

PUBLIC DISCLOSURE

February 2, 2026

**COMMUNITY REINVESTMENT ACT
PERFORMANCE EVALUATION**

Truxton Trust Company
20 Burton Hills Boulevard, Suite 200
Nashville, Tennessee 37215

RSSD ID NUMBER: 3290240

FEDERAL RESERVE BANK OF ATLANTA
1000 Peachtree Street, N.E.
Atlanta, Georgia 30309-4470

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, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to the institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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INSTITUTION’S CRA RATING

INSTITUTION’S CRA RATING: This institution is rated Satisfactory.

The Lending Test is rated: Satisfactory.

The Community Development Test is rated: Outstanding.

The following table indicates the performance levels of Truxton Trust Company (Truxton Trust) with respect to the Lending and Community Development tests.

Truxton Trust Bank		
Performance Levels	Performance Tests*	
	Lending Test	Community Development Test
Outstanding		X
Satisfactory	X	
Needs to Improve		
Substantial Noncompliance		
OVERALL RATING	Satisfactory	

*The Lending Test and the Community Development Test are weighted equally when arriving at an overall rating.

Major factors contributing to this rating include:

- The loan-to-deposit (LTD) ratio is reasonable given the bank’s size, financial condition, and assessment area (AA) credit needs.
- A majority of loans were made in the AA.
- The geographic distribution of loans reflects reasonable dispersion throughout the AA.
- The distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different sizes.
- The bank’s community development (CD) performance demonstrates excellent responsiveness to the CD needs of its AA through CD loans, qualified investments, and CD services.

INSTITUTION

DESCRIPTION OF INSTITUTION

Truxton Trust is a wholly-owned subsidiary of Truxton Corporation, a single bank holding company. The bank offers personal and business loans, depository accounts, wealth, and trust services. For purposes of the CRA, Truxton Trust has defined its sole AA as Nashville, Tennessee, which includes Davidson and Williamson counties in the Nashville-Davidson-Murfreesboro-Franklin, Tennessee MSA.

Branch Offices

The bank operates one branch, which was relocated since the previous CRA evaluation. The relocated branch remains in an upper-income census tract but no longer has an ATM; however, a full-service standalone ATM remains at the prior location.

Loan Portfolio

The following table shows the composition of the loan portfolio according to the Consolidated Report of Condition and Income (Call Report).

COMPOSITION OF LOAN PORTFOLIO		
Loan Type	12/31/2024	
	\$ (000s)	Percent
Construction and Development	44,646	6.8%
Secured by One- to Four- Family Dwellings	258,462	39.3%
Other Real Estate: Farmland	5,500	0.8%
Multifamily	37,465	5.7%
Nonfarm nonresidential	221,014	33.6%
Commercial and Industrial	46,191	7.0%
Loans to Individuals	43,875	6.7%
Agricultural Loans	0	0.0%
Total	\$657,153	100.00%

*This table does not include the entire loan portfolio. Specifically, it excludes loans to depository institutions, bankers acceptances, lease financing receivables, obligations of state and political subdivisions, and other loans that do not meet any other category. Contra assets are also not included in this table.

As of December 31, 2024, loans secured by one- to four-family dwellings made up the largest percent of the loan portfolio at 39.3 percent, followed by nonfarm nonresidential loans at 33.6 percent.

Credit Products

Truxton Trust provides individualized personal and business banking and wealth management services to high income and high net worth individuals, their families, and their businesses. While wealth management services represent a large part of the business strategy and revenue, the bank also offers various consumer credit products including residential mortgage loans, construction loans, personal lines of credit, home equity lines of credit, automobile loans, and personal loans. The bank offers various business financing options as well as remote-deposit services and online banking for all customers.

Truxton Trust complies with the requirements of the CRA. No known legal impediments exist that would restrict the bank from meeting the credit needs of its AA. The bank received a Satisfactory rating at its previous evaluation conducted by the Federal Reserve Bank of Atlanta on October 31, 2022 under the Intermediate Small Institution Examination Procedures.

SCOPE OF EXAMINATION

The CRA performance evaluation assesses the bank's record of meeting the credit needs of its community, including LMI neighborhoods, within the context of information such as asset size and financial condition of the institution, competitive factors, and the economic and demographic characteristics of its defined AA. Truxton Trust's CRA performance evaluation was based on CRA activities within its AA using the Intermediate Small Institution Examination Procedures. Under these procedures, institutions are evaluated using two separately rated tests: a Lending Test and a CD Test that includes an evaluation of CD loans, investments, and CD services, considering the bank's capacity and the need and availability of such opportunities for CD in the its AA.

Lending Test

The Lending Test evaluation included an analysis of HMDA-reportable loans originated from January 1, 2023 through December 31, 2024, and small business loans from January 1, 2024 through December 31, 2024. In 2023, Truxton Trust met the threshold requirements for HMDA reporting and transitioned to a HMDA-reporting institution, maintaining this status in 2024. Given the bank's asset size and office(s) located in an MSA, it submits annual reports about its residential real estate loan originations and applications pursuant to the HMDA. These loans are referred to as "HMDA-reportable" loans in this evaluation. Equal weight was placed on lending performance in 2023 and 2024 in deriving conclusions for HMDA-reportable lending. Refer to *Appendix C* for a detailed definition of small business loans.

Lending Test Analysis Comparisons

Lending Test analyses entail comparisons of bank performance each year to applicable AA demographics and the performance of other lenders for the same year. Under the Lending Test, comparisons to AA demographics for 2023 are based on 2023 FFIEC Census data and 2024 AA demographics are based on 2024 FFIEC Census data. Certain business demographics are based on Dun & Bradstreet (D&B) data applicable to the year of lending activity being considered. Key demographic data used for analysis are presented in *Appendix D*.

CD Test

For the CD test, the examination included CD loans, qualified investments, and CD services from July 1, 2022 through June 30, 2025. The definition of CD as outlined in *Appendix C* serves as the basis for this evaluation.

Community Contacts

As part of the CRA evaluation, one community contact was obtained from an individual specializing in economic development who is familiar with economic and demographic characteristics as well as CD opportunities in the AA. Information obtained from the contact was used to establish a context for the communities in which the bank operates and to gather information on the bank's performance. Specific information obtained from the community contact is included in the applicable section of the evaluation for the AA.

DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NASHVILLE, TENNESSEE AA

Overview

The Nashville, Tennessee AA consists of Davidson and Williamson counties, which are part of the 14-county Nashville-Davidson-Murfreesboro-Franklin, TN MSA. The AA consists of 220 census tracts: 16 low-income tracts (7.3 percent), 49 moderate-income tracts (22.3 percent), 66 middle-income tracts (30.0 percent), 82 upper-income tracts (37.3 percent), and seven with unknown-income levels (3.2 percent).

Truxton Trust operates one branch with no ATM and one stand-alone ATM in the AA and AA deposits totaled \$850.3 million as of June 30, 2024, reflecting an increase of 19.6 percent since the previous evaluation. The bank operates in a competitive banking market that includes regional and national financial institutions. According to the June 30, 2024 FDIC Summary of Deposits report, 48 financial institutions operate 316 branches in the AA.

Truxton Trust ranked 11th in deposit market share with 1.3 percent of total deposits. Pinnacle Bank and Bank of America ranked first and second with deposit market shares at 24.3 percent and 17.3 percent, respectively. Truxton Trust ranked 78th out of 687 HMDA reporters in 2023 and 90th out of 676 reporters in 2024.

Population and Income Characteristics

The AA is situated in the central region of Tennessee and had a population of 963,610 as of the 2020 Census. Davidson County, which includes the capital city of Nashville, is the largest county in the AA with a population of 715,884. Williamson County had a population of 247,726.

For purposes of classifying borrower income, this evaluation uses the FFIEC estimated median family income for the relevant area. As the following table shows, the median family income increased from \$100,500 in 2023 to \$101,700 in 2024.

Borrower Income Levels
Nashville-Davidson-Murfreesboro-Franklin, TN MSA

FFIEC Estimated Median Family Income		Low		Moderate		Middle		Upper	
		0	- 49.99%	50%	- 79.99%	80%	- 119.99%	120%	- & above
2023	\$100,500	0	- \$50,249	\$50,250	- \$80,399	\$80,400	- \$120,599	\$120,600	- & above
2024	\$101,700	0	- \$50,849	\$50,850	- \$81,359	\$81,360	- \$122,039	\$122,040	- & above

There are 220,226 families in the AA in 2024: 19.9 percent are low-income, 15.5 percent are moderate-income, 18.8 percent are middle-income, and 45.8 percent are upper-income. Of the total families, 8.4 percent have incomes below the poverty level.

Economic Conditions

Nashville has ranked as one of the top 10 large metropolitan areas for population and job growth in recent years. It is a leading national hub for the health care industry and a thriving tourism center. Between January 2022 and December 2024, total nonfarm payrolls grew 8.3 percent in the MSA¹ while nationwide total nonfarm payrolls increased by 5.5 percent.² According to the Bureau of Labor Statistics, the number of people employed in the AA totaled 716,900³. Key industries that represent most of the region’s economy are health care, music and entertainment, manufacturing, tourism and hospitality⁴. The largest employers include Vanderbilt University Medical Center, HCA Healthcare Inc., the State of Tennessee, the U.S. Government, and Nissan Americas⁵.

Small businesses play an important role in the Nashville metro economy. According to 2024 D&B data, there were 44,892 businesses in Nashville AA. Of the total businesses in the AA, 90.3 percent had total annual revenues less than or equal to \$1 million and were therefore considered small businesses. Additionally, 5.0 percent of small businesses were located in low-income tracts and 19.7 percent were in moderate-income tracts.

¹ “All Employees: Total Nonfarm in Nashville-Davidson-Murfreesboro-Franklin, TN (MSA)” *Federal Reserve Economic Data (FRED), St. Louis Fed*, <https://fred.stlouisfed.org/series/NASH947NA>

² “All Employees: Total Nonfarm” *Federal Reserve Economic Data (FRED), St. Louis Fed*, <https://fred.stlouisfed.org/series/NASH947NA>

³ “County Employment and Wages in TN, 4th quarter” *U.S. Bureau of Labor Statistics*, https://www.bls.gov/regions/southeast/news-release/2025/countyemploymentandwages_tennessee_20250610.htm

⁴ “The top industries and employers in the Nashville metro area” *Nash Today*, <https://nashtoday.6amcity.com/city-guide/work/top-industries-employers-nashville-tn>

⁵ “Largest employers in Nashville, ranked by total local employment 2024” *Business Journals*, <https://www.bizjournals.com/nashville/subscriber-only/2024/06/07/largest-employers-in-nashville.html>

The following table shows the unemployment rates percentages for the AA, the counties that comprise the AA, the MSA, and the state of Tennessee. As shown, the 2024 unemployment rate for the AA (2.8 percent) was lower than the unemployment rate for the state of Tennessee (3.4 percent) and equal to the MSA. Williamson County had the lowest unemployment rate (2.7 percent).

TN Nashville 2024 Unemployment Rates					
Area	2020	2021	2022	2023	2024
TN Nashville 2024	7.4%	4.0%	2.8%	2.6%	2.8%
Davidson County, TN	8.1%	4.4%	2.8%	2.7%	2.9%
Williamson County, TN	4.9%	2.7%	2.5%	2.6%	2.7%
Nashville-Davidson--Murfreeseboro--Franklin, TN MSA	7.1%	3.8%	2.8%	2.6%	2.8%
Tennessee	7.4%	4.5%	3.4%	3.2%	3.4%

Source: Bureau of Labor Statistics(BLS), Local Area Unemployment Statistics

Housing Characteristics

There are 404,321 housing units in the AA, of which 54.8 percent are owner-occupied, 36.7 percent are rental units, and 8.4 percent are vacant. In low-income tracts, 24.5 percent of housing units were owner-occupied and 65.6 percent were rentals, whereas 40.4 percent of housing units in moderate-income tracts were owner-occupied and 50.7 percent were rentals. These data suggest limited opportunity for homeownership lending in LMI tracts.

The median age of the housing stock was 38 years in Davidson County and 22 years in Williamson County. Housing units in LMI census tracts in the AA are older, with a median age of 47 years in low-income tracts and 46 years in moderate-income tracts.

