

#### **PUBLIC DISCLOSURE**

October 17, 2022

#### COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

## **United Bank**

Fairfax, VA

## Federal Reserve Bank of Richmond Richmond, Virginia

This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low— and moderate—income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, nor should it be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion or opinion of the Federal financial supervisory agency concerning the safety and soundness of this financial institution.

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365325

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Fairfax, Virginia 22030

Federal Reserve Bank of Richmond P. O. Box 27622 Richmond, Virginia 23261

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## TABLE OF CONTENTS

	Page
Institution Rating	
Overall Rating	4
Performance Test Ratings Table	4
Summary of Major Factors Supporting Rating	4
Institution	
Description of Institution	5
Scope of Examination	6
Conclusions with Respect to Performance Tests	8
Multistate Metropolitan Area	
Multistate Metropolitan Area Rating	24
Scope of Examination	25
Scope of Examination  Description of Operations in the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA Assessment Area	25
Conclusions with Respect to Performance Tests	32
	0_
Multistate Metropolitan Area	40
Multistate Metropolitan Area Rating	40
Scope of Examination	40
Description of Operations in the Wheeling, WV-OH MSA Assessment Area	40
Conclusions with Respect to Performance Tests	45
Multistate Metropolitan Area	
Multistate Metropolitan Area Rating	53
Scope of Examination	53
Description of Operations in the Myrtle Beach-Conway, SC-NC CSA Assessment Area	53
Conclusions with Respect to Performance Tests	58
Multistate Metropolitan Area	
Multistate Metropolitan Area Rating	67
Scope of Examination	67
Description of Operations in the Charlotte-Concord-Gastonia, NC-SC Assessment Area	67
Conclusions with Respect to Performance Tests	74
State of West Virginia	
Summary	
State Rating	82
Scope of Examination	82
Description of Institution's Operations	83
Conclusions with Respect to Performance Tests	83
Materialita a Anna (anni anna 1 anni a Call a	
Metropolitan Area (reviewed using full-scope review)	
Description of Institution's Operations in the Charleston-Huntington-Ashland, WV CS.	
Assessment Area	86 91
Conclusions with Respect to Performance Tests	91
Metropolitan Area (reviewed using full-scope review)	
Description of Institution's Operations in the Morgantown, WV MSA Assessment	
Area	99
Conclusions with Respect to Performance Tests	103

Metropolitan Area (reviewed using limited-scope review)  Description of Institution's Operations in Metropolitan Areas  Conclusions with Respect to Performance Tests	
Nonmetropolitan Statewide Area (reviewed using limited-scope review)  Description of Institution's Operations in the Nonmetropolitan Statewide Area  Conclusions with Respect to Performance Tests	115 116
State of North Carolina	
Summary State Rating	117 117 118 118
Metropolitan Area (reviewed using full-scope review)  Description of Institution's Operations in the Fayetteville-Sanford-Lumberton, NC  Assessment Area	121
Conclusions with Respect to Performance Tests	125
Metropolitan Area (reviewed using full-scope review) Description of Institution's Operations in the Greenville-Kinston-Washington, NC CSA Assessment Area Conclusions with Respect to Performance Tests	132 137
Metropolitan Area (reviewed using full-scope review) Description of Institution's Operations in the Raleigh-Durham-Cary, NC Assessment Area Conclusions with Respect to Performance Tests	145 149
Metropolitan Area (reviewed using full-scope review) Description of Institution's Operations in the Wilmington, NC MSA Assessment Area Conclusions with Respect to Performance Tests	158 162
Conclusions with Respect to Performance Tests	102
Metropolitan Area (reviewed using limited-scope review) Description of Institution's Operations in Metropolitan Areas Conclusions with Respect to Performance Tests	
Nonmetropolitan Statewide Area (reviewed using limited-scope review)  Description of Institution's Operations in the Nonmetropolitan Statewide Area  Conclusions with Respect to Performance Tests	173 177
State of South Carolina Summary State Rating	178
Scope of Examination  Description of Institution's Operations  Conclusions with Respect to Performance Tests	178 179 179
Metropolitan Area (reviewed using full-scope review) Description of Institution's Operations in the Charleston-North Charleston, SC MSA Assessment Area Conclusions with Respect to Performance Tests	181
Conclusions with Respect to Performance Tests	185

Metropolitan Area (reviewed using limited-scope review)  Description of Institution's Operations in Metropolitan Areas  Conclusions with Respect to Performance Tests	
Commonwealth of Virginia	-, -
Summary	
State Rating	196
Scope of Examination	
Description of Institution's Operations	197
Conclusions with Respect to Performance Tests	197
Metropolitan Area (reviewed using full-scope review)	
Description of Institution's Operations in the Harrisonburg-Staunton, VA CSA	
Assessment Area	200
Conclusions with Respect to Performance Tests	205
Metropolitan Area (reviewed using limited-scope review)	
Description of Institution's Operations in Metropolitan Areas	213
Conclusions with Respect to Performance Tests	216
Nonmetropolitan Statewide Area (reviewed using limited-scope review)	
Description of Institution's Operations in Nonmetropolitan Statewide Area	217
Conclusions with Respect to Performance Tests	221
Commonwealth of Pennsylvania	
State Rating	222
Scope of Examination	222
Description of Operations	223
Conclusions with Respect to Performance Tests	228
Appendices	
CRA Appendix A: Scope of Examination Tables	236
CRA Appendix B: Summary of State and Multistate Metropolitan Area Ratings	237
CRA Appendix C: Lending and Demographic Tables for Limited-Scope Reviews	238
CRA Appendix D: Loan, Branch, and Deposit Volume by Assessment Area	344
CRA Appendix E: Assessment Area Composition	346
CRA Appendix F: Branch Openings and Closings and Acquisition	
CRA Appendix G: Glossary	

#### INSTITUTION RATING

#### INSTITUTION'S CRA RATING: SATISFACTORY

The following table indicates the performance level of United Bank with respect to the lending, investment, and service tests.

PERFORMANCE	<u>UNITED BANK</u> PERFORMANCE TESTS			
LEVELS				
	Lending Test*	Investment Test	Service Test	
Outstanding		X		
High Satisfactory	X		X	
Low Satisfactory				
Needs to Improve				
Substantial Noncompliance				

<sup>\*</sup> The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

Major factors supporting the institution's rating include:

- Lending activity reflects good responsiveness to assessment area credit needs.
- A substantial majority of the institution's Home Mortgage Disclosure Act (HMDA) and small business and small farm loans are originated within the bank's assessment areas.
- The bank's geographic distribution performance is considered good overall.
- Overall, the bank's borrower distribution performance is considered good.
- The bank exhibits a good record of serving the credit needs of low-income individuals and geographies as well as very small businesses.
- The bank has made use of innovative and/or flexible lending practices during the review period in serving assessment area credit needs, particularly small businesses.
- The bank is a leader in providing community development loans during the evaluation period.
- The bank has an excellent level of qualified community development investments that demonstrate an excellent responsiveness to local credit needs, and it makes occasional use of innovative and/or complex investments to support community development initiatives.

- Delivery systems and branch locations are readily accessible to geographies and individuals of different income levels within the bank's assessment areas.
- Branch closings have not adversely affected the accessibility of its delivery systems.
- The bank's services do not vary in a way that inconveniences low- or moderate-income geographies or individuals.
- During the evaluation period, the bank was a leader in providing community development services.

## **INSTITUTION**

#### **DESCRIPTION OF INSTITUTION**

Headquartered in Fairfax, Virginia, United Bank (UB) is a subsidiary of United Bankshares, Inc. (UBS), a bank holding company headquartered in Charleston, West Virginia. UB and its holding company have several affiliates and subsidiaries, including George Mason Mortgage, a mortgage subsidiary headquartered in Fairfax, Virginia, and Crescent Mortgage, a mortgage subsidiary headquartered in Atlanta, Georgia.

On December 4, 2021, UBS merged with Community Bankers Trust Corporation, Richmond, Virginia, along with its subsidiary Essex Bank, Richmond, Virginia. The merger provides operations from Pennsylvania to South Carolina in the mid-Atlantic part of the United States. Essex Bank operated 24 branch offices in Virginia and Maryland, and upon consummation of the merger, UB maintained all but two of the Essex Bank branches (one in Rockville, Maryland and one in Edgewater, Maryland). A full list of the acquired Essex Bank branch offices is provided in Appendix F.

UB currently operates 221 full-service branch offices, 272 Automated Teller Machines (ATM), five loan production offices (LPO), and serves 34 assessment areas throughout West Virginia, southeastern Ohio, southwestern Pennsylvania, Maryland, Washington, D.C., Virginia, North Carolina, and South Carolina. Appendix E outlines the composition of the bank's assessment areas. Since the previous evaluation, not including the Essex Bank merger, UB has closed 15 branch offices while opening four branch offices as outlined in Appendix F. Four of the branch closures were located in moderate-income census tracts, while three branch openings were located in moderate-income census tracts; no branch activity occurred in low-income census tracts. UB received a "Needs to Improve" rating at its prior Community Reinvestment Act (CRA) evaluation conducted on August 5, 2020. While the bank's performance under the lending, investment, and service tests were considered "High Satisfactory," "Outstanding," and "High Satisfactory", respectively, which would yield a CRA rating of Satisfactory overall, due to a Fair Housing Act (FHA) violation identified during a concurrent target examination of UB and GMM, UB's overall CRA performance rating was adversely affected and downgraded to "Needs to Improve."

As of September 30, 2022, UB had assets of \$29 billion, of which 67.9% were net loans and 16% were securities. Deposits totaled \$23.1 billion as of the same time period. Various deposit and loan products are available through the institution including loans for residential mortgage, consumer, and business purposes. The composition of the loan portfolio (using gross loans) as of September 30, 2022, is represented in the following table:

## **Composition of Loan Portfolio**

Loan Type	9/30/2022		
Loan Type	\$(000s)	%	
Secured by 1-4 Family dwellings	4,624,486	23.2	
Multifamily	1,120,685	5.6	
Construction and Development	2,624,117	13.2	
Commercial & Industrial/	9,242,266	46.4	
NonFarm NonResidential	9,242,200	40.4	
Consumer Loans and Credit Cards	1,393,291	7.0	
Agricultural Loans/ Farmland	32,082	0.2	
All Other	873,228	4.4	
Total	19,910,155	100.0	

As indicated in the preceding table, UB is an active commercial and residential mortgage lender. The bank offers other loans such as consumer and farm loans; however, the dollar volume of such lending is relatively small in comparison to its commercial and residential mortgage lending. Based on its financial capacity, there are no significant limitations on the bank's ability to meet credit needs within the communities it serves.

#### **SCOPE OF EXAMINATION**

UB was evaluated using the interagency examination procedures for large banks developed by the Federal Financial Institutions Examination Council (FFIEC). UB is required to report certain information regarding its home mortgage lending in accordance with the HMDA. Accordingly, the bank's 2020 and 2021 HMDA loan originations and purchases were considered in the evaluation. UB is also required to collect loan data for small business and small farm loans in accordance with the CRA. Therefore, the evaluation includes an assessment area concentration analysis of all small business and small farm loans reported by the bank during 2020 and 2021. Since UB reported only 91 small farm loans totaling approximately \$7.1 million in two calendar years within its assessment areas, further analysis of these loans was not warranted within the geographic and borrower distributions, as doing so would not yield meaningful conclusions relative to rating the bank's performance. Loans extended or purchased by other affiliates or subsidiaries are not included or considered in the evaluation. Throughout the analysis of lending, loans without a reported income (in the case of borrower distribution) and loans where the reported geographic information is incomplete (in the case of geographic distribution) are excluded from both bank loan totals and comparative aggregate lending totals.

The evaluation also considers any qualified community development loans, investments, donations, and services originated, renewed, purchased, or provided since the previous evaluation dated August 5, 2020. In addition, all qualified investments funded as of the evaluation date were considered, regardless of when made.

Additionally, the scope of the review included UB activity from the markets as a result of the acquisition of Essex Bank. The activity includes community development loan activities, investments, and services performed during the review period; however, given the date of the acquisition in relation to the entire review period, the conclusions held minimal weight in the overall ratings.

United Bank Fairfax, Virginia

To help determine the availability of community development opportunities in specific assessment areas, the CRA public evaluations of other financial institutions operating in these same areas were reviewed. Additionally, in some markets, contact with members of the community were made to discern information about local economic conditions, local credit needs, performance of banks in the assessment area, as well as potential community development opportunities.

Due to its branch locations, an overall rating and ratings for the lending, investment, and service tests are assigned to the institution, the multistate assessment areas, the states of West Virginia, North Carolina, and South Carolina, as well as the Commonwealths of Virginia and Pennsylvania. The state ratings are based only on the performance in the assessment areas subject to full-scope review and excludes activity in the multistate assessment areas, as these are rated separately. For assessment areas that are reviewed utilizing the limited scope examination procedures, a determination is made as to whether performance is consistent with the overall state rating.

The following assessment areas were evaluated using the FFIEC's full-scope examination procedures because of their relative size as determined by loan activity, proportion of bank deposits, and market population:

- Washington-Baltimore-Arlington, DC-VA-MD-WV CSA
- Wheeling, WV-OH MSA
- Myrtle Beach-Conway, SC-NC CSA
- Charlotte-Concord-Gastonia, NC-SC
- Charleston-Huntington-Ashland, WV CSA
- Morgantown, WV MSA
- Fayetteville-Sanford-Lumberton, NC
- Greenville-Kinston-Washington, NC CSA
- Raleigh-Durham-Cary, NC
- Wilmington, NC MSA
- Charleston-North Charleston, SC MSA
- Harrisonburg-Staunton, VA CSA
- Pittsburgh, PA

The remaining 21 assessment areas were subject to limited scope reviews as provided for by the FFIEC examination procedures. Since performance at the institution level is weighted according to level of associated bank activity within the full scope assessment areas, in reaching conclusions for each of the performance tests, UB's ratings within the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA received the greatest weight, as it comprised 50.7%, 34.4%, and 48.7% of the loan volume (by dollar), number of branches, and deposit volume respectively. UB's overall performance in West Virginia received the next highest weight followed by its overall performance in North Carolina, South Carolina, and Virginia. Pennsylvania received the least amount of weight in reaching performance test ratings at the institution level, as it included only 1.5%, 1.8%, and 2.1% of the loan volume (by dollar), number of branches, and deposit volume respectively. Appendix D includes additional data about the distribution of lending, branches, and deposits by assessment area.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

#### LENDING TEST

The bank's overall lending test performance is rated "High Satisfactory." This rating considers the bank's lending activity, assessment area concentration, geographic and borrower distribution performance, and community development lending. In addition, the bank's level of responsiveness and innovation in serving the credit needs of its assessment areas are also considered. These components are discussed in the following sections.

Rated Area	<b>Lending Test Rating</b>
North Carolina	High Satisfactory
Pennsylvania	High Satisfactory
South Carolina	High Satisfactory
Virginia	High Satisfactory
West Virginia	High Satisfactory
Charlotte Multistate	High Satisfactory
Myrtle Beach Multistate CSA	High Satisfactory
Washington, DC Multistate CSA	High Satisfactory
Wheeling Multistate	High Satisfactory
OVERALL	HIGH SATISFACTORY

Reported home mortgage data, as well as reported small business data from calendar years 2020 and 2021 were fully analyzed and considered in this evaluation. While American Community Survey (ACS) data is collected and published by the U.S. Census Bureau on an annual basis, the demographic data relied upon in this performance evaluation is based on ACS data that is updated once every five years. The most recent update occurred in 2022. As such, when evaluating the bank's performance, relevant area demographic data from the 2015 ACS is used as a proxy for demand. Dun & Bradstreet (D&B) business demographic data from 2020 and 2021 are also considered when evaluating the bank's performance.

During 2020 and 2021, the bank reported approximately \$2.7 billion in HMDA, \$2 billion in small business, and \$8.7 million in small farm loans within its assessment areas. In assessing the bank's HMDA lending performance, consideration was given to all HMDA loan categories and the associated performance for each and the proportion of each category relative to the bank's total reported HMDA activity. Each loan category has been analyzed independently, and overall conclusions consider the performance of all the HMDA loan categories. In general, greater weight was given to loan categories and years with higher associated dollar volume.

Analysis tables are presented for each full-scope market for geographic and borrower distribution analyses in 2020 and 2021. HMDA and small business data from calendar years 2020 and 2021 were fully analyzed and considered in the evaluation, and bank and aggregate data from 2020 and 2021 are presented in the analysis tables. In instances where HMDA or small business distribution performance in 2021 varies significantly from the performance noted during 2020, such variance and the corresponding impact on the overall performance is discussed. Additionally, analysis tables for limited-scope areas are provided in Appendix C. While small farm loans were included in the lending activity and comparison of credit extended inside and outside of the bank's assessment areas, these loans were excluded from the geographic and borrower distribution performance analyses given their limited volume.

For the analysis of small business loans by borrower revenue, PPP lending had a significant impact on the bank's reported data as well as aggregate lending data. Since the PPP loan program did not require the collection or consideration of borrower revenue, large volumes of small business loans were originated during both 2020 and 2021 for which borrower revenue is not known. With the large volume of PPP loans originated and reported by UB during those years, the impact is that the proportion of bank loans to businesses with revenues of \$100,000 or less is significantly understated when compared to the total volume of loans originated. The 2020 and 2021 aggregate small business loan data also includes an unknown volume of PPP, which limits its impact usefulness in evaluating UB's performance.

Given these factors, when evaluating borrower distribution by business revenue, the analysis includes the percentage of loans originated to businesses with revenues less than \$1 million as compared to all originated loans as well as the percentage of those loans compared to the volume of loans where revenues are known. As an element of performance context, the analysis also includes data focusing solely on UB's PPP lending by loan size. Since loans in amounts of \$100,000 or less are generally considered to positively impact smaller businesses, the portion of bank PPP lending in that category of loan amount was also used as a contextual element in the analysis.

## **Lending Activity:**

Since September 30, 2020, bank assets, loans, and deposits increased by 12%, 6.3%, and 13.2%, respectively. This growth primarily reflects the acquisition of Essex Bank, which occurred in the fourth quarter of 2021. Within the bank's footprint, by number volume of loans during the evaluation period, more small business loans were originated than HMDA reportable loans and small farm loans. By dollar volume of loans, more HMDA reportable loans were originated than small business and small farm loans. Of the HMDA reportable loans, home purchase and refinance loans were the bank's leading loan products, followed by home improvement and multifamily housing loans. The following table summarizes the bank's lending activity in 2020 and 2021 for the products evaluated.

## **Summary of Lending Activity**

Loan Type	#	%	\$(000)	% of \$
Home Improvement	858	3.55	93,164	1.99
Home Purchase	3,124	12.94	1,179,182	25.19
Multi-Family Housing	204	0.84	574,943	12.28
Refinancing	2,556	10.59	772,141	16.50
Loan Purpose Not Applicable	0	0	0	0
Other Purpose Closed-End	53	0.22	12,143	0.26
Other Purpose LOC	549	2.27	69,355	1.48
Total HMDA related	7,344	30	2,700,928	58
Small Business Secured by Real Estate	0	0	0	0
Small Business	16,698	69.16	1,970,842	42.11
Total Small Business related	16,698	69	1,970,842	42
Small Farm	101	0.40	8,665	0.20
TOTAL LOANS	24,143	100	4,680,435	100

When compared to 2020 aggregate data, the institution ranked 67<sup>th</sup> of 1,429 reporters of mortgage lending with a .3% market share and ranked 12<sup>th</sup> of 435 reporters of small business loans with a 2.2% market share. When compared to 2021 aggregate data, the institution ranked 75<sup>th</sup> of 1,482 reporters of mortgage lending with a 0.3% market share and ranked 18<sup>th</sup> of 439 reporters of small business loans with a 1.1% market share. All market share rankings consider originated and purchased loans. Lending activity is discussed in more detail in the multistate CSAs and MSAs, state, and full-scope assessment area sections later in this report. Overall, lending activity at the institutional level is considered good. Since there is variability of the conclusions for the rated areas, the overall conclusion is driven by the

conclusions in Pennsylvania, West Virginia, and the Washington DC, Myrtle Beach, and Wheeling multistate CSAs. Combined, those areas account for 72.3% of the number and 75.9% of the dollar volume of loans in the analysis as well as 61% of the bank's branches and 78.3% of its total deposit base.

Rated Area	Lending Activity
North Carolina	Low Satisfactory
Pennsylvania	High Satisfactory
South Carolina	Low Satisfactory
Virginia	Low Satisfactory
West Virginia	High Satisfactory
Charlotte Multistate	Low Satisfactory
Myrtle Beach Multistate CSA	High Satisfactory
Washington, DC Multistate CSA	High Satisfactory
Wheeling Multistate	High Satisfactory
OVERALL	HIGH SATISFACTORY

Overall lending levels reflect good responsiveness to the credit needs of the bank's assessment areas and did not vary greatly by rated area, as shown in the table above. The total number and dollar amount of loans were considered in arriving at lending activity conclusions, in addition to competitive factors and the bank's overall importance to the area. Additional details are discussed later for each assessment area reviewed under full-scope procedures.

#### **Assessment Area Concentration:**

To determine the institution's volume of lending within its assessment areas, the geographic location of the bank's originations and purchases for specific loan types from January 1, 2020, through December 31, 2021, was considered. The lending distribution inside and outside of the bank's assessment areas is represented in the following table; additionally, the table reflects the previously mentioned change in HMDA categorization requirements.

