pittsburgh CSA)	Limited-Scope	Pittsburgh MSA (Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, and Westmoreland Counties)

Scranton-Wilkes-Barre-Hazleton PA MSA (Scranton MSA)	Limited-Scope	Scranton-Wilkes-Barre MSA (Lackawanna and Luzerne Counties)
<b>South Carolina</b>		
Augusta-Richmond County SC MSA (Augusta MSA)	Limited-Scope	Augusta MSA (Aiken County)
Charleston-North Charleston SC MSA (Charleston MSA)	Limited-Scope	Charleston-North Charleston MSA (Berkeley, Charleston, and Dorchester Counties)
Columbia-Orangeburg-Newberry SC CSA (Columbia CSA)	Limited-Scope	Columbia MSA (Fairfield, Kershaw, Lexington, and Richland Counties), and Non-Metro (Orangeburg County)
Florence SC MSA (Florence MSA)	Limited-Scope	Florence MSA (Darlington and Florence Counties)
Greenville-Spartanburg-Anderson SC CSA (Greenville CSA)	Full-Scope	Greenville MSA (Anderson, Greenville, Laurens, and Pickens Counties); Spartanburg MSA (Spartanburg County); and Non-Metro (Cherokee, Greenwood, Oconee, and Union Counties)
Hilton Head Island-Bluffton SC MSA (Hilton Head Island MSA)	Limited-Scope	Hilton Head Island MSA (Beaufort Counties)
<b>Texas</b>		
Amarillo-Pampa-Borger TX CSA (Amarillo CSA)	Limited-Scope	Amarillo MSA (Potter and Randall Counties)
Austin-Round Rock TX MSA (Austin MSA)	Limited-Scope	Austin-Round Rock MSA (Bastrop, Hays, Travis, and Williamson Counties)
Beaumont-Port Arthur TX MSA (Beaumont MSA)	Limited-Scope	Beaumont-Port Arthur MSA (Jefferson County)
Brownsville-Harlingen-Raymondville TX CSA (Brownsville CSA)	Limited-Scope	Brownsville-Harlingen MSA (Cameron County)
Dallas-Fort Worth TX CSA (Dallas CSA)	Full-Scope	Dallas-Plano-Irving MD (Collin, Dallas, Denton, Ellis, Kaufman, and Rockwall Counties); Fort Worth-Arlington MD (Johnson, Tarrant, and Wise Counties); Sherman MSA (Grayson County); and Non-Metro (Cooke, Henderson, and Navarro Counties)
Houston-The Woodlands TX CSA (Houston CSA)	Full-Scope	Houston-The Woodlands-Sugar Land MSA (Austin, Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller Counties) and Non-Metro (Matagorda, Walker, Washington, and Wharton Counties)
Kerrville-Fredericksburg TX CSA (Kerrville CSA)	Limited-Scope	Non-Metro County of Gillespie County
Longview TX MSA (Longview MSA)	Limited-Scope	Longview MSA (Gregg, Harrison, Rusk, and Upshur Counties)
Texas Non-MSA	Limited-Scope	Non-Metro counties of Bee, Cass, Colorado, Grimes, Howard, Limestone, Polk, Refugio, San Jacinto, Shelby, Titus, and Van Zandt Counties
San Antonio-New Braunfels-Pearsall TX CSA (San Antonio CSA)	Limited-Scope	San Antonio-New Braunfels MSA (Bexar, Comal, Guadalupe, Kendall, and Medina Counties)
Texarkana TX MSA (Texarkana MSA)	Limited-Scope	Texarkana MSA (Bowie County)
Tyler-Jacksonville TX CSA (Tyler CSA)	Limited-Scope	Tyler MSA (Smith County)
Victoria-Port Lavaca TX CSA (Victoria CSA)	Limited-Scope	Non-Metro (Calhoun County)
<b>Virginia</b>		
Blacksburg-Christiansburg-Radford VA MSA (Blacksburg MSA)	Limited-Scope	Blacksburg-Christiansburg-Radford MSA (Montgomery and Pulaski Counties, plus the city of Radford)
Harrisonburg-Staunton VA CSA (Harrisonburg CSA)	Limited-Scope	Harrisonburg MSA (Rockingham County, plus the city of Harrisonburg), and Staunton-Waynesboro MSA (Augusta County, plus the cities of Staunton and Waynesboro)
Lynchburg VA MSA (Lynchburg MSA)	Limited-Scope	Lynchburg MSA (Amherst, Appomattox, Bedford, and Campbell Counties and the city of Lynchburg)

Virginia Non-MSA	Full-Scope	Non-Metro counties of Buckingham, Carroll, Charlotte, Cumberland, Henry, Lancaster, Lee, Louisa, Middlesex, Northumberland, Nottoway, Orange, Pittsylvania, Prince Edward, Smyth, Tazewell, Wise and Wythe Counties; plus, the cities of Danville, Galax, Martinsville, and Norton.
Richmond VA MSA (Richmond MSA)	Limited-Scope	Richmond MSA (Chesterfield, Hanover, Henrico, and Powhatan Counties, plus the city of Richmond)
Roanoke VA MSA (Roanoke MSA)	Limited-Scope	Roanoke MSA (Botetourt, Franklin, and Roanoke Counties, plus the cities of Roanoke and Salem)
<b>West Virginia</b>		
Beckley WV MSA (Beckley MSA)	Limited-Scope	Beckley MSA (Fayette and Raleigh Counties)
Morgantown-Fairmont WV CSA (Morgantown CSA)	Limited-Scope	Non-Metro (Marion County)
West Virginia Non-MSA	Full-Scope	Non-Metro counties of Barbour, Harrison, Mercer, Mingo, Nicholas, Randolph, Tucker, and Wyoming Counties)

## Appendix B: Summary of MMSA and State Ratings

RATINGS Woodforest National Bank				
Overall Bank:	Lending Test Rating*	Investment Test Rating	Service Test Rating	Overall Bank/State/Multistate Rating
Woodforest National Bank	Outstanding	Outstanding	Outstanding	Outstanding
MMSA or State:				
Charleston Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Charlotte Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Chicago Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Cincinnati Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Louisville Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Myrtle Beach Multistate	Outstanding	Outstanding	High Satisfactory	Outstanding
Virginia Beach Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Washington Multistate	Outstanding	Outstanding	Outstanding	Outstanding
Alabama	Outstanding	Outstanding	Outstanding	Outstanding
Florida	Outstanding	Outstanding	Outstanding	Outstanding
Georgia	Outstanding	Outstanding	Outstanding	Outstanding
Illinois	Outstanding	Outstanding	Outstanding	Outstanding
Indiana	Outstanding	Outstanding	Outstanding	Outstanding
Kentucky	Outstanding	Outstanding	Outstanding	Outstanding
Louisiana	Outstanding	Outstanding	High Satisfactory	Outstanding
Maryland	Outstanding	Outstanding	Outstanding	Outstanding
Mississippi	Outstanding	Outstanding	Outstanding	Outstanding
New York	Outstanding	Outstanding	High Satisfactory	Outstanding
North Carolina	Outstanding	Outstanding	Outstanding	Outstanding
Ohio	Outstanding	Outstanding	Outstanding	Outstanding
Pennsylvania	Outstanding	Outstanding	Outstanding	Outstanding
South Carolina	Outstanding	Outstanding	Outstanding	Outstanding
Texas	Outstanding	Outstanding	Outstanding	Outstanding
Virginia	Outstanding	Outstanding	Outstanding	Outstanding
West Virginia	Outstanding	Outstanding	High Satisfactory	Outstanding

(\*) The Lending Test is weighted more heavily than the Investment and Service Tests in the overall rating.



## Appendix C: Definitions and Common Abbreviations

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

**MMSA (state):** Any multistate metropolitan statistical area or multistate combined statistical area, as defined by the Office of Management and Budget.

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

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

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

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

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

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

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

## Appendix D: Tables of Performance Data

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### Content of Standardized Tables

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

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

- Table Q. Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses that were originated by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) in those geographies. Because aggregate small business data are not available for geographic areas smaller than counties, it may be necessary to compare bank loan data to aggregate data from geographic areas larger than the bank’s assessment area.
- Table R. Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenue** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$1 million) originated by the bank to businesses with revenues of \$1 million or less to: 1) the percentage distribution of businesses with revenues of greater than \$1 million; and 2) the percentage distribution of businesses for which revenues are not available. The table also presents aggregate peer small business data for the years the data is available.
- Table S. Assessment Area Distribution of Loans to Farms by Income Category of the Geography** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank’s assessment area.
- Table T. Assessment Area Distribution of Loans to Farms by Gross Annual Revenues** - Compares the percentage distribution of the number of small loans (loans less than or equal to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1 million or less to: 1) the percentage distribution of farms with revenues of greater than \$1

million; and 2) the percentage distribution of farms for which revenues are not available. The table also presents aggregate peer small farm data for the years the data is available.

**Table U. Assessment Area Distribution of Consumer Loans by Income Category of the Geography** – Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households in those geographies.

**Table V. Assessment Area Distribution of Consumer Loans by Income Category of the Borrower** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of households by income level in each MMSA/assessment area.

**CHARLESTON MULTISTATE CSA**

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Charleston-Huntington-Ashland WV-OH	35	175	100.0	7,736	7.8	0.0	7.8	12.5	20.0	11.5	50.1	74.3	50.5	29.4	5.7	30.1	0.3	0.0	0.2		
<b>Total</b>	<b>35</b>	<b>175</b>	<b>100.0</b>	<b>7,736</b>	<b>7.8</b>	<b>0.0</b>	<b>7.8</b>	<b>12.5</b>	<b>20.0</b>	<b>11.5</b>	<b>50.1</b>	<b>74.3</b>	<b>50.5</b>	<b>29.4</b>	<b>5.7</b>	<b>30.1</b>	<b>0.3</b>	<b>0.0</b>	<b>0.2</b>		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography														2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Charleston-Huntington-Ashland WV-OH	9	26	100.0	7.6	11.1	16.1	22.2	46.6	44.4	29.1	11.1	0.6	11.1		
<b>Total</b>	<b>9</b>	<b>26</b>	<b>100.0</b>	<b>7.6</b>	<b>11.1</b>	<b>16.1</b>	<b>22.2</b>	<b>46.6</b>	<b>44.4</b>	<b>29.1</b>	<b>11.1</b>	<b>0.6</b>	<b>11.1</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston-Huntington-Ashland WV-OH	35	175	100.0	7,736	80.1	57.1	47.1	5.1	0.0	14.8	42.9	
<b>Total</b>	<b>35</b>	<b>175</b>	<b>100.0</b>	<b>7,736</b>	<b>80.1</b>	<b>57.1</b>	<b>47.1</b>	<b>5.1</b>	<b>0.0</b>	<b>14.8</b>	<b>42.9</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charleston-Huntington-Ashland WV-OH	9	26	100.0	--	82.5	100.0	--	4.3	0.0	13.2	0.0	
<b>Total</b>	<b>9</b>	<b>26</b>	<b>100.0</b>	<b>--</b>	<b>82.5</b>	<b>100.0</b>	<b>--</b>	<b>4.3</b>	<b>0.0</b>	<b>13.2</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Charleston-Huntington-Ashland WV-OH	162	278	100.0	3.5	0.6	16.4	28.4	54.2	46.9	25.7	24.1	0.2	0.0	
<b>Total</b>	<b>162</b>	<b>278</b>	<b>100.0</b>	<b>3.5</b>	<b>0.6</b>	<b>16.4</b>	<b>28.4</b>	<b>54.2</b>	<b>46.9</b>	<b>25.7</b>	<b>24.1</b>	<b>0.2</b>	<b>0.0</b>	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Charleston-Huntington-Ashland WV-OH	56	109	100.0	4.6	8.9	18.7	17.9	54.3	58.9	21.4	12.5	1.0	1.8	
<b>Total</b>	<b>56</b>	<b>109</b>	<b>100.0</b>	<b>4.6</b>	<b>8.9</b>	<b>18.7</b>	<b>17.9</b>	<b>54.3</b>	<b>58.9</b>	<b>21.4</b>	<b>12.5</b>	<b>1.0</b>	<b>1.8</b>	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														



<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>														<b>2019-2021</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Charleston-Huntington-Ashland WV-OH	162	278	100.0	26.6	40.7	15.5	30.9	16.2	16.0	41.7	9.9	0.0	2.5		
<b>Total</b>	<b>162</b>	<b>278</b>	<b>100.0</b>	<b>26.6</b>	<b>40.7</b>	<b>15.5</b>	<b>30.9</b>	<b>16.2</b>	<b>16.0</b>	<b>41.7</b>	<b>9.9</b>	<b>0.0</b>	<b>2.5</b>		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>														<b>2022</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Charleston-Huntington-Ashland WV-OH	56	109	100.0	27.1	33.9	15.6	30.4	16.4	17.9	40.9	14.3	0.0	3.6		
<b>Total</b>	<b>56</b>	<b>109</b>	<b>100.0</b>	<b>27.1</b>	<b>33.9</b>	<b>15.6</b>	<b>30.4</b>	<b>16.4</b>	<b>17.9</b>	<b>40.9</b>	<b>14.3</b>	<b>0.0</b>	<b>3.6</b>		

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

**CHARLOTTE MULTISTATE CSA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2019-2021</b>
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Charlotte-Concord NC-SC	319	9,019	100.0	87,676	6.3	7.5	6.1	19.7	28.2	18.9	30.3	39.8	31.2	43.1	24.5	43.5	0.6	0.0	0.4	
<b>Total</b>	<b>319</b>	<b>9,019</b>	<b>100.0</b>	<b>87,676</b>	<b>6.3</b>	<b>7.5</b>	<b>6.1</b>	<b>19.7</b>	<b>28.2</b>	<b>18.9</b>	<b>30.3</b>	<b>39.8</b>	<b>31.2</b>	<b>43.1</b>	<b>24.5</b>	<b>43.5</b>	<b>0.6</b>	<b>0.0</b>	<b>0.4</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>														<b>2022</b>
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Charlotte-Concord NC-SC	58	2,577	100.0	4.6	8.6	24.1	29.3	29.1	39.7	40.3	20.7	1.9	1.7	
<b>Total</b>	<b>58</b>	<b>2,577</b>	<b>100.0</b>	<b>4.6</b>	<b>8.6</b>	<b>24.1</b>	<b>29.3</b>	<b>29.1</b>	<b>39.7</b>	<b>40.3</b>	<b>20.7</b>	<b>1.9</b>	<b>1.7</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charlotte-Concord NC-SC	319	9,019	100.0	87,676	88.4	45.8	47.4	3.5	2.8	8.1	51.4
<b>Total</b>	<b>319</b>	<b>9,019</b>	<b>100.0</b>	<b>87,676</b>	<b>88.4</b>	<b>45.8</b>	<b>47.4</b>	<b>3.5</b>	<b>2.8</b>	<b>8.1</b>	<b>51.4</b>
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Charlotte-Concord NC-SC	58	2,577	100.0	--	91.3	89.7	--	2.5	10.3	6.2	0.0
<b>Total</b>	<b>58</b>	<b>2,577</b>	<b>100.0</b>	<b>--</b>	<b>91.3</b>	<b>89.7</b>	<b>--</b>	<b>2.5</b>	<b>10.3</b>	<b>6.2</b>	<b>0.0</b>
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Charlotte-Concord NC-SC	975	2,003	100.0	6.2	7.5	25.2	31.9	36.6	42.2	32.0	18.3	0.1	0.2	
<b>Total</b>	<b>975</b>	<b>2,003</b>	<b>100.0</b>	<b>6.2</b>	<b>7.5</b>	<b>25.2</b>	<b>31.9</b>	<b>36.6</b>	<b>42.2</b>	<b>32.0</b>	<b>18.3</b>	<b>0.1</b>	<b>0.2</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Charlotte-Concord NC-SC	331	706	100.0	4.5	7.9	28.1	40.2	34.4	38.4	32.1	12.1	0.9	1.5	
<b>Total</b>	<b>331</b>	<b>706</b>	<b>100.0</b>	<b>4.5</b>	<b>7.9</b>	<b>28.1</b>	<b>40.2</b>	<b>34.4</b>	<b>38.4</b>	<b>32.1</b>	<b>12.1</b>	<b>0.9</b>	<b>1.5</b>	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Charlotte-Concord NC-SC	975	2,003	100.0	23.9	48.4	16.2	31.6	17.5	13.6	42.4	5.1	0.0	1.2	
<b>Total</b>	<b>975</b>	<b>2,003</b>	<b>100.0</b>	<b>23.9</b>	<b>48.4</b>	<b>16.2</b>	<b>31.6</b>	<b>17.5</b>	<b>13.6</b>	<b>42.4</b>	<b>5.1</b>	<b>0.0</b>	<b>1.2</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Charlotte-Concord NC-SC	331	706	100.0	23.3	44.1	16.6	27.5	17.9	19.0	42.3	6.9	0.0	2.4	
<b>Total</b>	<b>331</b>	<b>706</b>	<b>100.0</b>	<b>23.3</b>	<b>44.1</b>	<b>16.6</b>	<b>27.5</b>	<b>17.9</b>	<b>19.0</b>	<b>42.3</b>	<b>6.9</b>	<b>0.0</b>	<b>2.4</b>	

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

**CHICAGO MULTISTATE CSA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2019-2021</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Chicago-Naperville IL-IN	202	2,114	100.0	315,602	6.2	17.3	6.9	16.6	24.3	18.5	29.3	31.7	30.5	47.5	26.2	43.7	0.4	0.5	0.3			
<b>Total</b>	<b>202</b>	<b>2,114</b>	<b>100.0</b>	<b>315,602</b>	<b>6.2</b>	<b>17.3</b>	<b>6.9</b>	<b>16.6</b>	<b>24.3</b>	<b>18.5</b>	<b>29.3</b>	<b>31.7</b>	<b>30.5</b>	<b>47.5</b>	<b>26.2</b>	<b>43.7</b>	<b>0.4</b>	<b>0.5</b>	<b>0.3</b>			

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>														<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Chicago-Naperville IL-IN	39	597	100.0	5.9	17.9	17.1	15.4	32.1	46.2	44.4	20.5	0.5	0.0		
<b>Total</b>	<b>39</b>	<b>597</b>	<b>100.0</b>	<b>5.9</b>	<b>17.9</b>	<b>17.1</b>	<b>15.4</b>	<b>32.1</b>	<b>46.2</b>	<b>44.4</b>	<b>20.5</b>	<b>0.5</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Chicago-Naperville IL-IN	202	2,114	100.0	315,602	86.8	56.4	43.5	4.9	1.5	8.3	42.1	
<b>Total</b>	<b>202</b>	<b>2,114</b>	<b>100.0</b>	<b>315,602</b>	<b>86.8</b>	<b>56.4</b>	<b>43.5</b>	<b>4.9</b>	<b>1.5</b>	<b>8.3</b>	<b>42.1</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Chicago-Naperville IL-IN	39	597	100.0	--	89.5	94.9	--	3.8	5.1	6.7	0.0	
<b>Total</b>	<b>39</b>	<b>597</b>	<b>100.0</b>	<b>--</b>	<b>89.5</b>	<b>94.9</b>	<b>--</b>	<b>3.8</b>	<b>5.1</b>	<b>6.7</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Chicago-Naperville IL-IN	677	1,334	100.0	8.9	11.1	21.4	30.3	32.8	38.6	36.7	19.9	0.3	0.1	
<b>Total</b>	<b>677</b>	<b>1,334</b>	<b>100.0</b>	<b>8.9</b>	<b>11.1</b>	<b>21.4</b>	<b>30.3</b>	<b>32.8</b>	<b>38.6</b>	<b>36.7</b>	<b>19.9</b>	<b>0.3</b>	<b>0.1</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Chicago-Naperville IL-IN	232	587	100.0	8.1	7.8	21.5	34.9	35.2	41.4	34.7	15.9	0.5	0.0	
<b>Total</b>	<b>232</b>	<b>587</b>	<b>100.0</b>	<b>8.1</b>	<b>7.8</b>	<b>21.5</b>	<b>34.9</b>	<b>35.2</b>	<b>41.4</b>	<b>34.7</b>	<b>15.9</b>	<b>0.5</b>	<b>0.0</b>	

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



Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Chicago-Naperville IL-IN	677	1,334	100.0	25.1	49.3	15.2	29.1	17.0	12.7	42.6	5.2	0.0	3.7	
<b>Total</b>	<b>677</b>	<b>1,334</b>	<b>100.0</b>	<b>25.1</b>	<b>49.3</b>	<b>15.2</b>	<b>29.1</b>	<b>17.0</b>	<b>12.7</b>	<b>42.6</b>	<b>5.2</b>	<b>0.0</b>	<b>3.7</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Chicago-Naperville IL-IN	232	587	100.0	25.0	40.9	15.3	34.5	17.0	14.7	42.7	8.2	0.0	1.7	
<b>Total</b>	<b>232</b>	<b>587</b>	<b>100.0</b>	<b>25.0</b>	<b>40.9</b>	<b>15.3</b>	<b>34.5</b>	<b>17.0</b>	<b>14.7</b>	<b>42.7</b>	<b>8.2</b>	<b>0.0</b>	<b>1.7</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

**CINCINNATI MULTISTATE CSA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																				<b>2019-2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>					
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>			
Cincinnati-Wilmington-Maysville OH-KY-IN	55	453	100.0	41,461	6.7	9.1	7.1	18.8	32.7	17.9	35.2	40.0	34.1	38.2	18.2	40.1	1.1	0.0	0.8			
<b>Total</b>	<b>55</b>	<b>453</b>	<b>100.0</b>	<b>41,461</b>	<b>6.7</b>	<b>9.1</b>	<b>7.1</b>	<b>18.8</b>	<b>32.7</b>	<b>17.9</b>	<b>35.2</b>	<b>40.0</b>	<b>34.1</b>	<b>38.2</b>	<b>18.2</b>	<b>40.1</b>	<b>1.1</b>	<b>0.0</b>	<b>0.8</b>			

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>														<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>		
Cincinnati-Wilmington-Maysville OH-KY-IN	9	27	100.0	5.8	22.2	19.9	22.2	33.9	44.4	39.2	11.1	1.2	0.0		
<b>Total</b>	<b>9</b>	<b>27</b>	<b>100.0</b>	<b>5.8</b>	<b>22.2</b>	<b>19.9</b>	<b>22.2</b>	<b>33.9</b>	<b>44.4</b>	<b>39.2</b>	<b>11.1</b>	<b>1.2</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cincinnati-Wilmington-Maysville OH-KY-IN	55	453	100.0	41,461	82.5	38.2	49.2	5.6	1.8	11.9	60.0	
<b>Total</b>	<b>55</b>	<b>453</b>	<b>100.0</b>	<b>41,461</b>	<b>82.5</b>	<b>38.2</b>	<b>49.2</b>	<b>5.6</b>	<b>1.8</b>	<b>11.9</b>	<b>60.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cincinnati-Wilmington-Maysville OH-KY-IN	9	27	100.0	--	89.6	100.0	--	3.2	0.0	7.2	0.0	
<b>Total</b>	<b>9</b>	<b>27</b>	<b>100.0</b>	<b>--</b>	<b>89.6</b>	<b>100.0</b>	<b>--</b>	<b>3.2</b>	<b>0.0</b>	<b>7.2</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Cincinnati-Wilmington-Maysville OH-KY-IN	279	519	100.0	8.6	9.0	20.3	36.6	39.9	47.7	30.7	6.8	0.5	0.0	
<b>Total</b>	<b>279</b>	<b>519</b>	<b>100.0</b>	<b>8.6</b>	<b>9.0</b>	<b>20.3</b>	<b>36.6</b>	<b>39.9</b>	<b>47.7</b>	<b>30.7</b>	<b>6.8</b>	<b>0.5</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Cincinnati-Wilmington-Maysville OH-KY-IN	99	205	100.0	7.4	8.1	23.3	43.4	38.9	36.4	29.0	10.1	1.4	2.0	
<b>Total</b>	<b>99</b>	<b>205</b>	<b>100.0</b>	<b>7.4</b>	<b>8.1</b>	<b>23.3</b>	<b>43.4</b>	<b>38.9</b>	<b>36.4</b>	<b>29.0</b>	<b>10.1</b>	<b>1.4</b>	<b>2.0</b>	

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

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Cincinnati-Wilmington-Maysville OH-KY-IN	279	519	100.0	25.5	46.6	15.5	35.5	16.9	13.6	42.1	2.9	0.0	1.4	
<b>Total</b>	<b>279</b>	<b>519</b>	<b>100.0</b>	<b>25.5</b>	<b>46.6</b>	<b>15.5</b>	<b>35.5</b>	<b>16.9</b>	<b>13.6</b>	<b>42.1</b>	<b>2.9</b>	<b>0.0</b>	<b>1.4</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Cincinnati-Wilmington-Maysville OH-KY-IN	99	205	100.0	25.2	48.5	15.5	29.3	17.4	13.1	41.9	4.0	0.0	5.1	
<b>Total</b>	<b>99</b>	<b>205</b>	<b>100.0</b>	<b>25.2</b>	<b>48.5</b>	<b>15.5</b>	<b>29.3</b>	<b>17.4</b>	<b>13.1</b>	<b>41.9</b>	<b>4.0</b>	<b>0.0</b>	<b>5.1</b>	

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

**LOUISVILLE MULTISTATE CSA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>																			<b>2019-2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>				
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>		
Louisville KY-IN	55	292	100.0	23,343	7.1	20.0	6.5	15.3	9.1	14.4	34.0	60.0	32.7	40.2	10.9	42.9	3.5	0.0	3.5		
<b>Total</b>	<b>55</b>	<b>292</b>	<b>100.0</b>	<b>23,343</b>	<b>7.1</b>	<b>20.0</b>	<b>6.5</b>	<b>15.3</b>	<b>9.1</b>	<b>14.4</b>	<b>34.0</b>	<b>60.0</b>	<b>32.7</b>	<b>40.2</b>	<b>10.9</b>	<b>42.9</b>	<b>3.5</b>	<b>0.0</b>	<b>3.5</b>		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography</b>														<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>		
Louisville KY-IN	17	42	100.0	6.0	17.6	17.5	29.4	39.6	41.2	35.3	11.8	1.6	0.0		
<b>Total</b>	<b>17</b>	<b>42</b>	<b>100.0</b>	<b>6.0</b>	<b>17.6</b>	<b>17.5</b>	<b>29.4</b>	<b>39.6</b>	<b>41.2</b>	<b>35.3</b>	<b>11.8</b>	<b>1.6</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Louisville KY-IN	55	292	100.0	23,343	87.9	76.4	46.3	3.8	0.0	8.3	23.6	
<b>Total</b>	<b>55</b>	<b>292</b>	<b>100.0</b>	<b>23,343</b>	<b>87.9</b>	<b>76.4</b>	<b>46.3</b>	<b>3.8</b>	<b>0.0</b>	<b>8.3</b>	<b>23.6</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Louisville KY-IN	17	42	100.0	--	89.0	100.0	--	3.4	0.0	7.6	0.0	
<b>Total</b>	<b>17</b>	<b>42</b>	<b>100.0</b>	<b>--</b>	<b>89.0</b>	<b>100.0</b>	<b>--</b>	<b>3.4</b>	<b>0.0</b>	<b>7.6</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Louisville KY-IN	245	479	100.0	8.4	9.0	18.9	24.5	42.1	53.1	30.2	13.5	0.4	0.0	
<b>Total</b>	<b>245</b>	<b>479</b>	<b>100.0</b>	<b>8.4</b>	<b>9.0</b>	<b>18.9</b>	<b>24.5</b>	<b>42.1</b>	<b>53.1</b>	<b>30.2</b>	<b>13.5</b>	<b>0.4</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Louisville KY-IN	78	156	100.0	6.2	3.8	23.0	34.6	42.9	53.8	26.6	7.7	1.3	0.0	
<b>Total</b>	<b>78</b>	<b>156</b>	<b>100.0</b>	<b>6.2</b>	<b>3.8</b>	<b>23.0</b>	<b>34.6</b>	<b>42.9</b>	<b>53.8</b>	<b>26.6</b>	<b>7.7</b>	<b>1.3</b>	<b>0.0</b>	

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



Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Louisville KY-IN	245	479	100.0	24.8	46.1	15.9	30.2	17.6	14.3	41.6	6.5	0.0	2.9	
<b>Total</b>	<b>245</b>	<b>479</b>	<b>100.0</b>	<b>24.8</b>	<b>46.1</b>	<b>15.9</b>	<b>30.2</b>	<b>17.6</b>	<b>14.3</b>	<b>41.6</b>	<b>6.5</b>	<b>0.0</b>	<b>2.9</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Louisville KY-IN	78	156	100.0	23.5	46.2	16.7	35.9	18.4	12.8	41.4	2.6	0.0	2.6	
<b>Total</b>	<b>78</b>	<b>156</b>	<b>100.0</b>	<b>23.5</b>	<b>46.2</b>	<b>16.7</b>	<b>35.9</b>	<b>18.4</b>	<b>12.8</b>	<b>41.4</b>	<b>2.6</b>	<b>0.0</b>	<b>2.6</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

**MYRTLE BEACH MULTISTATE CSA**

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																			2019-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Myrtle Beach-Conway SC-NC	32	673	100.0	15,353	3.7	3.1	4.1	15.8	12.5	14.5	57.6	40.6	60.9	22.4	43.8	20.1	0.5	0.0	0.4		
<b>Total</b>	<b>32</b>	<b>673</b>	<b>100.0</b>	<b>15,353</b>	<b>3.7</b>	<b>3.1</b>	<b>4.1</b>	<b>15.8</b>	<b>12.5</b>	<b>14.5</b>	<b>57.6</b>	<b>40.6</b>	<b>60.9</b>	<b>22.4</b>	<b>43.8</b>	<b>20.1</b>	<b>0.5</b>	<b>0.0</b>	<b>0.4</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography														2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Myrtle Beach-Conway SC-NC	8	35	100.0	5.7	0.0	16.0	0.0	53.4	62.5	24.8	37.5	0.0	0.0		
<b>Total</b>	<b>8</b>	<b>35</b>	<b>100.0</b>	<b>5.7</b>	<b>0.0</b>	<b>16.0</b>	<b>0.0</b>	<b>53.4</b>	<b>62.5</b>	<b>24.8</b>	<b>37.5</b>	<b>0.0</b>	<b>0.0</b>		