The median housing value in the AA is \$316,523, which is higher than the median housing value for the state of Tennessee (\$177,600). Median gross rent in the AA is \$1,211 per month, which is higher than the median gross rent for the state of Tennessee (\$897 per month). These elevated housing costs contribute to an increased affordability gap within the AA. Housing cost burden is a challenge in the AA. Data shows that the percentage of renters with rent costs greater than 30 percent of income is 44.8 percent, which is higher than the state of Tennessee at 40.9 percent. Housing data suggests that housing in the AA is less affordable than housing in the state of Tennessee.

Credit and CD Needs

Information was obtained from an individual specializing in economic development for the area. The contact stated that overall economic conditions are good. The business community is optimistic about the growth potential for the area, but economic activity has slowed in the last six to eight months due to economic uncertainty. There has been population growth in the region and that is expected to continue. Recent college graduates are the primary people moving into the region. Drivers of population growth include quality of life and the strong business community. People are also moving out of the city to the surrounding suburban areas in search of more affordable housing. There is not enough affordable housing stock to meet demand and wage rates are not keeping up with the rising costs of housing. There is also an ongoing need for small business lending and a need to support small businesses and large corporations alike with both financial and technical assistance. The contact noted that financial institutions have good involvement with the community, particularly with small diverse/minority-owned businesses.

CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

LENDING TEST

Overview

The rating for the Lending Test is Satisfactory. The LTD ratio is reasonable and a majority of loans were made in the AA. The geographic distribution of loans reflects reasonable dispersion throughout the AA. The distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different sizes. Performance context information such as demographics, economic conditions, competition, business strategy, and opportunities was considered in evaluating lending performance.

The analysis included 76 HMDA-reportable loans (two-year review period) and 45 small business loans (one year review period) reported by the bank in the AA during the review period. With volumes of the two products being similar, they received equal weight in determining conclusions in the AA. Details for HMDA-reportable and small business lending and aggregate lending data can be found in *Appendix E*.

Loan-to-Deposit Ratio

The LTD ratio is reasonable given the bank’s size, financial condition, and AA credit needs. The average LTD for the 12 quarters from January 1, 2022 to December 31, 2024 was 75.7 percent. The LTD ratio was compared to three other depository institutions with branches in the same AA over the same period ranging from 60.9 to 100.9 percent. The LTD during the previous examination was 72.1 percent.

AA Concentration

The bank originated a majority of loans to borrowers and businesses in the AA. The table below shows, by product type, the number and percentage of loans that were located inside and outside of the AA.

Lending Inside and Outside the Assessment Area

Loan Types	Inside				Outside			
	#	%	\$(000s)	%	#	%	\$(000s)	%
Home Improvement	2	100	\$1,900	100	0	0	\$0	0
Home Purchase - Conventional	60	85.7	\$38,858	81.7	10	14.3	\$8,678	18.3
Loan Purpose Not Applicable	3	100	\$220	100	0	0	\$0	0
Multi-Family Housing	4	80	\$6,286	69.2	1	20	\$2,800	30.8
Other Purpose Closed-End	0	0	\$0	0	1	100	\$235	100
Refinancing	7	87.5	\$3,933	94.7	1	12.5	\$220	5.3
Total HMDA related	76	85.4	\$51,197	81.1	13	14.6	\$11,933	18.9
Small Business	45	69.2	\$15,068	69.2	20	30.8	\$6,716	30.8
Total Small Bus. related	45	69.2	\$15,068	69.2	20	30.8	\$6,716	30.8
TOTAL LOANS	121	78.6	\$66,265	78	33	21.4	\$18,649	22

Note: Affiliate loans not included

As indicated in the table above, 85.4 percent of HMDA-reportable loans (by number) and 81.1 percent (by dollar) were inside the bank’s AA. Additionally, 69.2 percent of small business loans (by number) and 69.2 percent (by dollar) were made to businesses within the AA. This indicates the bank’s willingness to originate loans that meet the credit needs of its AA.

Geographic Distribution of Loans

The geographic distribution of loans reflects reasonable dispersion throughout the AA. As described in the following sections, performance for HMDA-reportable lending is excellent and small business lending is reasonable.

Residential Real Estate (HMDA-reportable)

HMDA-reportable lending in low-income tracts is excellent. In 2023, lending in low-income tracts (13.6 percent) was above the percentage of owner-occupied units (2.8 percent) and above aggregate performance (4.0 percent). In 2024, lending in low-income tracts (9.4 percent) was above percentage of owner-occupied units (2.8 percent) and above aggregate performance (4.8 percent).

HMDA-reportable lending in moderate-income tracts is reasonable. In 2023, lending in moderate-income tracts (11.4 percent) was below the percentage of owner-occupied units (17.5 percent) and below aggregate performance (18.2 percent). In 2024, HMDA-reportable lending in moderate-income tracts (31.3 percent) was above the percentage of owner-occupied units (16.6 percent) and above aggregate performance (17.2 percent).

Small Business Loans

Small business lending in low-income tracts is excellent. Small business lending in low-income tracts (8.9 percent) was above the percentage of total businesses located in these tracts (5.0 percent).

Small business lending in moderate-income tracts is poor. Small business lending in moderate-income tracts (11.1 percent) was below the percentage of total businesses located in these tracts (19.7 percent).

This performance is considered reasonable in light of performance context such as competition. No conspicuous lending gaps were identified based on an analysis of the dispersion of the loan products reviewed. The bank had activity across AA census tract categories throughout the review period and maps did not indicate an absence of loans across LMI tracts.

Lending to Borrowers of Different Incomes and Businesses of Different Sizes

The distribution of loans reflects excellent penetration among individuals of different income levels and businesses of different sizes. As described in the following sections, performance for HMDA-reportable lending is excellent and small business lending performance is reasonable.

Residential Real Estate (HMDA-reportable) Loans

HMDA-reportable lending to low-income borrowers is excellent. In 2023, lending to low-income borrowers (11.4 percent) was below the percentage of low-income families (20.3 percent) but above aggregate performance (4.2 percent). In 2024, HMDA-reportable lending to low-income borrowers (28.1 percent) was above the percentage of low-income families (19.9 percent) and above the aggregate performance (3.6 percent).