## Comparison of Credit Extended Inside and Outside of Assessment Area(s)

Loan Type	Inside			Outside				
Loan Type	#	%	\$(000)	%	#	%	\$(000)	%
Home Purchase	2,695	86.3	977,690	82.9	429	13.7	201,492	17.1
Home Improvement	785	91.5	85,573	91.9	73	8.5	7,591	8.1
Refinancing	2,330	91.2	669,037	86.6	226	8.8	103,104	13.4
Multi-Family Housing	145	71.1	429,009	74.6	59	28.9	145,934	25.4
Loan Purpose Not Applicable	0	0.0	0	0.0	0	0.0	0	0.0
Other Purpose Closed/Exempt	50	94.3	10,927	90.0	3	5.7	1,216	10.0
Other Purpose LOC	494	90.0	62,133	89.6	55	10.0	7,222	10.4
Total HMDA related	6,499	88.5	2,234,369	82.7	845	11.5	466,559	17.3
Small Business	15,424	92.4	1,777,915	90.2	1,274	7.6	192,927	9.8
Small Farm	91	90.1	7,076	81.7	10	9.9	1,589	18.3
TOTAL LOANS	22,014	91.2	4,019,360	85.9	2,129	8.8	661,075	14.1

As indicated in the preceding table, a substantial majority of the total number (91.2%) and dollar amount (85.9%) of loans were extended to residents and businesses within the bank's assessment areas. A substantial majority of lending inside the assessment areas indicates responsiveness to assessment area credit needs.

## **Geographic and Borrower Distribution:**

When evaluating the geographic and borrower distribution for a specific loan category (HMDA and small business) within an assessment area, primary emphasis is placed on the number (and corresponding percentage) of loans originated or purchased. When considering all loan products to arrive at an overall conclusion, the level of performance of each category is typically weighted by the dollar volume of each category. The geographic and borrower distribution performance of HMDA loans focused on performance for Home Purchase, Home Improvement, Refinancing, and Multifamily loan categories. Performance for the Not Applicable, Other Closed, and Other Line of Credit loan categories was not evaluated because not all HMDA reporters are required to report each loan category, or the category contains relatively few loans overall. Similarly, when the performance of multiple assessment areas is considered to reach state and institutional ratings, the levels of performance of the assessment areas subject to full-scope reviews are weighted primarily according to their dollar volume during the review period. In all cases, conclusions additionally take into consideration relevant performance context factors.

The bank originated a large number of Paycheck Protection Program (PPP) loans in response to the COVID-19 pandemic (pandemic or COVID-19) during 2020 and 2021, and information about those loans is discussed further throughout the evaluation. In evaluating the borrower distribution of reported small business loans, the loan size of PPP loans with no reported revenue was considered as an element of performance context.

The bank's overall geographic distribution of loans in low- and moderate-income census tracts is good, and its lending patterns do not reveal any unexplained gaps in any of the assessment areas. Overall, the bank's distribution of loans to low- and moderate-income borrowers and businesses of different sizes is also good. Further details with respect to the geographic and borrower distributions are provided within each assessment area discussion.

## **Community Development Lending:**

The bank is a leader in making community development loans, as shown in the table below. Since there is variability of the conclusions for the rated areas, the overall conclusion is driven by the conclusions in West Virginia, Pennsylvania, and the Washington DC, Myrtle Beach, and Charlotte multistate CSAs. Combined, those areas account for 74.3% of the number and 78.6% of the dollar volume of loans in the analysis as well as 61.5% of the bank's branches and 78.4% of its total deposit base.

Rated Area	Community Development Lending Activity
Virginia	Adequate
West Virginia	Leader
North Carolina	Adequate
South Carolina	Adequate
Pennsylvania	Leader
Washington, DC multistate CSA	Leader
Wheeling multistate	Adequate
Myrtle Beach multistate CSA	Leader
Charlotte multistate	Leader
OVERALL	LEADER

The bank is a leader in providing community development loans for a variety of community development purposes, originating, or renewing 165 such loans totaling approximately \$451.9 million. These loans were made to borrowers that develop affordable housing, offer community services to low-and moderate-income individuals, or promote economic development, and revitalization/stabilization and/or job creation within the bank's markets. Community development loans that benefit the multistate, statewide and/or assessment area levels are discussed within the corresponding sections of this evaluation. The following table summarizes the number and dollar volume of UB's community development lending by category.

CRA DEFINITION	#	\$
Affordable Housing	62	\$281,651,800
Serve Low/Moderate-Income People	89	\$98,805,283
Support Small Business/ Farm	1	\$25,000
Revitalization/ Stabilization/ Job Creation	13	\$71,452,410
TOTAL	165	\$451,934,493

UB makes use of flexible lending practices in serving assessment area credit needs. In addition to the loans mentioned above, the bank originated loans as a part of the PPP. More specifically, the bank originated 76 loans totaling approximately \$113.5 million as a part of the PPP for loans with amounts greater than \$1 million during 2021. Subsequently, these loans counted as qualified community development loans during the evaluation. Loans that were \$1 million or less will be evaluated as a part of the lending test, as these were reported on the institution's CRA Loan Application Register. PPP loans with amounts greater than \$1 million specific to each assessment area will be further discussed in applicable sections within this evaluation. The bank's 2020 PPP loans in amounts greater than \$1 million and extended prior to August 5, 2020, were evaluated during the previous evaluation and totaled 227 loans in the amount of \$471.1 million.

While the bank was already in a leadership position in many of its assessment areas, particularly in the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA and state of West Virginia, additional consideration was given for the number and dollar amount of PPP loans made in the bank's assessment areas, which bolster the overall conclusion that the bank is a leader in making community development loans. Taken together, the bank made 241 qualified community development loans totaling \$565.4 million during the review period.

#### **Product Innovation**

Overall, UB makes use of innovative and/or flexible lending practices in serving the credit needs of its assessment areas, particularly the flexible lending practices that it deployed during the pandemic.

Rated Area	<b>Use of Product Innovation</b>
Virginia	Makes Use
West Virginia	Makes Use
North Carolina	Makes Use
South Carolina	Makes Use
Pennsylvania	Makes Use
Washington, DC multistate CSA	Makes Extensive Use
Wheeling multistate	Makes Use
Myrtle Beach multistate CSA	Makes Use
Charlotte multistate	Makes Use
OVERALL	Makes Use

As shown in the table above, the bank's use of innovative and/or flexible lending practices in serving assessment area credit needs are noted. Following are descriptions of each of the innovative and/or flexible lending options offered by the bank during the review period.

## **Lending Activities in Response to the COVID-19 Pandemic**

Shortly after the Pandemic, UB expanded services in a variety of ways that assisted customers, including low- and moderate-income customers and customers located in low- and moderate-income geographies, in the areas of fee relief, loan assistance, and cash availability. Customers were provided a number of waived fees, including overdrafts, stop payments, ATM fees, and service charges. In order to assist customers with cash availability, penalties for partial Certificate of Deposit withdrawals were waived, ATM withdrawal limits were raised, and both debit card and mobile deposit limits were increased. Finally, loan assistance programs were initiated to allow customers to defer payments for credit cards, mortgages, and installment loans. Repossessions and foreclosures were also suspended for a period of time. Additionally, the bank created a dedicated webpage for customers with information on COVID-19 questions related to the bank and links to various community resources.

## Small Business Administration (SBA) PPP

PPP loans are available to businesses with fewer than 500 employees or businesses that meet SBA industry size standards. The program provides funds for payroll costs and other operational costs to businesses impacted by the pandemic and are fully forgivable if employee retention criteria are met and the funds are used for eligible purposes. UB originated a total of 14,154 PPP loans to small businesses totaling approximately \$1.8 billion; including 76 loans totaling \$113.5 million that were \$1 million and greater in loan amount. The total also includes 227 loans totaling \$471.1 million counted at the previous evaluation that were \$1 million and greater in loan amount and extended prior to August 5, 2020. As previously stated, of the PPP originated loans, 97.9% were for loan amounts less than \$1 million and approximately 72% of the loans were for loan amounts less than \$100,000. Of the loans less than \$100,000, an average loan amount of \$30,489 was originated. As previously discussed in the Community Development Lending section, a portion of these loans also received credit as qualified community development loans.

## PPP Support Mechanisms

In the third quarter of 2020, UB engaged a third-party vendor to develop a dedicated online webpage customer portal so that borrowers had improved direct access to apply for PPP loan forgiveness. This was particularly useful during the period of time that bank locations were closed due to the on-going pandemic. When the second funding round was announced during 2021, the portal was expanded to accept funding applications for the second round of PPP loans. To ensure that the portal functioned properly, testing and development calls were held with 13 employees in various departments across UB; many of the calls would take place around the clock to ensure that processes were in place prior to customer launch.

UB established a PPP Committee, a group of 15 employees, dedicated to ensuring that the bank's PPP loan process for both funding and forgiveness functioned effectively, and that borrowers had appropriate access to critical PPP loan funds, as well as forgiveness. Initially, the group was responsible for inputting all paper PPP loan applications bank-wide. The group later established and trained a regional-based group of staff members to handle this function, with the PPP committee providing ongoing oversight, tracking, and support. The regional-based group included employees within and outside of this department and included front line retail and small business lending staff who dedicated additional worktime to assist in the PPP loan effort.

The PPP committee created comprehensive written guidance for both lenders and customers on the processes for how to apply for a PPP loan using both UB's paper and online portal process. They established a set of market-based liaisons. These trained staff members were responsible for being UB's subject matter experts on PPP loan program requirements and bank processes so that lenders and customers had assistance with any questions relevant to the PPP loan topic.

The PPP committee was also responsible for correcting errors on applications submitted in the bank's online portal that would otherwise delay the application process and potentially put the borrower's funding in jeopardy. The team corresponded directly with both lenders and borrowers to ensure that the correct information was collected. During the review period, these efforts resulted in the successful funding of 312 PPP loans totaling approximately \$43 million that otherwise would have not been funded due to various application input errors.

During the second quarter of 2021, as the funding period of the PPP closed, the committee established a centralized process within the bank's online portal to manage application forgiveness. For the period of June 1, 2021, through December 31, 2021, the team processed approximately 2,000 forgiveness applications resulting in approximately \$87 million in forgiveness payments to customers.

As the PPP program has entered into the repayment/forgiveness period, the bank maintains the applicable processes with direct oversight by the CRA Officer.

#### Loan Deferral

UB assisted homeowners and other borrowers with proactive outreach and increased communications emphasizing that the bank would work with its customers to help during the pandemic. Consideration was given for offering payment accommodations during the pandemic, such as 90-day loan deferrals to consumer and commercial borrowers impacted by the pandemic. These activities had a significant impact in helping borrowers avoid delinquencies or negative credit bureau reporting caused by hardships from pandemic-related issues and eased cash flow pressures on consumers and businesses impacted by the pandemic. UB offered loan deferrals to 5,987 customers for 7,141 loan deferrals and is noted by assessment area below.

## **Loan Deferrals made during the Pandemic**

MARKET	Number of Customers Deferred	Number of Loans Deferred	Estimated Total Deferred Interest
BECKLEY, WV MSA	378	438	\$344,685.86
CHARLESTON-HUNTINGTON-ASHLAND, VA CSA	786	882	\$1,654,921.23
CHARLESTON-NORTH CHARLESTON, SC MSA	79	98	\$1,170,517.75
CHARLOTTE-CONCORD-GASTONIA, NC-SC	90	119	\$576,687.16
CHARLOTTESVILLE, VA	35	39	\$669,582.30
COLUMBIA, SC	22	23	\$668,771.95
FAYETTEVILLE-SANFORD-LUMBERTON, NC	25	33	\$98,378.95
RUTHERFORD COUNTY, NC NONMSA	12	13	\$10,279.40
GOLDSBORO, NC MSA	5	6	\$3,573.81
GREENVILLE-KINSTON-WASHINGTON, NC CSA	36	47	\$181,982.09
GREENVILLE-SPARTANBURG-ANDERSON, SC	52	80	\$635,228.75
HARRISONBURG-STAUNTON, VA CSA	64	73	\$361,223.95
HICKORY-LENOIR-MORGANTON, NC	18	31	\$42,361.18
LYNCHBURG, VA	1	1	\$273.98
MORGANTOWN, WV MSA	272	435	\$2,101,044.31
MYRTLE BEACH-CONWAY, SC-NC CSA	113	193	\$1,155,246.21
NEW BERN-MOOREHEAD CITY, NC CSA	14	17	\$68,053.82
NORTH CAROLINA NONMSA	7	8	\$8,473.28
OTHER NONMSA	278	315	\$215,062.39
REGIONAL	1,927	2,170	\$7,031,810.10
PARKERSBURG-VIENNA, WV	139	224	\$462,154.78
PITTSBURGH, PA	76	141	\$225,375.87
RALEIGH-DURHAM-CARY, NC	64	76	\$1,064,965.32
RICHMOND, VA	32	32	\$254,234.25
ROCKY MOUNT-WILSON-ROANOKE RAPIDS, NC	7	12	\$60,161.83
DARE-PASQUOTANK COUNTY, NC NONMSA	15	15	\$48,553.83
VIRGINIA NONMSA	15	17	\$7,278.57
WASHINGTON-BALTIMORE-ARLINGTON, DC-VA-MD-WV CSA	1,203	1,363	\$19,090,933.67
WEIRTON-STEUBENVILLE, WV	41	44	\$12,867.38
WHEELING, WV-OH MSA	159	172	\$71,877.36
WILMINGTON, NC MSA	22	24	\$138,077.74
Grand Total	5,987	7,141	\$38,434,639.07

## Mortgage programs

During the review period, the following mortgage programs, designed to facilitate affordable housing, were originated throughout the bank's assessment areas, and were considered within the overall lending rating.

Mortgage Program	#	\$
FHA	115	23,551,939
NC Homeowners Assistance Fund	21	1,919,067
USDA Rural Housing	49	7,475,875
VA	144	40,263,518
WV Housing Development Fund	115	12,266,524
HomeReady	11	2,045,317
Home Possible	20	3,976,076

- North Carolina Homeowners Assistance Fund: The Fund was established to prevent mortgage delinquencies, defaults, displacements, and foreclosures for homeowners experiencing financial difficulties due to the pandemic. This income-based fund provides many low- and-moderate-income families within North Carolina assistance. In total, during the review period, the bank assisted 21 individuals with down payment assistance through the programs, totaling \$1.9 million throughout North Carolina.
- West Virginia Housing Development Fund: During the review period, UB originated 115 loans totaling \$12.3 million through this fund. The Fund was established to increase the supply of residential housing for persons and families of low- and moderate-income.
- <u>HomeReady</u>: This mortgage program is offered through Fannie Mae and is available to all LMI borrowers. The program features terms that are more flexible than traditional government-insured loans, such as a lower down payment, cancellable mortgage insurance, and flexible funding source options such as gifts and grants. During the review period, the bank made 11 of these loans totaling \$2 million throughout its assessment areas.
- <u>Home Possible</u>: During the review period, the bank originated 20 Freddie Mac Home Possible Mortgage loans totaling \$4 million. This affordable mortgage program offers qualified low-income borrowers a mortgage product that allows for credit flexibilities to attain owning a home.
- Federal Housing Agency (FHA)/U.S. Department of Veterans Affairs (VA) Insured Loan Programs: These government-insured loan programs offer flexible, long-term financing to eligible borrowers with low or no down payment requirements and are offered throughout all of the bank's assessment areas. During the review period, the bank originated 115 FHA loans totaling \$23.5 million and 144 VA loans totaling \$40.3 million.
- <u>U.S. Department of Agriculture Rural Development (RD) Loan Program</u>: This loan program is designed to assist LMI borrowers in purchasing affordable housing in rural areas and features no down payment requirement. During the review period, the bank originated 49 of these loans totaling \$7.5 million throughout all of UB's assessment areas.

#### INVESTMENT TEST

The institution's level of responding to community development needs through its investment activities is rated outstanding at the institutional level. This conclusion is driven by the outstanding ratings within the majority of the multistate assessment areas along with the commonwealths of Virginia and Pennsylvania, as well as the states of West Virginia and South Carolina. While there is some level of variation across the rated areas, in general, the investment test rating at the institutional level and the underlying rated areas is driven by an excellent level of investment and grant activity, occasional use of innovative or complex investments, and excellent responsiveness to credit and community development needs.

Multistate		Investments	Dor	nations/Grants	<b>Investment Test</b>	
MSA/State	#	\$	#	\$	Rating	
Virginia	73	\$22,200,000	74	\$171,752	Outstanding	
West Virginia	62	\$33,500,000	245	\$1,118,535	Outstanding	
North Carolina	18	\$11,300,000	75	\$245,867	High Satisfactory	
South Carolina	18	\$14,200,000	79	\$253,950	Outstanding	
Pennsylvania	12	\$6,700,000	28	\$28,375	Outstanding	
Washington, DC multistate CSA	52	\$37,800,000	294	\$1,315,546	Outstanding	
Wheeling multistate	8	\$8,400,000	11	\$18,160	Outstanding	
Myrtle Beach multistate CSA	7	\$10,100,000	27	\$40,339	Outstanding	
Charlotte multistate	4	\$2,600,000	34	\$92,450	Low Satisfactory	
Regional	13	\$11,800,000	8	\$6,200	-	
TOTAL	267	\$158,600,000	875	\$3,291,174	Outstanding	

Investments in equity housing funds, low-income mortgage loan pools, Small Business Investment Companies (SBICs), low-income housing tax credits, venture capital companies, and qualified community development bonds have been made. These investments demonstrate excellent responsiveness to community needs. As of September 30, 2022, UB held an excellent level of community development investments comprised of 267 allocations from 120 qualified investments totaling \$158.6 million. This represents 3.4% of total securities and 0.5% of total assets. Of the qualified investments, approximately \$26.4 million benefits regional or statewide areas that include one or more of the bank's assessment areas and/or the greater state or region. Investments that were allocated specifically across the bank's assessment areas are further presented within the corresponding assessment areas of this evaluation.

The bank's qualified investments across regional and statewide areas includes investments in Virginia, West Virginia, North Carolina, as well as larger regional areas and are listed below:

- \$6 million in one CRA qualified investment fund with allocations to various assessment areas, including \$1.9 million in regional activity. This investment fund invests in affordable housing initiatives throughout the bank's assessment areas.
- \$9 million of housing bonds issued by the Virginia Housing Development Authority (VHDA), of which \$7.7 million is statewide and \$1.3 million is specifically allocated within the bank's assessment areas. VHDA bonds provide affordable housing to low- and moderate-income borrowers or in low- and moderate-income areas throughout the Commonwealth of Virginia.

- \$7 million of low-income housing tax credit (LIHTC) projects invested through Housing Equity Funds of Virginia, of which \$1.9 million is allocated within the bank's assessment areas and \$5.1 million is statewide. These funds are administered through the Virginia Community Development Corporation (VCDC), which is the parent of the Virginia Community Development Fund, a chartered Community Development Financial Institution (CDFI). The funds facilitate the development and financing of affordable housing throughout the Commonwealth of Virginia utilizing the federal LIHTC program.
- \$10 million in 13 SBIC investments which invest in small businesses throughout regional and statewide presence.
- \$1.5 million in three equity investments throughout West Virginia (\$500,000), Virginia (\$5,000), and North Carolina (\$1 million). The proceeds are used to help small businesses, social service non-profits, and small farms grow operations.
- \$250,000 in an equity investment that provides rural areas in West Virginia access to health care, many of which have low-and-moderate-income residents.

The institution also actively supports numerous community development organizations through grants and/or donations. Since the previous evaluation, 875 donations totaling approximately \$3.3 million were made to community development organizations whose operations assist low- and moderate-income people, promote economic development or revitalization efforts, as well as provide affordable housing.

#### SERVICE TEST

The bank's overall performance under the service test is rated high satisfactory, as three of the underlying full scope-multistate assessment areas, states, and commonwealths are also rated "High Satisfactory," with the exception of the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA multistate assessment area, which was rated "Outstanding." These ratings consider the accessibility of delivery systems, changes in branch office locations, reasonableness of hours and services, and the level of community development services provided by the bank. The bank's product and service offerings are consistent and made available across all of its assessment areas.

Rated Area	Services Test Rating		
Virginia	High Satisfactory		
West Virginia	High Satisfactory		
North Carolina	High Satisfactory		
South Carolina	High Satisfactory		
Pennsylvania	High Satisfactory		
Washington, DC multistate CSA	Outstanding		
Wheeling multistate	High Satisfactory		
Myrtle Beach multistate CSA	High Satisfactory		
Charlotte multistate	High Satisfactory		
OVERALL	High Satisfactory		

## **Accessibility of Delivery Systems**

The bank's delivery systems are readily accessible to geographies and individuals of different income levels throughout the bank's assessment areas. In addition to branch locations, consideration was given to the distribution of stand-alone ATMs, which provide further ease of access to individuals in the bank's assessment areas. The bank's website and mobile application offer full functionality features and extend the bank's ability to offer its products and services beyond its physical branch presence. Overall, delivery systems are readily accessible and convenient to all portions of the assessment areas. Of the 221 full-service branch offices, six (2.7%) are located within low-income areas and 47 (21.3%) are located in moderate-income areas. The table below provides the conclusion for each rated area for this component of the service test.