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Myrtle Beach-Conway SC-NC	32	673	100.0	15,353	87.4	59.4	47.1	3.4	3.1	9.2	37.5	
<b>Total</b>	<b>32</b>	<b>673</b>	<b>100.0</b>	<b>15,353</b>	<b>87.4</b>	<b>59.4</b>	<b>47.1</b>	<b>3.4</b>	<b>3.1</b>	<b>9.2</b>	<b>37.5</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Myrtle Beach-Conway SC-NC	8	35	100.0	--	92.3	100.0	--	1.9	0.0	5.8	0.0	
<b>Total</b>	<b>8</b>	<b>35</b>	<b>100.0</b>	<b>--</b>	<b>92.3</b>	<b>100.0</b>	<b>--</b>	<b>1.9</b>	<b>0.0</b>	<b>5.8</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Myrtle Beach-Conway SC-NC	97	191	100.0	1.3	0.0	17.4	23.7	64.0	54.6	17.1	21.6	0.2	0.0	
<b>Total</b>	<b>97</b>	<b>191</b>	<b>100.0</b>	<b>1.3</b>	<b>0.0</b>	<b>17.4</b>	<b>23.7</b>	<b>64.0</b>	<b>54.6</b>	<b>17.1</b>	<b>21.6</b>	<b>0.2</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Myrtle Beach-Conway SC-NC	35	81	100.0	2.8	5.7	15.4	8.6	60.1	65.7	21.7	20.0	0.0	0.0	
<b>Total</b>	<b>35</b>	<b>81</b>	<b>100.0</b>	<b>2.8</b>	<b>5.7</b>	<b>15.4</b>	<b>8.6</b>	<b>60.1</b>	<b>65.7</b>	<b>21.7</b>	<b>20.0</b>	<b>0.0</b>	<b>0.0</b>	

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Myrtle Beach-Conway SC-NC	97	191	100.0	23.1	42.3	16.4	35.1	19.1	14.4	41.4	8.2	0.0	0.0	
<b>Total</b>	<b>97</b>	<b>191</b>	<b>100.0</b>	<b>23.1</b>	<b>42.3</b>	<b>16.4</b>	<b>35.1</b>	<b>19.1</b>	<b>14.4</b>	<b>41.4</b>	<b>8.2</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Myrtle Beach-Conway SC-NC	35	81	100.0	22.6	28.6	16.8	31.4	19.6	22.9	41.1	17.1	0.0	0.0	
<b>Total</b>	<b>35</b>	<b>81</b>	<b>100.0</b>	<b>22.6</b>	<b>28.6</b>	<b>16.8</b>	<b>31.4</b>	<b>19.6</b>	<b>22.9</b>	<b>41.1</b>	<b>17.1</b>	<b>0.0</b>	<b>0.0</b>	

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

**VIRGINIA BEACH MULTISTATE CSA**

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Virginia Beach-Norfolk VA-NC	128	1,063	100.0	35,908	4.4	7.0	3.7	22.9	28.9	21.0	35.9	41.4	36.1	35.8	21.9	37.8	1.1	0.8	1.4	
<b>Total</b>	<b>128</b>	<b>1,063</b>	<b>100.0</b>	<b>35,908</b>	<b>4.4</b>	<b>7.0</b>	<b>3.7</b>	<b>22.9</b>	<b>28.9</b>	<b>21.0</b>	<b>35.9</b>	<b>41.4</b>	<b>36.1</b>	<b>35.8</b>	<b>21.9</b>	<b>37.8</b>	<b>1.1</b>	<b>0.8</b>	<b>1.4</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography														2022
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Virginia Beach-Norfolk VA-NC	33	67	100.0	4.6	3.0	23.9	36.4	35.9	33.3	34.0	24.2	1.6	3.0	
<b>Total</b>	<b>33</b>	<b>67</b>	<b>100.0</b>	<b>4.6</b>	<b>3.0</b>	<b>23.9</b>	<b>36.4</b>	<b>35.9</b>	<b>33.3</b>	<b>34.0</b>	<b>24.2</b>	<b>1.6</b>	<b>3.0</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Virginia Beach-Norfolk VA-NC	128	1,063	100.0	35,908	88.9	58.6	46.1	2.9	0.0	8.2	41.4	
<b>Total</b>	<b>128</b>	<b>1,063</b>	<b>100.0</b>	<b>35,908</b>	<b>88.9</b>	<b>58.6</b>	<b>46.1</b>	<b>2.9</b>	<b>0.0</b>	<b>8.2</b>	<b>41.4</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Virginia Beach-Norfolk VA-NC	33	67	100.0	--	90.9	97.0	--	2.2	3.0	6.9	0.0	
<b>Total</b>	<b>33</b>	<b>67</b>	<b>100.0</b>	<b>--</b>	<b>90.9</b>	<b>97.0</b>	<b>--</b>	<b>2.2</b>	<b>3.0</b>	<b>6.9</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Virginia Beach-Norfolk VA-NC	489	874	100.0	5.5	9.6	25.4	35.4	36.7	35.4	32.1	19.0	0.3	0.6	
<b>Total</b>	<b>489</b>	<b>874</b>	<b>100.0</b>	<b>5.5</b>	<b>9.6</b>	<b>25.4</b>	<b>35.4</b>	<b>36.7</b>	<b>35.4</b>	<b>32.1</b>	<b>19.0</b>	<b>0.3</b>	<b>0.6</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Virginia Beach-Norfolk VA-NC	200	388	100.0	6.0	7.0	24.1	39.0	36.3	36.0	32.5	16.0	1.1	2.0	
<b>Total</b>	<b>200</b>	<b>388</b>	<b>100.0</b>	<b>6.0</b>	<b>7.0</b>	<b>24.1</b>	<b>39.0</b>	<b>36.3</b>	<b>36.0</b>	<b>32.5</b>	<b>16.0</b>	<b>1.1</b>	<b>2.0</b>	

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



<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Virginia Beach-Norfolk VA-NC	489	874	100.0	22.7	53.6	16.6	28.2	18.9	11.0	41.7	6.5	0.0	0.6	
<b>Total</b>	<b>489</b>	<b>874</b>	<b>100.0</b>	<b>22.7</b>	<b>53.6</b>	<b>16.6</b>	<b>28.2</b>	<b>18.9</b>	<b>11.0</b>	<b>41.7</b>	<b>6.5</b>	<b>0.0</b>	<b>0.6</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Virginia Beach-Norfolk VA-NC	200	388	100.0	22.6	41.0	16.5	31.5	18.8	16.5	42.0	9.5	0.0	1.5	
<b>Total</b>	<b>200</b>	<b>388</b>	<b>100.0</b>	<b>22.6</b>	<b>41.0</b>	<b>16.5</b>	<b>31.5</b>	<b>18.8</b>	<b>16.5</b>	<b>42.0</b>	<b>9.5</b>	<b>0.0</b>	<b>1.5</b>	

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

**WASHINGTON MULTISTATE CSA**

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography																				2019-2021
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	182	3,253	100.0	279,322	5.5	6.6	5.0	18.9	28.0	18.1	37.3	50.0	37.9	37.7	14.8	38.6	0.5	0.5	0.4	
<b>Total</b>	<b>182</b>	<b>3,253</b>	<b>100.0</b>	<b>279,322</b>	<b>5.5</b>	<b>6.6</b>	<b>5.0</b>	<b>18.9</b>	<b>28.0</b>	<b>18.1</b>	<b>37.3</b>	<b>50.0</b>	<b>37.9</b>	<b>37.7</b>	<b>14.8</b>	<b>38.6</b>	<b>0.5</b>	<b>0.5</b>	<b>0.4</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography														2022
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	22	44	100.0	5.2	9.1	20.4	18.2	37.9	59.1	35.7	13.6	0.8	0.0	
<b>Total</b>	<b>22</b>	<b>44</b>	<b>100.0</b>	<b>5.2</b>	<b>9.1</b>	<b>20.4</b>	<b>18.2</b>	<b>37.9</b>	<b>59.1</b>	<b>35.7</b>	<b>13.6</b>	<b>0.8</b>	<b>0.0</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	182	3,253	100.0	279,322	89.2	50.0	47.3	3.6	0.0	7.1	50.0	
<b>Total</b>	<b>182</b>	<b>3,253</b>	<b>100.0</b>	<b>279,322</b>	<b>89.2</b>	<b>50.0</b>	<b>47.3</b>	<b>3.6</b>	<b>0.0</b>	<b>7.1</b>	<b>50.0</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues</b>											<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	22	44	100.0	--	90.7	100.0	--	3.0	0.0	6.3	0.0	
<b>Total</b>	<b>22</b>	<b>44</b>	<b>100.0</b>	<b>--</b>	<b>90.7</b>	<b>100.0</b>	<b>--</b>	<b>3.0</b>	<b>0.0</b>	<b>6.3</b>	<b>0.0</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	599	1,208	100.0	8.8	12.2	21.6	36.7	37.7	43.1	31.6	8.0	0.3	0.0	
<b>Total</b>	<b>599</b>	<b>1,208</b>	<b>100.0</b>	<b>8.8</b>	<b>12.2</b>	<b>21.6</b>	<b>36.7</b>	<b>37.7</b>	<b>43.1</b>	<b>31.6</b>	<b>8.0</b>	<b>0.3</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	183	387	100.0	7.8	18.6	22.6	32.8	38.2	39.3	30.9	9.3	0.6	0.0	
<b>Total</b>	<b>183</b>	<b>387</b>	<b>100.0</b>	<b>7.8</b>	<b>18.6</b>	<b>22.6</b>	<b>32.8</b>	<b>38.2</b>	<b>39.3</b>	<b>30.9</b>	<b>9.3</b>	<b>0.6</b>	<b>0.0</b>	

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

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	599	1,208	100.0	23.9	58.8	16.3	25.4	18.4	10.7	41.5	3.7	0.0	1.5	
<b>Total</b>	<b>599</b>	<b>1,208</b>	<b>100.0</b>	<b>23.9</b>	<b>58.8</b>	<b>16.3</b>	<b>25.4</b>	<b>18.4</b>	<b>10.7</b>	<b>41.5</b>	<b>3.7</b>	<b>0.0</b>	<b>1.5</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Washington-Baltimore-Arlington DC-MD-VA-WV-PA	183	387	100.0	23.6	57.9	16.2	30.1	18.9	8.7	41.3	3.3	0.0	0.0	
<b>Total</b>	<b>183</b>	<b>387</b>	<b>100.0</b>	<b>23.6</b>	<b>57.9</b>	<b>16.2</b>	<b>30.1</b>	<b>18.9</b>	<b>8.7</b>	<b>41.3</b>	<b>3.3</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0*

**ALABAMA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – ALABAMA</b>																			<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Anniston-Oxford	11	104	5.5	1,444	5.0	0.0	3.2	30.2	0.0	26.0	55.1	100.0	61.3	7.9	0.0	8.7	1.8	0.0	0.8	
Birmingham-Hoover-Talladega	61	742	30.5	27,116	6.9	8.2	6.7	20.6	29.5	18.8	30.7	42.6	27.8	40.5	19.7	45.8	1.3	0.0	0.8	
Gadsden	0	0	0.0	1,732	5.2	0.0	3.5	21.1	0.0	18.9	47.1	0.0	47.7	26.7	0.0	29.9	0.0	0.0	0.0	
Huntsville-Decatur	29	272	14.5	12,462	9.4	10.3	10.6	22.5	31.0	19.4	36.3	44.8	37.1	31.9	13.8	33.0	0.0	0.0	0.0	
Mobile-Daphne-Fairhope	32	465	16.0	19,417	4.3	6.3	4.0	19.8	31.3	17.7	42.3	21.9	41.9	33.4	40.6	36.5	0.1	0.0	0.0	
Montgomery-Selma-Alexander City	40	292	20.0	9,252	8.1	12.5	7.2	19.9	25.0	17.9	36.2	35.0	33.9	32.3	27.5	37.7	3.6	0.0	3.2	
AL Non-MSA	14	65	7.0	4,597	0.0	0.0	0.0	20.0	14.3	17.2	46.5	57.1	51.5	33.5	28.6	31.3	0.0	0.0	0.0	
Tuscaloosa	13	130	6.5	5,033	1.3	0.0	1.2	27.4	76.9	27.9	37.1	0.0	35.2	31.7	23.1	34.9	2.5	0.0	0.9	
<b>Total</b>	<b>200</b>	<b>2,070</b>	<b>100.0</b>	<b>81,053</b>	<b>6.1</b>	<b>7.5</b>	<b>5.9</b>	<b>21.3</b>	<b>29.5</b>	<b>19.1</b>	<b>37.0</b>	<b>39.5</b>	<b>36.1</b>	<b>34.6</b>	<b>23.5</b>	<b>38.2</b>	<b>1.1</b>	<b>0.0</b>	<b>0.7</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - ALABAMA</b>														<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Anniston-Oxford	1	1	2.8	3.0	0.0	20.6	0.0	53.4	100.0	21.8	0.0	1.2	0.0		
Birmingham-Hoover-Talladega	11	26	30.6	7.2	9.1	17.2	27.3	30.9	27.3	43.3	27.3	1.4	9.1		
Gadsden	0	0	0.0	6.5	0.0	15.2	0.0	43.6	0.0	32.9	0.0	1.8	0.0		
Huntsville-Decatur	6	21	16.7	11.3	33.3	17.5	0.0	33.8	50.0	35.4	16.7	2.0	0.0		
Mobile-Daphne-Fairhope	9	946	25.0	2.1	0.0	22.2	22.2	43.4	77.8	31.4	0.0	0.9	0.0		
Montgomery-Selma-Alexander City	5	91	13.9	8.1	0.0	24.8	20.0	34.7	40.0	27.9	40.0	4.5	0.0		
AL Non-MSA	3	5	8.3	1.5	0.0	10.4	0.0	65.4	66.7	22.4	33.3	0.3	0.0		
Tuscaloosa	1	1	2.8	5.2	0.0	12.7	0.0	45.5	100.0	31.1	0.0	5.5	0.0		
<b>Total</b>	<b>36</b>	<b>1,091</b>	<b>100.0</b>	<b>6.4</b>	<b>8.3</b>	<b>18.5</b>	<b>16.7</b>	<b>37.9</b>	<b>52.8</b>	<b>35.2</b>	<b>19.4</b>	<b>2.0</b>	<b>2.8</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – ALABAMA											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Anniston-Oxford	11	104	5.5	1,444	79.4	36.4	38.4	5.4	0.0	15.2	63.6	
Birmingham-Hoover-Talladega	61	742	30.5	27,116	83.3	54.1	41.5	5.5	0.0	11.3	45.9	
Gadsden	0	0	0.0	1,732	81.5	0.0	36.7	5.2	0.0	13.3	0.0	
Huntsville-Decatur	29	272	14.5	12,462	83.7	55.2	47.0	4.5	3.4	11.8	41.4	
Mobile-Daphne-Fairhope	32	465	16.0	19,417	84.2	43.8	39.6	4.7	0.0	11.1	56.3	
Montgomery-Selma-Alexander City	40	292	20.0	9,252	81.0	47.5	36.7	4.9	0.0	14.1	52.5	
AL Non-MSA	14	65	7.0	4,597	79.7	42.9	34.7	5.0	0.0	15.3	57.1	
Tuscaloosa	13	130	6.5	5,033	82.8	0.0	45.0	5.2	0.0	11.9	100.0	
<b>Total</b>	<b>200</b>	<b>2,070</b>	<b>100.0</b>	<b>81,053</b>	<b>82.9</b>	<b>46.0</b>	<b>41.0</b>	<b>5.0</b>	<b>0.5</b>	<b>12.1</b>	<b>53.5</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – ALABAMA											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Anniston-Oxford	1	1	2.8	--	84.6	100.0	--	3.7	0.0	11.7	0.0	
Birmingham-Hoover-Talladega	11	26	30.6	--	88.6	100.0	--	3.5	0.0	7.9	0.0	
Gadsden	0	0	0.0	--	86.0	0.0	--	3.8	0.0	10.2	0.0	
Huntsville-Decatur	6	21	16.7	--	88.3	100.0	--	3.1	0.0	8.6	0.0	
Mobile-Daphne-Fairhope	9	946	25.0	--	88.6	88.9	--	3.2	11.1	8.1	0.0	
Montgomery-Selma-Alexander City	5	91	13.9	--	87.1	100.0	--	3.1	0.0	9.8	0.0	
AL Non-MSA	3	5	8.3	--	84.3	100.0	--	3.8	0.0	11.9	0.0	
Tuscaloosa	1	1	2.8	--	88.1	100.0	--	3.5	0.0	8.4	0.0	
<b>Total</b>	<b>36</b>	<b>1,091</b>	<b>100.0</b>	<b>--</b>	<b>87.9</b>	<b>97.2</b>	<b>--</b>	<b>3.4</b>	<b>2.8</b>	<b>8.7</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Anniston-Oxford	44	90	3.5	5.4	4.5	18.7	34.1	62.9	56.8	10.6	4.5	2.4	0.0
Birmingham-Hoover-Talladega	353	652	28.0	8.9	13.0	21.8	25.5	35.9	46.5	33.0	15.0	0.3	0.0
Gadsden	16	29	1.3	6.7	18.8	22.6	50.0	43.4	25.0	27.3	6.3	0.0	0.0
Huntsville-Decatur	193	338	15.3	8.1	16.6	23.0	33.7	40.0	36.8	28.9	13.0	0.0	0.0
Mobile-Daphne-Fairhope	260	475	20.7	5.5	9.6	17.8	22.3	45.6	45.0	31.1	23.1	0.0	0.0
Montgomery-Selma-Alexander City	162	312	12.9	9.7	9.9	23.8	27.8	36.5	40.1	29.9	22.2	0.1	0.0
AL Non-MSA	174	313	13.8	0.0	0.0	18.5	27.0	50.9	53.4	30.7	19.5	0.0	0.0
Tuscaloosa	57	93	4.5	1.4	3.5	23.5	35.1	42.1	43.9	31.7	17.5	1.3	0.0
<b>Total</b>	<b>1,259</b>	<b>2,302</b>	<b>100.0</b>	<b>7.0</b>	<b>10.0</b>	<b>21.3</b>	<b>27.6</b>	<b>41.1</b>	<b>44.8</b>	<b>30.4</b>	<b>17.6</b>	<b>0.3</b>	<b>0.0</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Anniston-Oxford	14	24	3.0	2.9	0.0	19.2	35.7	55.2	57.1	21.6	7.1	1.1	0.0
Birmingham-Hoover-Talladega	140	277	30.0	6.8	8.6	24.1	39.3	35.9	38.6	32.2	12.1	1.1	1.4
Gadsden	5	8	1.1	7.0	20.0	15.5	20.0	44.5	60.0	31.3	0.0	1.7	0.0
Huntsville-Decatur	55	98	11.8	9.6	10.9	18.4	25.5	39.9	30.9	31.6	30.9	0.5	1.8
Mobile-Daphne-Fairhope	85	172	18.2	2.3	4.7	24.1	18.8	47.4	45.9	25.7	29.4	0.5	1.2
Montgomery-Selma-Alexander City	70	136	15.0	8.0	8.6	27.7	42.9	38.0	31.4	25.6	15.7	0.7	1.4
AL Non-MSA	74	139	15.9	1.5	0.0	10.3	18.9	64.3	64.9	23.5	12.2	0.4	4.1
Tuscaloosa	23	45	4.9	6.7	4.3	14.9	34.8	45.9	26.1	28.7	30.4	3.9	4.3
<b>Total</b>	<b>466</b>	<b>899</b>	<b>100.0</b>	<b>6.1</b>	<b>6.4</b>	<b>21.5</b>	<b>30.7</b>	<b>42.5</b>	<b>42.3</b>	<b>28.9</b>	<b>18.7</b>	<b>1.0</b>	<b>1.9</b>

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



<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – ALABAMA</b>													<b>2019-2021</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Anniston-Oxford	44	90	3.5	25.5	22.7	15.7	38.6	16.8	22.7	41.9	11.4	0.0	4.5	
Birmingham-Hoover-Talladega	353	652	28.0	25.0	42.5	15.4	30.9	16.2	15.9	43.4	7.9	0.0	2.8	
Gadsden	16	29	1.3	24.9	50.0	17.0	37.5	14.8	12.5	43.4	0.0	0.0	0.0	
Huntsville-Decatur	193	338	15.3	25.0	53.4	16.0	30.1	16.4	9.3	42.7	5.2	0.0	2.1	
Mobile-Daphne-Fairhope	260	475	20.7	25.7	34.6	15.4	35.4	16.8	18.8	42.1	10.0	0.0	1.2	
Montgomery-Selma-Alexander City	162	312	12.9	26.3	38.9	15.3	35.2	16.6	17.9	41.8	6.8	0.0	1.2	
AL Non-MSA	174	313	13.8	24.2	31.0	15.7	29.3	16.0	20.7	44.1	16.7	0.0	2.3	
Tuscaloosa	57	93	4.5	25.8	52.6	14.4	29.8	16.0	17.5	43.8	0.0	0.0	0.0	
<b>Total</b>	<b>1,259</b>	<b>2,302</b>	<b>100.0</b>	<b>25.3</b>	<b>40.3</b>	<b>15.5</b>	<b>32.3</b>	<b>16.3</b>	<b>16.7</b>	<b>42.9</b>	<b>8.7</b>	<b>0.0</b>	<b>2.0</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – ALABAMA</b>													<b>2022</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Anniston-Oxford	14	24	3.0	25.0	42.9	16.8	42.9	17.5	0.0	40.7	14.3	0.0	0.0	
Birmingham-Hoover-Talladega	140	277	30.0	24.9	41.4	15.5	33.6	16.8	16.4	42.7	7.1	0.0	1.4	
Gadsden	5	8	1.1	23.9	20.0	16.6	80.0	17.3	0.0	42.2	0.0	0.0	0.0	
Huntsville-Decatur	55	98	11.8	25.4	54.5	15.8	25.5	16.3	12.7	42.5	5.5	0.0	1.8	
Mobile-Daphne-Fairhope	85	172	18.2	24.8	30.6	16.1	30.6	16.9	23.5	42.1	15.3	0.0	0.0	
Montgomery-Selma-Alexander City	70	136	15.0	26.6	40.0	15.3	34.3	17.5	18.6	40.6	5.7	0.0	1.4	
AL Non-MSA	74	139	15.9	23.3	35.1	14.5	28.4	16.7	25.7	45.5	8.1	0.0	2.7	
Tuscaloosa	23	45	4.9	24.7	21.7	14.8	47.8	16.4	26.1	44.2	4.3	0.0	0.0	
<b>Total</b>	<b>466</b>	<b>899</b>	<b>100.0</b>	<b>25.0</b>	<b>38.6</b>	<b>15.6</b>	<b>32.8</b>	<b>16.8</b>	<b>18.9</b>	<b>42.5</b>	<b>8.4</b>	<b>0.0</b>	<b>1.3</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

**FLORIDA**

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – FLORIDA																				2019-2021		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Jacksonville-St Mary's-Palatka	23	226	100.0	30,000	6.5	8.7	6.7	25.8	56.5	25.6	33.8	30.4	32.5	33.9	4.3	35.2	0.0	0.0	0.0			
<b>Total</b>	<b>23</b>	<b>226</b>	<b>100.0</b>	<b>30,000</b>	<b>6.5</b>	<b>8.7</b>	<b>6.7</b>	<b>25.8</b>	<b>56.5</b>	<b>25.6</b>	<b>33.8</b>	<b>30.4</b>	<b>32.5</b>	<b>33.9</b>	<b>4.3</b>	<b>35.2</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>			

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – FLORIDA														2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Jacksonville-St Mary's-Palatka	3	6	100.0	6.9	33.3	26.8	66.7	36.5	0.0	27.0	0.0	2.7	0.0		
<b>Total</b>	<b>3</b>	<b>6</b>	<b>100.0</b>	<b>6.9</b>	<b>33.3</b>	<b>26.8</b>	<b>66.7</b>	<b>36.5</b>	<b>0.0</b>	<b>27.0</b>	<b>0.0</b>	<b>2.7</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – FLORIDA</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Jacksonville-St Mary’s-Palatka	23	226	100.0	30,000	91.6	69.6	41.9	2.5	0.0	5.9	30.4	
<b>Total</b>	<b>23</b>	<b>226</b>	<b>100.0</b>	<b>30,000</b>	<b>91.6</b>	<b>69.6</b>	<b>41.9</b>	<b>2.5</b>	<b>0.0</b>	<b>5.9</b>	<b>30.4</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - FLORIDA</b>											<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Jacksonville-St Mary’s-Palatka	3	6	100.0	--	92.7	100.0	--	2.0	0.0	5.3	0.0	
<b>Total</b>	<b>3</b>	<b>6</b>	<b>100.0</b>	<b>--</b>	<b>93.7</b>	<b>100.0</b>	<b>--</b>	<b>2.0</b>	<b>0.0</b>	<b>5.3</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – FLORIDA</b>														<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>		
Jacksonville-St Mary’s-Palatka	84	146	100.0	7.9	26.2	27.8	35.7	38.3	27.4	26.0	10.7	0.0	0.0		
<b>Total</b>	<b>84</b>	<b>146</b>	<b>100.0</b>	<b>7.9</b>	<b>26.2</b>	<b>27.8</b>	<b>35.7</b>	<b>38.3</b>	<b>27.4</b>	<b>26.0</b>	<b>10.7</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – FLORIDA</b>														<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>		
Jacksonville-St Mary’s-Palatka	31	63	100.0	8.1	19.4	31.5	54.8	34.8	22.6	24.8	0.0	0.9	3.2		
<b>Total</b>	<b>31</b>	<b>63</b>	<b>100.0</b>	<b>8.1</b>	<b>19.4</b>	<b>31.5</b>	<b>54.8</b>	<b>34.8</b>	<b>22.6</b>	<b>24.8</b>	<b>0.0</b>	<b>0.9</b>	<b>3.2</b>		

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

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – FLORIDA</b>													<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Jacksonville-St Mary’s-Palatka	84	146	100.0	26.4	41.7	17.6	41.7	17.5	10.7	38.5	6.0	0.0	0.0	
<b>Total</b>	<b>84</b>	<b>146</b>	<b>100.0</b>	<b>26.4</b>	<b>41.7</b>	<b>17.6</b>	<b>41.7</b>	<b>17.5</b>	<b>10.7</b>	<b>38.5</b>	<b>6.0</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower - FLORIDA</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Jacksonville-St Mary’s-Palatka	31	63	88.6	26.0	48.4	18.0	35.5	19.1	3.2	36.9	9.7	0.0	3.2	
<b>Total</b>	<b>31</b>	<b>63</b>	<b>88.6</b>	<b>26.0</b>	<b>48.4</b>	<b>18.0</b>	<b>35.5</b>	<b>19.1</b>	<b>3.2</b>	<b>36.9</b>	<b>9.7</b>	<b>0.0</b>	<b>3.2</b>	

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

**GEORGIA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – GEORGIA</b>																				<b>2019-2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>					
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>			
Atlanta-Sandy Springs	211	3,160	100.0	204,797	7.3	9.5	6.5	23.7	40.8	22.9	27.8	30.8	28.3	40.8	18.5	42.0	0.5	0.5	0.4			
<b>Total</b>	<b>211</b>	<b>3,160</b>	<b>100.0</b>	<b>204,797</b>	<b>7.3</b>	<b>9.5</b>	<b>6.5</b>	<b>23.7</b>	<b>40.8</b>	<b>22.9</b>	<b>27.8</b>	<b>30.8</b>	<b>28.3</b>	<b>40.8</b>	<b>18.5</b>	<b>42.0</b>	<b>0.5</b>	<b>0.5</b>	<b>0.4</b>			

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – GEORGIA</b>															<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>				
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>			
Atlanta-Sandy Springs	19	48	100.0	6.4	5.3	22.9	31.6	27.2	47.4	40.1	10.5	3.5	5.3			
<b>Total</b>	<b>19</b>	<b>48</b>	<b>100.0</b>	<b>6.4</b>	<b>5.3</b>	<b>22.9</b>	<b>31.6</b>	<b>27.2</b>	<b>47.4</b>	<b>40.1</b>	<b>10.5</b>	<b>3.5</b>	<b>5.3</b>			

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – GEORGIA											2019-2021
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta-Sandy Springs	211	3,160	100.0	204,797	93.1	38.4	41.7	2.1	0.9	4.8	60.7
<b>Total</b>	<b>211</b>	<b>3,160</b>	<b>100.0</b>	<b>204,797</b>	<b>93.1</b>	<b>38.4</b>	<b>41.7</b>	<b>2.1</b>	<b>0.9</b>	<b>4.8</b>	<b>60.7</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – GEORGIA											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Atlanta-Sandy Springs	19	48	100.0	--	94.1	100.0	--	1.7	0.0	4.2	0.0
<b>Total</b>	<b>19</b>	<b>48</b>	<b>100.0</b>	<b>--</b>	<b>94.1</b>	<b>100.0</b>	<b>--</b>	<b>1.7</b>	<b>0.0</b>	<b>4.2</b>	<b>0.0</b>

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – GEORGIA</b>														<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>		
Atlanta-Sandy Springs	352	714	100.0	9.2	16.8	25.4	40.3	28.9	31.0	36.5	11.9	0.2	0.0		
<b>Total</b>	<b>352</b>	<b>714</b>	<b>100.0</b>	<b>9.2</b>	<b>16.8</b>	<b>25.4</b>	<b>40.3</b>	<b>28.9</b>	<b>31.0</b>	<b>36.5</b>	<b>11.9</b>	<b>0.2</b>	<b>0.0</b>		
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>															

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – GEORGIA</b>														<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>		
Atlanta-Sandy Springs	115	237	100.0	7.8	9.6	23.6	44.3	29.4	37.4	36.2	7.0	3.0	1.7		
<b>Total</b>	<b>115</b>	<b>237</b>	<b>100.0</b>	<b>7.8</b>	<b>9.6</b>	<b>23.6</b>	<b>44.3</b>	<b>29.4</b>	<b>37.4</b>	<b>36.2</b>	<b>7.0</b>	<b>3.0</b>	<b>1.7</b>		
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>															