HMDA-reportable lending to moderate-income borrowers is excellent. In 2023, HMDA-reportable lending to moderate-income borrowers (20.5 percent) was above the percentage of low-income families (15.8 percent) and above aggregate performance (14.0 percent). In 2024, HMDA-reportable lending to moderate-income borrowers (18.8 percent) was above the percentage of moderate-income families (15.5 percent) and above the aggregate (12.7 percent).

This lending performance demonstrates responsiveness to the community credit needs of affordable housing discussed by the community contact by providing LMI individuals with access to mortgage financing.

Small Business Loans

Small business lending to businesses of different sizes is reasonable. Small business lending to businesses with gross annual revenues of \$1 million or less (44.4 percent) was below the percentage of total businesses in the AA (90.3 percent). Additionally, 25 of 45 total originations (55.6 percent) were in amounts of \$250,000 or less, an indicator of the bank's willingness to make small dollar loans to help meet the credit needs of the business community.

Responsiveness to Substantiated Complaints

Neither the bank nor the Reserve Bank received CRA-related complaints since the previous evaluation.

CD TEST

The rating for the CD Test is Outstanding. CD performance demonstrates excellent responsiveness to the needs of its AA through CD loans, qualified investments, and CD services considering the bank's capacity and needs and availability of opportunities for CD in the AA.

Truxton Trust originated 24 CD loans totaling \$59.6 million; 19 loans for \$58.4 million financed affordable housing development and five loans for \$1.2 million were provided to organizations that offer community services to LMI individuals.

Examples of CD loans that were responsive to identified community credit needs include:

- Four loans for \$12.8 million to one of the largest nonprofit affordable housing developers in Nashville for property acquisition, development, and ownership of several multi-family projects;
- A revolving line of credit to a CDFI to allow the organization to purchase multifamily properties prior to obtaining long term financing to preserve affordable housing; and
- A \$300,000 line of credit to a nonprofit organization to provide support and education to low-income cancer victims, including family and friends of those diagnosed.

Qualified investments totaled \$15.9 million; 14 investments for \$8.4 million supported affordable housing and nine investments for \$7.5 million promoted economic development. Further, management demonstrated its commitment to community reinvestment with 33 donations totaling \$307,250 targeted to LMI populations.

Examples of notable CD investments include:

- Two investments in municipal bonds for a not-for-profit organization totaling \$1.4 million, with proceeds funding low-income housing; and
- One senior preferred equity investment totaling \$1.5 million focused on resolving economic inequalities impacting low-income borrowers and communities as well as expanding access to capital for underserved and underbanked borrowers in pursuit of home ownership.

Employees engaged in 32 CD service activities for 1,295 hours benefiting the AA. Activities targeting LMI individuals included personal finance management education, affordable housing development, and other community and economic development services.

FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

No evidence of discriminatory or other illegal credit practices inconsistent with helping to meet community credit needs was identified.

APPENDIX A – SCOPE OF EXAMINATION

TIME PERIOD REVIEWED			
January 1, 2023 to December 31, 2024 – Lending Test (HMDA-reportable loans)			
January 1, 2024 to December 31, 2024 – Lending Test (Small business loans)			
July 1, 2022 to June 30, 2025 – CD Test			
FINANCIAL INSTITUTION			PRODUCTS REVIEWED
Truxton Trust Company, Nashville, Tennessee			HMDA-Reportable and Small Business Loans
AFFILIATE(S)	AFFILIATE RELATIONSHIP		PRODUCTS REVIEWED
N/A	N/A		N/A
LIST OF ASSESSMENT AREAS AND TYPE OF EXAMINATION			
<i>ASSESSMENT AREAS</i>	<i>TYPE OF EXAMINATION</i>	<i>BRANCHES VISITED</i>	<i>OTHER INFORMATION</i>
Nashville, Tennessee (Nashville-Davidson-Murfreesboro-Franklin Metropolitan Statistical Area (MSA))	<i>Full-scope Review</i>	<i>N/A</i>	<i>N/A</i>

APPENDIX B – DEFINITIONS AND GENERAL INFORMATION

Definitions

ATM	Automated Teller Machine
CD	Community Development
CDC	Community Development Corporation
CDFI	Community Development Financial Institution
CRA	Community Reinvestment Act (Regulation BB)
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
HMDA	Home Mortgage Disclosure Act (Regulation C)
HUD	Department of Housing and Urban Development
LMI	Low- and Moderate-Income
LTD	Loan-to-Deposit
LTV	Loan-to-Value Ratio
MD	Metropolitan Division
MSA	Metropolitan Statistical Area
OMB	Office of Management and Budget
REIS	Regional Economic Information System
SBA	Small Business Administration
USDA	United States Department of Agriculture

Rounding Convention

Because the percentages presented in tables were rounded to the nearest tenth in most cases, some columns may not total exactly 100 percent.

General Information

The CRA requires each federal financial supervisory agency to use its authority when examining financial institutions subject to its supervision to assess the 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. Upon conclusion of such examination, the agency must prepare a written evaluation of the institution's record of meeting the credit needs of its community.

This document is an evaluation of the CRA performance of Truxton Trust Company prepared by the **Federal Reserve Bank of Atlanta**, the institution's supervisory agency, as of February 2, 2026. The agency rates the CRA performance of an institution consistent with the provisions set forth in Appendix A to 12 CFR Part 228.

APPENDIX C – GLOSSARY

Aggregate lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the metropolitan area/assessment area.

Census tract: A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of MSAs. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community development: All Agencies have adopted the following language. Affordable housing (including multi-family rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Effective September 1, 2005, the Board of Governors of the Federal Reserve System (Board), Office of the Comptroller of the Currency (OCC), and the Federal Deposit Insurance Corporation (FDIC) have adopted the following additional language as part of the revitalize or stabilize definition of community development. Activities that revitalize or stabilize-

- I. Low-or moderate-income geographies;
- II. Designated disaster areas; or
- III. Distressed or underserved nonmetropolitan middle-income geographies designated by the Board, FDIC, and OCC, based on-
 - a. Rates of poverty, unemployment, and population loss; or
 - b. Population size, density, and dispersion. Activities that revitalize and stabilize geographies designated based on population size, density, and dispersion if they help to meet essential community needs, including needs of low- and moderate-income individuals.

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

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 (for example, geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (for example, innovativeness, complexity, and responsiveness).

APPENDIX C – GLOSSARY (Continued)

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in an MSA to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (for example, approved, denied, and withdrawn).