Rated Area	Accessibility of Delivery Systems
Virginia	Readily Accessible
West Virginia	Readily Accessible
North Carolina	Readily Accessible
South Carolina	Readily Accessible
Pennsylvania	Readily Accessible
Washington, DC multistate CSA	Readily Accessible
Wheeling multistate	Readily Accessible
Myrtle Beach multistate CSA	Readily Accessible
Charlotte multistate	Readily Accessible
OVERALL	Readily Accessible

## **Changes in Branch Locations**

With the exception of the Washington, DC multistate CSA assessment area, the bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems, particularly to low- and-moderate-income geographies and/or individuals. The bank's record of opening branches in moderate-income census tracts in the Washington DC multistate CSA assessment area has improved the bank's delivery systems, particularly to low- and-moderate-income geographies and individuals within the Washington-Baltimore-Arlington, DC-VA-WV-MD MSA. Since the previous evaluation, not including the Essex Bank merger, UB has closed 15 branch offices, while opening four branch offices as outlined in Appendix F. Three of the branch closures were located in moderate-income census tracts, while three branch openings were also located in moderate-income census tracts; no branch activity occurred in low-income census tracts. Overall, UB's changes in branch locations have not adversely affected the accessibility of its delivery systems.

Rated Area	Accessibility of Delivery Systems			
Virginia	Not Adversely Affected			
West Virginia	Not Adversely Affected			
North Carolina	Not Adversely Affected			
South Carolina	Not Adversely Affected			
Pennsylvania	Not Adversely Affected			
Washington, DC multistate CSA	Improved			
Wheeling multistate	Not Adversely Affected			
Myrtle Beach multistate CSA	Not Adversely Affected			
Charlotte multistate	Not Adversely Affected			
OVERALL	Not Adversely Affected			

## Reasonableness of Businesses Hours and Services in Meeting Assessment Area Needs

The bank's business hours and services do not vary in a way that inconveniences certain portions of its assessment areas, particularly low-and-moderate-income geographies or individuals. Most branch locations operate within standard weekday hours (8:00 a.m. to 5:00 p.m.), with some branches offering extended hours. In addition, more than half of the bank's branches operate Saturday lobby hours as well, generally from 9:00 a.m. to 12:00 p.m., and drive-through facilities are operated at a vast majority of the bank's branches, many of which operate extended hours beyond standard lobby hours. While the bank's hours vary between branches and assessment areas, they do not vary in a way that adversely impacts low- and-moderate-income geographies or individuals. Moreover, the bank offers the same suite of products and services throughout its entire branch network, including 24-hour ATM access, bank-by-mail and bank-by-phone services, mobile and online banking, contact-free mobile deposits, Zelle, cash management programs for small businesses, and access to personal finance and budgeting tools. UB also offers a free checking account to all consumers, including low-and-moderate-income residents that features no monthly fee or minimum balance requirements.

Rated Area	Reasonableness of Business Hours and Services		
Virginia	Do Not Vary		
West Virginia	Do Not Vary		
North Carolina	Do Not Vary		
South Carolina	Do Not Vary		
Pennsylvania	Do Not Vary		
Washington, DC multistate CSA	Do Not Vary		
Wheeling multistate	Do Not Vary		
Myrtle Beach multistate CSA	Do Not Vary		
Charlotte multistate	Do Not Vary		
OVERALL	Do Not Vary		

#### **Community Development Services**

Shortly after the onset of the pandemic, the bank's ability to provide community development services were impacted. In March 2020, COVID-19 lockdowns were imposed in many geographic locations, which closed many businesses and organizations for varied periods of time, limiting the ability of bank personnel to provide in-person community development services. Additionally, opportunities for virtual community development service deliveries were limited by the capacity of community organizations and the ability of low- and moderate-income families and small businesses to access virtual technology. Despite these challenges, the bank and its employees were able to provide a significant level of community development services, and overall, UB is a leader in providing community development services. The following table depicts the provision of community development services within the rated areas. Since there is variability of the conclusions for the rated areas, the overall conclusion is driven by the conclusions in Virginia, West Virginia, Pennsylvania, and the Washington DC multistate CSA. Combined, those areas account for 67.9% of the number and 72.2% of the dollar volume of loans in the analysis as well as 66.5% of the bank's branches and 80.5% of its total deposit base.

Rated Area	<b>Community Development Services</b>			
Virginia	Leader			
West Virginia	Leader			
North Carolina	High Level			
South Carolina	High Level			
Pennsylvania	Leader			
Washington, DC multistate CSA	Leader			
Wheeling multistate	High Level			
Myrtle Beach multistate CSA	Adequate Level			
Charlotte multistate	Adequate Level			
OVERALL	Leader			

As shown in the preceding table, the bank is a leader in providing community development services in four of the nine rated areas, including the Washington, DC multistate CSA, the State of West Virginia, as well as the Commonwealth of Virginia and Pennsylvania; and a leader overall. Combined, the four overall ratings represent approximately 67% of the bank's operations for its entire footprint during the review period. During the review period, 1,120 bank employees provided 18,050 hours of community service activities to 566 different organizations operating throughout its assessment areas. Overall, this level of community development services is in line with the bank's overall performance at the previous evaluation. For this review, consideration was given to the impact of the pandemic on the bank's ability to provide community development service activities.

Many of the bank's typical community development service activities, such as financial literacy events and affordable housing activities are performed at in-person meetings or in large gatherings, many of which were restricted during 2020 and 2021 because of the pandemic. As a result, declines in the level of community development service activities in certain assessment areas did not necessarily have a negative impact on the bank's performance if these declines were attributable to the impacts of the pandemic. Additionally, UB has premier partners that it works closely with in order to identify community needs, perform outreach, and develop high-impact, responsive community development service opportunities for bank employees. The following table presents the number of service activities and corresponding hours by category.

CRA DEFINITION	#	Hours
Affordable Housing	71	1,075
Serve Low/Moderate- Income People	320	15,085
Support Small Business/ Farm	60	1,335
Revitalization/ Stabilization/ Job Creation	41	555
TOTAL	492	18,050

Specific examples of organizations that the bank and its employees partnered with in the provision of community development services include:

Beckley Kids Classic	Children's Home Society of WV
Boys & Girls Club	Wheeling Health Right
CASA	Toys for Tots
Workforce WV	ACCA Child Development Center
Every 1 Voice Matters	Arlington Free Clinic
Network2Work	CentroNia
United Way	Center for Economic Empowerment and Development
Hispanic Alliance	Homestretch Inc
Big Brother Big Sister	Recovery Café DC
Human Kind	Valley Assistance Network
Salvation Army	Habitat for Humanity

## **Financial Literacy Campaigns**

Additionally, bank employees participate in various financial literacy campaigns including the following:

- <u>America Saves:</u> This program is a national nonprofit aimed at supporting everyday Americans in saving money, reducing debt, building wealth, and creating better financial habits; many who are low-and-moderate income residents of UB's assessment areas. During the evaluation period, 413 employees served 1,724 hours through this campaign.
- Teach Children to Save: This program is a national campaign sponsored by the American Bankers Association Foundation, aimed at mobilizing bank employees to volunteer their time to visit area schools and conduct presentations aimed at helping elementary and middle school students develop savings habits. In general, low-and-moderate income census tracts and/or residents are the primary audience for UB's strategy. During the review period, 285 employees served 1,160 hours through this campaign through 114 schools and partnering organizations, including six of UB's Premier Partners. In addition, for both 2020 and 2021, UB randomly selected two low-and-moderate income qualified schools or organizations that participated in the program to each received \$3,000 in donations to help further grow the awareness of the program.
- #BanksNeverAskThat: This program, initiated by the American Bankers Association, is in recognition of National Cybersecurity Awareness Month in October, and UB participated in the program's social media portion of the campaign that brings awareness to customers on how to protect their banking account information. During the review period, 194 bank employees served 750 hours through this campaign.
- <u>Children's Science Center Community Program:</u> UB is the premier sponsor for Family Science Night, which allows the Children's Science Center to visit Title I schools across the region. The program allows children to learn about STEM-related fields from Science Center personnel and to learn about banking in sessions taught by bank employees.

Activities at the multistate, statewide, and/or assessment area levels are discussed within the corresponding sections of this evaluation.

## Other Retail Banking Activities

Additional consideration was given to the bank's retail banking activities that were implemented in response to the pandemic. These activities included those that reduce fees or increase the availability of the bank's services for borrowers, including low- and-moderate-income borrowers, as well as providing alternative service options considering the limited access to branch locations. In response to the pandemic, UB waived non-sufficient funds (NSF) checking deposit fees for customers during April and May 2020 totaling \$91,120, and during January through April 2021 totaling \$196,939. UB also waived fees or increased ATM limits for 12,060 customers and its impact is listed by assessment area below.

ATM Cash Back Fee Waivers and ATM Withdraw Limit Increases during the Pandemic

Assessment Area	# of Customers Cash Back Fees Waived	\$ of Cash Back Fees Waived	# of Customers with ATM Withdraw Limit Increase	
BECKLEY, WV MSA	512	\$1,024	15	
CHARLESTON-HUNTINGTON-ASHLAND, WV CSA	1,655	\$3,310	71	
CHARLESTON-NORTH CHARLESTON, SC MSA	5	\$10	0	
CHARLOTTE-CONCORD-GASTONIA, NC-SC	11	\$22	0	
CHARLOTTESVILLE, VA	149	\$298	7	
COLUMBIA, SC	1	\$2	0	
FAYETTEVILLE-SANFORD-LUMBERTON, NC	1	\$2	0	
GREENVILLE-SPARTANBURG-ANDERSON, SC	1	\$2	0	
HARRISONBURG-STAUNTON, VA CSA	415	\$830	11	
HICKORY-LENOIR-MORGANTON, NC	2	\$4	0	
LYNCHBURG, VA	1	\$2	0	
MORGANTOWN, WV MSA	661	\$1,322	22	
MYRTLE BEACH – CONWAY, SC-NC CSA	10	\$20	0	
NEW BERN-MOOREHEAD CITY, NC CSA	3	\$6	0	
OTHER NONMSA	740	\$1,480	14	
OUT OF ASSESSMENT AREA	1,367	\$2,734	42	
PARKERSBURG-VIENNA, WV	421	\$842	21	
PITTSBURGH, PA	755	\$1,510	36	
RALEIGH-DURHAM-CARY, NC	8	\$16	0	
RICHMOND, VA	17	\$34	0	
ROCKY MOUNT-WILSON-ROANOKE RAPIDS, NC	3	\$6	0	
DARE-PASQUOTANK COUNTY, NC NONMSA	1	\$2	0	
VIRGINIA NONMSA	217	\$434	16	
WASHINGTON-BALTIMORE-ARLINGTON, DC-VA-MD-WV CSA	3,953	\$7,906	95	
WEIRTON-STEUBENVILLE, WV	151	\$302	0	
WHEELING, WV-OH MSA	635	\$1,270	13	
WILMINGTON, NC MSA	2	\$4	0	
Grand Total	11,697	\$23,394	363	

### FAIR LENDING OR OTHER ILLEGAL CREDIT PRACTICES REVIEW

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act) established the Consumer Financial Protection Bureau (CFPB). In general, the Dodd-Frank Act gives the CFPB, among other things, primary examination, and enforcement authority over insured depository institutions with total assets of more than \$10 billion when assessing compliance with the requirements of Federal consumer financial laws, including UB. The Federal Reserve, however, retains authority to enforce compliance with the bank's CRA and certain other consumer compliance laws and regulations. Since the conclusion of the previous CRA evaluation, the Federal Reserve had not cited any violations involving discriminatory or other illegal credit practices that adversely affected the Federal Reserve's evaluation of the bank's CRA performance.

#### MULTISTATE METROPOLITAN AREA

CRA RATING FOR Washington-Baltimore-Arlington, DC-VA-MD-WV CSA<sup>1</sup>: Outstanding

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>Outstanding</u>
The Service Test is rated: Outstanding

Major factors supporting the rating include:

• Lending activity reflects good responsiveness to community credit needs, and the bank makes use of flexible lending practices in serving the assessment area's credit needs.

- UB's geographic and borrower distribution performance are both considered good.
- The bank makes extensive use of flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.
- UB exhibits a good record of serving the credit needs of low-income individuals and areas and very small businesses.
- UB is a leader in making community development loans.
- The bank maintains an excellent level of qualified investments benefiting this assessment area that demonstrate an excellent responsiveness to local credit needs, and it makes occasional use of innovative and/or complex investments to support community development initiatives.
- Delivery systems and branch locations are readily accessible to all segments of the assessment area. Since the pervious evaluation, branching activity has improved the accessibility of its delivery systems, particularly to low- and moderate-income neighborhoods and individuals. Bank services and branch hours do not vary in a way that inconveniences low- and moderate-income people or census tracts within the assessment area.
- The bank is a leader in providing community development services.

<sup>&</sup>lt;sup>1</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

### SCOPE OF EXAMINATION

The lending test review considered HMDA and small business loans, originated or purchased, from January 1, 2020, through December 31, 2021. Small farm loans were excluded from further analysis given the limited volume of originations during the review period. Community development loans made during this evaluation period, and qualified community development services provided during the review period, were considered. All qualified investments extended during the review period or funded as of the evaluation date, regardless of when made, were also considered.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WASHINGTON-BALTIMORE-ARLINGTON, DC-VA-MD-WV CSA ASSESSMENT AREA

UB delineates a portion of the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA assessment area, including parts of the Washington-Arlington-Alexandria, DC-VA-MD-WV MD, Baltimore-Columbia-Towson, MD metropolitan division, Frederick-Gaithersburg-Rockville, MD metropolitan division, Hagerstown-Martinsburg, MD-WV MSA, and the Winchester VA-WV MSA. The complete composition of the assessment area is detailed in Appendix E. Due to the merger between UB and Essex Bank consummating in December 2021, the Baltimore-Columbia-Towson, MD metropolitan division portion of the assessment is not included in the geographic and borrower analysis of the lending test; however, all community development loans originated since the previous evaluation start date, as well as all qualified investment and service test activity since the prior evaluation are included in the respective analyses. As noted in the chart below, UB operates 73 branch offices and 91 ATMs, as well as three branch offices and three ATMs in the Baltimore-Columbia-Towson, MD metropolitan division portion of the assessment area. Additionally, one loan production office is located in the Baltimore-Columbia-Towson, MD metropolitan division portion of the assessment area. All of the bank's products and services are available within the assessment area.

Tract					DEMOGRAPHICS			
Income	Branches ATMS		TMS Census Tracts		Households	Total		
Levels					Celisus Tracts		Households	Businesses
Levels	#	%	#	%	# %		%	%
Low	3	4.1%	7	7.7%	127	9.9%	8.9%	5.2%
Moderate	15	20.5%	23	25.3%	277	21.5%	20.8%	18.5%
Middle	27	37.0%	29	31.9%	432	33.6%	35.3%	34.4%
Upper	28	38.4%	32	35.2%	432	33.6%	34.5%	41.2%
Unknown	0	0.0%	0	0.0%	18	1.4%	0.4%	0.6%
Totals	73	100%	91	100%	1,286	100%	100%	100%

Based on 2015 ACS data, the assessment area (excluding the Baltimore-Columbia-Townson, MD metropolitan division) served by the bank has a total population of 5,708,346 and a median housing value of \$375,511. Within the assessment area, the owner-occupancy rate is 58.1%, which is significantly higher than the owner-occupancy rate for the District of Columbia (37.2%), but slightly lower than the rates in West Virginia (60.8%), Maryland (60.1%), and Virginia (59.2%). The percentage of families living below the poverty level in the assessment area (6.1%) is significantly lower than the rates in the District of Colombia (14.3%) and West Virginia (13.1%) and slightly lower than the rates in Maryland (7%) and Virginia (8.2%). Median family incomes for the MSAs and metropolitan divisions within the assessment area are detailed in the table below.

Median Family Income by MSA/MD	2020	2021
Washington-Arlington-Alexandria, DC-VA-MD-WV MD	\$118,700	\$122,100
Frederick-Gaithersburg-Rockville, MD metropolitan division	\$124,400	\$129,900
Hagerstown-Martinsburg, MD-WV MSA	\$73,000	\$74,400
Baltimore-Columbia-Townson, MD MSA*	N/A	\$105,100
Winchester VA-WV MSA	\$83,400	\$81,400

<sup>\*</sup> the bank entered the market during December 2021

The following table provides family and household demographic information for the assessment area as well as the tract and owner-occupied housing unit distribution by tract income level. The table also provides D&B business data.

202	1 Washington	n-Baltimore	Arlington, I	OC-VA-MD-	WV CSA AA	Demograp	hics				
Income Categories	Tract Dis	tribution	Families by T	Γract Income	Families < Po as % of Fami	,	Families by Family Income				
	#	%	#	%	#	%	#	%			
Low	127	9.9	108,207	8.0	23,007	21.3	295,133	21.9			
Moderate	277	21.5	269,901	20.1	24,892	9.2	220,798	16.4			
Middle	432	33.6	474,724	35.3	22,944	4.8	267,287	19.9			
Upper	432	33.6	489,268	36.4	9,976	2.0	561,853	41.8			
Unknown	18	1.4	2,971	0.2	496	16.7	0	0.0			
Total AA	1,286	100.0	1,345,071	100.0	81,315	6.0	1,345,071	100.0			
	Housing			Hous	sing Type by	Гract					
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant			
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit			
Low	204,120	47,524	3.7	23.3	135,486	66.4	21,110	10.3			
Moderate	464,006	217,000	16.9	46.8	210,836	45.4	36,170	7.8			
Middle	774,797	481,368	37.6	62.1	245,527	31.7	47,902	6.2			
Upper	750,468	532,670	41.6	71.0	177,407	23.6	40,391	5.4			
Unknown	9,515	1,881	0.1	19.8	6,876	72.3	758	8.0			
Total AA	2,202,906	1,280,443	100.0	58.1	776,132	35.2	146,331	6.6			
			Businesses by Tract & Revenue Size								
	Total Busines	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue Not Reported				
	#	%	#	%	#	%	#	%			
Low	17,318	5.2	16,211	5.3	985	4.0	122	4.4			
Moderate	61,294	18.5	56,030	18.5	4,805	19.6	459	16.5			
Middle	113,870	34.4	104,473	34.4	8,545	34.9	852	30.6			
Upper	136,315	41.2	125,212	41.3	9,934	40.6	1,169	42.0			
Unknown	1,978	0.6	1,584	0.5	211	0.9	183	6.6			
Total AA	330,775	100.0	303,510	100.0	24,480	100.0	2,785	100.0			
Pere	centage of Tota	l Businesses:		91.8		7.4		0.8			
				Fa	rms by Tract	& Revenue S	ize				
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue Not Reported				
	#	%	#	%	#	%	#	%			
Low	60	2.8	60	2.8	0	0.0	0	0.0			
Moderate	279	12.9	273	12.9	6	20.7	0	0.0			
Middle	844	39.1	832	39.2	10	34.5	2	33.3			
Upper	973	45.1	956	45.0	13	44.8	4	66.7			
Unknown	2	0.1	2	0.1	0	0.0	0	0.0			
Total AA	2,158	100.0	2,123	100.0	29	100.0	6	100.0			
	Percentage of	Total Farms:		98.4		1.3		0.3			
Source: 2021 FFIEC Census	Da ta										

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Percentages may not total 100.0 percent due to rounding

Federal and local government agencies provide a large portion of area employment for residents. In addition, the hospitality, travel, education, and healthcare industries provide significant employment opportunities. While the local economy is primarily driven by federal and local government employers, there are also diverse industries contributing to local employment opportunities, including aerospace and defense, manufacturing, healthcare services, and leisure and hospitality. Major area employers include Accenture National Securities, Inova Health Systems, Capital One Bank, Northrop Grumman International, Orbital Sciences Corporation, Marriott, McDonalds, Crosby Corporation, Lockheed Martin Corp, Marriott, Discovery Communications Inc., First Data, Deloitte Consulting LLP, Navy Federal Credit Union, and Raytheon Company.