<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – GEORGIA</b>													<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Atlanta-Sandy Springs	352	714	100.0	23.8	46.9	16.4	29.5	17.3	14.8	42.5	7.1	0.0	1.7	
<b>Total</b>	<b>352</b>	<b>714</b>	<b>100.0</b>	<b>23.8</b>	<b>46.9</b>	<b>16.4</b>	<b>29.5</b>	<b>17.3</b>	<b>14.8</b>	<b>42.5</b>	<b>7.1</b>	<b>0.0</b>	<b>1.7</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – GEORGIA</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Atlanta-Sandy Springs	115	237	100.0	23.7	41.7	16.2	27.0	17.9	23.5	42.2	6.1	0.0	1.7	
<b>Total</b>	<b>115</b>	<b>237</b>	<b>100.0</b>	<b>23.7</b>	<b>41.7</b>	<b>16.2</b>	<b>27.0</b>	<b>17.9</b>	<b>23.5</b>	<b>42.2</b>	<b>6.1</b>	<b>0.0</b>	<b>1.7</b>	

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

**ILLINOIS**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – ILLINOIS</b>																			<b>2019-2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>				
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggt.</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggt.</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggt.</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggt.</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggt.</b>		
Bloomington-Pontiac	7	28	3.4	3,345	7.0	0.0	7.2	13.3	28.6	11.9	56.1	28.6	55.0	23.6	42.9	25.9	0.0	0.0	0.0		
Carbondale-Marion	15	51	7.2	1,938	8.7	0.0	7.7	15.8	13.3	11.5	45.8	46.7	47.3	25.6	33.3	28.7	4.1	6.7	4.7		
Champaign-Urbana	37	341	17.9	3,313	10.9	2.7	11.4	18.3	35.1	16.1	42.0	48.6	45.1	26.4	13.5	26.5	2.3	0.0	1.0		
Danville	7	37	3.4	843	3.9	0.0	3.9	23.2	28.6	18.1	42.4	71.4	40.5	30.4	0.0	37.5	0.0	0.0	0.0		
Davenport-Moline	19	94	9.2	2,821	4.3	0.0	4.3	32.9	31.6	33.8	55.1	68.4	55.1	7.7	0.0	6.8	0.0	0.0	0.0		
Decatur	5	77	2.4	1,301	27.2	40.0	26.8	11.9	0.0	8.7	27.9	60.0	29.2	33.0	0.0	35.3	0.0	0.0	0.0		
Dixon-Sterling	6	7	2.9	981	0.0	0.0	0.0	16.0	16.7	15.5	75.6	83.3	71.2	8.3	0.0	13.4	0.0	0.0	0.0		
IL Non-MSA	34	123	16.4	2,336	9.4	0.0	7.6	20.9	14.7	19.7	46.2	50.0	48.0	22.7	35.3	23.7	0.8	0.0	0.9		
Peoria	17	57	8.2	6,725	10.5	23.5	10.1	14.4	5.9	12.0	44.9	41.2	45.1	30.2	29.4	32.8	0.0	0.0	0.0		
Rockford-Freeport-Rochelle	17	28	8.2	6,417	9.9	11.8	9.7	14.3	17.6	15.6	33.9	52.9	31.2	40.0	11.8	41.0	2.0	5.9	2.5		
Springfield-Jacksonville-Lincoln	25	127	12.1	3,309	14.4	20.0	12.1	17.5	28.0	15.3	35.9	20.0	36.3	32.2	32.0	36.3	0.0	0.0	0.0		
St Louis-St Charles-Farmington	18	94	8.7	10,479	9.2	22.2	8.0	19.2	16.7	17.7	46.7	61.1	47.3	24.9	0.0	27.0	0.0	0.0	0.0		
<b>Total</b>	<b>207</b>	<b>1,064</b>	<b>100.0</b>	<b>43,808</b>	<b>9.9</b>	<b>8.7</b>	<b>9.1</b>	<b>17.8</b>	<b>21.7</b>	<b>16.3</b>	<b>44.5</b>	<b>49.3</b>	<b>44.6</b>	<b>27.1</b>	<b>19.3</b>	<b>29.3</b>	<b>0.7</b>	<b>1.0</b>	<b>0.7</b>		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – ILLINOIS</b>														<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>		
Bloomington-Pontiac	2	2	5.9	0.7	0.0	21.5	0.0	53.3	100.0	17.5	0.0	7.0	0.0		
Carbondale-Marion	2	13	5.9	5.2	0.0	24.3	0.0	32.5	50.0	29.1	0.0	8.9	50.0		
Champaign-Urbana	1	5	2.9	11.0	100.0	18.9	0.0	24.5	0.0	39.8	0.0	5.8	0.0		
Danville	0	0	0.0	14.8	0.0	10.1	0.0	47.1	0.0	25.3	0.0	2.7	0.0		
Davenport-Moline	1	2	2.9	6.9	0.0	28.0	100.0	53.6	0.0	11.5	0.0	0.0	0.0		
Decatur	0	0	0.0	17.5	0.0	22.1	0.0	40.2	0.0	19.4	0.0	0.8	0.0		
Dixon-Sterling	1	2	2.9	0.0	0.0	10.1	0.0	63.5	100.0	26.4	0.0	0.0	0.0		
IL Non-MSA	13	41	38.2	0.0	0.0	33.7	23.1	50.8	38.5	12.0	38.5	3.5	0.0		
Peoria	3	4	8.8	9.4	33.3	15.2	0.0	49.1	66.7	26.2	0.0	0.0	0.0		
Rockford-Freeport-Rochelle	4	7	11.8	6.4	0.0	21.8	25.0	39.0	50.0	30.0	25.0	2.8	0.0		
Springfield-Jacksonville-Lincoln	4	6	11.8	12.0	0.0	25.9	50.0	22.8	25.0	39.3	25.0	0.0	0.0		
St Louis-St Charles-Farmington	3	14	8.8	7.2	0.0	24.1	0.0	46.1	100.0	21.9	0.0	0.7	0.0		
<b>Total</b>	<b>34</b>	<b>96</b>	<b>100.0</b>	<b>7.5</b>	<b>5.9</b>	<b>22.3</b>	<b>20.6</b>	<b>42.2</b>	<b>50.0</b>	<b>25.8</b>	<b>20.6</b>	<b>2.2</b>	<b>2.9</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues- ILLINOIS</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bloomington-Pontiac	7	28	3.4	3,345	80.8	71.4	44.1	5.1	0.0	14.1	28.6	
Carbondale-Marion	15	51	7.2	1,938	80.5	73.3	50.3	4.7	0.0	14.7	26.7	
Champaign-Urbana	37	341	17.9	3,313	81.8	51.4	44.6	4.3	5.4	13.9	43.2	
Danville	7	37	3.4	843	77.3	57.1	42.9	5.4	0.0	17.3	42.9	
Davenport-Moline	19	94	9.2	2,821	79.4	73.7	47.6	5.6	0.0	15.0	26.3	
Decatur	5	77	2.4	1,301	79.2	40.0	50.4	5.4	0.0	15.4	60.0	
Dixon-Sterling	6	7	2.9	981	78.4	83.3	49.7	4.9	0.0	16.7	16.7	
IL Non-MSA	34	123	16.4	2,336	77.6	73.5	57.2	5.0	2.9	17.4	23.5	
Peoria	17	57	8.2	6,725	80.3	82.4	50.8	5.7	0.0	14.0	17.6	
Rockford-Freeport-Rochelle	17	28	8.2	6,417	82.2	82.4	44.3	5.8	0.0	12.0	17.6	
Springfield-Jacksonville-Lincoln	25	127	12.1	3,309	78.9	68.0	54.1	5.3	0.0	15.8	32.0	
St Louis-St Charles-Farmington	18	94	8.7	10,479	82.8	55.6	53.5	4.5	0.0	12.7	44.4	
<b>Total</b>	<b>207</b>	<b>1,064</b>	<b>100.0</b>	<b>43,808</b>	<b>80.7</b>	<b>67.6</b>	<b>49.7</b>	<b>5.1</b>	<b>1.4</b>	<b>14.2</b>	<b>30.9</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – ILLINOIS											2022
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington-Pontiac	2	2	5.9	--	83.1	100.0	--	4.3	0.0	12.5	0.0
Carbondale-Marion	2	13	5.9	--	82.2	100.0	--	4.2	0.0	13.6	0.0
Champaign-Urbana	1	5	2.9	--	84.3	100.0	--	3.5	0.0	12.2	0.0
Danville	--	--	--	--	79.7	--	--	4.7	--	15.6	--
Davenport-Moline	1	2	2.9	--	81.8	100.0	--	4.9	0.0	13.4	0.0
Decatur	--	--	--	--	81.5	--	--	4.7	--	13.8	--
Dixon-Sterling	1	2	2.9	--	81.2	100.0	--	4.2	0.0	14.6	0.0
IL Non-MSA	13	41	38.2	--	79.4	100.0	--	4.5	0.0	16.1	0.0
Peoria	3	4	8.8	--	82.6	100.0	--	4.8	0.0	12.6	0.0
Rockford-Freeport-Rochelle	4	7	11.8	--	84.6	100.0	--	4.8	0.0	10.6	0.0
Springfield-Jacksonville-Lincoln	4	6	11.8	--	84.0	100.0	--	3.8	0.0	12.1	0.0
St Louis-St Charles-Farmington	3	14	8.8	--	84.9	100.0	--	3.8	0.0	11.3	0.0
<b>Total</b>	<b>34</b>	<b>96</b>	<b>100.0</b>	<b>--</b>	<b>83.3</b>	<b>100.0</b>	<b>--</b>	<b>4.3</b>	<b>0.0</b>	<b>12.5</b>	<b>0.0</b>

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
 Due to rounding, totals may not equal 100.0%

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – ILLINOIS** **2019-2021**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Bloomington-Pontiac	56	110	4.7	4.3	1.8	13.9	37.5	57.4	39.3	24.4	21.4	0.0	0.0
Carbondale-Marion	70	112	5.9	7.7	5.7	14.2	22.9	45.3	58.6	26.9	11.4	5.9	1.4
Champaign-Urbana	129	233	10.8	14.5	13.2	17.1	41.9	47.3	39.5	19.3	5.4	1.9	0.0
Danville	34	70	2.9	4.1	0.0	15.5	20.6	48.7	55.9	31.7	23.5	0.0	0.0
Davenport-Moline	64	122	5.4	2.1	0.0	28.2	45.3	61.5	51.6	8.2	3.1	0.0	0.0
Decatur	18	33	1.5	18.7	38.9	11.6	33.3	34.3	5.6	35.4	22.2	0.0	0.0
Dixon-Sterling	54	107	4.5	0.0	0.0	17.4	35.2	72.9	61.1	9.7	3.7	0.0	0.0
IL Non-MSA	185	350	15.5	4.6	5.9	19.9	23.8	53.6	54.6	20.8	15.7	1.1	0.0
Peoria	121	228	10.2	6.9	12.4	17.1	29.8	49.5	45.5	26.5	12.4	0.0	0.0
Rockford-Freeport-Rochelle	88	167	7.4	9.7	14.8	17.4	21.6	36.2	45.5	36.2	17.0	0.5	1.1
Springfield-Jacksonville-Lincoln	219	382	18.4	13.3	26.5	16.1	29.7	40.0	32.0	30.6	11.9	0.0	0.0
St Louis-St Charles-Farmington	152	278	12.8	11.4	13.8	20.0	27.6	46.9	50.0	21.7	8.6	0.0	0.0
<b>Total</b>	<b>1,190</b>	<b>2,192</b>	<b>100.0</b>	<b>8.8</b>	<b>12.4</b>	<b>18.0</b>	<b>30.1</b>	<b>47.8</b>	<b>45.5</b>	<b>24.8</b>	<b>11.8</b>	<b>0.5</b>	<b>0.2</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – ILLINOIS** **2022**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Bloomington-Pontiac	24	41	6.1	1.1	0.0	23.1	29.2	54.2	58.3	16.7	12.5	4.8	0.0
Carbondale-Marion	21	59	5.3	4.7	4.8	27.8	33.3	36.4	38.1	23.8	19.0	7.4	4.8
Champaign-Urbana	31	56	7.8	13.5	16.1	22.4	35.5	23.7	35.5	35.0	9.7	5.4	3.2
Danville	12	20	3.0	9.0	8.3	8.2	25.0	52.7	58.3	28.1	8.3	1.9	0.0
Davenport-Moline	17	29	4.3	4.6	11.8	23.8	47.1	59.4	35.3	12.2	5.9	0.0	0.0
Decatur	10	18	2.5	7.1	10.0	23.6	30.0	51.5	50.0	16.7	10.0	1.1	0.0
Dixon-Sterling	12	22	3.0	0.0	0.0	14.1	8.3	59.2	58.3	26.7	33.3	0.0	0.0
IL Non-MSA	68	124	17.2	0.0	0.0	29.2	41.2	55.9	47.1	13.7	11.8	1.2	0.0
Peoria	38	73	9.6	5.2	26.3	20.1	23.7	52.6	47.4	22.2	2.6	0.0	0.0
Rockford-Freeport-Rochelle	38	78	9.6	6.8	7.9	23.6	36.8	41.8	36.8	26.7	18.4	1.1	0.0
Springfield-Jacksonville-Lincoln	68	125	17.2	12.0	22.1	23.2	42.6	34.2	29.4	30.6	5.9	0.0	0.0
St Louis-St Charles-Farmington	57	105	14.4	9.0	14.0	27.1	43.9	43.7	35.1	19.7	5.3	0.5	1.8
<b>Total</b>	<b>396</b>	<b>750</b>	<b>100.0</b>	<b>6.7</b>	<b>11.6</b>	<b>23.5</b>	<b>36.6</b>	<b>45.8</b>	<b>40.9</b>	<b>22.5</b>	<b>10.1</b>	<b>1.5</b>	<b>0.8</b>

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

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – ILLINOIS														2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Bloomington-Pontiac	56	110	4.7	24.6	42.9	14.6	28.6	17.3	16.1	43.5	8.9	0.0	3.6		
Carbondale-Marion	70	112	5.9	27.7	55.7	13.7	27.1	16.5	12.9	42.2	4.3	0.0	0.0		
Champaign-Urbana	129	233	10.8	28.9	72.1	14.5	22.5	15.2	3.9	41.5	0.8	0.0	0.8		
Danville	34	70	2.9	23.4	38.2	16.2	20.6	18.3	32.4	42.1	8.8	0.0	0.0		
Davenport-Moline	64	122	5.4	24.7	57.8	17.2	20.3	19.1	10.9	39.0	3.1	0.0	7.8		
Decatur	18	33	1.5	25.4	44.4	15.2	27.8	17.1	27.8	42.2	0.0	0.0	0.0		
Dixon-Sterling	54	107	4.5	20.5	38.9	16.9	27.8	17.8	16.7	44.7	11.1	0.0	5.6		
IL Non-MSA	185	350	15.5	29.9	48.6	16.6	25.9	16.6	15.1	36.8	7.0	0.0	3.2		
Peoria	121	228	10.2	23.3	43.0	16.2	38.0	18.3	13.2	42.1	5.8	0.0	0.0		
Rockford-Freeport-Rochelle	88	167	7.4	24.9	46.6	15.9	26.1	17.9	13.6	41.3	8.0	0.0	5.7		
Springfield-Jacksonville-Lincoln	219	382	18.4	25.1	63.9	15.9	21.5	17.2	8.2	41.9	4.6	0.0	1.8		
St Louis-St Charles-Farmington	152	278	12.8	26.8	56.6	16.7	24.3	17.1	10.5	39.4	5.3	0.0	3.3		
<b>Total</b>	<b>1,190</b>	<b>2,192</b>	<b>100.0</b>	<b>25.6</b>	<b>54.1</b>	<b>16.0</b>	<b>25.6</b>	<b>17.4</b>	<b>12.2</b>	<b>41.0</b>	<b>5.5</b>	<b>0.0</b>	<b>2.6</b>		

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%



Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – ILLINOIS														2022
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bloomington-Pontiac	24	41	6.1	26.2	33.3	14.6	41.7	16.6	12.5	42.6	12.5	0.0	0.0	
Carbondale-Marion	21	59	5.3	26.8	52.4	14.3	9.5	16.4	19.0	42.5	19.0	0.0	0.0	
Champaign-Urbana	31	56	7.8	28.0	61.3	14.5	32.3	15.6	6.5	41.8	0.0	0.0	0.0	
Danville	12	20	3.0	23.5	16.7	16.6	58.3	17.3	16.7	42.5	8.3	0.0	0.0	
Davenport-Moline	17	29	4.3	25.2	76.5	16.6	17.6	18.8	0.0	39.5	5.9	0.0	0.0	
Decatur	10	18	2.5	24.5	40.0	16.2	30.0	17.8	10.0	41.5	20.0	0.0	0.0	
Dixon-Sterling	12	22	3.0	21.6	41.7	15.9	41.7	17.1	16.7	45.3	0.0	0.0	0.0	
IL Non-MSA	68	124	17.2	29.9	50.0	16.9	35.3	17.1	10.3	36.2	1.5	0.0	2.9	
Peoria	38	73	9.6	23.7	42.1	15.9	34.2	18.5	13.2	41.8	7.9	0.0	2.6	
Rockford-Freeport-Rochelle	38	78	9.6	24.4	28.9	16.1	31.6	18.3	21.1	41.2	13.2	0.0	5.3	
Springfield-Jacksonville-Lincoln	68	125	17.2	24.9	60.3	16.2	29.4	16.9	8.8	42.0	1.5	0.0	0.0	
St Louis-St Charles-Farmington	57	105	14.4	27.9	59.6	16.0	26.3	18.4	10.5	37.8	1.8	0.0	1.8	
<b>Total</b>	<b>396</b>	<b>750</b>	<b>100.0</b>	<b>25.9</b>	<b>50.0</b>	<b>15.8</b>	<b>31.3</b>	<b>17.7</b>	<b>11.6</b>	<b>40.6</b>	<b>5.6</b>	<b>0.0</b>	<b>1.5</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

INDIANA

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
Bloomington-Bedford	6	33	2.1	2,928	4.8	0.0	5.5	20.9	16.7	19.7	42.9	83.3	44.4	30.2	0.0	30.3	1.2	0.0	0.1
Evansville	19	80	6.6	4,632	8.2	10.5	8.1	18.6	31.6	19.4	35.6	52.6	34.6	33.0	5.3	34.3	4.6	0.0	3.7
Fort Wayne-Huntington-Auburn	45	232	15.6	9,938	6.1	17.8	5.6	15.4	28.9	14.1	47.2	35.6	48.6	28.1	17.8	28.4	3.1	0.0	3.2
Indianapolis-Carmel-Muncie	142	2,321	49.1	49,575	10.6	17.6	7.9	21.4	21.1	17.8	31.9	39.4	33.4	35.9	21.8	40.6	0.3	0.0	0.2
Lafayette-West Lafayette-Frankfort	11	59	3.8	3,054	3.6	0.0	2.8	26.6	18.2	28.5	28.8	18.2	28.1	37.7	63.6	38.8	3.3	0.0	1.8
IN Non-MSA	10	36	3.5	4,568	0.0	0.0	0.0	8.0	10.0	6.4	70.0	70.0	67.5	21.9	20.0	26.1	0.0	0.0	0.0
South Bend-Elkhart-Mishawaka	44	407	15.2	10,991	5.9	4.5	4.9	16.7	27.3	14.2	53.9	50.0	56.4	23.5	18.2	24.5	0.0	0.0	0.0
Terre Haute	12	84	4.2	2,196	7.4	0.0	7.7	23.9	8.3	22.4	30.7	58.3	30.4	38.0	33.3	39.5	0.0	0.0	0.0
<b>Total</b>	<b>289</b>	<b>3,252</b>	<b>100.0</b>	<b>87,882</b>	<b>8.4</b>	<b>12.8</b>	<b>6.6</b>	<b>19.6</b>	<b>22.8</b>	<b>17.0</b>	<b>38.4</b>	<b>43.3</b>	<b>40.0</b>	<b>32.7</b>	<b>21.1</b>	<b>35.7</b>	<b>0.9</b>	<b>0.0</b>	<b>0.8</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Bloomington-Bedford	0	0	0.0	10.6	0.0	15.0	0.0	38.6	0.0	31.3	0.0	4.4	0.0
Evansville	3	10	10.3	7.9	0.0	20.9	0.0	28.5	66.7	36.1	0.0	6.6	33.3
Fort Wayne-Huntington-Auburn	7	9	24.1	3.5	0.0	17.9	0.0	46.9	85.7	28.4	14.3	3.3	0.0
Indianapolis-Carmel-Muncie	6	12	20.7	7.8	0.0	20.2	33.3	37.0	66.7	32.0	0.0	3.0	0.0
Lafayette-West Lafayette-Frankfort	0	0	0.0	7.4	0.0	24.3	0.0	39.8	0.0	24.7	0.0	3.7	0.0
IN Non-MSA	4	9	13.8	0.5	0.0	15.1	25.0	66.4	75.0	17.9	0.0	0.0	0.0
South Bend-Elkhart-Mishawaka	9	12	31.0	5.0	0.0	20.3	22.2	46.5	66.7	27.8	11.1	0.3	0.0
Terre Haute	0	0	0.0	6.8	0.0	14.6	0.0	41.4	0.0	29.9	0.0	7.3	0.0
<b>Total</b>	<b>29</b>	<b>52</b>	<b>100.0</b>	<b>6.7</b>	<b>0.0</b>	<b>19.6</b>	<b>17.2</b>	<b>40.3</b>	<b>72.4</b>	<b>30.4</b>	<b>6.9</b>	<b>2.9</b>	<b>3.4</b>

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – INDIANA											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bloomington-Bedford	6	33	2.1	2,928	86.6	50.0	39.7	3.7	16.7	9.7	33.3	
Evansville	19	80	6.6	4,632	84.1	47.4	46.4	5.0	5.3	10.9	47.4	
Fort Wayne-Huntington-Auburn	45	232	15.6	9,938	85.3	75.6	47.6	4.5	2.2	10.1	22.2	
Indianapolis-Carmel-Muncie	142	2,321	49.1	49,575	88.7	60.6	46.1	3.5	3.5	7.7	35.9	
Lafayette-West Lafayette-Frankfort	11	59	3.8	3,054	85.9	36.4	46.6	3.4	9.1	10.7	54.5	
IN Non-MSA	10	36	3.5	4,568	83.3	80.0	43.0	4.4	0.0	12.3	20.0	
South Bend-Elkhart-Mishawaka	44	407	15.2	10,991	84.6	52.3	45.1	5.0	0.0	10.5	47.7	
Terre Haute	12	84	4.2	2,196	81.4	91.7	38.4	4.8	0.0	13.9	8.3	
<b>Total</b>	<b>289</b>	<b>3,252</b>	<b>100.0</b>	<b>87,882</b>	<b>87.0</b>	<b>61.6</b>	<b>45.6</b>	<b>4.0</b>	<b>3.1</b>	<b>9.0</b>	<b>35.3</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – INDIANA											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bloomington-Bedford	--	--	--	--	88.2	--	--	3.1	--	8.7	--	
Evansville	3	10	10.3	--	86.3	100.0	--	4.1	0.0	9.7	0.0	
Fort Wayne-Huntington-Auburn	7	9	24.1	--	87.7	100.0	--	3.7	0.0	8.6	0.0	
Indianapolis-Carmel-Muncie	6	12	20.7	--	90.5	100.0	--	2.9	0.0	6.6	0.0	
Lafayette-West Lafayette-Frankfort	--	--	--	--	87.8	--	--	2.8	--	9.4	--	
IN Non-MSA	4	9	13.8	--	85.2	100.0	--	3.8	0.0	11.0	0.0	
South Bend-Elkhart-Mishawaka	9	12	31.0	--	86.4	100.0	--	4.2	0.0	9.3	0.0	
Terre Haute	--	--	--	--	83.6	--	--	4.1	--	12.4	--	
<b>Total</b>	<b>29</b>	<b>52</b>	<b>100.0</b>	<b>--</b>	<b>89.0</b>	<b>100.0</b>	<b>--</b>	<b>3.3</b>	<b>0.0</b>	<b>7.8</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – INDIANA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bloomington-Bedford	47	88	3.3	4.7	0.0	19.0	29.8	50.1	70.2	26.2	0.0	0.0	0.0	
Evansville	146	264	10.4	9.4	13.7	18.8	19.2	41.8	45.2	29.7	21.9	0.3	0.0	
Fort Wayne-Huntington-Auburn	209	425	14.9	6.7	10.0	15.5	20.1	53.5	54.5	24.1	15.3	0.3	0.0	
Indianapolis-Carmel-Muncie	555	1,055	39.5	10.1	10.3	24.2	35.3	35.2	41.4	30.2	12.8	0.3	0.2	
Lafayette-West Lafayette-Frankfort	28	55	2.0	5.6	7.1	20.1	39.3	35.0	35.7	36.7	17.9	2.6	0.0	
IN Non-MSA	147	279	10.5	0.0	0.0	7.5	11.6	71.3	78.9	21.1	9.5	0.0	0.0	
South Bend-Elkhart-Mishawaka	216	419	15.4	4.9	6.9	15.5	23.1	56.3	54.6	23.4	15.3	0.0	0.0	
Terre Haute	57	109	4.1	6.2	15.8	23.8	28.1	33.1	29.8	37.0	26.3	0.0	0.0	
<b>Total</b>	<b>1,405</b>	<b>2,694</b>	<b>100.0</b>	<b>7.8</b>	<b>8.8</b>	<b>20.2</b>	<b>26.6</b>	<b>43.4</b>	<b>50.1</b>	<b>28.3</b>	<b>14.4</b>	<b>0.3</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – INDIANA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bloomington-Bedford	12	23	2.6	5.3	0.0	17.1	16.7	43.1	58.3	29.6	25.0	4.9	0.0	
Evansville	46	104	10.1	8.6	10.9	22.9	34.8	36.3	45.7	31.8	8.7	0.3	0.0	
Fort Wayne-Huntington-Auburn	56	113	12.3	4.0	7.1	19.3	39.3	51.1	44.6	25.3	8.9	0.3	0.0	
Indianapolis-Carmel-Muncie	178	353	39.1	8.1	10.1	22.0	38.2	41.4	42.1	27.1	7.3	1.3	2.2	
Lafayette-West Lafayette-Frankfort	8	14	1.8	6.3	0.0	19.6	25.0	47.5	62.5	22.6	12.5	3.9	0.0	
IN Non-MSA	44	91	9.7	1.0	4.5	13.1	11.4	69.7	79.5	16.2	4.5	0.0	0.0	
South Bend-Elkhart-Mishawaka	88	181	19.3	5.0	6.8	19.7	28.4	49.0	47.7	26.0	17.0	0.3	0.0	
Terre Haute	23	35	5.1	6.6	21.7	20.1	30.4	39.9	39.1	32.0	8.7	1.3	0.0	
<b>Total</b>	<b>455</b>	<b>914</b>	<b>100.0</b>	<b>6.6</b>	<b>8.8</b>	<b>20.5</b>	<b>32.3</b>	<b>45.2</b>	<b>48.1</b>	<b>26.5</b>	<b>9.9</b>	<b>1.2</b>	<b>0.9</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – INDIANA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bloomington-Bedford	47	88	3.3	26.6	48.9	15.0	21.3	16.1	17.0	42.3	10.6	0.0	2.1	
Evansville	146	264	10.4	22.5	50.0	17.1	33.6	17.5	6.8	42.9	3.4	0.0	6.2	
Fort Wayne-Huntington-Auburn	209	425	14.9	21.8	39.7	17.3	29.7	19.5	17.7	41.3	9.1	0.0	3.8	
Indianapolis-Carmel-Muncie	555	1,055	39.5	24.0	50.3	16.3	27.4	17.9	14.1	41.7	5.4	0.0	2.9	
Lafayette-West Lafayette-Frankfort	28	55	2.0	25.7	64.3	14.9	7.1	17.8	17.9	41.6	7.1	0.0	3.6	
IN Non-MSA	147	279	10.5	21.8	40.1	16.6	32.0	19.3	11.6	42.3	12.2	0.0	4.1	
South Bend-Elkhart-Mishawaka	216	419	15.4	22.0	35.2	16.6	31.9	19.0	21.3	42.4	8.3	0.0	3.2	
Terre Haute	57	109	4.1	25.0	36.8	16.3	36.8	17.1	14.0	41.5	10.5	0.0	1.8	
<b>Total</b>	<b>1,405</b>	<b>2,694</b>	<b>100.0</b>	<b>23.5</b>	<b>45.0</b>	<b>16.4</b>	<b>29.3</b>	<b>18.2</b>	<b>14.9</b>	<b>41.9</b>	<b>7.3</b>	<b>0.0</b>	<b>3.5</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – INDIANA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bloomington-Bedford	12	23	2.6	25.9	41.7	13.6	16.7	17.8	16.7	42.8	16.7	0.0	8.3	
Evansville	46	104	10.1	22.7	43.5	16.7	26.1	17.5	21.7	43.1	2.2	0.0	6.5	
Fort Wayne-Huntington-Auburn	56	113	12.3	21.6	32.1	17.1	35.7	19.8	21.4	41.6	8.9	0.0	1.8	
Indianapolis-Carmel-Muncie	178	353	39.1	23.6	38.8	16.5	33.1	18.4	21.3	41.5	4.5	0.0	2.2	
Lafayette-West Lafayette-Frankfort	8	14	1.8	26.1	50.0	15.3	12.5	17.0	25.0	41.6	0.0	0.0	12.5	
IN Non-MSA	44	91	9.7	22.1	36.4	16.6	22.7	18.8	22.7	42.4	6.8	0.0	11.4	
South Bend-Elkhart-Mishawaka	88	181	19.3	22.7	29.5	16.7	36.4	18.6	22.7	42.0	10.2	0.0	1.1	
Terre Haute	23	35	5.1	24.9	30.4	16.5	39.1	18.1	26.1	40.5	4.3	0.0	0.0	
<b>Total</b>	<b>455</b>	<b>914</b>	<b>100.0</b>	<b>23.3</b>	<b>36.3</b>	<b>16.4</b>	<b>31.9</b>	<b>18.5</b>	<b>22.0</b>	<b>41.8</b>	<b>6.4</b>	<b>0.0</b>	<b>3.5</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