Home mortgage loans: Includes home purchase and home improvement loans as defined in the HMDA regulation. This definition also includes multi-family (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancings of home improvement and home purchase loans.

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 (for example, geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

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

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

Metropolitan area (MA): A MSA or a metropolitan division (MD) as defined by the Office of Management and Budget. An MSA is a core area containing at least one urbanized area of 50,000 or more inhabitants, together with adjacent communities having a high degree of economic and social integration with that core. An MD is a division of an MSA based on specific criteria including commuting patterns. Only an MSA that has a population of at least 2.5 million may be divided into MDs.

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.

Multi-family: Refers to a residential structure that contains five or more units.

Other products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

APPENDIX C – GLOSSARY (Continued)

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.

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

Small loan(s) to business(es): A loan included in 'loans to small businesses' as defined in the Call Report and the Thrift Financial Reporting (TFR) 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. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small loan(s) to farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the 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.

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

APPENDIX D – ASSESSMENT AREA DEMOGRAPHIC TABLES

Combined Demographics Report - 2023

Assessment Area: TN Nashville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	7.3%	12,342	5.6%	3,941	31.9%	44,684	20.3%
Moderate-income	52	23.6%	46,689	21.2%	7,538	16.1%	34,890	15.8%
Middle-income	63	28.6%	63,413	28.8%	3,917	6.2%	41,864	19.0%
Upper-income	82	37.3%	95,787	43.5%	2,759	2.9%	98,788	44.9%
Unknown-income	7	3.2%	1,995	0.9%	381	19.1%	0	0.0%
Total Assessment Area	220	100.0%	220,226	100.0%	18,536	8.4%	220,226	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	25,417	6,237	2.8%	24.5%	16,685	65.6%	2,495	9.8%
Moderate-income	94,988	38,754	17.5%	40.8%	47,712	50.2%	8,522	9.0%
Middle-income	121,687	70,104	31.6%	57.6%	41,711	34.3%	9,872	8.1%
Upper-income	157,659	105,174	47.4%	66.7%	39,951	25.3%	12,534	8.0%
Unknown-income	4,570	1,498	0.7%	32.8%	2,406	52.6%	666	14.6%
Total Assessment Area	404,321	221,767	100.0%	54.8%	148,465	36.7%	34,089	8.4%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,312	4.8%	2,091	4.8%	210	4.8%	11	2.7%
Moderate-income	9,964	20.5%	8,815	20.1%	1,083	25.0%	66	16.2%
Middle-income	10,986	22.6%	10,095	23.0%	826	19.1%	65	15.9%
Upper-income	23,853	49.1%	21,696	49.5%	1,905	44.0%	252	61.8%
Unknown-income	1,462	3.0%	1,139	2.6%	309	7.1%	14	3.4%
Total Assessment Area	48,577	100.0%	43,836	100.0%	4,333	100.0%	408	100.0%
Percentage of Total Businesses:			90.2%		8.9%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	7	1.8%	7	1.8%	0	0.0%	0	0.0%
Moderate-income	40	10.4%	38	9.9%	2	50.0%	0	0.0%
Middle-income	78	20.2%	78	20.4%	0	0.0%	0	0.0%
Upper-income	258	66.8%	256	67.0%	2	50.0%	0	0.0%
Unknown-income	3	0.8%	3	0.8%	0	0.0%	0	0.0%
Total Assessment Area	386	100.0%	382	100.0%	4	100.0%	0	0.0%
Percentage of Total Farms:			99.0%		1.0%		0.0%	

Based on 2023 FFIEC Census Data and 2023 D&B Information

APPENDIX D – ASSESSMENT AREA DEMOGRAPHIC TABLES (Continued)

Combined Demographics Report - 2024

Assessment Area: TN Nashville

Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low-income	16	7.3%	12,342	5.6%	3,941	31.9%	43,738	19.9%
Moderate-income	49	22.3%	44,953	20.4%	7,490	16.7%	34,242	15.5%
Middle-income	66	30.0%	65,149	29.6%	3,965	6.1%	41,373	18.8%
Upper-income	82	37.3%	95,787	43.5%	2,759	2.9%	100,873	45.8%
Unknown-income	7	3.2%	1,995	0.9%	381	19.1%	0	0.0%
Total Assessment Area	220	100.0%	220,226	100.0%	18,536	8.4%	220,226	100.0%
	Housing Units by Tract	Housing Types by Tract						
		Owner-Occupied		Rental		Vacant		
		#	%	%	#	%	#	%
Low-income	25,417	6,237	2.8%	24.5%	16,685	65.6%	2,495	9.8%
Moderate-income	90,813	36,726	16.6%	40.4%	46,080	50.7%	8,007	8.8%
Middle-income	125,862	72,132	32.5%	57.3%	43,343	34.4%	10,387	8.3%
Upper-income	157,659	105,174	47.4%	66.7%	39,951	25.3%	12,534	8.0%
Unknown-income	4,570	1,498	0.7%	32.8%	2,406	52.6%	666	14.6%
Total Assessment Area	404,321	221,767	100.0%	54.8%	148,465	36.7%	34,089	8.4%
	Total Businesses by Tract	Businesses by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	2,225	5.0%	2,012	5.0%	200	5.0%	13	3.6%
Moderate-income	8,842	19.7%	7,913	19.5%	877	22.1%	52	14.4%
Middle-income	11,373	25.3%	10,353	25.5%	951	23.9%	69	19.1%
Upper-income	21,113	47.0%	19,222	47.4%	1,677	42.2%	214	59.1%
Unknown-income	1,339	3.0%	1,055	2.6%	270	6.8%	14	3.9%
Total Assessment Area	44,892	100.0%	40,555	100.0%	3,975	100.0%	362	100.0%
	Percentage of Total Businesses:		90.3%		8.9%		0.8%	
	Total Farms by Tract	Farms by Tract & Revenue Size						
		Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported		
		#	%	#	%	#	%	#
Low-income	6	1.7%	6	1.7%	0	0.0%	0	0.0%
Moderate-income	35	9.9%	33	9.5%	2	40.0%	0	0.0%
Middle-income	73	20.7%	73	21.0%	0	0.0%	0	0.0%
Upper-income	235	66.8%	232	66.9%	3	60.0%	0	0.0%
Unknown-income	3	0.9%	3	0.9%	0	0.0%	0	0.0%
Total Assessment Area	352	100.0%	347	100.0%	5	100.0%	0	0.0%
	Percentage of Total Farms:		98.6%		1.4%		0.0%	