Washington-Baltimore-Arlington, DC-VA-MD-WV CSA Employees by Industry												
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3					
Government	596,979*	585,468*	570,880*	589,989*	587,365*	593,276*	578,499*					
Private Sector												
Private Sector Total, all industries	2,204,998	1,931,576	2,030,179	2,064,212	2,036,053	2,085,552	2,120,854					
Agriculture, forestry, fishing and hunting	1,019*	1,113*	1,178*	1,111*	999*	1,170*	1,197*					
Mining, quarrying, and oil and gas extraction	245*	224*	219*	229*	233*	233*	232*					
Utilities	5,254*	5,261*	5,230*	5,233*	5,219*	5,158*	5,156*					
Construction	113,416*	110,263*	113,494*	113,214*	109,841*	112,994*	113,736*					
Manufacturing	53,178*	51,383*	52,385*	51,970*	53,493*	54,226*	52,637*					
Wholesale trade	40,483*	37,996*	38,347*	39,192*	39,092*	39,087*	39,585*					
Retail Trade	216,881*	181,162	200,842	212,640*	206,611	209,438	210,617					
Transportation and warehousing	61,811*	56,344*	59,178*	63,374*	60,613*	58,781*	61,111*					
Information	69,958	66,759	67,108	67,015*	66,826	67,432	67,823					
Finance and insurance	81,636*	81,007*	81,523*	81,291*	80,957*	80,832*	80,556*					
Real estate and rental and leasing	46,554*	43,319*	43,819*	44,167*	43,430*	44,017*	44,643*					
Professional and technical services	464,718*	457,939*	463,706*	464,315*	463,135*	465,650*	466,901*					
Management of companies and enterprises	40,095*	38,894*	38,742*	38,014*	37,996*	38,114*	38,241*					
Administrative and waste services	168,080*	154,560*	157,433*	159,434*	156,194*	162,722*	165,362*					
Educational services	87,235*	76,086*	73,191*	78,705*	78,372*	77,695*	76,517*					
Health care and social assistance	294,320*	262,435*	273,473*	279,931*	281,233*	283,323*	284,357*					
Arts, entertainment, and recreation	37,845*	19,589	29,347	25,365*	23,874	31,640*	38,622*					
Accommodation and food services	238,012*	129,142	161,834	164,358*	159,164	181,637*	200,361*					
Other services, except public administration	157,209	133,839	142,187	144,427	142,644	145,749	145,855					
Public administration	0	0	0	0	0	0	0					
Unclassified	Unclassified 4,369 3,930 4,616 5,108* 5,177 4,729 4,87											
Source: Bureau of Labor Statistics (BLS), Quarterly	Census of Emp	ployment and	Wages									
* Indicates that some or all of the data for this catego.	ry was suppre	ssed for conf	identiality rea	isons								

Recent unemployment rates are included in the following table.

Washington-Baltimore-Arlington, DC-VA-MD-WV CSA Unemployment Rates									
Area	2020	2021							
Washington-Baltimore-Arlington, DC-VA-MD-WV CSA	6.15%	4.37%							
District of Columbia, DC	7.96%	6.58%							
Montgomery County, MD	6.22%	5.49%							
Washington County, MD	6.83%	5.36%							
Arlington County, VA	4.42%	2.99%							
Clarke County, VA	4.56%	3.09%							
Fairfax County, VA	5.79%	3.48%							
Frederick County, VA	4.60%	2.90%							
Loudoun County, VA	5.28%	3.09%							
Prince William County, VA	6.47%	3.95%							
Spotsylvania County, VA	5.94%	3.78%							
Stafford County, VA	5.57%	3.64%							
Warren County, VA	5.80%	3.54%							
Alexandria city, VA	5.99%	3.77%							
Fairfax city, VA	5.78%	3.42%							
Falls Church city, VA	3.79%	2.65%							
Fredericksburg city, VA	7.08%	4.66%							
Manassas city, VA	6.53%	3.91%							
Manassas Park city, VA	6.64%	3.80%							
Winchester city, VA	5.92%	3.50%							
Berkeley County, WV	6.06%	3.56%							
Jefferson County, WV	5.83%	3.09%							
Frederick-Gaithersburg-Rockville, MD	6.15%	5.35%							
Hagerstown-Martinsburg, MD-WV MSA	6.46%	4.48%							
Washington-Arlington-Alexandria, DC-VA-MD-WV MD	6.46%	4.76%							
Winchester, VA-WV MSA	4.97%	3.09%							
District of Columbia	7.96%	6.58%							
Maryland	6.67%	5.77%							
Virginia	6.20%	3.91%							
West Virginia	8.15%	5.03%							
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Stati	stics								

Unemployment rates within the assessment area are similar to those of the metropolitan areas comprising the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA assessment area. During 2020, West Virginia held the highest state rate among the states and District of Columbia within the assessment area, while the District of Columbia had the highest during 2021. Virginia consistently had the lowest unemployment rates.

Area         2010 Median Family Income         2015 Median Family Income         Percent Change           Washington-Baltimore-Arlington, DC-VA-MD-WV CSA         \$112,317         \$109,362         -2.63%           District of Columbia, DC         \$77,188         \$85,321         10.54%           Montgomery County, MD         \$121,676         \$117,798         -3.19%           Washington County, MD         \$71,665         \$67,201         -6.23%           Arlington County, VA         \$138,239         \$140,838         1.88%           Clarke County, VA         \$93,591         \$90,862         -2.92%           Fairfax County, VA         \$135,374         \$129,805         -4.11%           Frederick County, VA         \$74,888         \$78,706         5.10%           Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%	Washington-Baltimore-Arlington, DC-VA-MD-WV CSA Median Family Income Change									
MD-WV CSA         \$112,317         \$109,302         \$2.65%           District of Columbia, DC         \$77,188         \$85,321         10.54%           Montgomery County, MD         \$121,676         \$117,798         -3.19%           Washington County, MD         \$71,665         \$67,201         -6.23%           Arlington County, VA         \$138,239         \$140,838         1.88%           Clarke County, VA         \$93,591         \$90,862         -2.92%           Fairfax County, VA         \$135,374         \$129,805         -4.11%           Frederick County, VA         \$142,034         \$137,534         -5.10%           Loudoun County, VA         \$142,034         \$137,534         -5.10%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$110,334         \$107,143         -2.89%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$87,000		2010 Median Family	Family							
Montgomery County, MD         \$121,676         \$117,798         -3.19%           Washington County, MD         \$71,665         \$67,201         -6.23%           Arlington County, VA         \$138,239         \$140,838         1.88%           Clarke County, VA         \$93,591         \$90,862         -2.92%           Fairfax County, VA         \$135,374         \$129,805         -4.11%           Frederick County, VA         \$74,888         \$78,706         5.10%           Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$110,334         \$107,143         -2.89%           Fairfax city, VA         \$112,094         \$124,547         3.75%           Falls Church city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$87,005         \$78,304         -9.99%           Manassas Park city, VA         \$8		\$112,317	\$109,362	-2.63%						
Washington County, MD         \$71,665         \$67,201         -6.23%           Arlington County, VA         \$138,239         \$140,838         1.88%           Clarke County, VA         \$93,591         \$90,862         -2.92%           Fairfax County, VA         \$135,374         \$129,805         -4.11%           Frederick County, VA         \$74,888         \$78,706         5.10%           Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$1110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$69,694 </td <td>District of Columbia, DC</td> <td>\$77,188</td> <td>\$85,321</td> <td>10.54%</td>	District of Columbia, DC	\$77,188	\$85,321	10.54%						
Arlington County, VA         \$133,239         \$140,838         1.88%           Clarke County, VA         \$93,591         \$90,862         -2.92%           Fairfax County, VA         \$135,374         \$129,805         -4.11%           Frederick County, VA         \$74,888         \$78,706         5.10%           Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$69,694         \$63,304         -9.17%           Jefferson County, WV         \$84,051 <td>Montgomery County, MD</td> <td>\$121,676</td> <td>\$117,798</td> <td>-3.19%</td>	Montgomery County, MD	\$121,676	\$117,798	-3.19%						
Clarke County, VA         \$93,591         \$90,862         -2.92%           Fairfax County, VA         \$135,374         \$129,805         -4.11%           Frederick County, VA         \$74,888         \$78,706         5.10%           Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$71,543         \$62,361         -12.83%           Manassas Park city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$69,694         \$63,304         -9.17%           Jefferson County, WV         \$84,051 </td <td>Washington County, MD</td> <td>\$71,665</td> <td>\$67,201</td> <td>-6.23%</td>	Washington County, MD	\$71,665	\$67,201	-6.23%						
Fairfax County, VA         \$135,374         \$129,805         -4.11%           Frederick County, VA         \$74,888         \$78,706         5.10%           Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$87,543         \$62,361         -12.83%           Manassas Park city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$61,264         \$57,444         -6.24%           Berkeley County, WV         \$84,051         \$79,830         -5.02%           Frederick-Gaithersburg-Rockville, MD MD	Arlington County, VA	\$138,239	\$140,838	1.88%						
Frederick County, VA         \$74,888         \$78,706         5.10%           Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$71,543         \$62,361         -12.83%           Manassas city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$61,264         \$57,444         -6.24%           Berkeley County, WV         \$69,694         \$63,304         -9.17%           Jefferson County, WV         \$84,051         \$79,830         -5.02%           Frederick-Gaithersburg-Rockville, MD MD	Clarke County, VA	\$93,591	\$90,862	-2.92%						
Loudoun County, VA         \$142,034         \$137,534         -3.17%           Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$61,264         \$57,444         -6.24%           Berkeley County, WV         \$69,694         \$63,304         -9.17%           Jefferson County, WV         \$84,051         \$79,830         -5.02%           Frederick-Gaithersburg-Rockville, MD MD         \$116,727         \$112,655         -3.49%           Hagerstown-Martinsburg, MD-WV MSA         \$70,034         \$64,343         -8.13%           Washington-Ar	Fairfax County, VA	\$135,374	\$129,805	-4.11%						
Prince William County, VA         \$108,344         \$107,304         -0.96%           Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$61,264         \$57,444         -6.24%           Berkeley County, WV         \$69,694         \$63,304         -9.17%           Jefferson County, WV         \$84,051         \$79,830         -5.02%           Frederick-Gaithersburg-Rockville, MD MD         \$116,727         \$112,655         -3.49%           Hagerstown-Martinsburg, MD-WV MSA         \$70,034         \$64,343         -8.13%           Washington-Arlington-Alexandria, DC-VA-MD-WV MD         \$106,105         -3.03%           Winchester	Frederick County, VA	\$74,888	\$78,706	5.10%						
Spotsylvania County, VA         \$92,259         \$87,569         -5.08%           Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$71,543         \$62,361         -12.83%           Manassas city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$61,264         \$57,444         -6.24%           Berkeley County, WV         \$69,694         \$63,304         -9.17%           Jefferson County, WV         \$84,051         \$79,830         -5.02%           Frederick-Gaithersburg-Rockville, MD MD         \$116,727         \$112,655         -3.49%           Hagerstown-Martinsburg, MD-WV MSA         \$70,034         \$64,343         -8.13%           Washington-Arlington-Alexandria, DC-VA-MD-WV MD         \$106,105         -3.03%           Winchester, VA-WV M	Loudoun County, VA	\$142,034	\$137,534	-3.17%						
Stafford County, VA         \$110,334         \$107,143         -2.89%           Warren County, VA         \$78,807         \$72,738         -7.70%           Alexandria city, VA         \$111,092         \$109,075         -1.82%           Fairfax city, VA         \$120,046         \$124,547         3.75%           Falls Church city, VA         \$154,669         \$165,430         6.96%           Fredericksburg city, VA         \$71,543         \$62,361         -12.83%           Manassas Park city, VA         \$87,000         \$78,304         -9.99%           Manassas Park city, VA         \$82,034         \$78,177         -4.70%           Winchester city, VA         \$61,264         \$57,444         -6.24%           Berkeley County, WV         \$69,694         \$63,304         -9.17%           Jefferson County, WV         \$84,051         \$79,830         -5.02%           Frederick-Gaithersburg-Rockville, MD MD         \$116,727         \$112,655         -3.49%           Hagerstown-Martinsburg, MD-WV MSA         \$70,034         \$64,343         -8.13%           Washington-Arlington-Alexandria, DC-VA-MD-WV MD         \$109,424         \$106,105         -3.03%           Winchester, VA-WV MSA         \$67,011         \$69,817         4.19%	Prince William County, VA	\$108,344	\$107,304	-0.96%						
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Alexandria city, VA       \$111,092       \$109,075       -1.82%         Fairfax city, VA       \$120,046       \$124,547       3.75%         Falls Church city, VA       \$154,669       \$165,430       6.96%         Fredericksburg city, VA       \$71,543       \$62,361       -12.83%         Manassas city, VA       \$87,000       \$78,304       -9.99%         Manassas Park city, VA       \$82,034       \$78,177       -4.70%         Winchester city, VA       \$61,264       \$57,444       -6.24%         Berkeley County, WV       \$69,694       \$63,304       -9.17%         Jefferson County, WV       \$84,051       \$79,830       -5.02%         Frederick-Gaithersburg-Rockville, MD MD       \$116,727       \$112,655       -3.49%         Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Stafford County, VA	\$110,334	\$107,143	-2.89%						
Fairfax city, VA       \$120,046       \$124,547       3.75%         Falls Church city, VA       \$154,669       \$165,430       6.96%         Fredericksburg city, VA       \$71,543       \$62,361       -12.83%         Manassas city, VA       \$87,000       \$78,304       -9.99%         Manassas Park city, VA       \$82,034       \$78,177       -4.70%         Winchester city, VA       \$61,264       \$57,444       -6.24%         Berkeley County, WV       \$69,694       \$63,304       -9.17%         Jefferson County, WV       \$84,051       \$79,830       -5.02%         Frederick-Gaithersburg-Rockville, MD MD       \$116,727       \$112,655       -3.49%         Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Warren County, VA	\$78,807	\$72,738	-7.70%						
Falls Church city, VA       \$154,669       \$165,430       6.96%         Fredericksburg city, VA       \$71,543       \$62,361       -12.83%         Manassas city, VA       \$87,000       \$78,304       -9.99%         Manassas Park city, VA       \$82,034       \$78,177       -4.70%         Winchester city, VA       \$61,264       \$57,444       -6.24%         Berkeley County, WV       \$69,694       \$63,304       -9.17%         Jefferson County, WV       \$84,051       \$79,830       -5.02%         Frederick-Gaithersburg-Rockville, MD MD       \$116,727       \$112,655       -3.49%         Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Alexandria city, VA	\$111,092	\$109,075	-1.82%						
Fredericksburg city, VA       \$71,543       \$62,361       -12.83%         Manassas city, VA       \$87,000       \$78,304       -9.99%         Manassas Park city, VA       \$82,034       \$78,177       -4.70%         Winchester city, VA       \$61,264       \$57,444       -6.24%         Berkeley County, WV       \$69,694       \$63,304       -9.17%         Jefferson County, WV       \$84,051       \$79,830       -5.02%         Frederick-Gaithersburg-Rockville, MD MD       \$116,727       \$112,655       -3.49%         Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Fairfax city, VA	\$120,046	\$124,547	3.75%						
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Winchester city, VA       \$61,264       \$57,444       -6.24%         Berkeley County, WV       \$69,694       \$63,304       -9.17%         Jefferson County, WV       \$84,051       \$79,830       -5.02%         Frederick-Gaithersburg-Rockville, MD MD       \$116,727       \$112,655       -3.49%         Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Manassas city, VA	\$87,000	\$78,304	-9.99%						
Berkeley County, WV       \$69,694       \$63,304       -9.17%         Jefferson County, WV       \$84,051       \$79,830       -5.02%         Frederick-Gaithersburg-Rockville, MD MD       \$116,727       \$112,655       -3.49%         Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Manassas Park city, VA	\$82,034	\$78,177	-4.70%						
Jefferson County, WV       \$84,051       \$79,830       -5.02%         Frederick-Gaithersburg-Rockville, MD MD       \$116,727       \$112,655       -3.49%         Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Winchester city, VA	\$61,264	\$57,444	-6.24%						
Frederick-Gaithersburg-Rockville, MD MD         \$116,727         \$112,655         -3.49%           Hagerstown-Martinsburg, MD-WV MSA         \$70,034         \$64,343         -8.13%           Washington-Arlington-Alexandria, DC-VA-MD-WV MD         \$109,424         \$106,105         -3.03%           Winchester, VA-WV MSA         \$67,011         \$69,817         4.19%           District of Columbia         \$77,188         \$85,321         10.54%           Maryland         \$92,668         \$90,089         -2.78%           Virginia         \$80,053         \$78,390         -2.08%	Berkeley County, WV	\$69,694	\$63,304	-9.17%						
Hagerstown-Martinsburg, MD-WV MSA       \$70,034       \$64,343       -8.13%         Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Jefferson County, WV	\$84,051	\$79,830	-5.02%						
Washington-Arlington-Alexandria, DC-VA-MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Frederick-Gaithersburg-Rockville, MD MD	\$116,727	\$112,655	-3.49%						
MD-WV MD       \$109,424       \$106,105       -3.03%         Winchester, VA-WV MSA       \$67,011       \$69,817       4.19%         District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	Hagerstown-Martinsburg, MD-WV MSA	\$70,034	\$64,343	-8.13%						
District of Columbia       \$77,188       \$85,321       10.54%         Maryland       \$92,668       \$90,089       -2.78%         Virginia       \$80,053       \$78,390       -2.08%	,	\$109,424	\$106,105	-3.03%						
Maryland         \$92,668         \$90,089         -2.78%           Virginia         \$80,053         \$78,390         -2.08%	Winchester, VA-WV MSA	\$67,011	\$69,817	4.19%						
Virginia \$80,053 \$78,390 -2.08%	District of Columbia	\$77,188	\$85,321	10.54%						
	Maryland	\$92,668	\$90,089	-2.78%						
West Virginia \$53,245 \$52,866 -0.71%	Virginia	\$80,053	\$78,390	-2.08%						
	West Virginia	\$53,245	\$52,866	-0.71%						

Source: 2006 - 2010 U.S. Census Bureau American Community Survey; 2011 - 2015 U.S. Census Bureau American Community Survey; Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, a majority of locality median family income amounts within the assessment area have declined from 2010 to 2015. Furthermore, a majority of locality housing cost burden percentages remained higher than 30 percent or more of household income during the review period for both low-and-moderate income renters and owners within the assessment area as presented in the chart below.

	Cost	Burden - Rei	nters	Cost	Burden - Ow	ners
	Low	Moderate	All	Low	Moderate	All
Area	Income	Income	Renters	Income	Income	Owners
Washington-Baltimore-Arlington, DC-						
VA-MD-WV CSA	78%	62%	43%	72%	48%	21%
District of Columbia, DC	69%	51%	42%	69%	43%	22%
Montgomery County, MD	83%	70%	47%	76%	54%	22%
Washington County, MD	71%	38%	39%	67%	37%	21%
Arlington County, VA	83%	71%	35%	75%	58%	18%
Clarke County, VA	75%	36%	55%	53%	32%	18%
Fairfax County, VA	82%	78%	42%	75%	58%	21%
Frederick County, VA	76%	54%	35%	66%	42%	19%
Loudoun County, VA	82%	78%	43%	77%	60%	20%
Prince William County, VA	87%	71%	48%	74%	55%	23%
Spotsylvania County, VA	81%	54%	48%	63%	39%	21%
Stafford County, VA	76%	55%	44%	67%	39%	18%
Warren County, VA	77%	36%	38%	59%	31%	20%
Alexandria city, VA	83%	68%	40%	74%	41%	20%
Fairfax city, VA	80%	81%	44%	69%	43%	21%
Falls Church city, VA	92%	92%	40%	100%	38%	27%
Fredericksburg city, VA	83%	35%	47%	69%	37%	17%
Manassas city, VA	85%	52%	55%	73%	50%	27%
Manassas Park city, VA	92%	79%	48%	91%	47%	35%
Winchester city, VA	86%	59%	47%	61%	36%	18%
Berkeley County, WV	73%	49%	40%	57%	41%	19%
Jefferson County, WV	74%	34%	44%	57%	30%	17%
Frederick-Gaithersburg-Rockville, MD	83%	65%	47%	72%	53%	22%
Hagerstown-Martinsburg, MD-WV MSA	72%	43%	40%	62%	38%	20%
Washington-Arlington-Alexandria, DC- VA-MD-WV MD	79%	61%	43%	72%	51%	22%
Winchester, VA-WV MSA	70%	51%	39%	57%	35%	19%
District of Columbia	69%	51%	42%	69%	43%	22%
Maryland	79%	55%	46%	70%	44%	23%
Virginia Virginia	77%	56%	43%	65%	40%	21%
West Virginia	64%	36%	37%	47%	20%	14%

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local affordable housing official was contacted during the evaluation to assist in evaluating the bank's CRA performance and indicated that their organization serves the community as a housing resource network that provides housing development opportunities as well as counseling services to low-to-moderate income households in Prince George's and Montgomery Counties, Maryland. The contact indicated that the number of individuals impacted through the organization can vary from year to year. Additionally, the contact mentioned a specific program that has positively impacted the local community: a home improvement program that provided 50 Prince George's County homeowners with

a new roof, windows, siding, landscaping, driveways, and/or walkways. Another program the organization operates is a multi-family property within Prince George's County that offers affordable housing options to local residents. The contact stated that the organization's funding comes from federal, state, and local governments as well as grants, donations, sale of stock homes, along with fees and program income. The contact noted that there are opportunities for local financial institutions to provide counseling services to low- and-moderate income households regarding first-time homebuying opportunities and foreclosure-related procedures and noted that local financial institutions were meeting the credit needs of the community and was not aware of any discriminatory practices.

Another housing official whose organization provides counseling, training, advocacy, technical assistance, and other services for low- and moderate-income home buyers, homeowners, and tenants within the District of Columbia (District), was contacted during the evaluation. The contact explained that the goal of its organization is to prevent homelessness and increase sustainable housing opportunities by providing the skills, self-esteem, and empowerment necessary within families and communities. Further, the organization works to build the individual and group capacity for economic, physical, and social development of homes, neighborhoods, and communities using numerous programs that assist local residents. Such programs offered to tenants include rental assistance case management, landlord/tenant counseling, fair housing/predatory lending complaint services, and financial/credit counseling sessions. The contact noted that low- and-moderate income households have first priority for all programs, but any resident may use the available resources. However, the contact also noted that most programs have a wait list, and there has been an increase of clients requesting their services because the overall availability of affordable housing has declined recently. The office is funded through a multifaceted approach using federal and third-party partners, including some of the nation's largest financial institutions. The contact indicated that at least three banks make regular contributions that help the office to fund and carry out their programs. The contact did not note any discriminatory practices for local banks.