**KENTUCKY**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - KENTUCKY</b>																			<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Bowling Green-Glasgow	11	32	9.4	3,129	6.3	18.2	5.2	17.7	54.5	18.5	31.4	18.2	29.2	40.1	9.1	44.3	4.5	0.0	2.8	
Lexington-Fayette-Richmond-Frankfort	33	103	28.2	15,494	4.9	6.1	4.6	17.3	24.2	16.9	38.7	39.4	39.9	39.2	30.3	38.5	0.0	0.0	0.0	
KY Non-MSA	71	309	60.7	9,792	0.4	2.8	0.5	11.1	12.7	11.7	60.0	60.6	58.9	28.5	23.9	28.9	0.0	0.0	0.0	
Owensboro	2	4	1.7	2,118	2.8	0.0	3.2	28.7	100.0	24.0	41.0	0.0	42.7	27.5	0.0	30.1	0.0	0.0	0.0	
<b>Total</b>	<b>117</b>	<b>448</b>	<b>100.0</b>	<b>30,533</b>	<b>3.4</b>	<b>5.1</b>	<b>3.3</b>	<b>15.9</b>	<b>21.4</b>	<b>15.9</b>	<b>45.4</b>	<b>49.6</b>	<b>45.1</b>	<b>34.9</b>	<b>23.9</b>	<b>35.5</b>	<b>0.4</b>	<b>0.0</b>	<b>0.3</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography - KENTUCKY</b>														<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Bowling Green-Glasgow	2	4	11.8	4.7	0.0	18.6	0.0	39.2	50.0	33.0	50.0	4.3	0.0		
Lexington-Fayette-Richmond-Frankfort	1	3	5.9	3.8	0.0	16.5	100.0	37.2	0.0	38.6	0.0	3.9	0.0		
KY Non-MSA	11	18	64.7	0.8	0.0	15.2	9.1	44.8	54.5	38.3	36.4	1.0	0.0		
Owensboro	3	6	17.6	0.0	0.0	22.6	33.3	47.5	33.3	22.9	33.3	7.0	0.0		
<b>Total</b>	<b>17</b>	<b>31</b>	<b>100.0</b>	<b>2.6</b>	<b>0.0</b>	<b>16.6</b>	<b>17.6</b>	<b>40.6</b>	<b>47.1</b>	<b>37.0</b>	<b>35.3</b>	<b>3.1</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – KENTUCKY</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bowling Green-Glasgow	11	32	9.4	3,129	86.1	81.8	52.4	3.8	0.0	10.1	18.2	
Lexington-Fayette-Richmond-Frankfort	33	103	28.2	15,494	86.8	93.9	51.2	3.5	0.0	9.7	6.1	
KY Non-MSA	71	309	60.7	9,792	84.2	84.5	49.1	3.9	1.4	11.9	14.1	
Owensboro	2	4	1.7	2,118	83.7	50.0	54.0	4.7	0.0	11.7	50.0	
<b>Total</b>	<b>117</b>	<b>448</b>	<b>100.0</b>	<b>30,533</b>	<b>85.6</b>	<b>86.3</b>	<b>50.8</b>	<b>3.8</b>	<b>0.9</b>	<b>10.6</b>	<b>12.8</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – KENTUCKY</b>											<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Bowling Green-Glasgow	2	4	11.8	--	87.6	100.0	--	3.3	0.0	9.2	0.0	
Lexington-Fayette--Richmond-Frankfort	1	3	5.9	--	88.2	100.0	--	3.0	0.0	8.8	0.0	
KY Non-MSA	11	18	64.7	--	85.7	100.0	--	3.4	0.0	11.0	0.0	
Owensboro	3	6	17.6	--	85.2	100.0	--	4.0	0.0	10.8	0.0	
<b>Total</b>	<b>17</b>	<b>31</b>	<b>100.0</b>	<b>--</b>	<b>87.1</b>	<b>100.0</b>	<b>--</b>	<b>3.2</b>	<b>0.0</b>	<b>9.7</b>	<b>0.0</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – KENTUCKY</b>													<b>2019-2021</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bowling Green-Glasgow	59	118	8.6	6.7	5.1	19.7	25.4	31.9	39.0	39.6	30.5	2.2	0.0	
Lexington-Fayette-Richmond-Frankfort	169	299	24.7	6.3	11.8	20.9	34.9	36.3	28.4	36.4	24.9	0.0	0.0	
KY Non-MSA	430	742	62.9	0.3	0.2	14.1	14.4	60.4	67.9	25.2	17.4	0.0	0.0	
Owensboro	26	47	3.8	3.7	3.8	24.5	30.8	48.7	53.8	23.1	11.5	0.0	0.0	
<b>Total</b>	<b>684</b>	<b>1,206</b>	<b>100.0</b>	<b>3.6</b>	<b>3.7</b>	<b>18.2</b>	<b>21.1</b>	<b>47.0</b>	<b>55.1</b>	<b>31.0</b>	<b>20.2</b>	<b>0.2</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – KENTUCKY</b>													<b>2022</b>	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bowling Green-Glasgow	27	48	10.2	2.7	0.0	25.9	44.4	40.3	44.4	28.4	11.1	2.7	0.0	
Lexington-Fayette-Richmond-Frankfort	67	135	25.4	4.6	4.5	18.1	22.4	40.4	59.7	35.6	11.9	1.3	1.5	
KY Non-MSA	165	313	62.5	1.4	1.8	14.8	20.6	47.3	52.1	36.0	24.8	0.5	0.6	
Owensboro	5	13	1.9	0.0	0.0	23.2	20.0	55.2	80.0	20.2	0.0	1.4	0.0	
<b>Total</b>	<b>264</b>	<b>509</b>	<b>100.0</b>	<b>2.8</b>	<b>2.3</b>	<b>17.8</b>	<b>23.5</b>	<b>44.2</b>	<b>53.8</b>	<b>34.1</b>	<b>19.7</b>	<b>1.1</b>	<b>0.8</b>	

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



Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – KENTUCKY														2019-2021
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bowling Green-Glasgow	59	118	8.6	23.9	40.7	14.0	32.2	17.6	11.9	44.5	8.5	0.0	6.8	
Lexington-Fayette-Richmond-Frankfort	169	299	24.7	24.3	49.1	14.8	27.8	16.0	13.6	44.9	8.3	0.0	1.2	
KY Non-MSA	430	742	62.9	24.4	39.1	15.0	30.0	16.4	16.3	44.2	10.0	0.0	4.7	
Owensboro	26	47	3.8	24.1	42.3	16.6	19.2	16.5	11.5	42.8	19.2	0.0	7.7	
<b>Total</b>	<b>684</b>	<b>1,206</b>	<b>100.0</b>	<b>24.3</b>	<b>41.8</b>	<b>14.9</b>	<b>29.2</b>	<b>16.3</b>	<b>15.1</b>	<b>44.4</b>	<b>9.8</b>	<b>0.0</b>	<b>4.1</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – KENTUCKY														2022
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Bowling Green-Glasgow	27	48	10.2	23.2	18.5	15.5	40.7	17.6	40.7	43.8	0.0	0.0	0.0	
Lexington-Fayette-Richmond-Frankfort	67	135	25.4	23.0	38.8	15.3	34.3	17.0	14.9	44.7	10.4	0.0	1.5	
KY Non-MSA	165	313	62.5	24.4	32.7	14.8	35.2	15.6	18.2	45.2	11.5	0.0	2.4	
Owensboro	5	13	1.9	24.2	20.0	15.8	20.0	17.6	0.0	42.4	40.0	0.0	20.0	
<b>Total</b>	<b>264</b>	<b>509</b>	<b>100.0</b>	<b>23.7</b>	<b>32.6</b>	<b>15.1</b>	<b>35.2</b>	<b>16.5</b>	<b>19.3</b>	<b>44.7</b>	<b>10.6</b>	<b>0.0</b>	<b>2.3</b>	

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

LOUISIANA

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – LOUISIANA																			2019-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Alexandria	1	4	0.7	2,901	9.8	100.0	8.1	10.5	0.0	10.0	45.0	0.0	47.4	34.3	0.0	34.4	0.3	0.0	0.2	
Baton Rouge	25	188	17.1	16,114	8.9	8.0	7.2	25.9	56.0	25.0	20.1	16.0	20.7	45.0	20.0	47.1	0.1	0.0	0.1	
Houma-Thibodaux	5	21	3.4	5,675	0.0	0.0	0.0	18.8	20.0	20.9	55.5	60.0	54.0	25.7	20.0	25.1	0.0	0.0	0.0	
Lafayette-Opelousas-Morgan City	20	223	13.7	17,104	6.2	0.0	5.9	20.2	30.0	18.6	39.9	60.0	41.6	33.6	10.0	33.9	0.1	0.0	0.0	
Lake Charles-Jennings	6	716	4.1	5,990	4.3	0.0	5.3	24.2	0.0	23.9	33.1	16.7	30.9	38.2	83.3	39.9	0.2	0.0	0.1	
Monroe-Ruston	15	600	10.3	5,595	19.5	13.3	20.6	12.3	26.7	11.0	25.3	46.7	24.6	42.8	13.3	43.7	0.1	0.0	0.1	
New Orleans-Metairie-Hammond	65	1,680	44.5	49,119	8.7	16.9	8.7	20.6	20.0	20.1	30.7	46.2	29.9	38.8	16.9	40.2	1.1	0.0	1.1	
Shreveport-Bossier City-Minden	9	693	6.2	9,452	15.1	44.4	16.0	19.7	33.3	19.1	26.9	11.1	28.4	38.3	11.1	36.4	0.1	0.0	0.1	
<b>Total</b>	<b>146</b>	<b>4,125</b>	<b>100.0</b>	<b>111,950</b>	<b>9.0</b>	<b>13.7</b>	<b>8.6</b>	<b>20.7</b>	<b>28.1</b>	<b>20.0</b>	<b>31.4</b>	<b>39.7</b>	<b>31.7</b>	<b>38.4</b>	<b>18.5</b>	<b>39.1</b>	<b>0.5</b>	<b>0.0</b>	<b>0.5</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – LOUISIANA														2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Alexandria	1	1	4.5	7.7	0.0	21.8	100.0	27.0	0.0	43.1	0.0	0.3	0.0		
Baton Rouge	4	10	18.2	12.1	25.0	18.7	25.0	32.5	50.0	35.4	0.0	1.4	0.0		
Houma-Thibodaux	1	1	4.5	3.2	0.0	15.7	0.0	44.6	100.0	34.3	0.0	2.3	0.0		
Lafayette-Opelousas-Morgan City	4	8	18.2	7.1	25.0	21.6	0.0	27.7	75.0	42.5	0.0	1.2	0.0		
Lake Charles-Jennings	0	0	0.0	7.3	0.0	15.8	0.0	37.4	0.0	38.4	0.0	1.1	0.0		
Monroe-Ruston	2	5	9.1	11.7	0.0	21.4	50.0	28.5	50.0	38.2	0.0	0.1	0.0		
New Orleans-Metairie-Hammond	10	33	45.5	7.3	10.0	23.4	40.0	29.9	20.0	37.6	30.0	1.7	0.0		
Shreveport-Bossier City-Minden	0	0	0.0	6.1	0.0	25.0	0.0	25.3	0.0	36.7	0.0	6.9	0.0		
<b>Total</b>	<b>22</b>	<b>58</b>	<b>100.0</b>	<b>8.0</b>	<b>13.6</b>	<b>21.6</b>	<b>31.8</b>	<b>30.5</b>	<b>40.9</b>	<b>38.0</b>	<b>13.6</b>	<b>2.0</b>	<b>0.0</b>		

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – LOUISIANA											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Alexandria	1	4	0.7	2,901	85.4	100.0	39.9	3.8	0.0	10.8	0.0	
Baton Rouge	25	188	17.1	16,114	89.3	56.0	34.1	3.1	0.0	7.6	44.0	
Houma-Thibodaux	5	21	3.4	5,675	87.3	60.0	27.5	4.0	0.0	8.7	40.0	
Lafayette-Opelousas-Morgan City	20	223	13.7	17,104	89.1	55.0	32.9	3.5	0.0	7.4	45.0	
Lake Charles-Jennings	6	716	4.1	5,990	88.1	66.7	32.2	3.0	0.0	9.0	33.3	
Monroe-Ruston	15	600	10.3	5,595	88.8	33.3	26.1	3.3	0.0	7.8	66.7	
New Orleans-Metairie-Hammond	65	1,680	44.5	49,119	91.3	44.6	37.6	2.6	1.5	6.1	53.8	
Shreveport-Bossier City-Minden	9	693	6.2	9,452	88.9	44.4	33.7	2.9	11.1	8.2	44.4	
<b>Total</b>	<b>146</b>	<b>4,125</b>	<b>100.0</b>	<b>111,950</b>	<b>89.8</b>	<b>48.6</b>	<b>34.7</b>	<b>3.0</b>	<b>1.4</b>	<b>7.2</b>	<b>50.0</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – LOUISIANA											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Alexandria	1	1	4.5	--	86.7	100.0	--	3.3	0.0	10.1	0.0	
Baton Rouge	4	10	18.2	--	90.2	100.0	--	2.7	0.0	7.0	0.0	
Houma-Thibodaux	1	1	4.5	--	88.1	100.0	--	3.6	0.0	8.3	0.0	
Lafayette-Opelousas-Morgan City	4	8	18.2	--	90.2	100.0	--	3.0	0.0	6.8	0.0	
Lake Charles-Jennings	--	--	--	--	89.0	--	--	2.6	--	8.4	--	
Monroe-Ruston	2	5	9.1	--	89.6	100.0	--	3.0	0.0	7.4	0.0	
New Orleans-Metairie-Hammond	10	33	45.5	--	92.0	100.0	--	2.3	0.0	5.7	0.0	
Shreveport-Bossier City-Minden	--	--	--	--	89.9	--	--	2.5	--	7.6	--	
<b>Total</b>	<b>22</b>	<b>58</b>	<b>100.0</b>	<b>--</b>	<b>90.7</b>	<b>100.0</b>	<b>--</b>	<b>2.6</b>	<b>0.0</b>	<b>6.7</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – LOUISIANA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Alexandria	14	25	2.6	8.5	21.4	11.9	7.1	43.5	64.3	36.0	7.1	0.0	0.0	
Baton Rouge	64	112	12.0	12.0	12.5	29.1	60.9	20.9	12.5	38.1	14.1	0.0	0.0	
Houma-Thibodaux	26	45	4.9	0.0	0.0	16.0	57.7	64.3	34.6	19.7	7.7	0.0	0.0	
Lafayette-Opelousas-Morgan City	77	127	14.4	5.2	3.9	24.9	42.9	42.2	50.6	27.6	2.6	0.0	0.0	
Lake Charles-Jennings	38	65	7.1	4.6	2.6	22.9	44.7	37.3	36.8	35.2	15.8	0.0	0.0	
Monroe-Ruston	69	118	12.9	17.9	23.2	13.0	37.7	30.8	29.0	38.3	10.1	0.0	0.0	
New Orleans-Metairie-Hammond	210	385	39.4	9.9	13.8	23.8	30.0	35.0	41.0	30.5	13.8	0.8	1.4	
Shreveport-Bossier City-Minden	35	56	6.6	11.6	17.1	20.2	34.3	32.0	37.1	36.2	11.4	0.0	0.0	
<b>Total</b>	<b>533</b>	<b>933</b>	<b>100.0</b>	<b>9.2</b>	<b>12.4</b>	<b>22.6</b>	<b>38.6</b>	<b>35.8</b>	<b>37.1</b>	<b>32.1</b>	<b>11.3</b>	<b>0.3</b>	<b>0.6</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – LOUISIANA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Alexandria	17	34	7.1	6.2	11.8	22.1	47.1	33.5	29.4	38.2	11.8	0.0	0.0	
Baton Rouge	24	44	10.0	15.1	25.0	17.2	29.2	31.2	41.7	34.2	4.2	2.4	0.0	
Houma-Thibodaux	9	15	3.8	3.6	0.0	16.0	22.2	46.9	66.7	30.9	11.1	2.7	0.0	
Lafayette-Opelousas-Morgan City	45	78	18.8	7.5	15.6	25.7	33.3	30.7	40.0	35.3	11.1	0.9	0.0	
Lake Charles-Jennings	16	28	6.7	8.7	6.3	16.7	25.0	36.2	25.0	37.1	31.3	1.3	12.5	
Monroe-Ruston	33	48	13.8	15.6	36.4	16.2	24.2	30.5	27.3	37.7	12.1	0.0	0.0	
New Orleans-Metairie-Hammond	83	144	34.6	8.6	9.6	26.4	48.2	31.6	30.1	32.0	10.8	1.4	1.2	
Shreveport-Bossier City-Minden	13	24	5.4	6.5	7.7	25.9	38.5	29.4	23.1	35.7	23.1	2.4	7.7	
<b>Total</b>	<b>240</b>	<b>415</b>	<b>100.0</b>	<b>9.1</b>	<b>15.4</b>	<b>23.1</b>	<b>37.1</b>	<b>32.4</b>	<b>33.3</b>	<b>34.0</b>	<b>12.5</b>	<b>1.5</b>	<b>1.7</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Alexandria	14	25	2.6	26.3	28.6	14.7	42.9	16.6	21.4	42.5	7.1	0.0	0.0
Baton Rouge	64	112	12.0	28.2	50.0	15.6	37.5	16.2	9.4	40.1	3.1	0.0	0.0
Houma-Thibodaux	26	45	4.9	25.7	50.0	15.3	23.1	17.1	7.7	42.0	19.2	0.0	0.0
Lafayette-Opelousas-Morgan City	77	127	14.4	27.1	41.6	14.7	28.6	15.0	14.3	43.1	7.8	0.0	7.8
Lake Charles-Jennings	38	65	7.1	25.5	34.2	15.5	31.6	16.0	23.7	43.1	10.5	0.0	0.0
Monroe-Ruston	69	118	12.9	27.4	49.3	14.8	30.4	15.3	15.9	42.5	4.3	0.0	0.0
New Orleans-Metairie-Hammond	210	385	39.4	26.6	43.3	15.0	30.0	15.4	19.0	43.1	7.1	0.0	0.5
Shreveport-Bossier City-Minden	35	56	6.6	24.4	25.7	15.6	34.3	15.6	22.9	44.3	17.1	0.0	0.0
<b>Total</b>	<b>533</b>	<b>933</b>	<b>100.0</b>	<b>26.5</b>	<b>42.8</b>	<b>15.1</b>	<b>31.1</b>	<b>15.6</b>	<b>16.9</b>	<b>42.7</b>	<b>7.9</b>	<b>0.0</b>	<b>1.3</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Alexandria	17	34	7.1	25.7	41.2	14.7	47.1	17.7	5.9	41.9	5.9	0.0	0.0
Baton Rouge	24	44	10.0	28.1	50.0	15.2	29.2	16.4	12.5	40.2	8.3	0.0	0.0
Houma-Thibodaux	9	15	3.8	26.9	44.4	15.1	33.3	14.7	22.2	43.3	0.0	0.0	0.0
Lafayette-Opelousas-Morgan City	45	78	18.8	26.2	40.0	14.6	28.9	15.7	17.8	43.4	13.3	0.0	0.0
Lake Charles-Jennings	16	28	6.7	24.9	25.0	15.4	25.0	16.3	18.8	43.3	18.8	0.0	12.5
Monroe-Ruston	33	48	13.8	27.1	63.6	14.5	21.2	15.9	12.1	42.4	3.0	0.0	0.0
New Orleans-Metairie-Hammond	83	144	34.6	27.1	49.4	14.4	22.9	15.5	20.5	43.0	6.0	0.0	1.2
Shreveport-Bossier City-Minden	13	24	5.4	26.1	30.8	15.4	38.5	15.9	30.8	42.6	0.0	0.0	0.0
<b>Total</b>	<b>240</b>	<b>415</b>	<b>100.0</b>	<b>26.8</b>	<b>46.3</b>	<b>14.8</b>	<b>27.5</b>	<b>15.8</b>	<b>17.5</b>	<b>42.6</b>	<b>7.5</b>	<b>0.0</b>	<b>1.3</b>

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

**MARYLAND**

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – MARYLAND																			2019-2021	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	
Salisbury-Cambridge	15	69	100.0	4,929	1.1	0.0	1.2	15.4	26.7	13.4	50.7	66.7	50.2	32.8	6.7	35.1	0.1	0.0	0.2	
<b>Total</b>	<b>15</b>	<b>69</b>	<b>100.0</b>	<b>4,929</b>	<b>1.1</b>	<b>0.0</b>	<b>1.2</b>	<b>15.4</b>	<b>26.7</b>	<b>13.4</b>	<b>50.7</b>	<b>66.7</b>	<b>50.2</b>	<b>32.8</b>	<b>6.7</b>	<b>35.1</b>	<b>0.1</b>	<b>0.0</b>	<b>0.2</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – MARYLAND														2022	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Salisbury-Cambridge	5	11	100.0	4.6	0.0	13.7	20.0	51.7	40.0	28.7	40.0	1.3	0.0		
<b>Total</b>	<b>5</b>	<b>11</b>	<b>100.0</b>	<b>4.6</b>	<b>0.0</b>	<b>13.7</b>	<b>20.0</b>	<b>51.7</b>	<b>40.0</b>	<b>28.7</b>	<b>40.0</b>	<b>1.3</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - MARYLAND</b>												<b>2019-2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Salisbury-Cambridge	15	69	100.0	4,929	86.3	80.0	42.0	3.6	0.0	10.1	20.0	
<b>Total</b>	<b>15</b>	<b>69</b>	<b>100.0</b>	<b>4,929</b>	<b>86.3</b>	<b>80.0</b>	<b>42.0</b>	<b>3.6</b>	<b>0.0</b>	<b>10.1</b>	<b>20.0</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues - MARYLAND</b>												<b>2022</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Salisbury-Cambridge	5	11	100.0	--	88.0	100.0	--	3.1	0.0	8.9	0.0	
<b>Total</b>	<b>5</b>	<b>11</b>	<b>100.0</b>	<b>--</b>	<b>88.0</b>	<b>100.0</b>	<b>--</b>	<b>3.1</b>	<b>0.0</b>	<b>8.9</b>	<b>0.0</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – MARYLAND</b>														<b>2019-2021</b>
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Salisbury-Cambridge	75	143	100.0	2.0	2.7	23.1	52.0	44.5	34.7	30.4	10.7	0.0	0.0	
<b>Total</b>	<b>75</b>	<b>143</b>	<b>100.0</b>	<b>2.0</b>	<b>2.7</b>	<b>23.1</b>	<b>52.0</b>	<b>44.5</b>	<b>34.7</b>	<b>30.4</b>	<b>10.7</b>	<b>0.0</b>	<b>0.0</b>	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														

<b>Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – MARYLAND</b>														<b>2022</b>
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Salisbury-Cambridge	25	49	100.0	5.6	4.0	15.3	36.0	54.1	48.0	23.4	12.0	1.7	0.0	
<b>Total</b>	<b>25</b>	<b>49</b>	<b>100.0</b>	<b>5.6</b>	<b>4.0</b>	<b>15.3</b>	<b>36.0</b>	<b>54.1</b>	<b>48.0</b>	<b>23.4</b>	<b>12.0</b>	<b>1.7</b>	<b>0.0</b>	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														



<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – MARYLAND</b>														<b>2019-2021</b>
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Salisbury-Cambridge	75	143	100.0	25.5	54.7	16.6	21.3	16.8	14.7	41.1	2.7	0.0	6.7	
<b>Total</b>	<b>75</b>	<b>143</b>	<b>100.0</b>	<b>25.5</b>	<b>54.7</b>	<b>16.6</b>	<b>21.3</b>	<b>16.8</b>	<b>14.7</b>	<b>41.1</b>	<b>2.7</b>	<b>0.0</b>	<b>6.7</b>	
<i>Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – MARYLAND</b>														<b>2022</b>
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Salisbury-Cambridge	25	49	100.0	26.4	60.0	16.5	28.0	18.1	8.0	39.0	4.0	0.0	0.0	
<b>Total</b>	<b>25</b>	<b>49</b>	<b>100.0</b>	<b>26.4</b>	<b>60.0</b>	<b>16.5</b>	<b>28.0</b>	<b>18.1</b>	<b>8.0</b>	<b>39.0</b>	<b>4.0</b>	<b>0.0</b>	<b>0.0</b>	
<i>Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.                      Due to rounding, totals may not equal 100.0%</i>														

**MISSISSIPPI**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – MISSISSIPPI</b>																			<b>2019-2021</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.		
Cleveland- Indianola	2	9	1.1	971	0.0	0.0	0.0	48.7	0.0	48.1	26.6	50.0	28.5	24.7	50.0	23.4	0.0	0.0	0.0		
Columbus-West Point	18	124	10.2	1,725	7.0	16.7	4.5	19.1	44.4	19.3	42.9	27.8	38.4	31.0	11.1	37.8	0.0	0.0	0.0		
Gulfport-Biloxi-Pascagoula	41	231	23.3	10,050	7.4	9.8	6.9	13.1	19.5	12.1	55.8	51.2	54.7	23.4	19.5	26.0	0.3	0.0	0.2		
Jackson-Vicksburg-Brookhaven	25	164	14.2	9,325	12.0	12.0	11.6	32.7	24.0	30.6	30.4	56.0	31.6	24.9	8.0	26.1	0.0	0.0	0.0		
Memphis-Forrest City	5	49	2.8	4,588	0.0	0.0	0.0	13.0	40.0	7.8	43.3	60.0	42.6	43.8	0.0	49.6	0.0	0.0	0.0		
MS Non-MSA	64	487	36.4	9,447	5.5	4.7	5.2	22.6	17.2	19.5	41.4	40.6	44.3	29.9	37.5	30.7	0.5	0.0	0.2		
Tupelo-Corinth	21	158	11.9	4,224	0.0	0.0	0.0	10.6	0.0	9.8	52.0	52.4	50.3	37.0	47.6	39.7	0.3	0.0	0.2		
<b>Total</b>	<b>176</b>	<b>1,222</b>	<b>100.0</b>	<b>40,330</b>	<b>6.3</b>	<b>7.4</b>	<b>5.8</b>	<b>21.5</b>	<b>19.9</b>	<b>18.6</b>	<b>42.6</b>	<b>46.0</b>	<b>43.8</b>	<b>29.3</b>	<b>26.7</b>	<b>31.7</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – MISSISSIPPI</b>														<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Cleveland-Indianola	1	3	3.8	7.5	0.0	38.9	0.0	29.1	0.0	24.5	100.0	0.0	0.0		
Columbus-West Point	5	11	19.2	10.0	20.0	8.6	40.0	35.4	20.0	39.1	20.0	7.0	0.0		
Gulfport-Biloxi- Pascagoula	2	6	7.7	6.8	0.0	16.8	50.0	40.8	0.0	32.3	50.0	3.4	0.0		
Jackson-Vicksburg- Brookhaven	7	14	26.9	15.4	14.3	22.7	42.9	31.5	14.3	25.0	14.3	5.4	14.3		
Memphis-Forrest City	0	0	0.0	0.0	0.0	16.6	0.0	38.8	0.0	44.6	0.0	0.0	0.0		
MS Non-MSA	7	32	26.9	11.5	14.3	18.4	42.9	41.1	0.0	28.0	42.9	1.0	0.0		
Tupelo-Corinth	4	12	15.4	2.4	0.0	2.7	0.0	62.5	50.0	29.9	50.0	2.5	0.0		
<b>Total</b>	<b>26</b>	<b>78</b>	<b>100.0</b>	<b>9.1</b>	<b>11.5</b>	<b>17.5</b>	<b>34.6</b>	<b>40.0</b>	<b>15.4</b>	<b>30.5</b>	<b>34.6</b>	<b>2.9</b>	<b>3.8</b>		