Based on 2024 FFIEC Census Data and 2024 D&B information

APPENDIX E – LENDING TABLES

Geographic Distribution of HMDA Loans - Table 1 of 2
Assessment Area: TN Nashville

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count		Dollar				Owner Occupied Units %	Count		Dollar				Owner Occupied Units %
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Bank #		Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %			
HOME PURCHASE	Low	3	9.4%	4.3%	33	0.1%	3.2%	2.8%	3	10.7%	5.4%	150	1.3%	3.7%	2.8%
	Moderate	5	15.6%	19.7%	995	3.6%	14.4%	17.5%	9	32.1%	18.3%	1,979	17.5%	13.5%	16.6%
	Middle	5	15.6%	34.1%	502	1.8%	25.1%	31.6%	10	35.7%	32.0%	608	5.4%	24.2%	32.5%
	Upper	19	59.4%	40.9%	26,048	94.5%	56.5%	47.4%	6	21.4%	43.0%	8,543	75.7%	57.6%	47.4%
	Unknown	0	0.0%	1.1%	0	0.0%	0.9%	0.7%	0	0.0%	1.2%	0	0.0%	1.0%	0.7%
	Total	32	100%	100%	27,578	100%	100%	100%	28	100%	100%	11,280	100%	100%	100%
REFINANCE	Low	0	0.0%	4.3%	0	0.0%	2.9%	2.8%	0	0.0%	4.6%	0	0.0%	3.6%	2.8%
	Moderate	0	0.0%	17.7%	0	0.0%	11.9%	17.5%	0	0.0%	17.3%	0	0.0%	12.4%	16.6%
	Middle	0	0.0%	30.4%	0	0.0%	30.6%	31.6%	1	50.0%	31.1%	85	12.4%	23.2%	32.5%
	Upper	4	80.0%	46.9%	3,158	97.2%	53.9%	47.4%	1	50.0%	46.3%	600	87.6%	60.3%	47.4%
	Unknown	1	20.0%	0.6%	90	2.8%	0.7%	0.7%	0	0.0%	0.7%	0	0.0%	0.5%	0.7%
	Total	5	100%	100%	3,248	100%	100%	100%	2	100%	100%	685	100%	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	1.9%	0	0.0%	1.3%	2.8%	0	0.0%	2.1%	0	0.0%	1.8%	2.8%
	Moderate	0	0.0%	13.8%	0	0.0%	10.1%	17.5%	0	0.0%	12.5%	0	0.0%	7.3%	16.6%
	Middle	0	0.0%	26.9%	0	0.0%	17.6%	31.6%	0	0.0%	27.8%	0	0.0%	19.0%	32.5%
	Upper	2	100.0%	56.6%	1,900	100.0%	70.4%	47.4%	0	0.0%	56.8%	0	0.0%	71.0%	47.4%
	Unknown	0	0.0%	0.8%	0	0.0%	0.7%	0.7%	0	0.0%	0.8%	0	0.0%	0.8%	0.7%
	Total	2	100%	100%	1,900	100%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%
MULTI FAMILY	Low	0	0.0%	13.2%	0	0.0%	8.0%	9.9%	0	0.0%	16.7%	0	0.0%	14.0%	9.9%
	Moderate	0	0.0%	29.4%	0	0.0%	32.3%	30.1%	1	50.0%	29.5%	382	18.3%	27.3%	28.9%
	Middle	0	0.0%	27.9%	0	0.0%	24.5%	25.6%	1	50.0%	38.5%	1,700	81.7%	38.6%	26.8%
	Upper	2	100.0%	27.9%	4,204	100.0%	34.0%	32.5%	0	0.0%	15.4%	0	0.0%	20.1%	32.5%
	Unknown	0	0.0%	1.5%	0	0.0%	1.1%	1.8%	0	0.0%	0.0%	0	0.0%	0.0%	1.8%
	Total	2	100%	100%	4,204	100%	100%	100%	2	100%	100%	2,082	100%	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	2.2%	0	0.0%	1.2%	2.8%	0	0.0%	2.0%	0	0.0%	1.0%	2.8%
	Moderate	0	0.0%	11.6%	0	0.0%	6.6%	17.5%	0	0.0%	10.8%	0	0.0%	5.8%	16.6%
	Middle	0	0.0%	25.4%	0	0.0%	14.5%	31.6%	0	0.0%	27.7%	0	0.0%	16.5%	32.5%
	Upper	0	0.0%	59.9%	0	0.0%	77.2%	47.4%	0	0.0%	58.6%	0	0.0%	75.9%	47.4%
	Unknown	0	0.0%	0.8%	0	0.0%	0.5%	0.7%	0	0.0%	1.0%	0	0.0%	0.8%	0.7%
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%

Originations & Purchases

Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E – LENDING TABLES (Continued)

Geographic Distribution of HMDA Loans - Table 2 of 2
Assessment Area: TN Nashville