Two additional local affordable housing officials were contacted recently to discuss local housing conditions and community credit needs in northern Virginia. The contacts indicated that area unemployment rates have significantly improved since the declaration of the worldwide pandemic. The contacts also noted that the supply of affordable housing remains stagnant, while demand continues to remain high. The contacts suggested that affordable housing developers would benefit from flexible financing options from financial institutions; however, they acknowledged that area financial institutions are reasonably meeting local credit needs.

An economic development official was also contacted during the evaluation to discuss local economic conditions and community credit needs within Baltimore and indicated that their organization primarily serves as a coordinator for bringing together local jurisdictions in order to meet the needs of all businesses within the greater Baltimore region. The organization does not currently provide direct financing or support to local businesses. Rather, it primarily markets and promotes the Baltimore region, in addition to advocating for policy change. The contact indicated that currently the organization is working with local government to revitalize Baltimore's transit network within the next ten years to bolster the region's appeal, as well as working on a regional workforce development initiative in parallel to the transit project. The contact indicated that the top employers for the city of Baltimore are Johns Hopkins University, the University of Maryland Medical Center, Johns Hopkins Healthcare LLC, Med Star Good Samaritan Hospital, and Med Star Union Memorial Hospital, and that local unemployment rates were starting to trend downward after rising sharply during the pandemic. The contact indicated that historically its office hasn't provided direct funding to businesses in the area, but that it is considering changing the policy to encourage and provide local financial institutions with an opportunity to begin investing in the community through the organization's work in new and established businesses within the greater Baltimore metro area. The contact did not note any issues with local financial institutions and was unaware of any discriminatory practices taking place.

UB holds a strong deposit market share within the assessment area (8th of 87 banks operating within the assessment area) having 3% of all deposits from the June 30, 2022, FDIC deposit market share report when compared to the other banking institutions that operate within the assessment area. Overall, there is significant opportunity for community development loans and investments within the market area. Despite a competitive market, the bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its array of banking services and products; as noted above, all of the bank's services and products are offered in this assessment area, which includes 93 community development loans totaling \$281.6 million, as well as qualified investments totaling \$37.9 million during the review period. In addition, during the COVID-19 pandemic within this assessment area, the bank deferred 1,203 customer's loan interest, which totaled 1,363 loans in the amount of \$19.1 million. Furthermore, during the pandemic, within this assessment area, the bank waived 3,953 customer's ATM fees totaling \$7,906 and increased 95 customer's ATM withdrawal limits.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WASHINGTON-BALTIMORE-ARLINGTON, DC-VA-MD-WV CSA ASSESSMENT AREA

The bank's lending test performance in the Washington-Baltimore-Arlington, DC-MD-VA-WV CSA assessment is high satisfactory. Lending levels show good responsiveness to assessment area credit needs. Overall, the geographic distribution, as well as loans among borrowers of different income levels and businesses of different sizes is good. The bank is a leader in originating community development loans.

The investment test performance is outstanding. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs and makes significant use of innovative and complex investments to support community development initiatives.

The service test performance is outstanding. The bank's delivery systems are readily accessible to all portions of the assessment area. Since the previous evaluation, branching activity has improved the accessibility of its delivery systems, especially to low- and-moderate-income residents and geographies, and business hours and services do not vary in a way that inconveniences any particular individuals or areas. Further, the bank is a leader in providing community development services.

#### LENDING TEST

The institution's lending performance within this assessment area is considered high satisfactory. This conclusion is based on an evaluation of the institution's lending activity, the geographic and borrower distribution of lending, as well as the level of community development lending, while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes extensive use of flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document; particularly, the dollar volume of PPP loans that assisted small businesses during the Covid-19 pandemic within this assessment area was much greater than any of the remaining assessment areas. There were no gaps in lending, and the geographic distribution and dispersion of loans was good.

## **Lending Activity:**

The bank's HMDA and small business lending within the assessment area, as measured by number (39.2%) is slightly higher than the percentage of branch offices (34.4%) and less than the percentage of deposits (48.7%) in the assessment area. However, lending by dollar volume (50.7%) is greater than the percentage of branch offices and the percentage of deposits. As of June 30, 2022, the institution ranked 8th out of 87 financial institutions in deposit market share with 3% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 69th of 911 reporters of mortgage lending with a .3% market share and ranked 15th of 321 reporters of small business loans with a 1.3% market share. All market share rankings consider originated and purchased loans. Lending activity reflects good responsiveness to assessment area credit needs. As such, overall lending activity is considered good.

## **Geographic Distribution:**

Overall, the geographic loan distribution within this assessment area is considered good for HMDA lending and adequate for small business lending and is considered good overall.

	Ass	essme	nt Are						n, DC-	VA-MD	-w v C	SA	
					k And Aç	ggregate	Loans By Y	ear					
Geographic			202						202			_	Owner Occupied
Income Level	Bank		Agg	Bank		Agg	Bank		Agg	Bank		Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
							ase Loans			1			T
Low	25	5.8	4.4	8,556	3.5	3.7	19	4.7	4.5	8,055	3.2	3.5	3.
Moderate	83	19.1	17.7	27,759	11.5	13.2	80	19.9	17.7	29,172	11.4	12.9	16.
Middle	145	33.4	39.5	56,787	23.5	34.1	122	30.3	39.5	51,763	20.3	34.0	37.
Upper	179	41.2	38.1	148,069	61.2	48.7	181	45.0	38.0	166,236	65.1	49.3	41.
Unknown	2	0.5	0.2	927	0.4	0.3	0	0.0	0.2	0	0.0	0.2	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	434	100.0	100.0	242,098	100.0	100.0	402	100.0	100.0	255,226	100.0	100.0	100.
	1			ı		Refinanc		-		1			Г
Low	23	4.7	2.9	8,070	3.9	2.4	17	4.7	3.4	7,045	4.7	2.7	3.
Moderate	89	18.1	12.2	25,198	12.3	9.1	83	22.9	14.3	23,991	15.9	10.4	16.
Middle	157	32.0	34.5	50,190	24.4	29.8	117	32.2	36.1	34,522	22.9	30.7	37.6
Upper	220	44.8	50.2	121,084	59.0	58.5	145	39.9	46.1	84,102	55.7	56.1	41.
Unknown	2	0.4	0.2	854	0.4	0.2	1	0.3	0.2	1,310	0.9	0.2	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	491	100.0	100.0	205,396	100.0	100.0	363	100.0	100.0	150,970	100.0	100.0	100.
					Home	Improve	ment Loans			-			
Low	6	4.1	2.6	684	3.6	2.6	1	0.4	2.5	1,000	2.8	2.3	3.7
Moderate	12	8.1	10.9	1,14	1 5.9	8.0	26	10.9	10.2	2,497	7.1	7.6	16.
Middle	30	20.3	30.6	1,837	9.6	24.2	66	27.6	30.6	7,687	21.7	25.0	37.6
Upper	100	67.6	55.8	15,553	80.9	65.0	146	61.1	56.5	24,188	68.4	64.8	41.
Unknown	0	0.0	0.1	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	148	100.0	100.0	19,215	100.0	100.0	239	100.0	100.0	35,372	100.0	100.0	100.
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	25.1	0	0.0	29.2	6	26.1	24.6	44,845	21.8	9.7	17.
Moderate	4	50.0	26.0	2,970	42.4	23.0	5	21.7	24.2	3,842	1.9	20.4	26.0
Middle	1	12.5	28.4	597	8.5	34.6	10	43.5	28.1	155,022	75.4	43.3	30.8
Upper	2	25.0	18.8	2,975	42.4	12.8	2	8.7	21.0	1,999	1.0	24.3	24.8
Unknown	1	12.5	1.7	470	6.7	0.4	0	0.0	2.1	0	0.0	2.4	1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	7,012	100.0	100.0	23	100.0	100.0	205,708	100.0	100.0	100.
					Total Ho	me Mort	gage Loans						Owner Occupied Units %
Low	57	4.8	3.4	17,479	3.6	3.7	44	3.9	3.7	61,106	9.1	3.2	3.7
Moderate	200	16.8	14.0	58,370	11.9	10.9	201	17.9	15.4	60,166	9.0	11.0	16.
Middle	366	30.8	35.9	113,993	23.2	31.3	334	29.7	37.1	252,198	37.7	32.3	37.6
Upper	561	47.2	46.5	299,925	61.0	53.8	543	48.4	43.6	294,895	44.0	52.6	41.
Unknown	5	0.4	0.2	2,251	0.5	0.2	1	0.1	0.2	1,310	0.2	0.3	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1,189	100.0	100.0	492,018	100.0	100.0	1,123	100.0	100.0	669,675	100.0	100.0	100.
Source: 2021 FF	EC Census 15 U.S. Cer					. C							

During 2020, refinance loans were the leading HMDA product by number, followed by home purchase loans and home improvement for the bank. Multifamily lending was given less weight due to limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered good, while performance for refinance loans is considered excellent. While their conclusions carry significantly less weight, home improvement and multifamily lending are both considered good.

As reflected in the preceding tables, UB's percentage of 2020 HMDA lending in low-income census tracts (4.8%) was greater than the aggregate lending level (3.4%) and the percentage of owner-occupied housing units located in such tracts (3.7%) and is considered excellent. The bank's level of lending in moderate-income census tracts (16.8%) was greater than the level of aggregate lending in such tracts (14%) and similar to the owner-occupied housing units located in moderate-income census tracts (16.9%) and is considered excellent. Overall, the bank's 2020 performance is considered excellent.

In 2021, home purchase loans were the leading HMDA product by number, followed by refinance loans home improvement loans, and multifamily loans. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered good, while performance for refinance loans is considered excellent. While their conclusions carry significantly less weight, home improvement and multifamily lending are both considered good.

Overall in 2021, UB's lending performance in low- and moderate-income tracts (3.9% and 17.9%, respectively) exceeded the percentage of owner-occupied housing units in the low- and moderate-income census tracts (3.7% and 16.9%, respectively) and the percentage of aggregate lending in such tracts (3.7% and 15.4%, respectively) and is considered good.

On a combined basis, HMDA lending performance is considered good based upon the relative dollar volume of performance for each year.

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Washington-Baltimore-Arlington, DC-VA-MD-WV CSA												
Geographic			20		And A	ggreg	ate Loar		Total				
Income	Bank		Agg	1		Agg	Ban	Bank		Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	132	3.5	4.4	14,103	3.0	4.2	105	4.3	4.9	13,343	4.3	4.5	5.2
Moderate	620	16.4	18.2	83,163	17.6	18.5	411	16.8	18.7	52,060	16.9	18.9	18.5
Middle	1,331	35.2	34.5	164,228	34.8	35.6	869	35.6	35.2	106,557	34.7	35.3	34.4
Upper	1,680	44.5	42.2	208,614	44.2	41.0	1,049	42.9	40.5	134,198	43.7	40.6	41.2
Unknown	13	0.3	0.4	2,319	0.5	0.5	10	0.4	0.4	984	0.3	0.5	0.6
Tract-Unk	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.1	
Total	3,776	100.0	100.0	472,427	100.0	100.0	2,444	100.0	100.0	307,142	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank's percentage of 2020 small business lending in low-income census tracts (3.5%) is slightly less than the aggregate reporters' lending level (4.4%) and the percentage of businesses located in such tracts (5%). Likewise, UB's level of lending in moderate-income census tracts (16.4%) is less than the aggregate lending level (18.2%) and the percentage of businesses located in such tracts (18.4%). Overall, the bank's small business lending performance during 2020 is considered adequate, and its performance during 2021 is substantially similar.

# Distribution by Borrower Income and Revenue Size of the Business:

The bank's borrower distribution is considered excellent for HMDA and good for small business lending within the assessment area. Overall, the distribution is considered good when considering the relative performance levels and dollar volume of each lending product during the years analyzed.

	Distribu	tion o	f 2020	and 202	1 Hom	ne Mor	rtgage Le	ending	g By Bo	orrower	Incom	e Lev	el
	Ass	essme	nt Are	a: Wash	ington	ı-Balti	more-Ar	lingto	n, DC-	VA-MD	-WV C	SA	
	Bank And Aggregate Loans By Year												
Borrower		2020							2021				Families by
Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hom	ne Purch	ase Loans						
Low	25	5.8	7.7	5,207	2.2	4.1	34	8.5	7.3	6,721	2.6	3.8	21.9
Moderate	137	31.6	21.8	45,538	18.8	15.8	86	21.4	20.3	30,620	12.0	14.5	16.4
Middle	53	12.2	23.0	20,176	8.3	21.6	53	13.2	21.5	18,703	7.3	19.7	19.9
Upper	205	47.2	33.0	164,861	68.1	44.7	203	50.5	32.0	187,274	73.4	43.5	41.8
Unknown	14	3.2	14.5	6,316	2.6	13.8	26	6.5	18.9	11,908	3 4.7	18.5	0.0
Total	434	100.0	100.0	242,098	100.0	100.0	402	100.0	100.0	255,226	100.0	100.0	100.0
					F	Refinanc	e Loans						
Low	31	6.3	4.4	5,669	2.8	2.4	47	12.9	6.6	9,461	6.3	3.6	21.9
Moderate	104	21.2	12.9	26,841	13.1	9.1	66	18.2	15.0	15,947	10.6	10.7	16.4
Middle	74	15.1	21.3	23,701	11.5	18.8	51	14.0	20.5	15,037	10.0	18.0	19.9
Upper	263	53.6	37.9	143,908	70.1	44.9	183	50.4	34.0	104,153	69.0	42.4	41.8
Unknown	19	3.9	23.5	5,277	2.6	24.8	16	4.4	23.9	6,372	4.2	25.3	0.0
Total	491	100.0	100.0	205,396	100.0	100.0	363	100.0	100.0	150,970	100.0	100.0	100.0
	•				Home	Improve	ment Loans			•			
Low	3	2.0	4.8	205	1.1	3.1	5	2.1	4.3	336	0.9	2.7	21.9
Moderate	17	11.5	11.5	1,247	6.5	8.4	24	10.0	11.7	1,985	5.6	8.4	16.4
Middle	23	15.5	22.1	2,525	13.1	17.4	50	20.9	22.8	4,976	14.1	18.4	19.9
Upper	96	64.9	58.9	14,523	75.6	66.6	151	63.2	58.5	26,315	74.4	66.3	41.8
Unknown	9	6.1	2.7	715	3.7	4.5	9	3.8	2.8	1,760	5.0	4.3	0.0
Total	148	100.0	100.0	19,215	100.0	100.0	239	100.0	100.0	35,372	100.0	100.0	100.0
	•				Total Ho	ome Mor	tgage Loans	;		•			
Low	61	5.2	5.3	11,17	1 2.3	2.9	89	8.1	6.7	16,806	3.6	3.7	21.9
Moderate	270	22.9	15.1	74,656	15.4	11.	1 191	17.4	16.6	50,634	10.9	12.	16.4
Middle	167	14.1	21.4	48,411	10.0	19.4	166	15.1	20.8	40,134	8.7	18.6	19.9
Upper	633	53.6	36.4	337,742	69.6	44.5	599	54.5	34.1	336,113	72.4	43.1	41.8
Unknown	50	4.2	21.8	13,026	2.7	22.1	55	5.0	21.8	20,280	4.4	22.5	0.0
Total	1,18	1 100.0	100.0	485,006	100.0	100.0	1,100	100.0	100.0	463,967	100.0	100.0	100.0
Source: 2021 Fl	TIFC C	. D - 4-											•

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

In 2020, the bank's level of lending to low-income borrowers (5.2%) was similar to the percentage of aggregate lending levels to such borrowers (5.3%) and less than the percentage of low-income families within the assessment area (21.9%). UB's lending to moderate-income borrowers (22.9%) was substantially greater than the aggregate lending level (15.1%) and the percentage of moderate-income families (16.4%). Overall, the bank's performance during 2020 is considered excellent.

In 2021, the bank's level of lending (8.1%) to low-income borrowers exceeded aggregate lending to such borrowers (6.7%), but was less than the percentage of low-income families (21.9%) within the assessment area and is considered excellent. The bank's level of lending to moderate-income borrowers (17.4%) was slightly greater than aggregate lending levels to such borrowers (16.6%), and the percentage of moderate-income families (16.4%) in the assessment area and is considered good. Overall, the bank's performance during 2021 is considered good.

UB's overall HMDA lending is considered excellent, driven by the bank's overall lending performance in 2020.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Washington-Baltimore-Arlington, DC-VA-MD-WV CSA													
	Bank And Aggregate Loans By Year										Total		
		,	20	20				-	20	21			Businesses
	Bank		Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, ,
By Revenue													
\$1 Million or Less	180	4.8	43.8	36,356	7.7	25.9	393	16.1	47.8	59,437	19.4	28.6	91.8
Over \$1 Million	254	6.7		86,694	18.4		404	16.5		126,038	41.0		7.4
Revenue Unknown	3,342	88.5		349,377	74.0		1,647	67.4		121,667	39.6		0.8
Total	3,776	100.0		472,427	100.0		2,444	100.0		307,142	100.0		100.0
					By L	oan Si	ze						u
\$100,000 or Less	2,565	67.9	87.9	88,707	18.8	31.9	1,677	68.6	92.7	54,478	17.7	38.0	
\$100,001 - \$250,000	662	17.5	6.8	106,558	22.6	19.9	405	16.6	4.1	66,307	21.6	17.9	
\$250,001 - \$1 Million	549	14.5	5.3	277,162	58.7	48.2	362	14.8	3.2	186,357	60.7	44.1	
Total	3,776	100.0	100.0	472,427	100.0	100.0	2,444	100.0	100.0	307,142	100.0	100.0	
		I	By Loa	n Size a	nd Rev	venue	\$1 Mill	ion or	Less				
\$100,000 or Less	104	57.8		4,871	13.4		254	64.6		9,169	15.4		
\$100,001 - \$250,000	33	18.3	•	5,948	16.4		67	17.0		10,406	17.5		
\$250,001 - \$1 Million	43	23.9		25,537	70.2		72	18.3		39,862	67.1		
Total	180	100.0		36,356	100.0		393	100.0		59,437	100.0		
Source: 2021 FFIEC C	ensus Dat	a											

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 91.6% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 4.8% were to businesses with revenues of \$1 million or less. However, 41.5% of the bank's loans where revenue was known (180 of 434 loans) were to businesses with revenues of \$1 million or less. The percentage is comparable to the 2020 aggregate lending level of 43.8% of reported loans being made to businesses with revenues of \$1 million or less. As previously mentioned, the percentage of UB's small business loans extended to businesses with revenues of \$1 million or less was impacted by a large volume of loans for which borrower revenue was unknown (88.5%). UB was an active PPP lender during 2020 and 2021, and the PPP loan program did not require the collection or consideration of borrower revenue data. Consequently, large volumes of small business loans were originated during 2020 and 2021 for which borrower revenue is unknown. The remaining portion of loans were to businesses that either had revenues exceeding \$1 million or had unknown revenues.

D&B data from 2021, indicates that 91.8% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 16.1% were to businesses with revenues of \$1 million or less. However, 49.3% of the bank's loans where revenue was known (393 of 797 loans) were to businesses with revenues of \$1 million or less. This level of lending is slightly greater than the 2021 aggregate lending level of 47.8%. The percentage of UB's small business loans extended to businesses with revenues of \$1 million or less was impacted by a large volume of loans for which borrower revenue was unknown (67.4%).

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

Washington-Baltimore-Arlington, DC-VA-MD-WV CSA 2020								
By Loan Size	#	%	\$(000s)	%				
\$100,000 or less	2,348	71.3%	78,453	22.7%				
\$100,001 - \$250,000	561	17.0%	87,649	25.4%				
\$250,001 - \$1 Million	385	11.7%	179,401	51.9%				
Over \$1 Million	0	0.0%	0	0.0%				
Total	3,294	100.0%	345,503	100.0%				

PPP Loans with no reported revenue

During 2020, 67.9% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 87.9% within the same category. Of the bank's PPP small business loans for which borrower revenue was not known, 71.3% had loan amounts of \$100,000 or less.

Washington-Baltimore-Arlington, DC-VA-MD-WV CSA 2021								
By Loan Size	#	%	\$(000s)	%				
\$100,000 or less	1,288	80.2%	38,319	32.4%				
\$100,001 - \$250,000	211	13.1%	32,869	27.8%				
\$250,001 - \$1 Million	107	6.7%	47,126	39.8%				
Over \$1 Million	0	0.0%	0	0.0%				
Total	1,606	100.0%	118,314	100.0%				

During 2021, 68.6% of the small business loans reported were \$100,000 and less, and the aggregate reported 92.7% within the same category. Of the bank's PPP small business loans for which borrower revenue was not known, 80.2% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

## **Community Development Loans:**

As previously discussed, opportunities for community development lending are extensively available within the assessment area. When considering UB's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank was a leader in making community development loans within this market. In total, 50 community development loans for approximately \$217.8 million were originated

within the assessment area during the evaluation period. The loans provided funding for a variety of organizations whose primary purpose is either economic development, affordable housing, or the provision of services to low- and moderate-income individuals. More specifically, three loans were made to organizations promoting economic development in the area, 27 were made in order to help develop and provide affordable housing, and 20 provided social services for low- and moderate-income residents. In addition, the bank originated 43 loans totaling \$63.8 million as a part of the PPP within this assessment area.