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – MISSISSIPPI</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cleveland-Indianola	2	9	1.1	971	83.5	0.0	36.3	3.2	0.0	13.3	100.0	
Columbus-West Point	18	124	10.2	1,725	82.4	55.6	42.0	4.8	0.0	12.9	44.4	
Gulfport-Biloxi-Pascagoula	41	231	23.3	10,050	85.6	61.0	42.4	3.0	0.0	11.4	39.0	
Jackson-Vicksburg-Brookhaven	25	164	14.2	9,325	85.6	68.0	36.2	3.6	0.0	10.8	32.0	
Memphis-Forrest City	5	49	2.8	4,588	86.6	20.0	38.3	2.8	0.0	10.5	80.0	
MS Non-MSA	64	487	36.4	9,447	82.8	46.9	41.6	3.8	0.0	13.4	53.1	
Tupelo-Corinth	21	158	11.9	4,224	82.1	38.1	36.6	4.6	0.0	13.3	61.9	
<b>Total</b>	<b>176</b>	<b>1,222</b>	<b>100.0</b>	<b>40,330</b>	<b>84.4</b>	<b>51.7</b>	<b>39.5</b>	<b>3.6</b>	<b>0.0</b>	<b>12.0</b>	<b>48.3</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – MISSISSIPPI</b>											<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cleveland-Indianola	1	3	3.8	--	83.8	100.0	--	3.0	0.0	13.2	0.0	
Columbus-West Point	5	11	19.2	--	83.1	100.0	--	4.3	0.0	12.5	0.0	
Gulfport-Biloxi-Pascagoula	2	6	7.7	--	85.5	100.0	--	2.9	0.0	11.6	0.0	
Jackson-Vicksburg-Brookhaven	7	14	26.9	--	85.7	100.0	--	3.3	0.0	11.0	0.0	
Memphis-Forrest City	--	--	--	--	86.8	--	--	2.7	--	10.5	--	
MS Non-MSA	7	32	26.9	--	82.9	100.0	--	3.6	0.0	13.5	0.0	
Tupelo-Corinth	4	12	15.4	--	82.2	100.0	--	4.4	0.0	13.4	0.0	
<b>Total</b>	<b>26</b>	<b>78</b>	<b>100.0</b>	<b>--</b>	<b>84.5</b>	<b>100.0</b>	<b>--</b>	<b>3.4</b>	<b>0.0</b>	<b>12.1</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – MISSISSIPPI													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cleveland-Indianola	22	35	2.5	0.0	0.0	51.4	50.0	30.5	40.9	18.1	9.1	0.0	0.0	
Columbus-West Point	65	133	7.4	5.7	9.2	21.3	21.5	39.9	40.0	33.1	29.2	0.0	0.0	
Gulfport-Biloxi-Pascagoula	164	296	18.8	6.1	3.7	13.9	17.1	56.8	63.4	23.1	15.9	0.1	0.0	
Jackson-Vicksburg-Brookhaven	201	364	23.0	14.0	5.0	32.3	32.3	32.1	43.8	21.7	18.9	0.0	0.0	
Memphis-Forrest	27	67	3.1	0.0	0.0	14.5	33.3	48.0	51.9	37.5	14.8	0.0	0.0	
MS Non-MSA	267	476	30.5	5.7	4.9	21.5	25.5	44.9	46.8	27.5	22.5	0.3	0.4	
Tupelo-Corinth	128	236	14.6	0.0	0.0	5.1	4.7	61.9	71.1	33.0	24.2	0.0	0.0	
<b>Total</b>	<b>874</b>	<b>1,607</b>	<b>100.0</b>	<b>6.2</b>	<b>4.0</b>	<b>20.5</b>	<b>23.0</b>	<b>46.3</b>	<b>52.3</b>	<b>26.9</b>	<b>20.6</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – MISSISSIPPI													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cleveland-Indianola	7	15	2.1	10.9	0.0	39.7	42.9	32.6	57.1	16.7	0.0	0.0	0.0	
Columbus-West Point	28	52	8.3	9.0	3.6	11.0	28.6	29.4	46.4	46.3	17.9	4.3	3.6	
Gulfport-Biloxi-Pascagoula	49	88	14.5	6.3	6.1	16.7	20.4	40.4	42.9	33.3	24.5	3.3	6.1	
Jackson-Vicksburg-Brookhaven	68	140	20.1	16.8	8.8	26.7	33.8	35.6	38.2	19.9	17.6	0.9	1.5	
Memphis-Forrest City	7	13	2.1	0.0	0.0	17.1	28.6	40.3	14.3	42.6	57.1	0.0	0.0	
MS Non-MSA	123	237	36.4	9.1	13.8	19.6	17.9	43.0	47.2	27.2	19.5	1.2	1.6	
Tupelo-Corinth	56	103	16.6	1.4	1.8	4.1	5.4	64.4	60.7	29.1	30.4	1.0	1.8	
<b>Total</b>	<b>338</b>	<b>648</b>	<b>100.0</b>	<b>8.3</b>	<b>8.3</b>	<b>18.7</b>	<b>21.0</b>	<b>42.0</b>	<b>46.5</b>	<b>29.5</b>	<b>21.9</b>	<b>1.5</b>	<b>2.4</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cleveland-Indianola	22	35	2.5	32.9	54.5	16.4	27.3	16.2	13.6	34.5	4.5	0.0	0.0
Columbus-West Point	65	133	7.4	25.1	32.3	14.4	26.2	14.0	16.9	46.5	21.5	0.0	3.1
Gulfport-Biloxi-Pascagoula	164	296	18.8	24.5	36.0	15.8	34.8	17.8	15.2	41.9	12.8	0.0	1.2
Jackson-Vicksburg-Brookhaven	201	364	23.0	30.7	40.8	16.7	27.4	16.0	19.9	36.6	11.9	0.0	0.0
Memphis-Forrest City	27	67	3.1	17.0	22.2	14.1	29.6	19.4	37.0	49.5	0.0	0.0	11.1
MS Non-MSA	267	476	30.5	27.7	31.5	14.8	31.5	15.5	19.9	42.0	15.7	0.0	1.5
Tupelo-Corinth	128	236	14.6	21.5	28.9	14.6	33.6	16.3	21.9	47.6	15.6	0.0	0.0
<b>Total</b>	<b>874</b>	<b>1,607</b>	<b>100.0</b>	<b>25.9</b>	<b>34.4</b>	<b>15.4</b>	<b>30.9</b>	<b>16.5</b>	<b>19.5</b>	<b>42.2</b>	<b>14.0</b>	<b>0.0</b>	<b>1.3</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cleveland-Indianola M	7	15	2.1	34.4	14.3	15.7	57.1	14.7	14.3	35.2	14.3	0.0	0.0
Columbus-West Point	28	52	8.3	26.4	17.9	13.4	39.3	14.2	25.0	46.1	17.9	0.0	0.0
Gulfport-Biloxi-Pascagoula	49	88	14.5	24.9	40.8	15.2	28.6	17.9	20.4	42.0	8.2	0.0	2.0
Jackson-Vicksburg-Brookhaven	68	140	20.1	30.9	29.4	16.4	33.8	16.7	22.1	36.0	13.2	0.0	1.5
Memphis-Forrest City	7	13	2.1	16.7	42.9	13.6	0.0	17.7	14.3	52.1	42.9	0.0	0.0
MS Non-MSA	123	237	36.4	29.1	28.5	14.6	32.5	15.4	24.4	40.9	14.6	0.0	0.0
Tupelo-Corinth	56	103	16.6	21.0	25.0	13.6	35.7	16.2	26.8	49.3	10.7	0.0	1.8
<b>Total</b>	<b>338</b>	<b>648</b>	<b>100.0</b>	<b>26.3</b>	<b>29.0</b>	<b>14.9</b>	<b>33.1</b>	<b>16.5</b>	<b>23.4</b>	<b>42.3</b>	<b>13.6</b>	<b>0.0</b>	<b>0.9</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

**NEW YORK**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – NEW YORK</b>																			<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts			
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	
Albany-Schenectady	16	141	11.2	14,744	18.3	25.0	15.4	14.5	25.0	14.0	43.1	50.0	44.9	23.6	0.0	25.3	0.5	0.0	0.4	
Buffalo-Cheektowaga-Olean	53	318	37.1	27,216	10.0	15.1	9.8	12.4	15.1	11.7	38.0	41.5	37.3	35.8	28.3	38.7	3.8	0.0	2.5	
Elmira-Corning	5	15	3.5	1,070	19.2	40.0	17.8	11.3	20.0	13.4	41.3	20.0	41.1	28.1	20.0	27.8	0.1	0.0	0.0	
NY Non-MSA	14	109	9.8	2,527	8.1	14.3	7.1	8.1	0.0	7.3	80.7	85.7	82.9	3.2	0.0	2.7	0.0	0.0	0.0	
Rochester-Batavia-Seneca Falls	30	150	21.0	22,925	9.6	33.3	8.4	13.2	30.0	11.5	43.2	36.7	45.2	33.9	0.0	34.8	0.2	0.0	0.1	
Syracuse-Auburn*	1	1	0.7	1,738	0.0	0.0	0.0	35.8	0.0	33.4	64.2	100.0	66.6	0.0	0.0	0.0	0.0	0.0	0.0	
Utica-Rome	21	329	14.7	5,432	12.7	0.0	11.0	12.8	9.5	11.2	46.7	76.2	47.8	26.3	14.3	28.9	1.4	0.0	1.1	
Watertown-Fort Drum	3	50	2.1	2,205	0.0	0.0	0.0	17.6	0.0	13.1	75.6	100.0	80.6	6.8	0.0	6.3	0.0	0.0	0.0	
<b>Total</b>	<b>143</b>	<b>1,113</b>	<b>100.0</b>	<b>77,857</b>	<b>11.5</b>	<b>18.2</b>	<b>10.0</b>	<b>13.6</b>	<b>16.8</b>	<b>12.5</b>	<b>44.2</b>	<b>51.7</b>	<b>45.2</b>	<b>29.2</b>	<b>13.3</b>	<b>31.2</b>	<b>1.5</b>	<b>0.0</b>	<b>1.1</b>	

*Source: 2021 D&B Data; 01/01/2019 – 12/31/2021 Bank Data; 2021 CRA Aggregate Data, “-” data not available. Due to rounding, totals may not equal 100.0%.*  
*\*The Syracuse CSA spans 01/01/2019-10/09/2020, as WNB exited the market with the closing of a singular branch.*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – NEW YORK</b>														<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Albany-Schenectady	2	3	7.7	9.2	0.0	11.9	0.0	42.4	100.0	24.5	0.0	12.1	0.0		
Buffalo-Cheektowaga-Olean	12	28	46.2	8.2	33.3	15.2	25.0	42.7	25.0	31.1	16.7	2.8	0.0		
Elmira-Corning	1	4	3.8	19.6	0.0	17.9	0.0	39.7	0.0	22.8	100.0	0.1	0.0		
NY Non-MSA	0	0	0.0	5.3	0.0	14.7	0.0	75.8	0.0	4.2	0.0	0.0	0.0		
Rochester-Batavia	7	29	26.9	6.3	28.6	17.3	28.6	40.0	42.9	33.6	0.0	2.8	0.0		
Utica-Rome	2	2	7.7	7.3	0.0	13.3	0.0	48.0	100.0	23.2	0.0	8.2	0.0		
Watertown-Fort Drum	2	4	7.7	0.0	0.0	24.1	0.0	49.2	100.0	26.5	0.0	0.2	0.0		
<b>Total</b>	<b>26</b>	<b>70</b>	<b>100.0</b>	<b>7.6</b>	<b>23.1</b>	<b>15.6</b>	<b>19.2</b>	<b>43.9</b>	<b>46.2</b>	<b>28.0</b>	<b>11.5</b>	<b>4.9</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; “-” data not available. Due to rounding, totals may not equal 100.0%.*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – NEW YORK											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Albany-Schenectady	16	141	11.2	14,744	84.7	50.0	41.6	4.4	0.0	10.9	50.0	
Buffalo-Cheektowaga-Olean	53	318	37.1	27,216	84.5	73.6	43.2	5.0	0.0	10.6	26.4	
Elmira-Corning	5	15	3.5	1,070	79.0	60.0	42.9	5.4	0.0	15.6	40.0	
NY Non-MSA	14	109	9.8	2,527	80.5	35.7	39.1	5.1	0.0	14.4	64.3	
Rochester-Batavia-Seneca Falls	30	150	21.0	22,925	85.4	66.7	41.3	4.8	3.3	9.8	30.0	
Syracuse-Auburn*	1	1	0.7	1,738	84.5	100.0	45.2	3.5	0.0	12.0	0.0	
Utica-Rome	21	329	14.7	5,432	83.0	57.1	44.9	4.9	0.0	12.1	42.9	
Watertown-Fort Drum	3	50	2.1	2,205	79.3	66.7	40.8	5.1	0.0	15.6	33.3	
<b>Total</b>	<b>143</b>	<b>1,113</b>	<b>100.0</b>	<b>77,857</b>	<b>84.3</b>	<b>62.9</b>	<b>42.3</b>	<b>4.8</b>	<b>0.7</b>	<b>10.9</b>	<b>36.4</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%  
 \*The Syracuse CSA spans 01/01/2019-10/09/2020, as WNB exited the market with the closing of a singular branch.

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – NEW YORK											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Albany-Schenectady	2	3	7.7	--	85.4	100.0	--	4.0	0.0	10.6	0.0	
Buffalo-Cheektowaga-Olean	12	28	46.2	--	84.9	100.0	--	4.7	0.0	10.4	0.0	
Elmira-Corning	1	4	3.8	--	79.4	100.0	--	5.0	0.0	15.6	0.0	
NY Non-MSA	--	--	--	--	80.8	--	--	4.9	--	14.2	--	
Rochester-Batavia-Seneca Falls	7	29	26.9	--		100.0	--	4.6	0.0	9.8	0.0	
Utica-Rome	2	2	7.7	--	83.4	100.0	--	4.6	0.0	11.9	0.0	
Watertown-Fort Drum	2	4	7.7	--	79.8	100.0	--	4.9	0.0	15.3	0.0	
<b>Total</b>	<b>26</b>	<b>70</b>	<b>100.0</b>	<b>--</b>	<b>85.6</b>	<b>84.7</b>	<b>100.0</b>	<b>--</b>	<b>4.5</b>	<b>0.0</b>	<b>10.8</b>	<b>0.0</b>

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – NEW YORK													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Albany-Schenectady	79	154	8.6	10.8	34.2	20.2	25.3	47.1	31.6	21.8	8.9	0.2	0.0	
Buffalo-Cheektowaga-Olean	288	540	31.2	11.9	16.7	14.1	22.9	44.4	44.4	29.5	16.0	0.1	0.0	
Elmira-Corning	38	68	4.1	12.2	15.8	10.6	21.1	53.2	60.5	24.0	2.6	0.0	0.0	
NY Non-MSA	71	130	7.7	3.8	0.0	10.6	9.9	83.4	90.1	2.2	0.0	0.0	0.0	
Rochester-Batavia-Seneca Falls	266	447	28.9	8.9	15.8	15.0	32.0	48.1	46.6	27.9	5.6	0.1	0.0	
Syracuse-Auburn*	26	47	2.8	0.0	0.0	34.7	57.7	65.3	42.3	0.0	0.0	0.0	0.0	
Utica-Rome	124	237	13.4	10.9	4.0	11.6	24.2	54.3	71.0	23.2	0.8	0.0	0.0	
Watertown-Fort Drum	30	61	3.3	0.0	0.0	18.6	20.0	74.4	76.7	6.9	0.0	0.0	3.3	
<b>Total</b>	<b>922</b>	<b>1,684</b>	<b>100.0</b>	<b>9.7</b>	<b>13.9</b>	<b>15.8</b>	<b>25.7</b>	<b>50.3</b>	<b>52.7</b>	<b>24.2</b>	<b>7.6</b>	<b>0.1</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%  
 \*The Syracuse CSA spans 01/01/2019-10/09/2020, as WNB exited the market with the closing of a singular branch.

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – NEW YORK													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Albany-Schenectady	20	41	7.9	11.2	25.0	17.9	25.0	43.9	25.0	25.2	20.0	1.8	5.0	
Buffalo-Cheektowaga-Olean	73	158	28.9	9.7	19.2	17.3	23.3	45.9	42.5	26.4	15.1	0.7	0.0	
Elmira-Corning	15	29	5.9	12.7	20.0	15.2	6.7	53.8	73.3	18.3	0.0	0.0	0.0	
NY Non-MSA	21	40	8.3	2.6	0.0	19.2	52.4	73.5	38.1	4.7	9.5	0.0	0.0	
Rochester-Batavia-Seneca Falls	77	153	30.4	8.7	18.2	20.0	35.1	41.7	36.4	29.0	9.1	0.6	1.3	
Utica-Rome	37	74	14.6	6.4	8.1	17.6	16.2	50.2	62.2	21.7	2.7	4.2	10.8	
Watertown-Fort Drum	10	19	4.0	0.0	0.0	23.3	30.0	53.9	50.0	22.9	20.0	0.0	0.0	
<b>Total</b>	<b>253</b>	<b>514</b>	<b>100.0</b>	<b>8.7</b>	<b>15.4</b>	<b>18.9</b>	<b>27.7</b>	<b>46.8</b>	<b>43.9</b>	<b>24.6</b>	<b>10.7</b>	<b>1.0</b>	<b>2.4</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%



<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – NEW YORK</b>														<b>2019-2021</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Albany-Schenectady	79	154	8.6	26.2	59.5	15.9	29.1	18.6	7.6	39.4	1.3	0.0	2.5		
Buffalo-Cheektowaga-Olean	288	540	31.2	26.0	56.9	15.5	30.6	16.6	9.0	41.9	2.4	0.0	1.0		
Elmira-Corning	38	68	4.1	26.4	55.3	15.3	28.9	17.4	10.5	41.0	5.3	0.0	0.0		
NY Non-MSA	71	130	7.7	27.4	52.1	16.9	29.6	19.2	11.3	36.5	2.8	0.0	4.2		
Rochester-Batavia-Seneca Falls	266	447	28.9	24.2	68.8	16.0	22.6	17.4	6.4	42.4	1.5	0.0	0.8		
Syracuse-Auburn	26	47	2.8	26.3	57.7	18.5	23.1	18.0	19.2	37.2	0.0	0.0	0.0		
Utica-Rome	124	237	13.4	24.7	48.4	16.2	30.6	17.2	12.9	41.9	4.0	0.0	4.0		
Watertown-Fort Drum	30	61	3.3	22.6	40.0	16.2	40.0	20.8	13.3	40.5	6.7	0.0	0.0		
<b>Total</b>	<b>922</b>	<b>1,684</b>	<b>100.0</b>	<b>25.4</b>	<b>58.5</b>	<b>15.9</b>	<b>28.1</b>	<b>17.5</b>	<b>9.3</b>	<b>41.1</b>	<b>2.5</b>	<b>0.0</b>	<b>1.6</b>		

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%  
\*The Syracuse CSA spans 01/01/2019-10/09/2020, as WNB exited the market with the closing of a singular branch.*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – NEW YORK</b>														<b>2022</b>	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers			
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans		
Albany-Schenectady	20	41	7.9	26.1	55.0	16.8	30.0	17.7	0.0	39.4	5.0	0.0	10.0		
Buffalo-Cheektowaga-Olean	73	158	28.9	25.5	50.7	15.6	30.1	16.9	16.4	42.0	1.4	0.0	1.4		
Elmira-Corning	15	29	5.9	24.7	40.0	15.2	40.0	17.9	20.0	42.2	0.0	0.0	0.0		
NY Non-MSA	21	40	8.3	28.5	23.8	16.4	57.1	18.2	14.3	36.9	4.8	0.0	0.0		
Rochester-Batavia- Seneca Falls	77	153	30.4	24.5	45.5	15.5	31.2	17.6	11.7	42.4	5.2	0.0	6.5		
Utica-Rome	37	74	14.6	24.7	45.9	15.6	24.3	18.1	16.2	41.6	2.7	0.0	10.8		
Watertown-Fort Drum	10	19	4.0	22.3	50.0	17.2	20.0	18.4	10.0	42.2	0.0	0.0	20.0		
<b>Total</b>	<b>253</b>	<b>514</b>	<b>100.0</b>	<b>25.3</b>	<b>45.9</b>	<b>15.9</b>	<b>32.0</b>	<b>17.5</b>	<b>13.4</b>	<b>41.3</b>	<b>3.2</b>	<b>0.0</b>	<b>5.5</b>		

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

## NORTH CAROLINA

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Asheville-Marion-Brevard	17	372	2.2	13,494	3.0	0.0	3.0	14.7	17.6	15.8	53.5	82.4	53.3	28.8	0.0	27.8	0.0	0.0	0.0
Fayetteville-Sanford-Lumberton	70	500	9.2	15,110	2.4	7.1	1.9	20.0	24.3	17.9	50.0	55.7	50.2	27.6	12.9	30.0	0.1	0.0	0.0
Goldsboro	33	433	4.3	1,910	0.0	0.0	0.0	35.3	36.4	31.1	53.0	45.5	55.0	11.8	18.2	13.9	0.0	0.0	0.0
Greensboro-Winston-Salem-High Point	248	2,511	32.6	40,528	4.3	6.9	4.0	20.2	29.4	20.4	38.9	44.4	40.5	36.3	19.4	34.9	0.3	0.0	0.3
Greenville-Kinston-Washington	14	106	1.8	3,586	16.1	7.1	13.3	16.0	21.4	16.0	36.9	42.9	38.9	31.0	28.6	31.8	0.0	0.0	0.0
Hickory-Lenoir-Morganton	71	645	9.3	7,039	0.0	0.0	0.0	14.4	18.3	15.0	58.2	52.1	57.9	27.4	29.6	27.1	0.0	0.0	0.0
Jacksonville	10	222	1.3	3,010	0.0	0.0	0.0	11.1	0.0	8.6	68.7	80.0	71.7	19.5	20.0	19.6	0.7	0.0	0.1
New Bern-Morehead City	28	168	3.7	4,328	4.9	0.0	4.2	10.2	3.6	9.5	41.7	50.0	41.2	43.1	46.4	45.1	0.0	0.0	0.0
NC Non-MSA	54	426	7.1	6,820	0.0	0.0	0.0	22.2	29.6	21.1	71.0	66.7	72.0	6.8	3.7	6.8	0.0	0.0	0.0
Raleigh-Durham-Cary	165	2,168	21.7	60,761	4.9	8.5	4.5	22.0	33.3	21.8	32.9	38.8	34.5	39.8	19.4	39.0	0.5	0.0	0.3
Rocky Mount-Wilson-Roanoke Rapids	51	480	6.7	5,112	1.8	0.0	1.3	17.9	35.3	18.7	56.3	54.9	54.6	24.0	9.8	25.4	0.0	0.0	0.0
<b>Total</b>	<b>761</b>	<b>8,031</b>	<b>100.0</b>	<b>161,698</b>	<b>3.9</b>	<b>4.9</b>	<b>3.6</b>	<b>19.8</b>	<b>27.7</b>	<b>19.6</b>	<b>42.5</b>	<b>48.8</b>	<b>43.5</b>	<b>33.5</b>	<b>18.7</b>	<b>33.2</b>	<b>0.3</b>	<b>0.0</b>	<b>0.2</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – NORTH CAROLINA														2022
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Asheville-Marion-Brevard	3	5	2.4	0.8	0.0	19.6	33.3	56.7	66.7	22.7	0.0	0.2	0.0	
Fayetteville-Sanford-Lumberton	14	37	11.3	2.1	0.0	21.6	57.1	42.9	21.4	33.1	21.4	0.3	0.0	
Goldsboro	4	7	3.2	9.5	0.0	22.2	0.0	47.2	50.0	19.8	50.0	1.3	0.0	
Greensboro-Winston-Salem-High Point	48	103	38.7	6.8	12.5	18.1	20.8	40.4	47.9	34.4	18.8	0.3	0.0	
Greenville-Kinston-Washington	3	5	2.4	4.0	0.0	17.9	0.0	42.9	66.7	30.3	33.3	4.9	0.0	
Hickory-Lenoir-Morganton	9	36	7.3	0.7	0.0	19.4	11.1	51.1	66.7	28.9	22.2	0.0	0.0	
Jacksonville	2	7	1.6	0.1	0.0	20.5	50.0	46.6	50.0	32.2	0.0	0.7	0.0	
New Bern-Morehead City	1	1	0.8	0.0	0.0	12.0	0.0	42.5	0.0	44.1	100.0	1.3	0.0	
NC Non-MSA	13	33	10.5	2.6	0.0	24.9	46.2	65.7	53.8	5.7	0.0	1.1	0.0	
Raleigh-Durham-Cary	21	44	16.9	6.5	4.8	17.7	33.3	35.3	42.9	39.3	14.3	1.3	4.8	
Rocky Mount-Wilson-Roanoke Rapids	6	21	4.8	3.6	0.0	24.5	16.7	44.7	83.3	26.1	0.0	1.1	0.0	
<b>Total</b>	<b>124</b>	<b>299</b>	<b>100.0</b>	<b>4.9</b>	<b>5.6</b>	<b>18.9</b>	<b>28.2</b>	<b>41.9</b>	<b>48.4</b>	<b>33.5</b>	<b>16.9</b>	<b>0.9</b>	<b>0.8</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – NORTH CAROLINA</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Asheville-Marion-Brevard	17	372	2.2	13,494	89.7	52.9	49.6	3.1	0.0	7.2	47.1	
Fayetteville-Sanford-Lumberton	70	500	9.2	15,110	87.5	51.4	48.9	3.1	2.9	9.4	45.7	
Goldsboro	33	433	4.3	1,910	84.9	42.4	47.6	3.9	0.0	11.2	57.6	
Greensboro-Winston-Salem-High Point	248	2,511	32.6	40,528	87.0	64.1	49.3	4.0	1.2	9.0	34.7	
Greenville-Kinston-Washington	14	106	1.8	3,586	86.5	35.7	49.9	3.4	0.0	10.1	64.3	
Hickory-Lenoir-Morganton	71	645	9.3	7,039	84.5	45.1	49.0	4.9	0.0	10.6	54.9	
Jacksonville NC MSA	10	222	1.3	3,010	87.6	60.0	52.0	2.5	10.0	9.9	30.0	
New Bern-Morehead City	28	168	3.7	4,328	87.2	57.1	55.7	3.4	0.0	9.4	42.9	
NC Non-MSA	54	426	7.1	6,820	84.9	53.7	52.5	3.6	0.0	11.5	46.3	
Raleigh-Durham-Cary	165	2,168	21.7	60,761	89.2	44.8	47.1	3.1	0.6	7.7	54.5	
Rocky Mount-Wilson-Roanoke Rapids	51	480	6.7	5,112	83.8	54.9	43.6	4.2	0.0	12.0	45.1	
<b>Total</b>	<b>761</b>	<b>8,031</b>	<b>100.0</b>	<b>161,698</b>	<b>87.8</b>	<b>53.6</b>	<b>48.6</b>	<b>3.4</b>	<b>0.9</b>	<b>8.8</b>	<b>45.5</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – NORTH CAROLINA</b>												<b>2022</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Businesses with Revenues &lt;= 1MM</b>			<b>Businesses with Revenues &gt; 1MM</b>		<b>Businesses with Revenues Not Available</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Asheville-Marion-Brevard	3	5	2.4	--	91.5	100.0	--	2.4	0.0	6.1	0.0	
Fayetteville-Sanford-Lumberton	14	37	11.3	--	90.2	100.0	--	2.3	0.0	7.5	0.0	
Goldsboro	4	7	3.2	--	88.1	100.0	--	3.0	0.0	9.0	0.0	
Greensboro-Winston-Salem-High Point	48	103	38.7	--	89.7	100.0	--	3.0	0.0	7.3	0.0	
Greenville-Kinston-Washington	3	5	2.4	--	89.5	100.0	--	2.5	0.0	8.0	0.0	
Hickory-Lenoir-Morganton	9	36	7.3	--	87.1	100.0	--	3.9	0.0	9.0	0.0	
Jacksonville	2	7	1.6	--	90.1	100.0	--	1.9	0.0	8.1	0.0	
New Bern-Morehead City	1	1	0.8	--	89.5	100.0	--	2.6	0.0	7.9	0.0	
NC Non-MSA	13	33	10.5	--	87.6	100.0	--	2.9	0.0	9.6	0.0	
Raleigh-Durham-Cary	21	44	16.9	--	91.7	100.0	--	2.2	0.0	6.1	0.0	
Rocky Mount-Wilson-Roanoke Rapids	6	21	4.8	--	87.5	100.0	--	3.1	0.0	9.4	0.0	
<b>Total</b>	<b>124</b>	<b>299</b>	<b>100.0</b>	<b>--</b>	<b>90.4</b>	<b>100.0</b>	<b>--</b>	<b>2.6</b>	<b>0.0</b>	<b>7.1</b>	<b>0.0</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – NORTH CAROLINA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Asheville-Marion-Brevard	100	176	3.3	2.0	3.0	13.2	19.0	62.5	62.0	22.3	16.0	0.0	0.0	
Fayetteville-Sanford-Lumberton	329	608	10.8	2.1	2.4	21.1	26.7	55.2	58.1	21.6	12.8	0.0	0.0	
Goldsboro	125	224	4.1	0.0	0.0	33.1	41.6	54.5	50.4	12.4	8.0	0.0	0.0	
Greensboro-Winston-Salem-High Point	1,097	2,053	36.0	5.5	8.7	22.3	32.6	43.6	44.9	28.5	13.7	0.1	0.1	
Greenville-Kinston-Washington	45	79	1.5	11.9	8.9	22.7	22.2	38.6	33.3	26.7	35.6	0.0	0.0	
Hickory-Lenoir-Morganton	309	580	10.1	0.0	0.0	13.2	21.7	66.7	68.6	20.0	9.7	0.0	0.0	
Jacksonville	40	70	1.3	0.0	0.0	11.5	10.0	72.3	77.5	16.2	10.0	0.0	2.5	
New Bern-Morehead City	111	208	3.6	3.2	2.7	10.1	8.1	47.3	57.7	39.4	31.5	0.0	0.0	
NC Non-MSA	244	451	8.0	0.0	0.0	20.8	23.0	73.5	70.1	5.7	7.0	0.0	0.0	
Raleigh-Durham-Cary	465	897	15.2	6.8	8.8	26.3	42.6	33.1	32.5	33.8	16.1	0.0	0.0	
Rocky Mount-Wilson-Roanoke Rapids	185	325	6.1	0.8	1.1	23.5	25.4	54.4	55.1	21.3	18.4	0.0	0.0	
<b>Total</b>	<b>3,050</b>	<b>5,671</b>	<b>100.0</b>	<b>4.1</b>	<b>5.1</b>	<b>21.6</b>	<b>29.8</b>	<b>48.2</b>	<b>51.0</b>	<b>26.0</b>	<b>14.1</b>	<b>0.0</b>	<b>0.1</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – NORTH CAROLINA														2022
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Asheville-Marion-Brevard	32	66	3.4	1.0	3.1	17.1	15.6	60.6	62.5	20.9	18.8	0.4	0.0	
Fayetteville-Sanford-Lumberton	105	212	11.2	1.6	3.8	26.0	41.9	44.0	32.4	28.0	21.9	0.3	0.0	
Goldsboro	29	62	3.1	5.7	10.3	18.6	27.6	50.7	48.3	23.0	13.8	1.9	0.0	
Greensboro-Winston-Salem-High Point	312	620	33.2	6.4	10.6	19.8	28.5	46.1	49.4	27.3	11.2	0.3	0.3	
Greenville-Kinston-Washington	13	30	1.4	4.8	15.4	15.4	23.1	49.0	38.5	23.5	15.4	7.4	7.7	
Hickory-Lenoir-Morganton	95	175	10.1	0.6	1.1	15.6	32.6	61.3	48.4	22.5	17.9	0.0	0.0	
Jacksonville	13	25	1.4	0.8	0.0	20.3	0.0	52.2	84.6	26.7	15.4	0.0	0.0	
New Bern-Morehead City	43	81	4.6	0.0	0.0	14.4	14.0	41.1	53.5	42.8	32.6	1.7	0.0	
NC Non-MSA	100	198	10.6	1.8	1.0	21.3	29.0	70.2	66.0	5.3	4.0	1.3	0.0	
Raleigh-Durham-Cary	132	261	14.0	7.9	15.2	20.7	37.9	36.0	35.6	34.1	9.1	1.2	2.3	
Rocky Mount-Wilson-Roanoke Rapids	67	116	7.1	3.0	3.0	27.5	28.4	46.0	47.8	22.0	19.4	1.4	1.5	
<b>Total</b>	<b>941</b>	<b>1,846</b>	<b>100.0</b>	<b>4.7</b>	<b>7.1</b>	<b>20.6</b>	<b>30.2</b>	<b>46.5</b>	<b>48.0</b>	<b>27.3</b>	<b>14.0</b>	<b>0.9</b>	<b>0.6</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – NORTH CAROLINA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Asheville-Marion-Brevard	100	176	3.3	23.2	56.0	16.5	26.0	18.2	9.0	42.2	7.0	0.0	2.0	
Fayetteville-Sanford-Lumberton	329	608	10.8	23.5	34.0	15.7	31.3	17.3	22.5	43.6	10.9	0.0	1.2	
Goldsboro	125	224	4.1	23.8	32.0	16.9	36.8	16.3	19.2	43.0	11.2	0.0	0.8	
Greensboro-Winston-Salem-High Point	1,097	2,053	36.0	23.6	43.1	16.7	32.3	17.3	16.3	42.3	6.4	0.0	1.9	
Greenville-Kinston-Washington	45	79	1.5	26.5	35.6	15.4	37.8	15.8	24.4	42.3	2.2	0.0	0.0	
Hickory-Lenoir-Morganton	309	580	10.1	23.5	40.8	16.6	32.4	18.0	17.5	42.0	7.8	0.0	1.6	
Jacksonville	40	70	1.3	21.1	35.0	17.6	35.0	21.6	17.5	39.7	10.0	0.0	2.5	
New Bern-Morehead City	111	208	3.6	20.2	42.3	14.6	27.0	18.4	18.9	46.8	9.0	0.0	2.7	
NC Non-MSA	244	451	8.0	28.3	41.4	16.5	26.6	17.5	18.0	37.7	13.1	0.0	0.8	
Raleigh-Durham-Cary	465	897	15.2	23.6	55.5	16.6	31.0	17.5	8.6	42.3	4.3	0.0	0.6	
Rocky Mount-Wilson-Roanoke Rapids	185	325	6.1	26.4	36.8	15.6	36.2	17.6	18.4	40.4	5.4	0.0	3.2	
<b>Total</b>	<b>3,050</b>	<b>5,671</b>	<b>100.0</b>	<b>23.9</b>	<b>43.0</b>	<b>16.4</b>	<b>31.7</b>	<b>17.6</b>	<b>16.3</b>	<b>42.1</b>	<b>7.5</b>	<b>0.0</b>	<b>1.6</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%



Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – NORTH CAROLINA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Asheville-Marion-Brevard	32	66	3.4	23.1	34.4	16.7	34.4	17.6	15.6	42.5	6.3	0.0	9.4	
Fayetteville-Sanford-Lumberton	105	212	11.2	24.5	29.5	15.7	37.1	17.2	17.1	42.6	16.2	0.0	0.0	
Goldsboro	29	62	3.1	23.2	13.8	17.0	34.5	18.1	48.3	41.7	3.4	0.0	0.0	
Greensboro-Winston-Salem-High Point	312	620	33.2	23.8	38.5	16.5	34.0	17.4	18.9	42.3	7.4	0.0	1.3	
Greenville-Kinston-Washington	13	30	1.4	24.3	46.2	16.4	23.1	17.2	15.4	42.1	7.7	0.0	7.7	
Hickory-Lenoir-Morganton	95	175	10.1	23.4	47.4	16.7	32.6	18.3	13.7	41.6	6.3	0.0	0.0	
Jacksonville	13	25	1.4	20.0	15.4	18.6	38.5	20.4	23.1	41.0	15.4	0.0	7.7	
New Bern-Morehead City	43	81	4.6	20.0	34.9	16.2	34.9	17.0	18.6	46.8	7.0	0.0	4.7	
NC Non-MSA	100	198	10.6	26.4	31.0	17.1	33.0	17.3	25.0	39.2	8.0	0.0	3.0	
Raleigh-Durham-Cary	132	261	14.0	23.4	59.8	16.6	28.0	17.7	7.6	42.3	3.8	0.0	0.8	
Rocky Mount-Wilson-Roanoke Rapids	67	116	7.1	27.1	38.8	15.6	25.4	17.3	22.4	40.0	11.9	0.0	1.5	
<b>Total</b>	<b>941</b>	<b>1,846</b>	<b>100.0</b>	<b>23.8</b>	<b>39.3</b>	<b>16.5</b>	<b>32.6</b>	<b>17.6</b>	<b>18.3</b>	<b>42.1</b>	<b>8.1</b>	<b>0.0</b>	<b>1.7</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
 Due to rounding, totals may not equal 100.0%

**OHIO**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – OHIO</b>																			<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>			
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	
Cleveland-Akron-Canton	132	2,340	26.1	81,342	7.9	11.4	7.6	15.7	15.9	15.4	39.1	38.6	37.5	36.5	32.6	38.9	0.8	1.5	0.7	
Columbus-Marion-Zanesville	109	850	21.5	44,503	9.2	7.3	8.8	20.1	31.2	18.3	34.6	38.5	33.0	35.6	22.9	39.6	0.5	0.0	0.3	
Dayton-Springfield-Kettering	53	456	10.5	16,446	6.8	13.2	6.0	18.2	35.8	17.9	43.4	34.0	42.6	31.6	17.0	33.4	0.0	0.0	0.0	
Lima-Van Wert-Celina	24	197	4.7	3,009	2.3	8.3	1.8	11.9	12.5	8.9	46.2	54.2	43.9	39.6	25.0	45.4	0.0	0.0	0.0	
Mansfield-Ashland-Bucyrus	13	120	2.6	2,688	6.6	0.0	5.7	15.5	7.7	14.0	55.4	76.9	59.6	22.5	15.4	20.8	0.0	0.0	0.0	
OH Non-MSA	30	241	5.9	4,338	0.0	0.0	0.0	28.4	30.0	18.5	61.9	50.0	67.6	9.7	20.0	13.9	0.0	0.0	0.0	
Toledo-Findlay-Tiffin	103	788	20.4	14,073	9.3	9.7	7.9	11.7	24.3	10.8	43.8	49.5	44.0	35.1	16.5	37.4	0.1	0.0	0.0	
Wheeling	3	23	0.6	991	0.0	0.0	0.0	15.3	33.3	14.8	64.6	66.7	65.9	20.1	0.0	19.3	0.0	0.0	0.0	
Youngstown-Warren	39	184	7.7	9,829	7.3	10.3	6.7	11.9	5.1	10.0	46.4	56.4	46.8	34.5	28.2	36.5	0.0	0.0	0.0	
<b>Total</b>	<b>506</b>	<b>5,199</b>	<b>100.0</b>	<b>177,219</b>	<b>7.8</b>	<b>9.1</b>	<b>7.4</b>	<b>16.7</b>	<b>22.7</b>	<b>15.6</b>	<b>40.4</b>	<b>44.3</b>	<b>39.2</b>	<b>34.6</b>	<b>23.5</b>	<b>37.4</b>	<b>0.5</b>	<b>0.4</b>	<b>0.4</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – OHIO</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Cleveland-Akron-Canton	20	60	25.0	10.0	25.0	14.8	25.0	32.3	30.0	41.1	20.0	1.9	0.0	
Columbus-Marion-Zanesville	17	60	21.3	8.7	17.6	18.2	17.6	35.9	58.8	35.8	0.0	1.4	5.9	
Dayton-Springfield-Kettering	8	17	10.0	7.8	12.5	18.0	12.5	35.2	50.0	38.6	25.0	0.4	0.0	
Lima-Van Wert-Celina	4	9	5.0	3.6	0.0	15.1	0.0	46.3	75.0	35.0	25.0	0.0	0.0	
Mansfield-Ashland-Bucyrus	4	9	5.0	3.5	0.0	18.6	25.0	56.9	75.0	20.2	0.0	0.9	0.0	
OH Non-MSA	4	8	5.0	0.0	0.0	21.0	25.0	64.3	75.0	14.6	0.0	0.1	0.0	
Toledo-Findlay-Tiffin	12	28	15.0	6.3	0.0	16.1	25.0	37.9	33.3	32.3	41.7	7.5	0.0	
Wheeling	1	2	1.3	0.0	0.0	25.0	0.0	42.1	100.0	32.9	0.0	0.0	0.0	
Youngstown-Warren	10	25	12.5	5.7	0.0	16.7	20.0	48.7	70.0	28.5	10.0	0.4	0.0	
<b>Total</b>	<b>80</b>	<b>218</b>	<b>100.0</b>	<b>8.5</b>	<b>11.3</b>	<b>16.4</b>	<b>20.0</b>	<b>36.0</b>	<b>51.3</b>	<b>37.2</b>	<b>16.3</b>	<b>1.9</b>	<b>1.3</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – OHIO											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cleveland-Akron-Canton	132	2,340	26.1	81,342	83.2	50.0	49.1	6.0	0.0	10.8	50.0	
Columbus-Marion-Zanesville	109	850	21.5	44,503	83.2	51.4	45.3	5.0	0.9	11.9	47.7	
Dayton-Springfield-Kettering	53	456	10.5	16,446	81.3	54.7	48.3	5.8	0.0	12.9	45.3	
Lima-Van Wert-Celina	24	197	4.7	3,009	77.2	58.3	47.8	7.1	4.2	15.7	37.5	
Mansfield-Ashland-Bucyrus	13	120	2.6	2,688	79.5	61.5	47.2	5.8	0.0	14.7	38.5	
OH Non-MSA	30	241	5.9	4,338	78.7	66.7	50.0	5.6	0.0	15.8	33.3	
Toledo-Findlay-Tiffin	103	788	20.4	14,073	79.8	58.3	50.0	6.4	0.0	13.8	41.7	
Wheeling	3	23	0.6	991	78.2	66.7	43.4	5.5	0.0	16.3	33.3	
Youngstown-Warren	39	184	7.7	9,829	81.0	64.1	47.9	6.0	0.0	13.0	35.9	
<b>Total</b>	<b>506</b>	<b>5,199</b>	<b>100.0</b>	<b>177,219</b>	<b>82.2</b>	<b>55.3</b>	<b>48.0</b>	<b>5.8</b>	<b>0.4</b>	<b>12.0</b>	<b>44.3</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – OHIO											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Cleveland-Akron-Canton	20	60	25.0	--	90.8	100.0	--	3.2	0.0	6.1	0.0	
Columbus-Marion-Zanesville	17	60	21.3	--	90.8	100.0	--	2.6	0.0	6.6	0.0	
Dayton-Springfield-Kettering	8	17	10.0	--	88.4	100.0	--	3.4	0.0	8.2	0.0	
Lima-Van Wert-Celina	4	9	5.0	--	84.7	100.0	--	4.6	0.0	10.7	0.0	
Mansfield-Ashland-Bucyrus	4	9	5.0	--	86.4	100.0	--	3.7	0.0	9.9	0.0	
OH Non-MSA	4	8	5.0	--	84.9	100.0	--	3.8	0.0	11.3	0.0	
Toledo-Findlay-Tiffin	12	28	15.0	--	87.8	100.0	--	3.7	0.0	8.5	0.0	
Wheeling	1	2	1.3	--	83.6	100.0	--	4.0	0.0	12.3	0.0	
Youngstown-Warren	10	25	12.5	--	88.0	100.0	--	3.7	0.0	8.3	0.0	
<b>Total</b>	<b>80</b>	<b>218</b>	<b>100.0</b>	<b>--</b>	<b>89.9</b>	<b>100.0</b>	<b>--</b>	<b>3.2</b>	<b>0.0</b>	<b>7.0</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – OHIO													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cleveland-Akron-Canton	561	1,064	23.7	9.8	14.1	19.8	32.3	42.7	41.4	27.3	12.1	0.4	0.2	
Columbus-Marion-Zanesville	500	953	21.1	9.6	9.0	23.8	36.6	39.7	43.8	26.9	10.6	0.2	0.0	
Dayton-Springfield-Kettering	274	491	11.6	8.8	13.9	20.6	36.9	44.4	36.9	26.2	12.4	0.0	0.0	
Lima-Van Wert-Celina	122	227	5.1	3.0	2.5	10.3	18.9	49.9	59.0	36.8	19.7	0.0	0.0	
Mansfield-Ashland-Bucyrus	81	159	3.4	2.9	3.7	16.6	19.8	61.0	65.4	19.4	11.1	0.0	0.0	
OH Non-MSA	216	424	9.1	0.0	0.0	22.8	35.2	66.2	56.9	11.0	7.9	0.0	0.0	
Toledo-Findlay-Tiffin	401	767	16.9	9.3	15.0	14.9	16.5	46.5	52.9	29.3	15.7	0.0	0.0	
Wheeling	30	54	1.3	0.0	0.0	19.6	16.7	69.2	76.7	11.2	6.7	0.0	0.0	
Youngstown-Warren	185	352	7.8	7.1	5.4	15.0	17.8	53.6	64.3	24.3	12.4	0.0	0.0	
<b>Total</b>	<b>2,370</b>	<b>4,491</b>	<b>100.0</b>	<b>8.7</b>	<b>10.0</b>	<b>19.8</b>	<b>28.9</b>	<b>44.8</b>	<b>48.7</b>	<b>26.5</b>	<b>12.4</b>	<b>0.2</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – OHIO													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Cleveland-Akron-Canton	245	485	26.2	8.9	12.7	19.5	34.7	41.5	44.9	28.9	6.5	1.3	1.2	
Columbus-Marion-Zanesville	199	416	21.3	9.0	8.0	22.1	29.6	41.7	49.7	26.4	12.6	0.8	0.0	
Dayton-Springfield-Kettering	124	258	13.3	8.2	23.4	21.4	29.0	40.7	36.3	29.3	11.3	0.4	0.0	
Lima-Van Wert-Celina	57	138	6.1	4.1	1.8	15.4	17.5	50.5	61.4	30.0	19.3	0.0	0.0	
Mansfield-Ashland-Bucyrus	26	60	2.8	7.1	19.2	12.5	11.5	62.4	65.4	18.0	3.8	0.0	0.0	
OH Non-MSA	67	135	7.2	0.0	0.0	19.7	22.4	66.1	71.6	14.1	6.0	0.1	0.0	
Toledo-Findlay-Tiffin	113	277	12.1	7.2	5.3	16.9	33.6	44.1	45.1	29.2	14.2	2.6	1.8	
Wheeling	14	22	1.5	0.0	0.0	26.9	14.3	55.7	71.4	17.5	14.3	0.0	0.0	
Youngstown-Warren	90	204	9.6	5.5	4.4	18.4	18.9	56.5	67.8	19.0	8.9	0.7	0.0	
<b>Total</b>	<b>935</b>	<b>1,995</b>	<b>100.0</b>	<b>8.0</b>	<b>9.8</b>	<b>19.8</b>	<b>28.3</b>	<b>44.2</b>	<b>50.9</b>	<b>27.0</b>	<b>10.4</b>	<b>1.1</b>	<b>0.5</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – OHIO 2019-2021**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cleveland-Akron-Canton	561	1,064	23.7	25.1	43.7	15.6	31.4	17.3	16.6	42.1	5.5	0.0	2.9
Columbus-Marion-Zanesville	500	953	21.1	25.1	48.4	16.7	29.8	17.7	13.0	40.5	5.8	0.0	3.0
Dayton-Springfield-Kettering	274	491	11.6	24.5	49.3	15.8	32.5	17.3	11.3	42.3	4.0	0.0	2.9
Lima-Van Wert-Celina	122	227	5.1	21.1	38.5	16.0	32.8	17.4	17.2	45.5	8.2	0.0	3.3
Mansfield-Ashland-Bucyrus	81	159	3.4	21.5	33.3	17.3	34.6	19.0	14.8	42.2	11.1	0.0	6.2
OH Non-MSA	216	424	9.1	23.3	41.2	17.4	33.8	19.0	11.6	40.3	10.6	0.0	2.8
Toledo-Findlay-Tiffin	401	767	16.9	24.4	38.7	15.6	33.7	16.7	15.0	43.4	8.7	0.0	4.0
Wheeling	30	54	1.3	23.6	36.7	17.0	16.7	17.5	20.0	42.0	26.7	0.0	0.0
Youngstown-Warren OH CSA	185	352	7.8	24.4	36.8	16.0	28.1	18.0	22.2	41.5	9.2	0.0	3.8
<b>Total</b>	<b>2,370</b>	<b>4,491</b>	<b>100.0</b>	<b>24.7</b>	<b>43.0</b>	<b>16.0</b>	<b>31.5</b>	<b>17.4</b>	<b>14.9</b>	<b>41.9</b>	<b>7.3</b>	<b>0.0</b>	<b>3.2</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – OHIO 2022**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Cleveland-Akron-Canton	245	485	26.2	24.5	40.8	15.9	36.3	17.4	16.3	42.2	3.3	0.0	3.3
Columbus-Marion-Zanesville	199	416	21.3	24.3	37.7	17.0	36.7	18.5	16.6	40.2	4.5	0.0	4.5
Dayton-Springfield-Kettering	124	258	13.3	24.2	35.5	16.3	38.7	17.5	10.5	42.1	10.5	0.0	4.8
Lima-Van Wert-Celina	57	138	6.1	20.1	15.8	15.5	42.1	18.5	24.6	45.8	12.3	0.0	5.3
Mansfield-Ashland-Bucyrus	26	60	2.8	22.5	11.5	16.6	61.5	18.9	15.4	42.0	7.7	0.0	3.8
OH Non-MSA	67	135	7.2	22.9	41.8	16.9	37.3	19.0	13.4	41.2	7.5	0.0	0.0
Toledo-Findlay-Tiffin	113	277	12.1	23.9	39.8	16.1	36.3	17.7	11.5	42.3	7.1	0.0	5.3
Wheeling	14	22	1.5	21.9	35.7	16.2	21.4	18.2	14.3	43.7	21.4	0.0	7.1
Youngstown-Warren	90	204	9.6	25.1	32.2	16.6	36.7	17.8	15.6	40.6	13.3	0.0	2.2
<b>Total</b>	<b>935</b>	<b>1,995</b>	<b>100.0</b>	<b>24.2</b>	<b>36.2</b>	<b>16.3</b>	<b>37.6</b>	<b>17.8</b>	<b>15.2</b>	<b>41.7</b>	<b>7.2</b>	<b>0.0</b>	<b>3.9</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

## PENNSYLVANIA

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate
Altoona-Huntingdon	5	32	1.8	2,125	7.3	0.0	4.7	8.7	0.0	7.9	76.1	100.0	78.0	7.9	0.0	9.5	0.0	0.0	0.0
Bloomsburg-Berwick-Sunbury	13	139	4.7	1,957	0.0	0.0	0.0	13.7	7.7	12.6	77.5	76.9	77.2	8.5	15.4	10.1	0.3	0.0	0.2
East Stroudsburg	28	248	10.1	4,358	0.0	0.0	0.0	18.2	17.9	14.6	76.5	75.0	79.2	5.3	7.1	6.2	0.0	0.0	0.0
Erie-Meadville	23	64	8.3	5,849	12.4	0.0	10.3	10.9	0.0	9.7	52.4	78.3	54.1	24.3	21.7	26.0	0.0	0.0	0.0
Harrisburg-York-Lebanon	40	247	14.4	20,804	6.9	10.0	5.5	14.1	0.0	11.7	58.2	77.5	60.5	20.8	12.5	22.3	0.0	0.0	0.0
Johnstown-Somerset	8	26	2.9	2,351	2.0	0.0	2.4	18.4	0.0	15.0	47.9	50.0	50.5	31.7	50.0	32.1	0.0	0.0	0.0
Lancaster	5	29	1.8	13,518	4.1	0.0	3.6	11.0	0.0	9.9	72.4	80.0	73.7	12.4	20.0	12.8	0.0	0.0	0.0
Newark	6	101	2.2	1,261	0.0	0.0	0.0	51.7	33.3	51.6	48.3	66.7	48.4	0.0	0.0	0.0	0.0	0.0	0.0
PA Non-MSA	32	711	11.6	5,476	0.0	0.0	0.0	12.5	12.5	9.2	71.4	84.4	71.7	16.1	3.1	19.1	0.0	0.0	0.0
Philadelphia-Reading-Camden	27	448	9.7	118,080	5.8	11.1	4.9	20.0	18.5	18.5	38.5	51.9	41.4	35.0	18.5	34.7	0.6	0.0	0.6
Pittsburgh-New Castle-Weirton	71	943	25.6	56,388	4.9	7.0	3.8	16.5	23.9	14.9	41.2	62.0	40.1	36.5	7.0	33.4	0.9	0.0	7.8
Scranton-Wilkes-Barre-Hazleton	19	67	6.9	11,078	2.9	15.8	2.4	20.2	26.3	18.0	50.0	47.4	51.3	24.8	10.5	26.7	2.1	0.0	1.6
<b>Total</b>	<b>277</b>	<b>3,055</b>	<b>100.0</b>	<b>243,245</b>	<b>5.3</b>	<b>5.4</b>	<b>4.3</b>	<b>17.7</b>	<b>14.1</b>	<b>16.1</b>	<b>45.8</b>	<b>69.0</b>	<b>47.3</b>	<b>30.5</b>	<b>11.6</b>	<b>30.1</b>	<b>0.6</b>	<b>0.0</b>	<b>2.2</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

**Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – PENNSYLVANIA****2022**

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Altoona-Huntingdon	1	5	1.7	1.9	0.0	21.1	0.0	58.5	100.0	18.5	0.0	0.0	0.0
Bloomsburg-Berwick-Sunbury	2	16	3.4	0.0	0.0	9.8	0.0	67.5	50.0	22.6	50.0	0.1	0.0
East Stroudsburg	4	16	6.9	0.0	0.0	7.1	0.0	76.3	100.0	16.0	0.0	0.6	0.0
Erie-Meadville	8	10	13.8	8.0	0.0	19.2	37.5	44.8	50.0	26.9	12.5	1.1	0.0
Harrisburg-York-Lebanon	6	18	10.3	6.0	0.0	15.2	33.3	54.3	50.0	24.6	16.7	0.0	0.0
Johnstown-Somerset	2	4	3.4	3.5	0.0	14.5	0.0	59.1	100.0	23.0	0.0	0.0	0.0
Lancaster	1	4	1.7	3.7	0.0	11.3	0.0	69.3	0.0	15.7	100.0	0.0	0.0
Newark	1	1	1.7	1.2	0.0	66.8	100.0	32.0	0.0	0.0	0.0	0.0	0.0
PA Non-MSA	7	755	12.1	1.9	14.3	6.5	0.0	76.7	85.7	13.1	0.0	1.8	0.0
Philadelphia-Reading-Camden	7	16	12.1	5.6	42.9	20.5	28.6	36.4	14.3	35.9	0.0	1.6	14.3
Pittsburgh-New Castle-Weirton	15	50	25.9	5.4	20.0	16.8	20.0	38.5	53.3	37.7	6.7	1.7	0.0
Scranton-Wilkes-Barre-Hazleton	4	13	6.9	5.0	0.0	25.2	75.0	40.7	25.0	28.7	0.0	0.4	0.0
<b>Total</b>	<b>58</b>	<b>908</b>	<b>100.0</b>	<b>5.2</b>	<b>12.1</b>	<b>18.5</b>	<b>24.1</b>	<b>42.8</b>	<b>53.4</b>	<b>32.2</b>	<b>8.6</b>	<b>1.3</b>	<b>1.7</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%



<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – PENNSYLVANIA</b>											<b>2019-2021</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Altoona-Huntingdon	5	32	1.8	2,125	83.7	60.0	53.3	5.0	20.0	11.2	20.0	
Bloomsburg-Berwick-Sunbury	13	139	4.7	1,957	85.6	53.8	51.7	4.0	7.7	10.4	38.5	
East Stroudsburg	28	248	10.1	4,358	90.7	35.7	48.1	2.5	3.6	6.9	60.7	
Erie-Meadville	23	64	8.3	5,849	83.5	78.3	50.5	5.6	0.0	11.0	21.7	
Harrisburg-York-Lebanon	40	247	14.4	20,804	86.4	60.0	44.2	3.9	0.0	9.7	40.0	
Johnstown-Somerset	8	26	2.9	2,351	81.6	87.5	44.6	5.0	0.0	13.4	12.5	
Lancaster	5	29	1.8	13,518	88.1	60.0	50.8	4.5	0.0	7.4	40.0	
Newark	6	101	2.2	1,261	91.5	16.7	51.9	2.2	0.0	6.4	83.3	
PA Non-MSA	32	711	11.6	5,476	84.0	62.5	47.2	4.4	0.0	11.6	37.5	
Philadelphia-Reading-Camden	27	448	9.7	118,080	90.6	48.1	44.9	3.4	0.0	5.9	51.9	
Pittsburgh-New Castle-Weirton	71	943	25.6	56,388	86.1	52.1	48.0	4.4	0.0	9.5	47.9	
Scranton-Wilkes-Barre-Hazleton	19	67	6.9	11,078	86.4	63.2	40.3	4.0	0.0	9.6	36.8	
<b>Total</b>	<b>277</b>	<b>3,055</b>	<b>100.0</b>	<b>243,245</b>	<b>88.3</b>	<b>56.0</b>	<b>46.1</b>	<b>3.9</b>	<b>1.1</b>	<b>7.8</b>	<b>43.0</b>	

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Altoona-Huntingdon	1	5	1.7	--	85.3	100.0	--	4.4	0.0	10.3	0.0
Bloomsburg-Berwick-Sunbury	2	16	3.4	--	87.0	100.0	--	3.5	0.0	9.5	0.0
East Stroudsburg	4	16	6.9	--	92.1	75.0	--	2.0	25.0	5.9	0.0
Erie-Meadville	8	10	13.8	--	85.3	100.0	--	4.8	0.0	9.9	0.0
Harrisburg-York-Lebanon	6	18	10.3	--	88.1	100.0	--	3.3	0.0	8.6	0.0
Johnstown-Somerset	2	4	3.4	--	83.4	100.0	--	4.5	0.0	12.1	0.0
Lancaster	1	4	1.7	--	89.8	100.0	--	3.7	0.0	6.5	0.0
Newark	1	1	1.7	--	92.9	100.0	--	1.7	0.0	5.4	0.0
PA Non-MSA	7	755	12.1	--	85.8	71.4	--	3.8	28.6	10.5	0.0
Philadelphia-Reading-Camden	7	16	12.1	--	92.0	85.7	--	2.8	14.3	5.2	0.0
Pittsburgh-New Castle-Weirton	15	50	25.9	--	87.7	100.0	--	3.7	0.0	8.5	0.0
Scranton-Wilkes-Barre-Hazleton	4	13	6.9	--	88.3	100.0	--	3.4	0.0	8.4	0.0
<b>Total</b>	<b>58</b>	<b>908</b>	<b>100.0</b>	<b>--</b>	<b>89.9</b>	<b>93.1</b>	<b>--</b>	<b>3.2</b>	<b>6.9</b>	<b>6.9</b>	<b>0.0</b>

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Altoona-Huntingdon	70	153	4.9	6.5	5.7	10.7	5.7	74.6	84.3	8.2	4.3	0.0	0.0
Bloomsburg-Berwick-Sunbury	79	160	5.5	0.0	0.0	12.8	20.3	81.1	74.7	6.0	5.1	0.1	0.0
East Stroudsburg	53	129	3.7	0.0	0.0	12.1	9.4	82.7	90.6	5.2	0.0	0.0	0.0
Erie-Meadville	135	262	9.4	9.0	7.4	11.6	8.1	55.8	58.5	23.7	25.2	0.0	0.7
Harrisburg-York-Lebanon	168	321	11.7	6.3	17.9	12.2	10.7	61.6	61.3	19.9	10.1	0.0	0.0
Johnstown-Somerset	81	145	5.6	2.0	1.2	18.5	6.2	54.4	65.4	25.1	27.2	0.0	0.0
Lancaster	30	59	2.1	3.8	20.0	11.1	10.0	72.9	66.7	12.3	3.3	0.0	0.0
Newark	15	33	1.0	0.0	0.0	54.5	53.3	45.5	46.7	0.0	0.0	0.0	0.0
PA Non-MSA	186	356	12.9	0.0	0.0	11.4	21.5	75.2	73.7	13.4	4.8	0.0	0.0
Philadelphia-Reading-Camden	165	327	11.5	8.3	28.5	24.0	26.1	40.2	38.2	27.4	7.3	0.2	0.0
Pittsburgh-New Castle-Weirton	351	714	24.4	5.1	9.7	21.5	34.8	48.3	48.7	25.0	6.8	0.1	0.0
Scranton-Wilkes-Barre-Hazleton	105	188	7.3	3.2	10.5	20.7	35.2	52.5	45.7	23.2	8.6	0.4	0.0
<b>Total</b>	<b>1,438</b>	<b>2,847</b>	<b>100.0</b>	<b>6.0</b>	<b>9.9</b>	<b>19.8</b>	<b>21.7</b>	<b>50.9</b>	<b>58.9</b>	<b>23.2</b>	<b>9.4</b>	<b>0.1</b>	<b>0.1</b>