PRODUCT TYPE	Tract Income Levels	Bank & Aggregate Lending; Demographic Data															
		2023							2024								
		Count			Dollar				Owner Occupied Units %	Count			Dollar				Owner Occupied Units %
		Bank #	Agg %	Bank \$ (000s)	Agg \$ %	Bank \$ %	Bank #	Agg %		Bank \$ (000s)	Agg \$ %	Bank \$ %					
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	4.1%	0	0.0%	2.3%	2.8%	0	0.0%	3.5%	0	0.0%	1.5%	2.8%		
	Moderate	0	0.0%	15.9%	0	0.0%	6.5%	17.5%	0	0.0%	15.5%	0	0.0%	9.8%	16.6%		
	Middle	0	0.0%	30.5%	0	0.0%	18.1%	31.6%	0	0.0%	30.8%	0	0.0%	13.6%	32.5%		
	Upper	0	0.0%	47.9%	0	0.0%	72.5%	47.4%	0	0.0%	49.0%	0	0.0%	73.4%	47.4%		
	Unknown	0	0.0%	1.5%	0	0.0%	0.6%	0.7%	0	0.0%	1.1%	0	0.0%	1.7%	0.7%		
	<i>Total</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		
PURPOSE NOT APPLICABLE	Low	3	100.0%	9.9%	220	100.0%	11.8%	2.8%	0	0.0%	14.8%	0	0.0%	16.7%	2.8%		
	Moderate	0	0.0%	36.6%	0	0.0%	35.2%	17.5%	0	0.0%	33.3%	0	0.0%	39.6%	16.6%		
	Middle	0	0.0%	38.0%	0	0.0%	32.9%	31.6%	0	0.0%	37.0%	0	0.0%	20.2%	32.5%		
	Upper	0	0.0%	15.5%	0	0.0%	20.0%	47.4%	0	0.0%	14.8%	0	0.0%	23.5%	47.4%		
	Unknown	0	0.0%	0.0%	0	0.0%	0.0%	0.7%	0	0.0%	0.0%	0	0.0%	0.0%	0.7%		
	<i>Total</i>	<i>3</i>	<i>100%</i>	<i>100%</i>	<i>220</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>0</i>	<i>0.0%</i>	<i>100%</i>	<i>100%</i>		
HMDA TOTALS	Low	6	13.6%	4.0%	253	0.7%	3.3%	2.8%	3	9.4%	4.8%	150	1.1%	4.4%	2.8%		
	Moderate	5	11.4%	18.2%	995	2.7%	14.8%	17.5%	10	31.3%	17.2%	2,361	16.8%	14.0%	16.6%		
	Middle	5	11.4%	32.0%	502	1.4%	25.1%	31.6%	12	37.5%	31.2%	2,393	17.0%	24.8%	32.5%		
	Upper	27	61.4%	44.9%	35,310	95.0%	55.8%	47.4%	7	21.9%	45.7%	9,143	65.1%	56.0%	47.4%		
	Unknown	1	2.3%	0.9%	90	0.2%	0.8%	0.7%	0	0.0%	1.1%	0	0.0%	0.8%	0.7%		
	<i>Total</i>	<i>44</i>	<i>100%</i>	<i>100%</i>	<i>37,150</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>	<i>32</i>	<i>100%</i>	<i>100%</i>	<i>14,047</i>	<i>100%</i>	<i>100%</i>	<i>100%</i>		

Originations & Purchases
Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Geographic Distribution of Small Business Loans

Assessment Area: TN Nashville

PRODUCT TYPE	Tract Income Levels	Bank Lending & Demographic Data				
		2024				
		Count		Dollar		Total Businesses %
		#	%	\$ (000s)	\$ %	%
SMALL BUSINESSES	Low	4	8.9%	1,310	8.7%	5.0%
	Moderate	5	11.1%	2,619	17.4%	19.7%
	Middle	8	17.8%	3,100	20.6%	25.3%
	Upper	27	60.0%	8,024	53.3%	47.0%
	Unknown	1	2.2%	15	0.1%	3.0%
	<i>Total</i>	<i>45</i>	<i>100%</i>	<i>15,068</i>	<i>100%</i>	<i>100.0%</i>

Originations & Purchases
Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information
Percentages may not total 100 percent due to rounding

APPENDIX E – LENDING TABLES (Continued)

Borrower Distribution of HMDA Loans - Table 1 of 2

Assessment Area: TN Nashville

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count			Dollar			Families by Family Income %	Count			Dollar			Families by Family Income %
		Bank #	Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %		Bank #	Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	
HOME PURCHASE	Low	2	6.3%	2.6%	25	0.1%	1.0%	20.3%	9	32.1%	2.0%	214	1.9%	0.8%	19.9%
	Moderate	9	28.1%	13.7%	915	3.3%	7.1%	15.8%	5	17.9%	12.1%	67	0.6%	6.1%	15.5%
	Middle	0	0.0%	16.7%	0	0.0%	11.6%	19.0%	3	10.7%	16.1%	51	0.5%	10.8%	18.8%
	Upper	16	50.0%	47.5%	24,645	89.4%	61.2%	44.9%	5	17.9%	47.7%	7,100	62.9%	60.4%	45.8%
	Unknown	5	15.6%	19.5%	1,993	7.2%	19.0%	0.0%	6	21.4%	22.1%	3,848	34.1%	21.9%	0.0%
	Total	32	100%	100%	27,578	100%	100%	100%	28	100%	100%	11,280	100%	100%	100%
REFINANCE	Low	0	0.0%	9.3%	0	0.0%	3.9%	20.3%	0	0.0%	6.9%	0	0.0%	2.8%	19.9%
	Moderate	0	0.0%	16.4%	0	0.0%	8.4%	15.8%	0	0.0%	14.7%	0	0.0%	7.6%	15.5%
	Middle	0	0.0%	17.6%	0	0.0%	11.3%	19.0%	0	0.0%	14.8%	0	0.0%	9.4%	18.8%
	Upper	4	80.0%	42.0%	2,268	69.8%	49.4%	44.9%	1	50.0%	41.7%	85	12.4%	52.9%	45.8%
	Unknown	1	20.0%	14.8%	980	30.2%	26.9%	0.0%	1	50.0%	21.8%	600	87.6%	27.3%	0.0%
	Total	5	100%	100%	3,248	100%	100%	100%	2	100%	100%	685	100%	100%	100%
HOME IMPROVEMENT	Low	0	0.0%	5.4%	0	0.0%	1.9%	20.3%	0	0.0%	5.1%	0	0.0%	1.8%	19.9%
	Moderate	0	0.0%	13.6%	0	0.0%	6.4%	15.8%	0	0.0%	12.4%	0	0.0%	5.0%	15.5%
	Middle	0	0.0%	19.4%	0	0.0%	11.6%	19.0%	0	0.0%	17.7%	0	0.0%	9.5%	18.8%
	Upper	2	100.0%	57.6%	1,900	100.0%	72.9%	44.9%	0	0.0%	59.2%	0	0.0%	68.5%	45.8%
	Unknown	0	0.0%	4.0%	0	0.0%	7.2%	0.0%	0	0.0%	5.6%	0	0.0%	15.3%	0.0%
	Total	2	100%	100%	1,900	100%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%
MULTI FAMILY	Low	0	0.0%	0.0%	0	0.0%	0.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%	19.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.8%	1	50.0%	2.6%	382	18.3%	0.1%	15.5%
	Middle	0	0.0%	1.5%	0	0.0%	0.1%	19.0%	0	0.0%	0.0%	0	0.0%	0.0%	18.8%
	Upper	1	50.0%	8.8%	1,204	28.6%	0.6%	44.9%	0	0.0%	9.0%	0	0.0%	1.1%	45.8%
	Unknown	1	50.0%	89.7%	3,000	71.4%	99.4%	0.0%	1	50.0%	88.5%	1,700	81.7%	98.8%	0.0%
	Total	2	100%	100%	4,204	100%	100%	100%	2	100%	100%	2,082	100%	100%	100%
OTHER PURPOSE LOC	Low	0	0.0%	3.7%	0	0.0%	1.5%	20.3%	0	0.0%	4.3%	0	0.0%	1.5%	19.9%
	Moderate	0	0.0%	11.8%	0	0.0%	4.4%	15.8%	0	0.0%	11.9%	0	0.0%	4.6%	15.5%
	Middle	0	0.0%	17.9%	0	0.0%	9.4%	19.0%	0	0.0%	17.5%	0	0.0%	8.5%	18.8%
	Upper	0	0.0%	62.0%	0	0.0%	78.8%	44.9%	0	0.0%	61.7%	0	0.0%	81.6%	45.8%
	Unknown	0	0.0%	4.7%	0	0.0%	5.9%	0.0%	0	0.0%	4.6%	0	0.0%	3.8%	0.0%
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%