## **INVESTMENT TEST**

Overall, the bank has an excellent level of qualified community development investments and donations, which exhibit excellent responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, including the multistate assessment area, 52 investments that directly benefit the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA assessment area totaling \$37.9 million for the evaluation period, and \$22.5 million that has been committed but not yet funded. New investments total \$12.8 million since the previous evaluation.

During the evaluation period, the bank made one new \$10 million investment that supports affordable housing, one qualified equity investment totaling \$250,000, and acquired five community development bonds totaling \$2.8 million. These investments demonstrate excellent responsiveness to the affordable housing and community services needs in the assessment area. The bank's prior-period investments also support affordable housing, as well as community service needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$1,315,546. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development, revitalize, or stabilize low- and moderate-income geographies, and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the assessment area							
United Bank	#	\$					
Affordable Housing	30	78,155					
Community Service	235	1,074,760					
Economic	21	95,631					
Revitalize or Stabilize	8	67,000					
Total	294	1,315,546					

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

### **SERVICE TEST**

The institution's performance under the service test within this assessment area is rated outstanding. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low and moderate-income areas. Services and business hours do not vary in a way that inconveniences the market, particularly low-and-moderate-income census tracts. Since the previous evaluation, seven branch offices have been closed and four branch offices have been opened within the assessment area. One of the closed branches and three of the opened were located in moderate-income census tracts. The branching activity has improved the accessibility of its delivery systems, particularly to low-and-moderate-income geographies and/or individuals. Additionally, the bank is a leader in providing community development services.

#### **Retail Services:**

Delivery systems and branch locations are readily accessible to all market areas and individuals of different income levels within the assessment area. Alternative delivery systems are available through various avenues including 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the bank. Additionally, the bank's business hours and services offered do not vary in a way that inconveniences low- or moderate-income geographies or individuals within the area.

Within this assessment area, during a majority of the review period, UB operated 73 full-service branch offices (three branch offices also are operated within the Baltimore-Columbia-Townson, MD metropolitan division which the bank acquired from its merger with Essex Bank during December 2021). Of the 73 full-service branch offices, three (4.1%) are located in low-income census tracts, while 15 (20.5%) are located in moderate-income census tracts. The distribution of branches is good when considering that 8.9% and 20.8% of the assessment area's households are in low- and moderate-income areas. As previously mentioned, the bank has closed one and opened three branch offices in moderate-income tracts since the previous evaluation; the closure of the branch office has not adversely affected the ability to conduct banking activities within the respective geography, as one of the branch openings is within 0.2 miles of the closure and both locations are in the same moderate-income census tract. Additionally, the three branch openings within moderate-income census tracts has improved the accessibility of its delivery systems, particularly to low-and-moderate income geographies and/or individuals within Prince George's County, Maryland. Overall, within the assessment area, the bank has improved the accessibility of its delivery systems particularly to low-and-moderate-income individuals and the geographies with a net increase of two locations being in moderate-income census tracts.

# **Community Development Services:**

The bank is a leader in providing community development services in the assessment area. Approximately 485 bank employees provided more than 6,650 hours of community development services during the evaluation period for approximately 212 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, financial services, as well as affordable housing, economic development, job stabilization, and financial education which is responsive to the assessment area. During the evaluation period, bank employees utilized their financial expertise and served in various capacities for the organizations, including being board members and committee members.

Community Development Services in the assessment area					
	#				
Affordable Housing	47				
Community Services	`146				
Economic Development	14				
Revitalize or Stabilize	5				
Total	212				

## MULTISTATE METROPOLITAN AREA

# CRA RATING FOR Wheeling, WV-OH MSA<sup>2</sup>: Satisfactory

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>Outstanding</u>
The Service Test is rated: <u>High Satisfactory</u>

Major factors supporting the rating include:

- Lending activity reflects good responsiveness to assessment area credit needs.
- Geographic and borrower distribution performance are considered adequate and good, respectively.
- The bank extends an adequate level of community development loans and made use of flexible lending practices in serving the assessment area's credit needs. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.
- Responsiveness to credit needs of low-income individuals and geographies and very small businesses is considered good.
- The bank has an excellent level of qualified investments benefiting this assessment area exhibiting excellent responsiveness to community development needs, and it makes occasional use of innovative and/or complex investments to support community development initiatives within this assessment area.
- Delivery systems and branch locations are readily accessible to all segments of the assessment area. Bank services and branch hours do not vary in a way that inconveniences low- and moderate-income people or census tracts within the assessment area. Changes in branch locations have not adversely affected the accessibility of delivery systems, particularly to low-and-moderate-income areas or individuals.
- UB provided a relatively high level of community development services within the area.

## SCOPE OF EXAMINATION

The institution's lending test evaluation includes analysis of all reported HMDA and small business loan data for loans either originated or purchased during calendar years 2020 and 2021. Community development loans made, and community development services provided from the date of the previous evaluation through the evaluation date were also considered. All qualified investments made during this same period or outstanding as of the evaluation date, regardless of when made, were considered.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WHEELING, WV-OH MSA ASSESSMENT AREA

UB operates six branches and eight ATMs within the Wheeling, WV-OH MSA assessment area, which includes the counties of Marshall and Ohio, West Virginia, and Belmont County, Ohio which constitutes the entire MSA. The complete composition of the assessment area is detailed in Appendix E. All of the bank's products and services are offered within the market.

<sup>&</sup>lt;sup>2</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

Tract	Branches		ches ATMS		DEMOGRAPHICS					
Income					Census	s Tracts	Households	Total		
Levels								Businesses		
Levels	#	%	#	%	#	%	%	%		
Low	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%		
Moderate	2	33.3%	2	25.0%	13	27.7%	16.0%	22.7%		
Middle	3	50.0%	5	62.5%	26	55.3%	66.2%	58.7%		
Upper	1	16.7%	1	12.5%	8	17.0%	17.8%	18.6%		
Unknown	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%		
Totals	6	100%	8	100%	47	100%	100%	100%		

Based on 2015 ACS data, the assessment area served by the bank has a total population of 145,677 and a median housing value of \$96,302. Within the assessment area, the owner-occupancy rate is 63.3%, which is higher than the owner-occupancy rate for both the state of West Virginia (60.8%) and the state of Ohio (59.1%). The percentage of families living below the poverty level in the assessment area (9.3%) is lower than the rates in the state of West Virginia (13.1%) and the state of Ohio (11.5%). The Wheeling, WV-OH MSA median family income during 2020 and 2021 equaled \$68,900 and \$63,600, respectively. The following table includes pertinent demographic data for the assessment area.

	2	021 Wheelii	ng, WV-OH	MSA AA De	emographics	3		
Income Categories	Tract Dis	stribution	Families by T	Γract Income		overty Level ilies by Tract	Families l	oy Family ome
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	7,268	19.1
Moderate	13	27.7	5,127	13.5	1,159	22.6	7,334	19.3
Middle	26	55.3	25,848	68.1	2,103	8.1	7,923	20.9
Upper	8	17.0	6,992	18.4	281	4.0	15,442	40.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	47	100.0	37,967	100.0	3,543	9.3	37,967	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	ed.	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	11,748	5,253	12.0	44.7	4,350	37.0	2,145	18.3
Middle	45,658	30,134	68.8	66.0	9,520	20.9	6,004	13.1
Upper	11,766	8,416	19.2	71.5	2,239	19.0	1,111	9.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	69,172	43,803	100.0	63.3	16,109	23.3	9,260	13.4
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or = \$1 Million		Over \$1	Million	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,217	22.7	1,012	21.3	180	35.4	25	22.5
Middle	3,154	58.7	2,853	60.0	233	45.9	68	61.3
Upper	1,000	18.6	887	18.7	95	18.7	18	16.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,371	100.0	4,752	100.0	508	100.0	111	100.0
Perc	entage of Tota	al Businesses:		88.5		9.5		2.1
				Fa	rms by Tract	& Revenue S	ize	
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	12	9.8	11	9.1	1	50.0	0	0.0
Middle	91	74.0	90	74.4	1	50.0	0	0.0
Upper	20	16.3	20	16.5	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	123	100.0	121	100.0	2	100.0	0	0.0
]	Percentage of	Total Farms:		98.4		1.6		0.0
Source: 2021 FFIEC Census I	Data						•	

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The chart below presents government and private sector employee totals by industry. As depicted below, government, mining, oil and gas extraction, health care, accommodation and food services, and retail trade provide a large portion of area employment for residents. In addition, construction, and manufacturing provide employment opportunities.

Wheeling, WV	-OH MSA E	Employees	by Industr	у			
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3
Government	8,963	8,390	7,844	8,734	8,497	8,812	7,874
Private Sector							
Private Sector Total, all industries	49,899	44,412	47,249	48,497	47,244	48,349	48,991
Agriculture, forestry, fishing and hunting	19*	25*	35*	0*	0*	39*	45*
Mining, quarrying, and oil and gas extraction	3,445*	2,906*	2,768*	2,468*	2,477*	2,368*	2,397*
Utilities	263*	269*	274*	274*	266*	269*	268*
Construction	2,258	2,427	1,966*	1,254*	531*	2,312	2,483
Manufacturing	3,064	2,960	3,029	2,996	3,000	3,044	3,021
Wholesale trade	2,112*	2,068*	2,115*	2,428	2,083*	2,087*	2,231*
Retail Trade	7,982	7,215	7,684	8,329	7,932	7,850	7,931
Transportation and warehousing	1,291	1,133	1,107	962*	1,138	1,158	1,242
Information	592	480	469	491	488	491	497*
Finance and insurance	2,046	1,991	2,005	2,001	1,999	2,012	2,003
Real estate and rental and leasing	534	486	534	522	536	559	571*
Professional and technical services	1,664	1,399	1,434	1,466	1,439	1,540	1,472
Management of companies and enterprises	1,085	1,014	976	894*	972*	968*	958*
Administrative and waste services	2,370	2,372	2,451	2,412*	2,376*	2,519*	2,533*
Educational services	757*	582*	601*	635*	658*	596*	591*
Health care and social assistance	8,801*	8,248*	8,424*	8,454*	8,718*	8,731*	8,614*
Arts, entertainment, and recreation	621	483	740	665	595	824	924
Accommodation and food services	6,558	4,392	5,604	5,761	5,697	6,041	6,236
Other services, except public administration	1,879	1,501	1,730	1,738	1,700	1,770	1,817
Public administration	0	0	0	0	0	0	0
Unclassified							
Source: Bureau of Labor Statistics (BLS), Quarterly Censu	s of Employ	ment and N	(ages				
"Indicates that some or all of the data for this category was	suppresser	d for confid	entiality rea.	รอกร			

Recent unemployment rates since the previous evaluation are included in the following table.

Wheeling, WV-OH MSA Unemployment Rates							
Area	2020	2021					
Wheeling, WV-OH MSA	9.43%	5.81%					
Belmont County, OH	10.15%	6.11%					
Marshall County, WV	9.74%	6.25%					
Ohio County, WV	8.22%	5.12%					
Ohio	8.22%	5.14%					
West Virginia	8.15%	5.03%					
Source: Bureau of Labor Statistics Unemployment Statistics	(BLS), Local Area						

Overall, unemployment rates across the assessment area decreased during 2021 for each county and state, suggesting some level of improvement more recently. In addition, the MSA typically has had higher unemployment rates than the states of Ohio and West Virginia.

Wheeling, WV-OH MSA Median Family Income Change								
Area	2010 Median Family Income	2015 Median Family Income	<b>Percent Change</b>					
Wheeling, WV-OH MSA	\$52,945	\$56,853	7.38%					
Belmont County, OH	\$51,414	\$55,993	8.91%					
Marshall County, WV	\$47,350	\$54,659	15.44%					
Ohio County, WV	\$59,793	\$60,247	0.76%					
Ohio	\$64,989	\$62,817	-3.34%					
West Virginia	\$53,245	\$52,866	-0.71%					

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, MSA and county median family income amounts within the assessment area have increased from 2010 to 2015, as the respective state incomes have decreased slightly between 2010 and 2015. As presented in the following chart, during the review period, the housing cost burden percentages remained higher than 30 percent or more of household income for both low-income renters and owners within the assessment area, and the burden for moderate-income renters and owners is slightly less severe.

Wheeling, WV-OH MSA Housing Cost Burden										
	Co	st Burden - Rent	ers	Cost Burden - Owners						
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners				
Wheeling, WV-OH MSA	66%	33%	37%	49%	20%	12%				
Belmont County, OH	60%	26%	33%	50%	22%	12%				
Marshall County, WV	71%	38%	41%	46%	15%	12%				
Ohio County, WV	70%	38%	40%	50%	21%	11%				
Ohio	73%	34%	40%	64%	32%	17%				
West Virginia	64%	36%	37%	47%	20%	14%				

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local community official within the market working for an organization that provides social service opportunities was contacted during the evaluation to assist in evaluating the bank's CRA performance. The contact stated that banks can provide assistance to low- and moderate-income residents through various seminars and classes such as employment skills workshops, financial literacy, and budget counseling that is occasionally available through their office. In addition, the contact mentioned that rental assistance programs for individuals offered periodically through the organization could use funding. The contact stated that banks are adequately meeting the financial needs of the local community and is not aware of any evidence of discriminatory practices.

UB holds a strong deposit market share within the assessment area (2<sup>nd</sup> of 14 banks operating within the assessment area) having 9.8% of all deposits from the June 30, 2022, FDIC deposit market share report. Overall, there is limited opportunity for community development loans and investments within the market area. Nonetheless, the bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its array of banking services and products; as noted above all the bank's services and products are offered in this assessment area, which includes community development loans, as well as eight qualified investments totaling

\$18.3 million during the review period. In addition, during the COVID-19 emergency within this assessment area the bank deferred 159 customer's loan interest, which included 172 loans totaling t \$71,877 of deferred interest. Furthermore, during the pandemic, from this assessment area the bank waived 635 customer's ATM cash bank fees totaling \$1,270 and increased 13 customer's ATM withdrawal limits.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WHEELING, WV-OH MSA ASSESSMENT AREA

The bank's Lending Test performance in the Wheeling, WV-OH MSA assessment area is considered high satisfactory. Lending levels show good responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution and dispersion of loans is adequate. The bank's community development lending is considered adequate.

The Investment Test performance is outstanding. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs.

Under the Service Test, the bank's performance is considered high satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank made a relatively high level of community development services.

## **LENDING TEST**

The institution's overall lending performance within this assessment area is considered high satisfactory. This conclusion is based on an evaluation of the bank's lending activity, its geographic and its borrower distribution of lending, and its level of community development lending, while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. Overall, the bank's lending activity and borrower distribution are considered good. Additionally, its geographic distribution and community development lending performance are considered adequate. Those conclusions drove the bank's overall lending test rating in this assessment area. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. There were also no geographic gaps in lending within the assessment area.

## **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number and dollar (1.7% and 1.2%) is slightly less than the percentage of branch offices (2.7%), and the percentage of deposits (2.2%) in the assessment area. As of June 30, 2022, the institution ranked 2<sup>nd</sup> out of 14 financial institutions in deposit market share with 9.8% of the assessment area's available FDIC insured deposits (credit union deposits are not included). When compared to 2021 aggregate data, the institution ranked 20<sup>th</sup> of 178 reporters of mortgage lending with a 1.3% market share and ranked 8<sup>th</sup> of 56 reporters of small business loans with a 4.8% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered good.

#### **Geographic Distribution:**

The bank's geographic distribution performance is considered good for HMDA lending and adequate for small business lending within the assessment area. Overall, the performance is considered adequate when considering the relative performance of each product and the greater dollar volume of small business lending during both years. This assessment area does not contain any low-income census tracts. As such, performance was determined by the bank's level of lending within moderate-income census tracts.

				Assessm Ban			Loans By Y							
Geographic			202			.5 .5		-	20:	21			Owner Occupied	
Income Level	Bank	(	Agg	Bank		Agg	Bank	(	Agg	Bank	(	Agg	Units %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
				. ,	Hom	ne Purcha	ase Loans						l	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	1	2.1	8.3	40	0.5	5.6	1	5.9	9.9	92	5.2	6.5	12.	
Middle	29	61.7	65.9	4,064	51.6	61.6	11	64.7	66.0	927	52.3	61.4	68.8	
Upper	17	36.2	25.8	3,777	47.9	32.9	5	29.4	24.1	753	42.5	32.0	19.	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	47	100.0	100.0	7,881	100.0	100.0	17	100.0	100.0	1,772	100.0	100.0	100.	
	•			•	F	Refinance	Loans	-		•				
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	3	10.7	6.9	169	4.4	4.3	7	31.8	8.8	746	28.5	6.2	12.	
Middle	15	53.6	63.0	1,605	42.2	58.6	7	31.8	61.8	855	32.7	57.3	68.8	
Upper	10	35.7	30.2	2,033	53.4	37.1	8	36.4	29.4	1,017	38.8	36.5	19.	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	28	100.0	100.0	3,807	100.0	100.0	22	100.0	100.0	2,618	100.0	100.0	100.	
Home Improvement Loans														
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	1	8.3	11.9	30	9.8	10.2	0	0.0	9.0	0	0.0	7.4	12.	
Middle	7	58.3	59.6	145	47.5	52.3	7	100.0	66.3	285	100.0	62.1	68.8	
Upper	4	33.3	28.4	130	42.6	37.5	0	0.0	24.7	0	0.0	30.4	19.	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	12	100.0	100.0	305	100.0	100.0	7	100.0	100.0	285	100.0	100.0	100.	
					M	ultifamily	Loans						Multi-family Units %	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	0	0.0	35.7	0	0.0	9.2	0	0.0	20.0	0	0.0	8.2	31.	
Middle	0	0.0	57.1	0	0.0	88.7	0	0.0	52.0	0	0.0	74.9	52.4	
Upper	0	0.0	7.1	0	0.0	2.1	0	0.0	28.0	0	0.0	16.8	15.	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.	
	Total Home Mortgage Loans									Owner Occupied Units %				
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Moderate	5	5.4	7.9	239	1.9		8	16.3	9.5	838	16.5	6.5	12.	
Middle	53	57.6	64.4	5,924	48.2	60.5	28	57.1	64.1	2,479	48.7	60.1	68.8	
Upper	34	37.0	27.7	6,123	49.8	34.4	13	26.5	26.4	1,770	34.8	33.4	19.	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Total	92	100.0	100.0	12,286	100.0	100.0	49	100.0	100.0	5,087	100.0	100.0	100.	

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

46

For the bank, home purchase loans were the leading HMDA product by number, followed by refinance and home improvement lending during 2020. Multifamily lending was not a factor in the analysis, as the bank did not originate any such loans within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered poor, refinance lending is considered excellent, while performance for home improvement lending is adequate.

Overall, UB's level of lending in moderate-income census tracts (5.4%) was lower than both the level of aggregate lending in such tracts (7.9%) and the owner-occupied housing units located in moderate-income census tracts (12%). Overall, the bank's performance of lending in moderate-income census tracts during 2020 is considered adequate.

During 2021, refinance loans were the leading HMDA product by number, followed by home purchase and home improvement lending for the bank. Multifamily lending was not a factor in the analysis, as the bank did not originate any such loans within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered adequate, refinance lending is considered excellent, while performance for home improvement lending is very poor.

Overall, during 2021, UB's lending performance (16.3%) was greater than the percentage of owner-occupied housing units in the moderate-income census tracts (12%) and the percentage of aggregate lending in such tracts (9.5%) and is considered excellent.

On a combined basis, total HMDA lending performance is considered good based upon the relative performance and dollar volume for each year.

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geograph Assessment Area: Wheeling, WV-OH MSA										hy			
Geographic		Bank And Aggregate Loans By Year 2020 2021											Total
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	21	16.0	21.8	4,238	21.8	31.0	18	18.8	19.8	2,906	25.5	31.7	22.7
Middle	92	70.2	59.1	14,263	73.4	52.2	60	62.5	59.4	7,014	61.4	53.7	58.7
Upper	18	13.7	18.7	927	4.8	16.6	18	18.8	19.9	1,498	13.1	14.4	18.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.2	0	0.0	0.8	0	0.0	0.2	
Total	131	100.0	100.0	19,428	100.0	100.0	96	100.0	100.0	11,418	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 22.6% of all area businesses are located in moderate-income census tracts. During 2020, aggregate lenders originated 21.8% of small business loans in moderate-income census tracts. While the bank's level of lending (16%) is less than the aggregate level, overall, it is considered adequate.

D&B data from 2021, indicates that 22.7% of all area businesses are located in moderate-income census tracts. During 2021, aggregate lenders originated 19.8% of small business loans in moderate-income census tracts. UB's lending performance in moderate-income tracts (18.8%) is comparable to the aggregate lending level and is considered good overall.

On a combined basis, UB's performance is considered adequate given the greater weight given to its 2020 lending due to the larger dollar volume of originated loans.

## **Distribution by Borrower Income and Revenue Size of the Business:**

UB's borrower distribution performance is considered excellent for HMDA and adequate for small business lending. Overall, the distribution is considered good when considering the relative performance and dollar volumes of each lending product during the years analyzed.