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – PENNSYLVANIA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Altoona-Huntingdon	16	38	3.1	1.9	0.0	20.4	18.8	57.7	75.0	19.9	6.3	0.0	0.0	
Bloomsburg-Berwick-Sunbury	46	100	9.0	0.0	0.0	14.4	17.4	66.7	82.6	19.0	0.0	0.0	0.0	
East Stroudsburg	21	54	4.1	0.0	0.0	8.1	19.0	76.7	76.2	14.3	4.8	0.9	0.0	
Erie-Meadville	46	94	9.0	6.0	4.3	19.3	19.6	49.3	60.9	24.8	15.2	0.7	0.0	
Harrisburg-York-Lebanon	54	104	10.5	5.5	18.5	14.0	20.4	57.8	51.9	22.7	9.3	0.0	0.0	
Johnstown-Somerset	20	43	3.9	4.7	0.0	13.4	0.0	60.5	60.0	21.4	40.0	0.0	0.0	
Lancaster	17	33	3.3	2.8	11.8	13.8	17.6	71.1	58.8	12.4	11.8	0.0	0.0	
Newark	10	22	2.0	2.2	0.0	65.2	60.0	32.6	40.0	0.0	0.0	0.0	0.0	
PA Non-MSA	64	130	12.5	2.4	4.7	7.6	4.7	76.5	76.6	12.8	10.9	0.7	3.1	
Philadelphia-Reading-Camden	56	119	10.9	7.5	23.2	23.9	35.7	39.1	39.3	28.5	1.8	1.0	0.0	
Pittsburgh-New Castle-Weirton	128	248	25.0	5.1	5.5	22.7	38.3	43.9	44.5	27.8	10.9	0.5	0.8	
Scranton-Wilkes-Barre-Hazleton	34	65	6.6	2.9	11.8	26.1	41.2	45.3	35.3	25.2	11.8	0.4	0.0	
<b>Total</b>	<b>512</b>	<b>1,050</b>	<b>100.0</b>	<b>5.6</b>	<b>8.0</b>	<b>21.0</b>	<b>25.4</b>	<b>47.6</b>	<b>56.3</b>	<b>25.2</b>	<b>9.8</b>	<b>0.6</b>	<b>0.6</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – PENNSYLVANIA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Altoona-Huntingdon	70	153	4.9	24.0	44.3	16.3	42.9	17.4	5.7	42.4	5.7	0.0	1.4	
Bloomsburg-Berwick-Sunbury	79	160	5.5	22.9	49.4	17.9	22.8	18.0	16.5	41.2	8.9	0.0	2.5	
East Stroudsburg	53	129	3.7	23.1	50.9	16.4	24.5	19.4	18.9	41.1	3.8	0.0	1.9	
Erie-Meadville	135	262	9.4	24.2	43.7	16.0	30.4	18.0	19.3	41.8	3.7	0.0	3.0	
Harrisburg-York-Lebanon	168	321	11.7	22.4	56.0	16.9	24.4	19.6	11.3	41.1	6.0	0.0	2.4	
Johnstown-Somerset	81	145	5.6	24.8	49.4	16.1	27.2	17.0	12.3	42.1	3.7	0.0	7.4	
Lancaster	30	59	2.1	22.1	46.7	17.4	30.0	19.6	23.3	40.8	0.0	0.0	0.0	
Newark	15	33	1.0	30.1	66.7	20.7	20.0	20.4	13.3	28.8	0.0	0.0	0.0	
PA Non-MSA	186	356	12.9	23.1	47.3	16.9	23.1	17.7	17.2	42.2	10.2	0.0	2.2	
Philadelphia-Reading-Camden	165	327	11.5	26.7	67.3	16.1	21.2	17.1	7.3	40.1	1.8	0.0	2.4	
Pittsburgh-New Castle-Weirton	351	714	24.4	25.2	52.7	15.5	26.2	17.0	12.5	42.3	4.6	0.0	4.0	
Scranton-Wilkes-Barre-Hazleton	105	188	7.3	25.3	54.3	15.9	32.4	16.8	10.5	42.0	1.0	0.0	1.9	
<b>Total</b>	<b>1,438</b>	<b>2,847</b>	<b>100.0</b>	<b>25.2</b>	<b>52.5</b>	<b>16.2</b>	<b>26.5</b>	<b>17.6</b>	<b>13.2</b>	<b>41.1</b>	<b>4.9</b>	<b>0.0</b>	<b>2.9</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%

**Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – PENNSYLVANIA** **2022**

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Altoona-Huntingdon	16	38	3.1	23.5	25.0	17.1	25.0	16.8	31.3	42.6	18.8	0.0	0.0
Bloomsburg-Berwick-Sunbury	46	100	9.0	24.2	26.1	16.6	30.4	17.5	23.9	41.7	19.6	0.0	0.0
East Stroudsburg	21	54	4.1	22.7	19.0	17.0	57.1	19.3	14.3	41.0	9.5	0.0	0.0
Erie-Meadville	46	94	9.0	24.2	45.7	16.2	37.0	17.8	13.0	41.8	2.2	0.0	2.2
Harrisburg-York-Lebanon	54	104	10.5	22.3	48.1	16.9	35.2	19.7	16.7	41.1	0.0	0.0	0.0
Johnstown-Somerset	20	43	3.9	23.5	30.0	17.0	40.0	17.1	20.0	42.5	10.0	0.0	0.0
Lancaster	17	33	3.3	22.3	47.1	16.2	35.3	20.5	11.8	41.0	5.9	0.0	0.0
Newark	10	22	2.0	29.8	60.0	20.9	20.0	21.0	20.0	28.3	0.0	0.0	0.0
PA Non-MSA	64	130	12.5	23.5	43.8	16.1	29.7	17.8	15.6	42.6	9.4	0.0	1.6
Philadelphia-Reading-Camden	56	119	10.9	26.4	51.8	16.0	39.3	17.2	3.6	40.4	3.6	0.0	1.8
Pittsburgh-New Castle-Weirton	128	248	25.0	24.9	57.8	15.6	25.0	17.6	10.2	41.9	4.7	0.0	2.3
Scranton-Wilkes-Barre-Hazleton	34	65	6.6	25.0	44.1	16.0	35.3	17.0	5.9	42.0	8.8	0.0	5.9
<b>Total</b>	<b>512</b>	<b>1,050</b>	<b>100.0</b>	<b>24.9</b>	<b>45.5</b>	<b>16.1</b>	<b>32.6</b>	<b>17.8</b>	<b>13.5</b>	<b>41.1</b>	<b>6.8</b>	<b>0.0</b>	<b>1.6</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
 Due to rounding, totals may not equal 100.0%

**SOUTH CAROLINA**

Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.	% Businesses	% Bank Loans	Aggt.
Augusta-Richmond County	5	12	1.9	2,602	0.0	0.0	0.0	27.7	20.0	24.2	45.3	80.0	48.0	26.8	0.0	27.6	0.2	0.0	0.2
Charleston-North Charleston	28	4,139	10.8	25,339	7.6	0.0	7.0	18.6	28.6	16.0	34.6	60.7	34.0	37.6	10.7	41.3	1.5	0.0	1.7
Columbia-Orangeburg-Newberry	75	437	29.0	19,994	8.1	6.7	5.9	23.2	26.7	20.5	33.4	25.3	34.1	34.7	41.3	39.3	0.6	0.0	0.2
Florence	7	165	2.7	3,280	3.6	0.0	2.5	24.3	28.6	18.9	40.3	57.1	44.6	31.7	14.3	34.0	0.1	0.0	0.0
Greenville-Spartanburg-Anderson	111	887	42.9	33,174	4.7	9.9	4.2	18.0	21.6	15.5	40.5	42.3	40.3	36.8	26.1	40.0	0.0	0.0	0.0
Hilton Head Island-Bluffton	4	85	1.5	6,193	0.0	0.0	0.0	16.1	25.0	14.9	54.3	75.0	53.3	29.6	0.0	31.8	0.0	0.0	0.0
SC Non-MSA	29	172	11.2	2,049	0.0	0.0	0.0	25.2	37.9	26.4	68.6	62.1	66.8	6.2	0.0	6.8	0.0	0.0	0.0
<b>Total</b>	<b>259</b>	<b>5,897</b>	<b>100.0</b>	<b>92,631</b>	<b>5.5</b>	<b>6.2</b>	<b>4.8</b>	<b>20.1</b>	<b>25.9</b>	<b>17.3</b>	<b>39.4</b>	<b>43.2</b>	<b>39.1</b>	<b>34.5</b>	<b>24.7</b>	<b>38.4</b>	<b>0.5</b>	<b>0.0</b>	<b>0.5</b>

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Augusta-Richmond County	0	0	0.0	2.8	0.0	16.5	0.0	57.1	0.0	22.4	0.0	1.1	0.0
Charleston-North Charleston	3	5	11.1	7.0	33.3	19.6	33.3	27.7	0.0	44.5	33.3	1.2	0.0
Columbia-Orangeburg-Newberry	11	24	40.7	3.5	0.0	24.6	45.5	38.0	45.5	32.5	9.1	1.5	0.0
Florence	0	0	0.0	2.2	0.0	19.5	0.0	45.1	0.0	33.1	0.0	0.1	0.0
Greenville-Spartanburg-Anderson	10	17	37.0	3.5	0.0	16.8	40.0	40.7	60.0	38.0	0.0	1.0	0.0
Hilton Head Island-Bluffton	0	0	0.0	3.0	0.0	10.6	0.0	48.4	0.0	37.9	0.0	0.1	0.0
SC Non-MSA	3	5	11.1	0.0	0.0	34.0	66.7	59.4	33.3	3.8	0.0	2.8	0.0
<b>Total</b>	<b>27</b>	<b>51</b>	<b>100.0</b>	<b>4.2</b>	<b>3.7</b>	<b>19.6</b>	<b>44.4</b>	<b>38.3</b>	<b>44.4</b>	<b>36.7</b>	<b>7.4</b>	<b>1.1</b>	<b>0.0</b>

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – SOUTH CAROLINA											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Augusta-Richmond County	5	12	1.9	2,602	84.4	60.0	50.3	3.6	0.0	12.0	40.0	
Charleston-North Charleston	28	4,139	10.8	25,339	85.5	14.3	45.2	4.2	7.1	10.4	78.6	
Columbia-Orangeburg-Newberry	75	437	29.0	19,994	83.6	52.0	47.6	4.4	0.0	12.0	48.0	
Florence SC MSA	7	165	2.7	3,280	81.5	28.6	43.6	4.9	14.3	13.6	57.1	
Greenville-Spartanburg-Anderson	111	887	42.9	33,174	83.1	62.2	47.8	5.0	0.0	11.9	37.8	
Hilton Head Island-Bluffton	4	85	1.5	6,193	87.4	25.0	45.0	4.0	0.0	8.6	75.0	
SC Non-MSA	29	172	11.2	2,049	81.1	44.8	48.0	3.8	0.0	15.1	55.2	
<b>Total</b>	<b>259</b>	<b>5,897</b>	<b>100.0</b>	<b>92,631</b>	<b>84.0</b>	<b>50.6</b>	<b>46.8</b>	<b>4.5</b>	<b>1.2</b>	<b>11.5</b>	<b>48.3</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – SOUTH CAROLINA											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Augusta-Richmond County	--	--	--	--	90.5	--	--	2.0	--	7.4	--	
Charleston-North Charleston	3	5	11.1	--	92.8	100.0	--	1.9	0.0	5.3	0.0	
Columbia-Orangeburg-Newberry	11	24	40.7	--	91.5	90.9	--	2.1	9.1	6.4	0.0	
Florence SC	--	--	--	--	88.9	--	--	2.8	--	8.3	--	
Greenville-Spartanburg-Anderson	10	17	37.0	--	90.1	100.0	--	2.8	0.0	7.1	0.0	
Hilton Head Island-Bluffton	--	--	--	--	92.8	--	--	2.1	--	5.1	--	
SC Non-MSA	3	5	11.1	--	88.1	100.0	--	2.2	0.0	9.7	0.0	
<b>Total</b>	<b>27</b>	<b>51</b>	<b>100.0</b>	<b>--</b>	<b>91.2</b>	<b>96.3</b>	<b>--</b>	<b>2.3</b>	<b>3.7</b>	<b>6.5</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%



Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – SOUTH CAROLINA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Augusta-Richmond County	47	91	4.4	0.0	0.0	33.0	29.8	43.2	48.9	23.8	21.3	0.0	0.0	
Charleston-North Charleston	87	158	8.1	6.5	8.0	21.0	27.6	41.7	55.2	30.1	9.2	0.7	0.0	
Columbia-Orangeburg-Newberry	205	394	19.0	5.8	10.2	26.4	29.3	36.1	40.5	31.7	20.0	0.0	0.0	
Florence	21	39	1.9	2.8	0.0	20.0	23.8	48.5	42.9	28.6	33.3	0.0	0.0	
Greenville-Spartanburg-Anderson	529	940	49.0	4.7	5.9	21.6	30.4	44.4	44.4	29.3	19.3	0.0	0.0	
Hilton Head Island-Bluffton	21	39	1.9	0.0	0.0	22.2	61.9	50.7	23.8	27.1	14.3	0.0	0.0	
SC Non-MSA	169	271	15.7	0.0	0.0	30.9	34.9	63.6	62.1	5.5	3.0	0.0	0.0	
<b>Total</b>	<b>1,079</b>	<b>1,932</b>	<b>100.0</b>	<b>4.6</b>	<b>5.5</b>	<b>23.5</b>	<b>31.1</b>	<b>43.3</b>	<b>47.1</b>	<b>28.5</b>	<b>16.3</b>	<b>0.1</b>	<b>0.0</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – SOUTH CAROLINA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Augusta-Richmond County	25	53	5.9	2.8	4.0	22.4	20.0	53.7	64.0	20.2	12.0	0.9	0.0	
Charleston-North Charleston	39	77	9.2	6.2	17.9	26.4	38.5	32.9	28.2	33.6	15.4	0.9	0.0	
Columbia-Orangeburg-Newberry	88	184	20.9	3.6	4.5	25.2	37.5	42.0	34.1	28.4	21.6	0.9	2.3	
Florence	21	36	5.0	2.1	0.0	25.1	14.3	43.8	61.9	29.1	23.8	0.0	0.0	
Greenville-Spartanburg-Anderson	203	391	48.1	3.9	4.9	19.4	24.6	46.4	56.2	29.4	13.3	0.8	1.0	
Hilton Head Island-Bluffton	2	5	0.5	1.8	0.0	17.6	0.0	50.9	100.0	29.7	0.0	0.0	0.0	
SC Non-MSA	44	74	10.4	0.0	0.0	36.4	27.3	57.7	70.5	3.3	2.3	2.6	0.0	
<b>Total</b>	<b>422</b>	<b>820</b>	<b>100.0</b>	<b>3.9</b>	<b>5.2</b>	<b>23.2</b>	<b>28.0</b>	<b>43.6</b>	<b>51.4</b>	<b>28.4</b>	<b>14.5</b>	<b>0.9</b>	<b>0.9</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – SOUTH CAROLINA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Augusta-Richmond County	47	91	4.4	24.9	46.8	16.3	23.4	16.9	10.6	41.9	19.1	0.0	0.0	
Charleston-North Charleston	87	158	8.1	24.5	54.0	15.7	28.7	17.6	11.5	42.2	3.4	0.0	2.3	
Columbia-Orangeburg-Newberry	205	394	19.0	24.4	37.6	15.9	38.0	17.9	14.1	41.9	9.8	0.0	0.5	
Florence	21	39	1.9	25.8	28.6	15.6	42.9	16.4	14.3	42.2	14.3	0.0	0.0	
Greenville-Spartanburg-Anderson	529	940	49.0	24.4	45.4	15.8	30.1	16.8	15.1	43.0	7.2	0.0	2.3	
Hilton Head Island-Bluffton	21	39	1.9	20.6	52.4	16.5	28.6	18.3	19.0	44.5	0.0	0.0	0.0	
SC Non-MSA	169	271	15.7	28.9	39.1	16.4	30.8	17.3	18.9	37.4	9.5	0.0	1.8	
<b>Total</b>	<b>1,079</b>	<b>1,932</b>	<b>100.0</b>	<b>24.6</b>	<b>43.5</b>	<b>15.9</b>	<b>31.5</b>	<b>17.3</b>	<b>15.1</b>	<b>42.3</b>	<b>8.2</b>	<b>0.0</b>	<b>1.7</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – SOUTH CAROLINA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Augusta-Richmond County	25	53	5.9	25.0	36.0	16.4	60.0	17.9	0.0	40.7	4.0	0.0	0.0	
Charleston-North Charleston	39	77	9.2	24.0	35.9	16.1	35.9	18.0	20.5	42.0	0.0	0.0	7.7	
Columbia-Orangeburg-Newberry	88	184	20.9	24.5	33.0	15.7	36.4	17.8	18.2	42.0	9.1	0.0	3.4	
Florence	21	36	5.0	25.3	38.1	15.8	28.6	15.9	19.0	43.0	14.3	0.0	0.0	
Greenville-Spartanburg-Anderson	203	391	48.1	23.7	35.5	16.3	32.0	17.6	17.7	42.4	11.8	0.0	3.0	
Hilton Head Island-Bluffton	2	5	0.5	21.6	0.0	16.0	50.0	18.7	50.0	43.7	0.0	0.0	0.0	
SC Non-MSA	44	74	10.4	27.4	31.8	18.1	34.1	17.1	22.7	37.3	9.1	0.0	2.3	
<b>Total</b>	<b>422</b>	<b>820</b>	<b>100.0</b>	<b>24.1</b>	<b>34.6</b>	<b>16.2</b>	<b>35.1</b>	<b>17.7</b>	<b>17.8</b>	<b>42.0</b>	<b>9.5</b>	<b>0.0</b>	<b>3.1</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

**TEXAS**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – TEXAS</b>																			<b>2019-2021</b>		
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>				<b>Low-Income Tracts</b>			<b>Moderate-Income Tracts</b>			<b>Middle-Income Tracts</b>			<b>Upper-Income Tracts</b>			<b>Not Available-Income Tracts</b>				
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>Overall Market</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>Aggregate</b>		
Amarillo-Pampa-Borger	5	59	0.1	6,713	5.5	40.0	4.8	23.8	0.0	20.5	30.0	20.0	28.3	40.5	40.0	46.3	0.2	0.0	0.1		
Austin-Round Rock	119	7,390	1.8	72,836	6.2	10.9	6.8	12.3	25.2	13.7	34.2	36.1	35.6	46.0	27.7	43.1	1.2	0.0	0.8		
Beaumont-Port Arthur	15	788	0.2	5,560	6.2	13.3	6.6	24.0	26.7	22.0	44.2	53.3	43.9	25.5	6.7	27.4	0.1	0.0	0.0		
Brownsville-Harlingen-Raymondville	35	329	0.5	8,826	0.0	0.0	0.0	30.1	54.3	29.8	27.7	20.0	29.1	41.9	25.7	40.9	0.3	0.0	0.2		
Dallas-Fort Worth	540	18,886	8.4	232,555	6.7	8.9	6.9	18.1	21.5	18.8	27.5	34.1	26.8	47.0	35.0	46.9	0.7	0.6	0.6		
Houston-The Woodlands	5,305	364,679	82.2	239,928	9.0	5.8	9.2	17.9	18.6	18.6	23.4	29.1	24.6	49.5	46.5	47.4	0.2	0.1	0.1		
Kerrville-Fredericksburg	11	41	0.2	1,340	0.0	0.0	0.0	0.0	0.0	0.0	32.2	18.2	32.7	67.8	81.8	67.3	0.0	0.0	0.0		
Longview	27	268	0.4	7,382	4.7	0.0	3.8	11.9	22.2	10.2	60.0	70.4	59.8	23.2	7.4	25.9	0.2	0.0	0.4		
TX Non-MSA	107	3,914	1.7	6,472	0.0	0.0	0.0	13.1	21.5	12.7	74.4	73.8	73.4	12.4	4.7	13.8	0.0	0.0	0.0		
San Antonio-New Braunfels-Pearsall	252	4,531	3.9	53,126	4.2	4.4	3.8	19.6	30.6	19.3	29.3	36.9	28.0	46.7	28.2	48.8	0.2	0.0	0.2		
Texarkana	3	7	0.0	2,111	0.0	0.0	0.0	21.5	33.3	16.4	52.1	66.7	55.5	26.5	0.0	28.1	0.0	0.0	0.0		
Tyler-Jacksonville	21	120	0.3	6,951	6.2	0.0	5.8	17.3	42.9	17.6	34.9	28.6	33.4	41.5	28.6	42.9	0.2	0.0	0.3		
Victoria-Port Lavaca	11	211	0.2	339	0.0	0.0	0.0	12.2	9.1	13.9	16.3	9.1	25.4	71.6	81.8	60.8	0.0	0.0	0.0		
<b>Total</b>	<b>6,451</b>	<b>401,223</b>	<b>100.0</b>	<b>644,139</b>	<b>6.9</b>	<b>5.9</b>	<b>7.2</b>	<b>17.5</b>	<b>19.7</b>	<b>18.2</b>	<b>28.4</b>	<b>30.8</b>	<b>28.3</b>	<b>46.7</b>	<b>43.4</b>	<b>45.9</b>	<b>0.5</b>	<b>0.1</b>	<b>0.4</b>		

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – TEXAS</b>														<b>2022</b>
<b>Assessment Area:</b>	<b>Total Loans to Small Businesses</b>			<b>Low-Income Tracts</b>		<b>Moderate-Income Tracts</b>		<b>Middle-Income Tracts</b>		<b>Upper-Income Tracts</b>		<b>Not Available-Income Tracts</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	<b>% Businesses</b>	<b>% Bank Loans</b>	
Amarillo-Pampa-Borger	1	2	0.2	7.3	0.0	24.5	0.0	22.8	100.0	45.2	0.0	0.2	0.0	
Austin-Round Rock	14	534	3.0	2.7	14.3	13.3	35.7	33.3	42.9	44.8	7.1	5.8	0.0	
Beaumont-Port Arthur	1	3	0.2	4.9	0.0	31.3	0.0	21.1	0.0	36.1	100.0	6.6	0.0	
Brownsville-Harlingen-Raymondville	7	15	1.5	2.7	0.0	26.2	42.9	35.5	14.3	34.3	42.9	1.2	0.0	
Dallas-Fort Worth	42	3,208	8.9	4.5	7.1	17.8	19.0	31.2	47.6	45.6	23.8	0.9	2.4	
Houston-The Woodlands	340	35,331	71.9	8.5	5.0	19.1	26.2	24.9	33.2	45.5	35.3	2.1	0.3	
Kerrville-Fredericksburg	1	5	0.2	0.0	0.0	0.0	0.0	49.3	100.0	50.7	0.0	0.0	0.0	
Longview	7	30	1.5	0.0	0.0	22.1	14.3	57.2	85.7	20.5	0.0	0.2	0.0	
TX Non-MSA	12	660	2.5	0.5	0.0	15.7	8.3	66.9	66.7	16.9	25.0	0.0	0.0	
San Antonio-New Braunfels-Pearsall	48	1,994	10.1	4.9	10.4	21.4	29.2	27.7	41.7	45.4	18.8	0.6	0.0	
Texarkana	0	0	0.0	7.4	0.0	15.5	0.0	37.4	0.0	39.7	0.0	0.0	0.0	
Tyler-Jacksonville	0	0	0.0	1.9	0.0	22.0	0.0	42.2	0.0	33.3	0.0	0.6	0.0	
Victoria-Port Lavaca	0	0	0.0	0.0	0.0	0.0	0.0	68.4	0.0	31.6	0.0	0.0	0.0	
<b>Total</b>	<b>473</b>	<b>41,782</b>	<b>100.0</b>	<b>5.6</b>	<b>5.7</b>	<b>18.2</b>	<b>25.6</b>	<b>29.7</b>	<b>37.2</b>	<b>44.6</b>	<b>31.1</b>	<b>2.0</b>	<b>0.4</b>	

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%*

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – TEXAS</b>											
											<b>2019-2021</b>
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans
Amarillo-Pampa-Borger	5	59	0.1	6,713	84.4	60.0	45.1	4.2	0.0	11.4	40.0
Austin-Round Rock	119	7,390	1.8	72,836	89.4	33.6	45.2	3.0	0.8	7.6	65.5
Beaumont-Port Arthur	15	788	0.2	5,560	82.9	26.7	39.2	4.4	0.0	12.7	73.3
Brownsville-Harlingen-Raymondville	35	329	0.5	8,826	84.1	45.7	37.8	3.7	2.9	12.2	51.4
Dallas-Fort Worth	540	18,886	8.4	232,555	88.4	30.0	43.1	3.6	1.9	8.1	68.1
Houston-The Woodlands	5,305	364,679	82.2	239,928	88.2	23.0	42.1	4.0	5.5	7.8	71.6
Kerrville-Fredericksburg	11	41	0.2	1,340	90.1	72.7	50.6	3.1	0.0	6.7	27.3
Longview	27	268	0.4	7,382	82.7	48.1	45.5	4.5	0.0	12.8	51.9
TX Non-MSA	107	3,914	1.7	6,472	84.4	41.1	43.7	3.9	1.9	11.7	57.0
San Antonio-New Braunfels-Pearsall	252	4,531	3.9	53,126	87.4	58.7	43.8	3.5	2.4	9.1	38.9
Texarkana	3	7	0.0	2,111	81.1	66.7	46.4	4.6	0.0	14.3	33.3
Tyler-Jacksonville	21	120	0.3	6,951	86.1	47.6	46.5	3.9	0.0	10.0	52.4
Victoria-Port Lavaca	11	211	0.2	339	79.9	81.8	46.0	4.9	0.0	15.2	18.2
<b>Total</b>	<b>6,451</b>	<b>401,223</b>	<b>100.0</b>	<b>644,139</b>	<b>88.0</b>	<b>26.0</b>	<b>43.1</b>	<b>3.7</b>	<b>4.8</b>	<b>8.3</b>	<b>69.2</b>
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>											

<b>Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – TEXAS</b>											<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Amarillo-Pampa-Borger	1	2	0.2	--	87.8	100.0	--	3.2	0.0	9.0	0.0	
Austin-Round Rock	14	534	3.0	--	93.5	100.0	--	1.7	0.0	4.8	0.0	
Beaumont-Port Arthur	1	3	0.2	--	86.5	100.0	--	3.3	0.0	10.2	0.0	
Brownsville-Harlingen-Raymondville	7	15	1.5	--	88.1	100.0	--	2.6	0.0	9.2	0.0	
Dallas-Fort Worth	42	3,208	8.9	--	91.7	88.1	--	2.4	11.9	5.9	0.0	
Houston-The Woodlands	340	35,331	71.9	--	91.9	80.6	--	2.6	19.4	5.5	0.0	
Kerrville-Fredericksburg	1	5	0.2	--	92.4	100.0	--	2.3	0.0	5.3	0.0	
Longview	7	30	1.5	--	86.3	85.7	--	3.4	14.3	10.4	0.0	
TX Non-MSA	12	660	2.5	--	87.9	100.0	--	2.9	0.0	9.2	0.0	
San Antonio-New Braunfels-Pearsall	48	1,994	10.1	--	90.4	93.8	--	2.5	6.3	7.1	0.0	
Texarkana	--	--	--	--	84.9	--	--	3.6	--	11.5	--	
Tyler-Jacksonville	--	--	--	--	89.2	--	--	2.9	--	7.9	--	
Victoria-Port Lavaca	--	--	--	--		--	--	3.8	--	12.5	--	
<b>Total</b>	<b>473</b>	<b>41,782</b>	<b>100.0</b>	--	<b>91.6</b>	<b>84.1</b>	--	<b>2.4</b>	<b>15.9</b>	<b>5.9</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
 Due to rounding, totals may not equal 100.0%

83.7

Assessment Area:	Total Loans to Farms				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts		
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	Aggregate
Amarillo-Pampa-Borger	0	0	0.0	423	2.5	0.0	0.5	11.9	0.0	2.6	27.1	0.0	22.2	58.6	0.0	74.7	0.0	0.0	0.0
Austin-Round Rock	1	2	3.0	417	4.6	0.0	1.7	14.3	0.0	20.4	40.3	100.0	49.4	40.5	0.0	28.5	0.4	0.0	0.0
Beaumont-Port Arthur	0	0	0.0	65	4.1	0.0	0.0	14.3	0.0	4.6	38.7	0.0	18.5	42.8	0.0	76.9	0.0	0.0	0.0
Brownsville-Harlingen-Raymondville	0	0	0.0	94	0.0	0.0	0.0	21.6	0.0	16.0	33.4	0.0	43.6	44.8	0.0	40.4	0.2	0.0	0.0
Dallas-Fort Worth	2	29	6.1	1,702	4.2	0.0	0.8	15.5	0.0	10.2	34.3	50.0	48.2	45.6	50.0	40.6	0.4	0.0	0.2
Houston-The Woodlands	27	648	81.8	1,500	4.7	3.7	1.8	16.0	18.5	16.8	31.3	40.7	41.5	48.0	37.0	39.9	0.1	0.0	0.1
Kerrville-Fredericksburg	0	0	0.0	90	0.0	0.0	0.0	0.0	0.0	0.0	33.7	0.0	38.9	66.3	0.0	61.1	0.0	0.0	0.0
Longview	0	0	0.0	349	1.3	0.0	0.0	11.8	0.0	16.6	64.2	0.0	65.9	22.8	0.0	17.5	0.0	0.0	0.0
Non-MSA TX	3	43	9.1	864	0.0	0.0	0.0	9.8	0.0	13.2	73.3	33.3	67.0	16.9	66.7	19.8	0.0	0.0	0.0
San Antonio-New Braunfels-Pearsall	0	0	0.0	407	2.0	0.0	0.5	13.7	0.0	11.3	30.7	0.0	33.9	53.6	0.0	54.3	0.0	0.0	0.0
Texarkana	0	0	0.0	185	0.0	0.0	0.0	9.7	0.0	8.1	62.7	0.0	62.7	27.5	0.0	29.2	0.0	0.0	0.0
Tyler-Jacksonville	0	0	0.0	210	1.8	0.0	0.5	15.3	0.0	13.8	43.7	0.0	58.1	39.2	0.0	27.6	0.0	0.0	0.0
Victoria-Port Lavaca	0	0	0.0	23	0.0	0.0	0.0	3.7	0.0	0.0	14.8	0.0	30.4	81.5	0.0	69.6	0.0	0.0	0.0
<b>Total</b>	<b>33</b>	<b>722</b>	<b>100.0</b>	<b>6,329</b>	<b>3.8</b>	<b>3.0</b>	<b>0.8</b>	<b>14.8</b>	<b>15.2</b>	<b>12.7</b>	<b>35.8</b>	<b>42.4</b>	<b>47.7</b>	<b>45.4</b>	<b>39.4</b>	<b>38.7</b>	<b>0.2</b>	<b>0.0</b>	<b>0.1</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%