Originations & Purchases

Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

Borrower Distribution of HMDA Loans - Table 2 of 2

Assessment Area: TN Nashville

PRODUCT TYPE	Borrower Income Levels	Bank & Aggregate Lending; Demographic Data													
		2023							2024						
		Count			Dollar			Families by Family Income %	Count			Dollar			Families by Family Income %
		Bank #	Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %		Bank #	Agg %	Agg %	Bank \$ (000s)	Agg \$ %	Agg \$ %	
OTHER PURPOSE CLOSED/EXEMPT	Low	0	0.0%	6.7%	0	0.0%	3.0%	20.3%	0	0.0%	8.0%	0	0.0%	2.5%	19.9%
	Moderate	0	0.0%	16.1%	0	0.0%	4.4%	15.8%	0	0.0%	15.7%	0	0.0%	4.5%	15.5%
	Middle	0	0.0%	14.1%	0	0.0%	4.4%	19.0%	0	0.0%	18.9%	0	0.0%	6.9%	18.8%
	Upper	0	0.0%	49.3%	0	0.0%	68.1%	44.9%	0	0.0%	43.6%	0	0.0%	57.9%	45.8%
	Unknown	0	0.0%	13.8%	0	0.0%	20.1%	0.0%	0	0.0%	13.8%	0	0.0%	28.2%	0.0%
	Total	0	0.0%	100%	0	0.0%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%
PURPOSE NOT APPLICABLE	Low	3	100.0%	7.0%	220	100.0%	6.0%	20.3%	0	0.0%	0.0%	0	0.0%	0.0%	19.9%
	Moderate	0	0.0%	0.0%	0	0.0%	0.0%	15.8%	0	0.0%	0.0%	0	0.0%	0.0%	15.5%
	Middle	0	0.0%	0.0%	0	0.0%	0.0%	19.0%	0	0.0%	3.7%	0	0.0%	4.3%	18.8%
	Upper	0	0.0%	1.4%	0	0.0%	0.0%	44.9%	0	0.0%	0.0%	0	0.0%	0.0%	45.8%
	Unknown	0	0.0%	91.5%	0	0.0%	93.9%	0.0%	0	0.0%	96.3%	0	0.0%	95.7%	0.0%
	Total	3	100%	100%	220	100%	100%	100%	0	0.0%	100%	0	0.0%	100%	100%
HMDA TOTALS	Low	5	11.4%	4.2%	245	0.7%	1.5%	20.3%	9	28.1%	3.6%	214	1.5%	1.1%	19.9%
	Moderate	9	20.5%	14.0%	915	2.5%	6.6%	15.8%	6	18.8%	12.7%	449	3.2%	5.8%	15.5%
	Middle	0	0.0%	17.1%	0	0.0%	10.5%	19.0%	3	9.4%	16.0%	51	0.4%	9.5%	18.8%
	Upper	23	52.3%	48.4%	30,017	80.8%	56.2%	44.9%	6	18.8%	47.9%	7,185	51.1%	54.9%	45.8%
	Unknown	7	15.9%	16.3%	5,973	16.1%	25.3%	0.0%	8	25.0%	19.8%	6,148	43.8%	28.6%	0.0%
	Total	44	100%	100%	37,150	100%	100%	100%	32	100%	100%	14,047	100%	100%	100%

Originations & Purchases

Based on 2023 & 2024 FFIEC Census Data; 2016-2020 ACS data

APPENDIX E – LENDING TABLES (Continued)

Small Business Loans by Business Revenue & Loan Size

Assessment Area: TN Nashville

		Bank Lending & Demographic Data				
		2024				
		Count		Dollar		Total Businesses
		#	%	\$ (000s)	\$ %	%
Revenue	\$1 Million or Less	20	44.4%	6,372	42.3%	90.3%
	Over \$1 Million	24	53.3%	8,595	57.0%	8.9%
	<i>Total Rev. available</i>	44	97.8%	14,968	99.3%	99.2%
	Rev. Not Known	1	2.2%	100	0.7%	0.8%
	<i>Total</i>	45	100%	15,068	100%	100%
Loan Size	\$100,000 or Less	13	28.9%	826	5.5%	
	\$100,001 - \$250,000	12	26.7%	2,048	13.6%	
	\$250,001 - \$1 Million	20	44.4%	12,194	80.9%	
	<i>Total</i>	45	100%	15,068	100%	
Loan Size & Rev \$1 Mill or Less	\$100,000 or Less	8	40.0%	392	6.2%	
	\$100,001 - \$250,000	4	20.0%	810	12.7%	
	\$250,001 - \$1 Million	8	40.0%	5,170	81.1%	
	<i>Total</i>	20	100%	6,372	100%	

Originations & Purchases

Based on 2024 FFIEC Census Data; 2016-2020 ACS data; 2024 D&B information

Percentages may not total 100 percent due to rounding