	Distribu	tion o					tgage Lo	_			Incom	e Lev	el
			1				Loans By Y		II MIS	A			
Borrower			2020			,55			202	21			Families by
Income Level	Bank	(	Agg	Bank	1	Agg	Bank	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
				· · · · · · · · ·	Hom	e Purch	ase Loans						
Low	5	10.6	10.4	471	6.0	5.9	5	29.4	9.0	425	24.0	4.8	19.1
Moderate	10	21.3	24.8	896	11.4	18.	5	29.4	20.9	471	26.6	15.3	19.3
Middle	9	19.1	22.5	1,282	16.3	21.8	2	11.8	21.8	332	18.7	20.0	20.9
Upper	22	46.8	30.0	5,057	64.2	41.9	4	23.5	30.6	503	28.4	42.6	40.7
Unknown	1	2.1	12.3	175	2.2	12.3	1	5.9	17.8	41	2.3	17.3	0.0
Total	47	100.0	100.0	7,881	100.0	100.0	17	100.0	100.0	1,772	100.0	100.0	100.0
					F	Refinanc	e Loans						
Low	4	14.3	6.2	220	5.8	2.8	2	9.1	4.9	99	3.8	2.4	19.1
Moderate	7	25.0	15.6	529	13.9	9.6	3	13.6	14.4	265	10.1	9.2	19.3
Middle	8	28.6	20.5	1,073	28.2	17.3	4	18.2	22.5	548	20.9	18.3	20.9
Upper	6	21.4	42.2	1,404	36.9	52.5	12	54.5	43.3	1,591	60.8	53.9	40.7
Unknown	3	10.7	15.5	581	15.3	17.8	1	4.5	14.8	115	4.4	16.	0.0
Total	28	100.0	100.0	3,807	100.0	100.0	22	100.0	100.0	2,618	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	1	8.3	10.1	20	6.6	6.6	1	14.3	5.6	20	7.0	3.4	19.1
Moderate	1	8.3	11.9	20	6.6	10.9	1	14.3	17.4	30	10.5	10.3	19.3
Middle	5	41.7	22.9	115	37.7	18.4	0	0.0	17.4	0	0.0	15.0	20.9
Upper	5	41.7	44.5	150	49.2	54.4	5	71.4	47.2	235	82.5	60.4	40.7
Unknown	0	0.0	10.6	0	0.0	9.8	0	0.0	12.4	0	0.0	10.9	0.0
Total	12	100.0	100.0	305	100.0	100.0	7	100.0	100.0	285	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	3					
Low	10	10.9	8.3	711	5.8	4.3	8	16.3	6.8	544	10.7	3.6	19.1
Moderate	19	20.7	18.9	1,495	12.2	13.3	9	18.4	17.5	766	15.1	12.2	19.3
Middle	24	26.1	21.0	2,533	20.6	19.0	7	14.3	21.8	1,000	19.7	18.9	20.9
Upper	35	38.0	36.5	6,791	55.3	47.4	23	46.9	37.6	2,621	51.5	48.6	40.7
Unknown	4	4.3	15.3	756	6.2	16.	2	4.1	16.3	156	3.1	16.7	0.0
Total	92	100.0	100.0	12,286	100.0	100.0	49	100.0	100.0	5,087	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

 $\label{lem:multifamily loans} \textit{are not included in the borrower distribution analysis}.$ 

During 2020, the bank's HMDA lending to low-income borrowers (10.9%) exceeds the percentage of aggregate lending (8.3%) to such borrowers, but lags the percentage of low-income families residing in the assessment area (19.1%). The bank's level of lending to moderate-income borrowers (20.7%) exceeds both the aggregate lending level (18.9%) to such borrowers and the percentage of moderate-income families in the assessment area (19.3%). Overall, the bank's HMDA lending performance during 2020 is considered good.

During 2021, the bank's HMDA lending to low-income borrowers (16.3%) exceeds the percentage of aggregate lending (6.8%) to such borrowers, although it lags the percentage of low-income families residing in the assessment area (19.1%). The bank's level of lending to moderate-income borrowers (18.4%) exceeds the aggregate lending level (17.5%) to such borrowers and sightly lags the percentage of moderate-income families in the assessment area (19.3%). Overall, the bank's HMDA lending performance during 2021 is considered excellent, and is driven by the strength of its lending to low-income borrowers.

On a combined basis, the distribution is considered excellent based upon the strength of the relative performance levels in each year.

Distrib	oution of	f 2020					U	,		Size of B	usine	sses	
Assessment Area: Wheeling, WV-OH MSA													
_				Bank	And A	ggreg	ate Loar	ns By Y	(ear				Total
_			20	20					20	21			Total Businesses
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, 0
					By F	Reveni	ie						
<b>\$1 Million or Less</b> 9 6.9 28.0 765 3.9 20.3 15 15.6 45.4 2,006 17.6 24.8 88.5													
Over \$1 Million	19	14.5		4,753	24.5		18	18.8		4,752	41.6		9.5
Revenue Unknown	103	78.6		13,910	71.6		63	65.6		4,660	40.8		2.1
Total 131 100.0 19,428 100.0 96 100.0 11,418 100.0											100.0		
					By L	oan Si	ze						
\$100,000 or Less	85	64.9	83.6	3,300	17.0	29.5	64	66.7	89.7	2,206	19.3	35.8	
\$100,001 - \$250,000	20	15.3	9.5	3,464	17.8	21.3	20	20.8	6.1	3,576	31.3	20.4	
\$250,001 - \$1 Million	26	19.8	6.9	12,664	65.2	49.2	12	12.5	4.1	5,636	49.4	43.8	
Total	131	100.0	100.0	19,428	100.0	100.0	96	100.0	100.0	11,418	100.0	100.0	
,		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	5	55.6		165	21.6		7	46.7		271	13.5		
\$100,001 - \$250,000	4	44.4		600	78.4		6	40.0		884	44.1		
\$250,001 - \$1 Million	0	0.0		0	0.0		2	13.3		851	42.4		
Total	9	100.0		765	100.0		15	100.0		2,006	100.0		
ource: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data 2011-2015 U.S. Census Bureau: American Community Survey													

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 88.4% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 78.6% involved loans for which revenues were unknown and 6.9% were to businesses with revenues of \$1 million or less. However, 32.1% of the bank's loans where revenue was known (9 of 28 loans) were to businesses with revenues of \$1 million or less. The percentage is slightly greater than the 2020 aggregate lending level of 28% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 88.5% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 15.6% were to businesses with revenues of \$1 million or less, and 65.6% involved loans for which revenues were unknown.

However, 45.4% of the bank's loans where revenue was known (15 of 33 loans) were to businesses with revenues of \$1 million or less. This level of lending is equal to the 2021 aggregate lending level of 45.4%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following tables reflect this distribution.

Wheeling, WV-OH MSA 2020							
By Loan Size	#	%	\$(000s)	%			
\$100,000 or less	71	69.6%	2,525	18.2%			
\$100,001 - \$250,000	12	11.8%	2,074	15.0%			
\$250,001 - \$1 Million	19	18.6%	9.263	66.8%			

PPP Loans with no reported revenue

During 2020, 64.9% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 83.6% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 69.6% had loan amounts of \$100,000 or less.

0

102

Over \$1 Million

Total

0.0%

100.0%

0

13,862

0.0%

100.0%

Wheeling, WV-OH MSA 2021								
By Loan Size	#	%	\$(000s)	%				
\$100,000 or less	42	80.8%	1,192	28.7%				
\$100,001 - \$250,000	6	11.5%	991	23.8%				
\$250,001 - \$1 Million	4	7.7%	1,973	47.5%				
Over \$1 Million	0	0.0%	0	0.0%				
Total	52	100.0%	4,156	100.0%				

During 2021, 66.7% of the small business loans reported were \$100,000 and less, and the aggregate reported 89.7% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 80.8% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered adequate.

#### **Community Development Loans:**

As previously mentioned, opportunities for community development lending are limited within the Wheeling, WV-OH MSA assessment area. However, when considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank originated one loan totaling \$2 million as a part of the PPP within the assessment area. Within this assessment area, the bank extended an adequate level of community development loans during the evaluation period.

#### INVESTMENT TEST

Overall, the bank has an excellent level of qualified community development investments and donations, which exhibit excellent responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, including the multistate assessment area, UB holds eight qualified investments that directly benefit the Wheeling, WV-OH MSA assessment area that total \$8.4 million for the evaluation period; \$9.9 million has been committed but not yet funded. This includes \$5.4 million in new investments that support affordable housing.

During the evaluation period, the bank made two new investments that support low- and moderate-income affordable housing. These investments demonstrate excellent responsiveness to the affordable housing needs in the assessment area. The bank's prior-period investments also support affordable housing, as well as community service needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$18,160. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development, which are needed in the assessment area.

Qualified Investment Donations in the assessment area								
United Bank	#	\$						
Affordable Housing	0	0						
Community Service	7	12,800						
Economic	4	5,360						
Revitalize or Stabilize	0	0						
Total	11	18,160						

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

Within the assessment area, UB's performance under the service test is rated high satisfactory. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. Additionally, the bank provides a relatively high level of qualified services to community development organizations. One branch office was closed in a middle-income census tract within the assessment area since the previous evaluation.

#### **Retail Services:**

Delivery systems are readily accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access to their accounts through an automated system. Bank-by-mail, online banking, and mobile banking services are also offered by the institution. Additionally, the bank's business hours and services offered do not vary in a way that inconveniences low- or moderate-income geographies or individuals within the area.

The bank operates six full-service branch offices in the assessment area, two (33.3%) of which are located in moderate-income census tracts. The distribution of branches is excellent when considering that according to census data, 16% of the assessment area's households are located in moderate-income areas, while no low-income census tracts are located within the assessment area. Branch locations and business hours are considered convenient and meet the needs of the assessment area. Since the previous evaluation, one branch office has been closed in a middle-income census tract, and no branch office has been opened and the changes do not adversely affect the accessibility of its delivery systems.

# **Community Development Services:**

The bank provides a relatively high level of community development services in the assessment area. Nine bank employees provided 58 hours of community development services during the evaluation period for six different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as affordable housing, health care, food, job creation, and financial education which is responsive to the assessment area.

Community Development Services in the assessment area					
	#				
Affordable Housing	1				
Community Services	4				
Economic Development	0				
Revitalize or Stabilize	1				
Total	6				

# MULTISTATE METROPOLITAN AREA

CRA RATING FOR Myrtle Beach-Conway, SC-NC CSA3: Satisfactory

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>Outstanding</u>
The Service Test is rated: <u>High Satisfactory</u>

Major factors supporting the rating include:

• Lending activity reflects good responsiveness to assessment area credit needs.

- Geographic and borrower distribution performance are considered good and adequate, respectively.
- The bank exhibits a good responsiveness to credit needs of low-income individuals and geographies and very small businesses.
- The bank is a leader in making community development loans and makes use of flexible lending practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.
- The bank has an excellent level of qualified investments benefiting this assessment area exhibiting excellent responsiveness to community development needs, and it makes significant use of innovative and/or complex investments to support community development initiatives within this assessment area.
- Delivery systems and branch locations are readily accessible to all segments of the assessment area. Bank services and branch hours do not vary in a way that inconveniences low- and moderate-income people or census tracts within the assessment area. Changes in branch locations have not adversely affected the accessibility of delivery systems, particularly to low-and-moderate-income areas or individuals.
- UB has provided an adequate level of community development services within the area.

## SCOPE OF EXAMINATION

The institution's lending test evaluation includes analysis of all reported HMDA and small business loan data for loans either originated or purchased during calendar years 2020 and 2021. Community development loans made and community development services provided from the date of the previous evaluation through the evaluation date were also considered. All qualified investments made during this same period or outstanding as of the evaluation date, regardless of when made, were considered.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MYRTLE BEACH-CONWAY, SC-NC CSA ASSESSMENT AREA

UB operates 12 branches and 12 ATMs within the Myrtle Beach-Conway, SC-NC CSA assessment area which includes the Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA, and the Georgetown, SC micro-area. The assessment area includes Horry County and Georgetown County, South Carolina, and Brunswick County, North Carolina. The complete composition of the assessment area is detailed in Appendix E. All of the bank's products and services are offered within the market.

<sup>&</sup>lt;sup>3</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

Tract					DEMOGRAPHICS						
Income	Bra	nches	A	TMS	Census Tracts # %		Households	Total Businesses			
Levels	#	%	#	%			%	%			
Low	0	0.0%	0	0.0%	2	1.7%	1.2%	3.5%			
Moderate	5	41.7%	5	41.7%	21	17.5%	15.7%	13.7%			
Middle	4	33.3%	4	33.3%	67	55.8%	62.8%	56.6%			
Upper	3	25.0%	3	25.0%	25	20.8%	20.2%	25.8%			
Unknown	0	0.0%	0	0.0%	5 4.2%		0.2%	0.4%			
Totals	12	100%	12	100%	120	100%	100%	100%			

Based on 2015 ACS data, the assessment area served by the bank has a total population of 467,228 and a median housing value of \$164,737. Within the assessment area, the owner-occupancy rate is 45%, which is lower than the owner-occupancy rate for both the state of South Carolina (57.3%) and the state of North Carolina (55.7%). The percentage of families living below the poverty level in the assessment area (13.1%) is lower than the rate in the state of South Carolina (13.5%) and higher than the state of North Carolina (12.8%). The median family income during 2020 and 2021 equaled \$62,100 and \$66,300, respectively. The following table includes pertinent demographic data for the assessment area.

	2021 N	Ayrtle Beach	-Conway, S	C-NC CSA A	A Demogra	phics		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	
	#	%	#			%	#	%
Low	2	1.7	1,171	0.9	456	38.9	25,148	19.8
Moderate	21	17.5	20,376	16.0	4,624	22.7	22,608	17.8
Middle	67	55.8	79,653	62.6	9,893	12.4	26,463	20.8
Upper	25	20.8	25,699	20.2	1,659	6.5	52,925	41.6
Unknown	5	4.2	245	0.2	74	30.2	0	0.0
Total AA	120	100.0	127,144	100.0	16,706	13.1	127,144	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	-				% by unit
Low	4,023	489	0.4	12.2	1,731	43.0	1,803	44.8
Moderate	40,155	19,765	14.4	49.2	10,251	25.5	10,139	25.2
Middle	180,875	87,338	63.5	48.3	32,890	18.2	60,647	33.5
Upper	80,025	29,697	21.6	37.1	9,025	11.3	41,303	51.6
Unknown	366	206	0.1	56.3	105	28.7	55	15.0
Total AA	305,444	137,495	100.0	45.0	54,002	17.7	113,947	37.3
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	863	3.5	762	3.3	98	7.4	3	1.3
Moderate	3,414	13.7	3,201	13.7	178	13.5	35	15.3
Middle	14,118	56.6	13,323	57.0	665	50.4	130	56.8
Upper	6,429	25.8	6,002	25.7	366	27.7	61	26.6
Unknown	105	0.4	93	0.4	12	0.9	0	0.0
Total AA	24,929	100.0	23,381	100.0	1,319	100.0	229	100.0
Perc	entage of Tota	al Businesses:		93.8		5.3		0.9
				Fa	rms by Tract			
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	2	0.7	2	0.7	0	0.0	0	0.0
Moderate	82	27.2	80	28.3	2	11.1	0	0.0
Middle	187	62.1	174	61.5	13	72.2	0	0.0
Upper	28	9.3	25	8.8	3	16.7	0	0.0
Unknown	2	0.7	2	0.7	0	0.0	0	0.0
Total AA	301	100.0	283	100.0	18	100.0	0	0.0
	Percentage of	Total Farms:		94.0		6.0		0.0
Source: 2021 FFIEC Census I	Data							

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Government and private sector employment opportunities are depicted below in the chart. In addition to the private sector, accommodation and retail trade provide many residents of the assessment area with jobs. Health care and construction also provide this tourist area with many opportunities for employment.

Myrtle Beach-Conway, SC-NC CSA Employees by Industry									
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3		
Government	28,065	25,900	25,838	27,071	26,781	27,016	26,241		
Private Sector									
Private Sector Total, all industries	155,835	139,760	156,912	153,734	151,218	165,186	168,307		
Agriculture, forestry, fishing and hunting	216*	220°	232*	221*	682*	699*	711*		
Mining, quarrying, and oil and gas extraction	80*	77*	79*	78 <b>*</b>	68*	79*	75*		
Utilities	1,464	1,464	1,456	1,451	1,469	1,447	1,439		
Construction	11,361	11,098	11,169	11,390	11,273	11,609	11,680		
Manufacturing	6,899	6,524	6,659	6,783	6,685	6,943	6,963		
Wholesale trade	3,132	2,984	3,049	3,100	3,083	3,214	3,264		
Retail Trade	31,262	29,582	32,257	32,721	31,912	33,247	33,576		
Transportation and warehousing	3,097	2,796	3,031	3,143	3,255	3,442	3,493		
Information	2,249	2,135	2,150	2,191	2,253	2,254	2,295		
Finance and insurance	4,691	4,796	4,858	4,973	5,148	5,232	5,236		
Real estate and rental and leasing	5,064	4,855	5,631	5,068	4,891	5,814	6,248		
Professional and technical services	4,729*	4,451*	4,672*	4,749*	6,084	6,312	6,292		
Management of companies and enterprises	601*	511*	581*	577*	566	626	622		
Administrative and waste services	10,491	10,000	10,746	10,212	10,085	11,131	11,252		
Educational services	956	788	876	976	1,032	1,049	1,004		
Health care and social assistance	20,021	18,368	19,085	19,681	19,983	20,054	19,959		
Arts, entertainment, and recreation	7,034	4,998	6,638	6,206	5,812	7,582	7,911		
Accommodation and food services	36,275	28,623	37,643	34,139	32,431	39,740	41,576		
Other services, except public administration	4,509	3,778	4,389	4,298	4,339	4,537	4,542		
Public administration	0	0	0	0	0	0	0		
Unclassified	Unclassified								
Source: Bureau of Labor Statistics (BLS), Quarterly Census of Employment and Wages									
Indicates that some or all of the data for this category was suppressed for confidentiality reasons									

Recent unemployment rates since the previous evaluation are included in the following table.

Myrtle Beach-Conway, SC-NC CSA - Average Annual Unemployment Rates									
Area 2020 2021									
Brunswick County, NC	8.55%	5.99%							
Georgetown County, SC	7.31%	4.77%							
Horry County, SC	8.39%	5.07%							
Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	8.43%	5.31%							
NonMSA South Carolina	6.87%	5.18%							
North Carolina	7.08%	4.81%							
South Carolina 5.99% 4.00%									
Source: Bureau of Labor Statistics (BLS), Local Area									

Overall, unemployment rates across the assessment area decreased between 2020 and 2021, suggesting that the economy is improving somewhat from pandemic unemployment levels. In addition, the MSA typically has fluctuation periods throughout the year given the seasonal nature of tourism in the assessment area.

Myrtle Beach-Conway, SC	-NC CSA Median Family	y Income Change	
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Myrtle Beach-Conway, SC-NC CSA	\$57,163	\$53,564	-6.30%
Brunswick County, NC	\$59,505	\$57,126	-4.00%
Georgetown County, SC	\$58,929	\$53,688	-8.89%
Horry County, SC	\$56,199	\$52,543	-6.50%
Myrtle Beach-Conway-North Myrtle Beach, SC-NC MSA	\$56,901	\$53,695	-5.63%
NonMSA South Carolina	\$46,657	\$44,609	-4.39%
North Carolina	\$61,148	\$57,856	-5.38%
South Carolina	\$59,046	\$56,343	-4.58%

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, CSA, county, and state median family income amounts within the assessment area have decreased from 2010 to 2015. As presented in the following chart, housing cost burden percentages remain higher than 30 percent or more of household income for both low-and-moderate-income renters and owners within the assessment area during the evaluation period.

Myrtle Beach-C	Conway, SC	C-NC CSA Hou	sing Cost	Burden		
	Cost	Burden - Ren	ters	Cost	Burden - Owr	iers
	Low	Moderate	All	Low	Moderate	All
Area	Income	Income	Renters	Income	Income	Owners
Myrtle Beach-Conway, SC-NC CSA	76%	64%	45%	63%	40%	24%
Brunswick County, NC	78%	53%	45%	64%	39%	24%
Georgetown County, SC	61%	75%	43%	63%	38%	26%
Horry County, SC	77%	66%	45%	63%	40%	23%
Myrtle Beach-Conway-North Myrtle						
Beach, SC-NC MSA	78%	63%	45%	63%	40%	23%
NonMSA South Carolina	61%	47%	39%	54%	30%	20%
North Carolina	75%	49%	42%	60%	36%	20%
South Carolina	72%	52%	42%	58%	34%	19%

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local economic development official was recently contacted and described the market's economic conditions as positive, with rapid growth in the area. This in turn has led to an increase in demand for small businesses seeking small businesses loans. The organization works with local partners and third-party contacts to assist small businesses with all of their needs. The contact indicated that while unemployment has been high over the previous two years, it is now lower within the market. The contact also noted that within the area, the cost of living has increased in recent years. Small businesses are seeking ways for local institutions to provide additional access to credit. The businesses and applicants that the organization's clients generally like to do business with include smaller/local financial institutions who are familiar with the area. The contact further indicated that local larger businesses prefer checking account services from large institutions, but all of their clients prefer loans from smaller institutions.