Assessment Area:	Total Loans to Farms				Farms with Revenues <= 1MM			Farms with Revenues > 1MM		Farms with Revenues Not Available	
	#	\$	% of Total	Overall Market	% Farms	% Bank Loans	Aggregate	% Farms	% Bank Loans	% Farms	% Bank Loans
Amarillo-Pampa-Borger	--	--	--	423	95.1	--	58.6	3.7	--	1.2	--
Austin-Round Rock	1	2	3.0	417	97.1	100.0	55.6	1.6	0.0	1.4	0.0
Beaumont-Port Arthur	--	--	--	65	99.2	--	69.2	0.6	--	0.2	--
Brownsville-Harlingen-Raymondville	--	--	--	94	95.9	--	45.7	2.3	--	1.8	--
Dallas-Fort Worth	2	29	6.1	1,702	96.4	50.0	57.2	1.9	0.0	1.7	50.0
Houston-The Woodlands	27	648	81.8	1,500	95.7	22.2	54.9	2.3	3.7	2.1	74.1
Kerrville-Fredericksburg	--	--	--	90	99.0	--	63.3	0.3	--	0.7	--
Longview	--	--	--	349	98.0	--	72.8	1.4	--	0.6	--
Non-MSA TX	3	43	9.1	864	96.8	0.0	61.5	1.7	0.0	1.5	100.0
San Antonio-New Braunfels-Pearsall	--	--	--	407	96.5	--	57.0	1.6	--	1.8	--
Texarkana	--	--	--	185	94.9	--	56.2	3.0	--	2.1	--
Tyler-Jacksonville	--	--	--	210	96.6	--	72.9	1.8	--	1.6	--
Victoria-Port Lavaca	--	--	--	23	100.0	--	47.8	0.0	--	0.0	--
<b>Total</b>	<b>33</b>	<b>722</b>	<b>100.0</b>	<b>6,329</b>	<b>96.3</b>	<b>24.2</b>	<b>58.6</b>	<b>1.9</b>	<b>3.0</b>	<b>1.7</b>	<b>72.7</b>

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%



**Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – TEXAS** **2019-2021**

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Amarillo-Pampa-Borger	36	66	0.4	2.1	2.8	28.4	44.4	36.3	36.1	33.2	16.7	0.0	0.0
Austin-Round Rock	302	1,137	3.2	10.1	9.3	19.3	32.1	38.8	47.0	31.0	11.3	0.9	0.3
Beaumont-Port Arthur	65	146	0.7	7.8	12.3	27.8	24.6	39.4	43.1	25.0	20.0	0.0	0.0
Brownsville-Harlingen-Raymondville	370	652	3.9	0.0	0.0	32.1	51.1	31.3	27.8	36.6	21.1	0.0	0.0
Dallas-Fort Worth	1,305	2,689	13.7	10.3	7.0	23.7	28.8	31.1	43.8	34.7	20.2	0.2	0.2
Houston-The Woodlands	5,864	29,517	61.3	11.1	6.9	24.8	28.2	28.0	36.7	35.9	28.1	0.3	0.1
Kerrville-Fredericksburg	28	62	0.3	0.0	0.0	0.0	0.0	29.7	21.4	70.3	78.6	0.0	0.0
Longview	170	329	1.8	1.4	1.2	13.1	19.4	64.5	69.4	21.0	10.0	0.0	0.0
TX Non-MSA	434	943	4.5	0.0	0.5	14.0	17.3	72.8	74.4	13.1	7.8	0.0	0.0
San Antonio-New Braunfels-Pearsall	829	1,844	8.7	5.9	6.9	29.1	32.0	30.0	42.1	35.0	19.1	0.0	0.0
Texarkana	36	75	0.4	0.0	0.0	19.2	25.0	60.5	63.9	20.3	11.1	0.0	0.0
Tyler-Jacksonville	95	179	1.0	1.8	6.3	24.3	48.4	40.4	31.6	33.6	13.7	0.0	0.0
Victoria-Port Lavaca	26	48	0.3	0.0	0.0	19.5	34.6	17.3	11.5	63.1	53.8	0.0	0.0
<b>Total</b>	<b>9,560</b>	<b>37,687</b>	<b>100.0</b>	<b>9.2</b>	<b>6.3</b>	<b>24.1</b>	<b>29.2</b>	<b>32.4</b>	<b>40.4</b>	<b>34.0</b>	<b>24.1</b>	<b>0.2</b>	<b>0.1</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
 Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – TEXAS

2022

Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Amarillo-Pampa-Borger	16	35	0.5	6.4	6.3	25.8	37.5	30.4	25.0	37.4	31.3	0.0	0.0
Austin-Round Rock	105	703	3.4	6.5	8.6	23.9	45.7	36.8	35.2	31.2	8.6	1.6	1.9
Beaumont-Port Arthur	26	46	0.8	8.2	11.5	33.2	61.5	24.1	19.2	31.8	7.7	2.7	0.0
Brownsville-Harlingen-Raymondville	119	239	3.8	2.1	3.4	25.4	38.7	40.3	34.5	31.6	22.7	0.7	0.8
Dallas-Fort Worth	476	1,527	15.2	8.6	9.7	24.9	29.0	32.3	39.7	33.3	21.4	0.8	0.2
Houston-The Woodlands	1,764	9,668	56.4	10.6	8.0	24.0	29.4	28.7	36.2	35.1	25.2	1.7	1.2
Kerrville-Fredericksburg	15	34	0.5	0.0	0.0	0.0	0.0	46.8	66.7	53.2	33.3	0.0	0.0
Longview	57	114	1.8	0.0	0.0	19.9	22.8	60.9	68.4	19.1	8.8	0.0	0.0
TX Non-MSA	164	539	5.2	0.5	1.2	14.6	15.9	69.9	71.3	15.0	11.6	0.0	0.0
San Antonio-New Braunfels-Pearsall	334	673	10.7	6.2	6.9	30.0	38.0	31.5	38.3	31.8	15.6	0.5	1.2
Texarkana	15	28	0.5	4.0	0.0	15.6	33.3	47.0	46.7	33.4	20.0	0.0	0.0
Tyler-Jacksonville	24	51	0.8	1.8	0.0	24.3	58.3	43.5	29.2	29.5	12.5	0.9	0.0
Victoria-Port Lavaca	12	35	0.4	0.0	0.0	0.0	0.0	75.2	66.7	24.8	33.3	0.0	0.0
<b>Total</b>	<b>3,127</b>	<b>13,692</b>	<b>100.0</b>	<b>8.3</b>	<b>7.3</b>	<b>24.8</b>	<b>30.6</b>	<b>32.8</b>	<b>39.4</b>	<b>33.0</b>	<b>21.7</b>	<b>1.1</b>	<b>1.0</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower

2019-2021

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Amarillo-Pampa-Borger	36	66	0.4	25.1	38.9	16.0	33.3	17.8	11.1	41.1	11.1	0.0	5.6
Austin-Round Rock	302	1,137	3.2	23.5	57.9	16.5	24.5	18.0	11.6	42.0	5.0	0.0	1.0
Beaumont-Port Arthur	65	146	0.7	27.5	29.2	15.6	21.5	16.6	15.4	40.3	33.8	0.0	0.0
Brownsville-Harlingen-Raymondville	370	652	3.9	26.0	35.7	15.3	33.8	15.4	17.8	43.2	11.6	0.0	1.1
Dallas-Fort Worth	1,305	2,689	13.7	23.8	41.7	16.5	32.5	17.7	15.8	42.0	8.7	0.0	1.4
Houston-The Woodlands	5,864	29,517	61.3	24.9	35.8	15.9	28.8	16.7	17.7	42.4	14.9	0.0	2.7
Kerrville-Fredericksburg	28	62	0.3	17.2	28.6	16.1	35.7	13.2	21.4	53.5	14.3	0.0	0.0
Longview	170	329	1.8	24.5	38.2	15.6	31.2	17.3	17.6	42.7	11.2	0.0	1.8
TX Non-MSA	434	943	4.5	23.8	31.1	16.6	26.5	17.3	21.4	42.4	19.1	0.0	1.8
San Antonio-New Braunfels-Pearsall	829	1,844	8.7	24.4	46.4	16.0	30.2	17.8	14.4	41.8	7.4	0.0	1.7
Texarkana	36	75	0.4	24.6	33.3	15.2	22.2	16.6	27.8	43.5	16.7	0.0	0.0
Tyler-Jacksonville	95	179	1.0	23.8	47.4	16.6	27.4	17.2	17.9	42.4	5.3	0.0	2.1
Victoria-Port Lavaca	26	48	0.3	18.7	46.2	13.9	23.1	17.1	11.5	50.3	19.2	0.0	0.0
<b>Total</b>	<b>9,560</b>	<b>37,687</b>	<b>100.0</b>	<b>24.3</b>	<b>38.2</b>	<b>16.2</b>	<b>29.4</b>	<b>17.3</b>	<b>17.1</b>	<b>42.2</b>	<b>13.1</b>	<b>0.0</b>	<b>2.2</b>

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – TEXAS

2022

Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers	
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans
Amarillo-Pampa-Borger	16	35	0.5	24.3	18.8	17.0	50.0	17.1	6.3	41.6	12.5	0.0	12.5
Austin-Round Rock	105	703	3.4	22.6	52.4	16.9	31.4	18.4	10.5	42.1	4.8	0.0	1.0
Beaumont-Port Arthur	26	46	0.8	27.1	38.5	16.2	34.6	17.3	19.2	39.3	7.7	0.0	0.0
Brownsville-Harlingen-Raymondville	119	239	3.8	26.2	36.1	15.3	21.8	15.1	26.1	43.4	16.0	0.0	0.0
Dallas-Fort Worth	476	1,527	15.2	23.0	33.2	17.0	33.8	18.0	20.8	42.1	10.1	0.0	2.1
Houston-The Woodlands	1,764	9,668	56.4	24.6	33.5	15.9	31.7	16.9	19.9	42.6	12.9	0.0	2.0
Kerrville-Fredericksburg	15	34	0.5	16.2	26.7	16.3	46.7	17.0	13.3	50.4	13.3	0.0	0.0
Longview	57	114	1.8	23.8	33.3	16.2	35.1	18.0	14.0	42.0	15.8	0.0	1.8
TX Non-MSA	164	539	5.2	23.9	31.7	16.1	30.5	18.2	22.0	41.8	13.4	0.0	2.4
San Antonio-New Braunfels-Pearsall	334	673	10.7	24.1	41.3	16.0	31.4	18.4	18.0	41.5	8.1	0.0	1.2
Texarkana	15	28	0.5	25.8	26.7	13.4	33.3	16.7	6.7	44.1	33.3	0.0	0.0
Tyler-Jacksonville	24	51	0.8	24.2	37.5	15.6	16.7	18.9	33.3	41.3	12.5	0.0	0.0
Victoria-Port Lavaca	12	35	0.4	15.3	16.7	18.2	41.7	19.7	33.3	46.7	8.3	0.0	0.0
<b>Total</b>	<b>3,127</b>	<b>13,692</b>	<b>100.0</b>	<b>23.8</b>	<b>34.8</b>	<b>16.4</b>	<b>31.7</b>	<b>17.6</b>	<b>19.7</b>	<b>42.2</b>	<b>11.9</b>	<b>0.0</b>	<b>1.9</b>

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data.  
Due to rounding, totals may not equal 100.0%

**VIRGINIA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – VIRGINIA</b>																			<b>2019-2021</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts				
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate		
Blacksburg-Christiansburg-Radford	7	10	2.9	1,952	0.0	0.0	0.0	2.0	0.0	1.4	66.9	71.4	69.8	29.1	28.6	27.2	2.0	0.0	1.6		
Harrisonburg-Staunton	4	10	1.7	4,489	2.9	0.0	2.5	13.2	0.0	12.5	71.8	75.0	74.2	12.0	25.0	10.8	0.0	0.0	0.0		
Lynchburg	30	259	12.6	4,860	1.2	0.0	1.2	19.3	16.7	18.2	55.6	83.3	55.4	23.9	0.0	25.2	0.0	0.0	0.0		
VA Non-MSA	85	1,204	35.6	8,826	0.3	2.4	0.4	15.7	17.6	15.2	57.8	57.6	57.8	26.0	22.4	26.6	0.2	0.0	0.1		
Richmond	95	1,108	39.7	29,314	6.5	12.6	5.2	20.8	24.2	18.7	32.8	35.8	33.8	39.6	26.3	42.0	0.3	1.1	0.2		
Roanoke	18	59	7.5	6,610	2.8	5.6	3.4	15.1	33.3	15.1	49.1	50.0	48.6	32.9	11.1	32.9	0.0	0.0	0.0		
<b>Total</b>	<b>239</b>	<b>2,650</b>	<b>100.0</b>	<b>56,051</b>	<b>4.1</b>	<b>6.3</b>	<b>3.5</b>	<b>17.7</b>	<b>20.5</b>	<b>16.6</b>	<b>45.4</b>	<b>52.3</b>	<b>45.7</b>	<b>32.5</b>	<b>20.5</b>	<b>34.0</b>	<b>0.3</b>	<b>0.4</b>	<b>0.2</b>		

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – VIRGINIA</b>														<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Blacksburg-Christiansburg-Radford	3	3	5.9	0.6	0.0	13.1	33.3	51.0	66.7	34.7	0.0	0.6	0.0		
Harrisonburg-Staunton	0	0	0.0	0.0	0.0	15.7	0.0	69.8	0.0	14.5	0.0	0.0	0.0		
Lynchburg	10	29	19.6	2.8	0.0	11.3	20.0	55.8	60.0	25.8	20.0	4.3	0.0		
VA Non-MSA	17	50	33.3	0.9	5.9	20.8	17.6	52.9	52.9	25.3	23.5	0.1	0.0		
Richmond	13	23	25.5	5.5	7.7	17.5	30.8	37.9	38.5	37.4	15.4	1.6	7.7		
Roanoke	8	25	15.7	3.6	0.0	20.9	25.0	36.7	50.0	38.9	25.0	0.0	0.0		
<b>Total</b>	<b>51</b>	<b>130</b>	<b>100.0</b>	<b>3.7</b>	<b>3.9</b>	<b>17.5</b>	<b>23.5</b>	<b>44.7</b>	<b>51.0</b>	<b>32.8</b>	<b>19.6</b>	<b>1.3</b>	<b>2.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – VIRGINIA											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Blacksburg-Christiansburg-Radford	7	10	2.9	1,952	84.3	85.7	53.1	3.7	0.0	12.0	14.3	
Harrisonburg-Staunton	4	10	1.7	4,489	86.7	50.0	54.0	3.6	0.0	9.7	50.0	
Lynchburg	30	259	12.6	4,860	87.4	73.3	52.7	3.3	3.3	9.3	23.3	
VA Non-MSA	85	1,204	35.6	8,826	85.0	60.0	52.4	3.8	1.2	11.2	38.8	
Richmond	95	1,108	39.7	29,314	89.2	57.9	49.3	3.2	1.1	7.7	41.1	
Roanoke	18	59	7.5	6,610	86.2	83.3	49.6	3.7	0.0	10.1	16.7	
<b>Total</b>	<b>239</b>	<b>2,650</b>	<b>100.0</b>	<b>56,051</b>	<b>87.6</b>	<b>63.2</b>	<b>50.6</b>	<b>3.4</b>	<b>1.3</b>	<b>9.0</b>	<b>35.6</b>	

Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – VIRGINIA											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Blacksburg-Christiansburg-Radford	3	3	5.9	--	86.6	100.0	--	3.0	0.0	10.4	0.0	
Harrisonburg-Staunton	--	--	--	--	88.4	--	--	3.0	--	8.6	--	
Lynchburg	10	29	19.6	--	89.2	90.0	--	2.7	10.0	8.2	0.0	
VA Non-MSA	17	50	33.3	--	87.1	100.0	--	3.1	0.0	9.8	0.0	
Richmond	13	23	25.5	--	91.3	100.0	--	2.5	0.0	6.3	0.0	
Roanoke	8	25	15.7	--	88.1	100.0	--	3.0	0.0	8.9	0.0	
<b>Total</b>	<b>51</b>	<b>130</b>	<b>100.0</b>	<b>--</b>	<b>89.7</b>	<b>98.0</b>	<b>--</b>	<b>2.7</b>	<b>2.0</b>	<b>7.6</b>	<b>0.0</b>	

Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.  
Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – VIRGINIA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Blacksburg-Christiansburg-Radford	54	90	4.6	0.0	0.0	4.3	3.7	68.1	72.2	25.4	20.4	2.2	3.7	
Harrisonburg-Staunton	73	135	6.3	2.1	2.7	13.0	6.8	76.0	86.3	8.9	4.1	0.0	0.0	
Lynchburg	167	286	14.4	2.0	0.6	18.6	24.0	61.0	69.5	18.4	6.0	0.0	0.0	
VA Non-MSA	456	806	39.2	0.6	0.9	19.0	21.1	60.5	63.8	19.9	14.3	0.0	0.0	
Richmond	303	580	26.1	8.9	11.2	20.5	36.0	36.1	38.6	34.4	14.2	0.1	0.0	
Roanoke	109	196	9.4	3.0	9.2	21.9	31.2	46.0	44.0	29.1	15.6	0.0	0.0	
<b>Total</b>	<b>1,162</b>	<b>2,093</b>	<b>100.0</b>	<b>4.4</b>	<b>4.4</b>	<b>18.5</b>	<b>24.6</b>	<b>51.2</b>	<b>58.0</b>	<b>25.8</b>	<b>12.8</b>	<b>0.2</b>	<b>0.2</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – VIRGINIA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Blacksburg-Christiansburg-Radford	14	31	3.3	1.4	0.0	16.6	7.1	53.5	71.4	28.5	21.4	0.0	0.0	
Harrisonburg-Staunton	25	50	6.0	0.0	0.0	17.3	36.0	72.0	60.0	10.8	4.0	0.0	0.0	
Lynchburg	74	145	17.7	2.1	0.0	13.0	17.6	62.4	74.3	22.0	8.1	0.5	0.0	
VA Non-MSA	160	322	38.3	1.0	1.3	24.3	25.6	54.6	58.1	20.1	15.0	0.0	0.0	
Richmond	112	229	26.8	7.1	8.0	19.8	33.9	39.0	44.6	33.0	12.5	1.0	0.9	
Roanoke	33	63	7.9	4.4	12.1	23.5	30.3	41.5	36.4	30.7	21.2	0.0	0.0	
<b>Total</b>	<b>418</b>	<b>840</b>	<b>100.0</b>	<b>3.9</b>	<b>3.6</b>	<b>20.2</b>	<b>26.8</b>	<b>49.2</b>	<b>56.2</b>	<b>26.3</b>	<b>13.2</b>	<b>0.4</b>	<b>0.2</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – VIRGINIA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Blacksburg-Christiansburg-Radford	54	90	4.6	27.9	59.3	13.0	20.4	17.2	13.0	41.9	3.7	0.0	3.7	
Harrisonburg-Staunton	73	135	6.3	22.9	35.6	17.0	35.6	18.9	15.1	41.1	6.8	0.0	6.8	
Lynchburg	167	286	14.4	24.3	59.3	16.0	22.8	18.0	10.2	41.8	4.2	0.0	3.6	
VA Non-MSA	456	806	39.2	25.5	43.4	16.2	26.5	17.4	15.6	40.9	10.3	0.0	4.2	
Richmond	303	580	26.1	22.5	58.1	16.3	26.4	18.0	9.2	43.1	5.6	0.0	0.7	
Roanoke	109	196	9.4	24.0	54.1	16.0	29.4	19.1	7.3	40.8	2.8	0.0	6.4	
<b>Total</b>	<b>1,162</b>	<b>2,093</b>	<b>100.0</b>	<b>23.9</b>	<b>50.8</b>	<b>16.1</b>	<b>26.5</b>	<b>18.1</b>	<b>12.2</b>	<b>41.9</b>	<b>7.0</b>	<b>0.0</b>	<b>3.5</b>	

Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data. Due to rounding, totals may not equal 100.0%

Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – VIRGINIA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Not Available-Income Borrowers		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Blacksburg-Christiansburg-Radford	14	31	3.3	28.1	35.7	13.1	35.7	17.6	14.3	41.1	14.3	0.0	0.0	
Harrisonburg-Staunton	25	50	6.0	23.2	40.0	17.0	36.0	18.6	8.0	41.2	12.0	0.0	4.0	
Lynchburg	74	145	17.7	22.9	44.6	17.6	37.8	18.1	8.1	41.4	9.5	0.0	0.0	
VA Non-MSA	160	322	38.3	25.9	42.5	16.3	30.0	17.1	18.8	40.7	6.9	0.0	1.9	
Richmond	112	229	26.8	22.7	46.4	16.6	34.8	17.3	16.1	43.4	2.7	0.0	0.0	
Roanoke	33	63	7.9	24.9	39.4	14.4	36.4	19.0	18.2	41.7	3.0	0.0	3.0	
<b>Total</b>	<b>418</b>	<b>840</b>	<b>100.0</b>	<b>24.1</b>	<b>43.3</b>	<b>16.2</b>	<b>33.7</b>	<b>17.7</b>	<b>15.3</b>	<b>42.0</b>	<b>6.5</b>	<b>0.0</b>	<b>1.2</b>	

Source: 2020 U.S. Census; 01/01/2022 - 12/31/2022 Bank Data. Due to rounding, totals may not equal 100.0%



**WEST VIRGINIA**

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – WEST VIRGINIA</b>																				<b>2019-2021</b>		
Assessment Area:	Total Loans to Small Businesses				Low-Income Tracts			Moderate-Income Tracts			Middle-Income Tracts			Upper-Income Tracts			Not Available-Income Tracts					
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	Aggregate			
Beckley	18	1,534	32.1	1,785	0.0	0.0	0.0	4.3	0.0	3.7	84.7	83.3	82.0	11.0	16.7	14.3	0.0	0.0	0.0			
Morgantown-Fairmont	6	15	10.7	726	7.0	0.0	5.5	10.4	0.0	11.0	32.7	50.0	31.4	49.9	50.0	52.1	0.0	0.0	0.0			
WV Non-MSA	32	259	57.1	3,715	0.0	0.0	0.0	13.1	15.6	13.3	56.7	59.4	57.5	30.3	25.0	29.2	0.0	0.0	0.0			
<b>Total</b>	<b>56</b>	<b>1,808</b>	<b>100.0</b>	<b>6,226</b>	<b>1.0</b>	<b>0.0</b>	<b>0.6</b>	<b>10.2</b>	<b>8.9</b>	<b>10.3</b>	<b>61.1</b>	<b>66.1</b>	<b>61.5</b>	<b>27.7</b>	<b>25.0</b>	<b>27.6</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>			

*Source: 2021 D&B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available. Due to rounding, totals may not equal 100.0%*

<b>Table Q: Assessment Area Distribution of Loans to Small Businesses by Income Category of the Geography – WEST VIRGINIA</b>														<b>2022</b>	
Assessment Area:	Total Loans to Small Businesses			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts			
	#	\$	% of Total	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans	% Businesses	% Bank Loans		
Beckley	6	11	46.2	0.0	0.0	14.8	16.7	65.6	66.7	19.6	16.7	0.0	0.0		
Morgantown-Fairmont	2	2	15.4	6.5	0.0	13.5	100.0	35.9	0.0	44.0	0.0	0.0	0.0		
WV Non-MSA	5	28	38.5	1.2	0.0	16.2	60.0	55.8	0.0	26.8	40.0	0.0	0.0		
<b>Total</b>	<b>13</b>	<b>41</b>	<b>100.0</b>	<b>1.6</b>	<b>0.0</b>	<b>15.4</b>	<b>46.2</b>	<b>55.7</b>	<b>30.8</b>	<b>27.2</b>	<b>23.1</b>	<b>0.0</b>	<b>0.0</b>		

*Source: 2022 D&B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available. Due to rounding, totals may not equal 100.0%*

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – WEST VIRGINIA											2019-2021	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Beckley	18	1,534	32.1	1,785	80.7	66.7	47.7	4.6	5.6	14.7	27.8	
Morgantown-Fairmont	6	15	10.7	726	82.9	83.3	43.5	4.7	0.0	12.5	16.7	
WV Non-MSA	32	259	57.1	3,715	80.8	65.6	47.6	4.8	0.0	14.4	34.4	
<b>Total</b>	<b>56</b>	<b>1,808</b>	<b>100.0</b>	<b>6,226</b>	<b>81.1</b>	<b>67.9</b>	<b>47.2</b>	<b>4.7</b>	<b>1.8</b>	<b>14.2</b>	<b>30.4</b>	
<i>Source: 2021 D&amp;B Data; 01/01/2019 - 12/31/2021 Bank Data; 2021 CRA Aggregate Data, "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table R: Assessment Area Distribution of Loans to Small Businesses by Gross Annual Revenues – WEST VIRGINIA											2022	
Assessment Area:	Total Loans to Small Businesses				Businesses with Revenues <= 1MM			Businesses with Revenues > 1MM		Businesses with Revenues Not Available		
	#	\$	% of Total	Overall Market	% Businesses	% Bank Loans	Aggregate	% Businesses	% Bank Loans	% Businesses	% Bank Loans	
Beckley	6	11	46.2	--	82.8	100.0	--	3.9	0.0	13.3	0.0	
Morgantown-Fairmont	2	2	15.4	--	84.4	100.0	--	4.2	0.0	11.4	0.0	
WV Non-MSA	5	28	38.5	--	82.7	80.0	--	4.1	20.0	13.2	0.0	
<b>Total</b>	<b>13</b>	<b>41</b>	<b>100.0</b>	<b>--</b>	<b>82.9</b>	<b>92.3</b>	<b>--</b>	<b>4.1</b>	<b>7.7</b>	<b>13.0</b>	<b>0.0</b>	
<i>Source: 2022 D&amp;B Data; 01/01/2022 - 12/31/2022 Bank Data; "--" data not available.                      Due to rounding, totals may not equal 100.0%</i>												

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – WEST VIRGINIA													2019-2021	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Beckley	78	144	37.5	0.0	0.0	8.2	5.1	80.9	87.2	10.9	7.7	0.0	0.0	
Morgantown-Fairmont	19	41	9.1	3.1	15.8	7.3	10.5	46.8	36.8	42.8	36.8	0.0	0.0	
WV Non-MSA	111	190	53.4	0.0	0.0	12.6	9.9	64.8	71.2	22.6	18.9	0.0	0.0	
<b>Total</b>	<b>208</b>	<b>375</b>	<b>100.0</b>	<b>0.4</b>	<b>1.4</b>	<b>10.7</b>	<b>8.2</b>	<b>67.0</b>	<b>74.0</b>	<b>21.9</b>	<b>16.3</b>	<b>0.0</b>	<b>0.0</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

Table U: Assessment Area Distribution of Consumer Loans by Income Category of the Geography – WEST VIRGINIA													2022	
Assessment Area:	Total Consumer Loans			Low-Income Tracts		Moderate-Income Tracts		Middle-Income Tracts		Upper-Income Tracts		Not Available-Income Tracts		
	#	\$	% of Total	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	% of Households	% Bank Loans	
Beckley	24	50	26.7	0.0	0.0	15.0	12.5	66.8	79.2	18.2	8.3	0.0	0.0	
Morgantown-Fairmont	8	13	8.9	2.5	0.0	11.3	12.5	41.3	62.5	44.9	25.0	0.0	0.0	
WV Non-MSA	58	104	64.4	1.0	1.7	18.9	44.8	57.8	43.1	22.3	10.3	0.0	0.0	
<b>Total</b>	<b>90</b>	<b>167</b>	<b>100.0</b>	<b>0.9</b>	<b>1.1</b>	<b>16.8</b>	<b>33.3</b>	<b>58.1</b>	<b>54.4</b>	<b>24.1</b>	<b>11.1</b>	<b>0.0</b>	<b>0.0</b>	

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

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – WEST VIRGINIA</b>													<b>2019-2021</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Beckley	78	144	37.5	24.1	33.3	16.3	26.9	18.0	20.5	41.6	19.2	0.0	0.0	
Morgantown-Fairmont	19	41	9.1	20.5	15.8	15.3	26.3	16.3	36.8	47.9	10.5	0.0	10.5	
WV Non-MSA	111	190	53.4	25.2	45.9	16.0	25.2	16.1	13.5	42.7	11.7	0.0	3.6	
<b>Total</b>	<b>208</b>	<b>375</b>	<b>100.0</b>	<b>24.3</b>	<b>38.5</b>	<b>16.0</b>	<b>26.0</b>	<b>16.7</b>	<b>18.3</b>	<b>43.0</b>	<b>14.4</b>	<b>0.0</b>	<b>2.9</b>	

*Source: 2015 ACS; 01/01/2019 - 12/31/2021 Bank Data.  
Due to rounding, totals may not equal 100.0%*

<b>Table V - Assessment Area Distribution of Consumer Loans by Income Category of the Borrower – WEST VIRGINIA</b>													<b>2022</b>	
<b>Assessment Area:</b>	<b>Total Consumer Loans</b>			<b>Low-Income Borrowers</b>		<b>Moderate-Income Borrowers</b>		<b>Middle-Income Borrowers</b>		<b>Upper-Income Borrowers</b>		<b>Not Available-Income Borrowers</b>		
	<b>#</b>	<b>\$</b>	<b>% of Total</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	<b>% of Households</b>	<b>% Bank Loans</b>	
Beckley	24	50	26.7	27.3	16.7	14.6	29.2	15.4	25.0	42.7	25.0	0.0	4.2	
Morgantown-Fairmont	8	13	8.9	19.5	37.5	14.8	25.0	14.4	12.5	51.3	0.0	0.0	25.0	
WV Non-MSA	58	104	64.4	24.9	36.2	15.4	37.9	17.9	8.6	41.9	17.2	0.0	0.0	
<b>Total</b>	<b>90</b>	<b>167</b>	<b>100.0</b>	<b>24.8</b>	<b>31.1</b>	<b>15.1</b>	<b>34.4</b>	<b>16.7</b>	<b>13.3</b>	<b>43.4</b>	<b>17.8</b>	<b>0.0</b>	<b>3.3</b>	

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