Another local economic development official was contacted during the evaluation and indicated that it focuses on encouraging growth of new businesses and industry within the assessment area. Some of the resources that the organization provides include loan programs, local tax credits, training resources, site selection needs, and assistance with energy and transportation needs. Additionally, this office's staff works with near-by community colleges to match available talent within the market to the needs of prospective businesses for employment opportunities. The contact noted that the top employers within the market include local government as well as retail and energy companies. The contact also indicated that local unemployment rates increased during 2020, but have returned to more typical rates for the area. The official noted that the organization does not directly work with local financial institutions, but that it does at times direct prospective businesses towards financing and credit opportunities. The contact stated there may be potential for local financial institutions to participate in the attraction and retention of businesses through the area's Small Business Center. This could be done by offering commercial financing, as well as potentially holding small business seminars or financial education classes. Lastly, the contact did not note any issues with local financial institutions and was unaware of any discriminatory practices taking place.

UB holds a strong deposit market share within the assessment area (9th of 23 banks operating within the assessment area) having 6% of all deposits from the June 30, 2022, FDIC deposit market share report. Overall, there is reasonable opportunity for community development loans and investments within the market area. Despite a competitive market, especially from larger institutions, the bank faces no significant constraints in taking advantage of all available community development opportunities. While UB is new to this market since the previous evaluation, it serves the assessment area through its array of banking services and products; as noted above all the bank's services and products are offered in this assessment area, which included seven community development loans totaling \$17.5 million, as well as seven qualified investments totaling \$20 million during the review period. In addition, during the COVID-19 emergency within this assessment area the bank deferred 113 customer's loan interest, which included 193 individual loans in the amount of \$1.2 million.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MYRTLE BEACH-CONWAY, SC-NC CSA ASSESSMENT AREA

The bank's Lending Test performance in the Myrtle Beach-Conway, SC-NC CSA assessment area is considered high satisfactory. Lending levels show good responsiveness to assessment area credit needs. Within the area, lending activity is considered good, borrower distribution is adequate, geographic distribution is good, and the bank is a leader in originating community development loans.

The Investment Test performance is outstanding. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs and makes occasional use of initiative investments.

Under the Service Test, the bank's performance is considered high satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences any particular individuals or areas, and branch changes have not adversely affected areas or individuals of the assessment area. Further, the bank has provided an adequate level of community development services.

## **LENDING TEST**

The institution's overall lending performance within this assessment area is considered high satisfactory. This conclusion is based on an evaluation of the bank's lending activity, its geographic and its borrower distribution of lending, and its level of community development lending, while taking into account the UB's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. Good geographic distribution, adequate borrower distribution, and excellent CD lending performance driver the overall lending test rating in this market. The bank also makes use of flexible lending

practices in serving the credit needs of the assessment area. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document. There were no gaps in lending, and the geographic dispersion of loans is good.

## **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number and dollar (7.3% and 6.7%) is greater than the percentage of branch offices (5.4%), and the percentage of deposits (4%) in the assessment area. As of June 30, 2022, the institution ranked 9<sup>th</sup> out of 23 financial institutions in deposit market share with 6% of the assessment area's available FDIC insured deposits (credit union deposits are not included). When compared to 2021 aggregate data, the institution ranked 40<sup>th</sup> of 770 reporters of mortgage lending with a 0.7% market share and ranked 12<sup>th</sup> of 129 reporters of small business loans with a 3.1% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered good.

# **Geographic Distribution:**

The bank's geographic distribution performance is considered adequate for HMDA lending and good for small business lending within the assessment area. UB's geographic distribution performance is considered good overall when considering the relative strengths of performance for each product and comparable dollar volumes of loans.

				Dani	k And Ar	naroasts	Loane By V			IC CSA			
			202		K And Aç	ggregate	Loans By Year 2021						
Geographic Income Level	Bank	:	Agg	Bank		Agg	Bank		Agg	Bank	(	Agg	Owner Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	<u> </u>			.,,,,			ase Loans			.,,,,	,	,	
Low	1	0.5	0.5	224	0.5	0.4	6	2.6	0.4	759	1.2	0.3	0.4
Moderate	5	2.7	9.7	2,675	5.7	7.6	18	7.9	10.5	4,076	6.3	8.3	14.
Middle	103	56.6	61.6	23,510	49.9	57.8	113	49.3	60.5	31,314	48.2	57.3	63.5
Upper	73	40.1	28.1	20,724	44.0	34.0	92	40.2	28.4	28,811	44.4	34.0	21.
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	182	100.0	100.0	47,133	100.0	100.0	229	100.0	100.0	64,960	100.0	100.0	100.
					F	Refinance	Loans						
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.3	0.4
Moderate	4	7.3	8.6	1,070	6.3	6.8	8	15.7	10.1	1,100	7.2	8.0	14.
Middle	29	52.7	61.0	8,628	51.0	56.4	25	49.0	62.0	5,778	37.8	57.8	63.
Upper	22	40.0	30.2	7,219	42.7	36.6	18	35.3	27.6	8,417	55.0	33.8	21.
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	55	100.0	100.0	16,917	100.0	100.0	51	100.0	100.0	15,295	100.0	100.0	100
					Home	Improve	ment Loans						
Low	0	0.0	0.3	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	0.
Moderate	1	10.0	10.3	45	6.1	8.4	2	7.7	9.3	197	8.1	5.8	14.
Middle	7	70.0	59.9	596	80.4	54.2	16	61.5	55.3	1,150	47.4	48.3	63.
Upper	2	20.0	29.5	100	13.5	37.2	8	30.8	35.3	1,080	44.5	45.8	21.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	741	100.0	100.0	26	100.0	100.0	2,427	100.0	100.0	100.
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	13.4	0	0.0	11.2	0	0.0	10.7	0	0.0	0.8	3.0
Moderate	0	0.0	14.9	0	0.0	1.9	0	0.0	14.3	0	0.0	13.6	3.8
Middle	1	33.3	52.2	1,000	46.7	52.9	0	0.0	57.1	0	0.0	63.5	53.0
Upper	2	66.7	19.4	1,142	53.3	34.0	0	0.0	17.9	0	0.0	22.1	40.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	2,142	100.0	100.0	0	0.0	100.0	0	0.0	100.0	100
					Total Ho	me Morto	gage Loans						Owner Occupied
Low	1	0.4	0.4	224	0.3	0.4	6	1.8	0.4	759	0.9	0.3	Units %
Moderate	12	4.6	9.3	4,235	6.2	7.2	32	9.7	10.3	5,663	6.6	8.3	14.
Middle	146	56.4	61.2	34,214	50.4	57.0	168	51.1	61.1	40,226	47.0	57.6	63.
Upper	100	38.6	29.1	29,210	43.0	35.3	123	37.4	28.2	38,913	45.5	33.7	21.
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	00,310	0.0	0.1	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
	,	0.0	0.0		0.0	0.0	U	0.0	0.0	U	0.0	0.0	

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

In both 2020 and 2021, for the bank, home purchase loans were the leading HMDA product by number and dollar volumes, followed by refinance and home improvement lending. Multifamily lending received minimal weight in the analysis, as the bank originated very few loans in this loan type category. Considering both demographic and aggregate proxies for demand, in 2020, the bank's performance for home purchase lending is poor, refinance lending is adequate, home improvement lending is good, and multifamily lending is very poor.

Overall, in 2020, UB's level of lending in low-income census tracts (.4%) was equal to the level of aggregate lending in such tracts (.4%) and the owner-occupied housing units located in moderate-income census tracts (.4%). The bank's level of lending in moderate-income census tracts (4.6%) was lower than both the level of aggregate lending in such tracts (9.3%) and the owner-occupied housing units located in moderate-income census tracts (14.4%). On a combined basis, the performance during 2020 is considered poor.

In 2021, considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is good, refinance lending is excellent, and home improvement lending is adequate.

On a combined basis, UB's 2021 lending performance in low-income tracts (1.8%) was greater than the percentage of owner-occupied housing units in the low-income census tracts (.4%) and the percentage of aggregate lending in such tracts (.4%) and is considered excellent. Lending performance in moderate-income tracts (9.7%) was less than the percentage of owner-occupied housing units in the moderate-income census tracts (14.4%), but similar to the percentage of aggregate lending in such tracts (10.3%) and is considered good. Overall, UB's performance is considered good during 2021.

On a combined basis, total HMDA lending performance is considered adequate based upon the relative performance levels and dollar volumes for each year.

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geograph Assessment Area: Myrtle Beach-Conway, SC-NC CSA														
Geographic	Bank And Aggregate Loans By Year 2020 2021														
Income	Ban	Bank Agg Bank Agg Bank Agg													
Level	# #% #% \$(000) \$% \$% # #% \$(000) \$% \$%												%		
Low	47	9.7	4.1	5,553	12.1	4.7	41	7.6	3.7	5,563	7.9	5.2	3.5		
Moderate	45	9.3	13.3	3,754	8.2	14.0	49	9.1	13.1	6,011	8.5	13.2	13.7		
Middle	218	44.9	55.1	20,094	43.8	51.5	266	49.6	57.7	32,375	45.8	54.4	56.6		
Upper	175	36.0	26.4	15,986	34.9	28.8	177	33.0	24.5	26,070	36.9	26.6	25.8		
Unknown	1	0.2	0.5	450	1.0	0.5	3	0.6	0.4	619	0.9	0.4	0.4		
Tract-Unk	0	0.0	0.7	0	0.0	0.5	0	0.0	0.7	0	0.0	0.1			
Total	486	100.0	100.0	45,837	100.0	100.0	536	100.0	100.0	70,638	100.0	100.0	100.0		

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 3.5% of all area businesses are located in low- income census tracts. Aggregate lenders reported extending 4.1% of small business loans in low-income census tracts during 2020. The bank's lending performance in low-income tracts (9.7%) significantly exceeds demographic and aggregate data. D&B data from 2020, indicates that 13.7% of all area businesses are located in moderate- income census tracts, and aggregate lenders reported extending 13.3% of small business loans in moderate-income census tracts during 2020. The bank's lending performance in moderate-income tracts (9.3%) is less than both the demographic and aggregate data. On a combined basis, UB's level of small business lending is considered good, and its lending performance in 2021 is substantially similar.

# Distribution by Borrower Income and Revenue Size of the Business:

UB's borrower distribution performance is considered adequate for HMDA lending and good for small business lending. Overall, the performance is considered adequate when considering the relative performance and dollar volume of each lending product during the years analyzed.

	Distribu	tion o					~ ~	_	•		Incom	e Lev	el el	
	1		Asses			-	Beach-Co		, SC-N	IC CSA				
		Loans By Year 2021												
Borrower Income Level	Bank	<b>r</b>	2020 Agg	Bank	(	Agg	Bank	(	Agg	Bank	1	Agg	Families by Family Income %	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%		
	, #	# /0	# /0	Φ(000)	-		ase Loans	# /0	# /0	\$(000)	Ψ /0	Ψ /0		
Low	Low 3 1.6 3.9 388 0.8 1.9 4 1.7 3.6 455 0.7 1.7													
Moderate	16	8.8	13.8	2,109	4.5	9.2	16	7.0	13.2	3,055	4.7	8.8	19.8 17.8	
Middle	20	11.0	) 19.9	2,773	5.9	16.2	27	11.8	17.4	5,342	8.2	14.	20.8	
Upper	140	76.9	53.4	40,754	86.5	63.5	171	74.7	52.0	53,343	82.1	61.7	41.6	
Unknown	3	1.6	9.0	1,109	2.4	9.2	11	4.8	13.8	2,765	4.3	13.7	0.0	
Total	182	100.0	100.0	47,133	100.0	100.0	229	100.0	100.0	64,960	100.0	100.0	100.0	
	,				F	Refinanc	e Loans							
Low	0	0.0	3.0	0	0.0	1.5	2	3.9	4.6	166	1.1	2.4	19.8	
Moderate	6	10.9	10.3	938	5.5	6.5	8	15.7	14.2	1,197	7.8	9.6	17.8	
Middle	6	10.9	17.7	1,077	6.4	13.8	4	7.8	19.7	764	5.0	16.3	20.8	
Upper	34	61.8	46.4	12,348	73.0	54.5	30	58.8	41.9	11,33	1 74.1	50.7	41.6	
Unknown	9	16.4	22.6	2,554	15.1	23.7	7	13.7	19.6	1,837	12.0	21.0	0.0	
Total	55	100.0	100.0	16,917	100.0	100.0	51	100.0	100.0	15,295	100.0	100.0	100.0	
					Home	Improve	ment Loans	,						
Low	0	0.0	5.1	0	0.0	2.9	4	15.4	4.6	258	10.6	2.0	19.8	
Moderate	2	20.0	13.5	65	8.8	9.8	2	7.7	12.3	110	4.5	7.8	17.8	
Middle	1	10.0	22.1	170	22.9	18.	6	23.1	16.3	383	15.8	10.2	20.8	
Upper	7	70.0	55.9	506	68.3	63.4	13	50.0	62.2	1,583	65.2	71.8	41.6	
Unknown	0	0.0	3.4	0	0.0	5.8	1	3.8	4.6	93	3.8	8.2	0.0	
Total	10	100.0	100.0	741	100.0	100.0	26	100.0	100.0	2,427	100.0	100.0	100.0	
	1				Total Ho	ome Mor	tgage Loans	3		1			T	
Low	4	1.6	3.5	413	0.6	1.7	10	3.0	4.1	879	1.0	2.0	19.8	
Moderate	24	9.4	12.0	3,112	2 4.7	7.9	26	7.9	13.6	4,362	5.1	9.1	17.8	
Middle	28	10.9	18.8	4,060	6.2	15.0	40	12.2	18.4	6,744	7.9	14.9	20.8	
Upper	187	73.0	49.8	54,478	82.9	59.0	233	70.8	47.8	68,806	80.4	57.4	41.6	
Unknown	13	5.1	16.0	3,678	5.6	16.5	20	6.1	16.2	4,770	5.6	16.6	0.0	
Total	256	100.0	100.0	65,741	100.0	100.0	329	100.0	100.0	85,561	100.0	100.0	100.0	

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, the bank's HMDA lending to low-income borrowers (1.6%) is less than the percentage of aggregate lending (3.5%) to such borrowers and the percentage of low-income families residing in the assessment area (19.8%). The bank's level of lending to moderate-income borrowers (9.4%) is less than both the aggregate lending (12%) to such borrowers and the percentage of moderate-income families in the assessment area (17.8%). Overall, the bank's HMDA lending performance during 2020 is considered adequate, and its performance during 2021 is similar.

Note:

Percentages may not total 100.0 percent due to rounding.

Distrib	ution o	f 2020	and 20	)21 Sma	ll Busi	ness L	ending l	By Rev	enue	Size of B	Busine	sses		
Assessment Area: Myrtle Beach-Conway, SC-NC CSA														
		Bank And Aggregate Loans By Year												
<u>_</u>			20	20					20	21			Total Businesses	
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, -	
					By F	Reveni	1e			•				
\$1 Million or Less 250 51.4 42.6 17,204 37.5 37.1 175 32.6 46.9 25,328 35.9 39.8 93.8														
Over \$1 Million	82	16.9		11,128	24.3		124	23.1		23,635	33.5		5.3	
Revenue Unknown         154         31.7         17,505         38.2         237         44.2         21,675         30.7														
Total         486         100.0         45,837         100.0         536         100.0         70,638         100.0														
By Loan Size														
\$100,000 or Less	338	69.5	88.8	13,782	30.1	35.9	312	58.2	92.0	13,268	18.8	38.6		
\$100,001 - \$250,000	117	24.1	7.0	18,539	40.4	22.7	155	28.9	4.8	25,795	36.5	21.2		
\$250,001 - \$1 Million	31	6.4	4.3	13,516	29.5	41.4	69	12.9	3.1	31,575	44.7	40.2		
Total	486	100.0	100.0	45,837	100.0	100.0	536	100.0	100.0	70,638	100.0	100.0		
		J	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less					
\$100,000 or Less	205	82.0		6,661	38.7		98	56.0		4,142	16.4			
\$100,001 - \$250,000	32	12.8		4,916	28.6		50	28.6		8,083	31.9			
\$250,001 - \$1 Million	13	5.2		5,627	32.7		27	15.4		13,103	51.7			
Total	250	100.0		17,204	100.0		175	100.0		25,328	100.0			
Source: 2021 FFIEC Co 2021 Dun & B 2011-2015 U.S	ra dstreet I	Da ta	America	п Соттиг	iity Sura	vey								

D&B data from 2020, indicates that 93.5% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 31.7% involved loans for which revenues were unknown and 51.4% were to businesses with revenues of \$1 million or less. However, 75.3% of the bank's loans where revenue was known (250 of 332 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 42.6% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 93.8% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 32.6% were to businesses with revenues of \$1 million or less, and 44.2% involved loans for which revenues were unknown. However, 58.5% of the bank's loans where revenue was known (175 of 299 loans) were to businesses with revenues of \$1 million or less. This level of lending is greater than the 2021 aggregate lending level of 46.9%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

PPP Loans with no reported revenue

Myrtle Bea	Myrtle Beach-Conway, SC-NC CSA 2020											
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	26	76.5%	849	30.6%								
\$100,001 - \$250,000	6	17.6%	892	32.2%								
\$250,001 - \$1												
Million	2	5.9%	1,032	37.2%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	34	100.0%	2,773	100.0%								

During 2020, 69.5% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 88.8% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 76.5% had loan amounts of \$100,000 or less.

Myrtle Beach-C	Myrtle Beach-Conway, SC-NC CSA 2021											
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	112	87.5%	3,012	37.4%								
\$100,001 - \$250,000	10	7.8%	1,566	19.5%								
\$250,001 - \$1 Million	6	4.7%	3,465	43.1%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	128	100.0%	8,043	100.0%								

During 2021, 58.2% of the small business loans reported were \$100,000 and less, and the aggregate reported 92% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 87.5% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

## **Community Development Loans:**

As previously mentioned, opportunities for community development lending are reasonably available within the Myrtle Beach-Conway, SC-NC CSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, UB originated three loans totaling \$12.3 million. One of the loans supported affordable housing and the other two loans provided services to low-and-moderate income residents of the assessment area. In addition, the bank originated four loans totaling \$5.2 million as a part of the PPP. Within this assessment area, the bank is a leader in making community development loans during the evaluation period.

#### INVESTMENT TEST

Overall, the bank has an excellent level of qualified community development investments. In addition to the previously described investments that benefit regional or statewide areas, including the multistate assessment area, the bank holds seven qualified investments that directly benefit the Myrtle Beach-Conway, SC-NC CSA assessment area totaling \$10.1 million for the evaluation period and has committed but not yet funded an additional \$9.9 million.

During the evaluation period, the bank held six investments that support low- and moderate-income affordable housing and multifamily housing complexes, as well as one equity investment that supports community services. These investments demonstrate excellent responsiveness to the affordable housing and community needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$40,339. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development, revitalize, or stabilize low- and moderate-income geographies, which are needed in the assessment area.

Qualified Investment Donations in the assessment area										
United Bank	#	\$								
Affordable Housing	0	0								
Community Service	23	33,179								
Economic	3	5,660								
Revitalize or Stabilize	1	1,500								
Total	27	40,339								

In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives, particularly LIHTC.

#### SERVICE TEST

Within the assessment area, UB's performance under the service test is rated high satisfactory. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. Additionally, the bank has provided an adequate level of qualified services to community development organizations. The assessment area is new since the previous evaluation and no branch closings or openings have occurred.

#### **Retail Services:**

Delivery systems are readily accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail, online banking, and mobile banking services are also offered by the institution. In addition, UB provides customers with 24-hour telephone access to their accounts through an automated system. Additionally, the bank's business hours and services offered do not vary in a way that inconveniences low- or moderate-income geographies or individuals within the area.

Since the previous evaluation, UB is new to this market and operates 12 full-service branch offices in the assessment area, while none are located in low-income census tracts, five (41.7%) are located in moderate-income census tracts. The distribution of branches is excellent when considering that according to census data, 1.2% and 15.7% of the assessment area's households reside in low- and-moderate-income areas. Branch locations are considered convenient and meet the needs of the assessment area and do not adversely affect the accessibility of its delivery systems, particularly to low-and-moderate income geographies. No branch office has been closed during the review period.

# **Community Development Services:**

The bank provides an adequate level of community development services in the assessment area. Eleven bank employees provided 133 hours of community development services during the evaluation period for 15 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as affordable housing, health care, food, financial services, and financial education which is responsive to the assessment area. During the evaluation period, bank employee utilized their financial expertise by serving as board or committee members for the organizations.

Community Development Services in the assessment area								
	#							
Affordable Housing	1							
Community Services	13							
Economic Development	0							
Revitalize or Stabilize	1							
Total	15							

# MULTISTATE METROPOLITAN AREA

CRA RATING FOR Charlotte-Concord-Gastonia, NC-SC<sup>4</sup>: Satisfactory

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>Low Satisfactory</u>
The Service Test is rated: High Satisfactory

Major factors supporting the rating include:

• Lending activity reflects adequate responsiveness to assessment area credit needs.

- Geographic and borrower distribution performance are considered excellent and good, respectively.
- The bank exhibits a good responsiveness to credit needs of low-income individuals and geographies and very small businesses.
- The bank is a leader in making community development loans and makes use of flexible lending practices in serving the credit needs of the assessment area. A summary of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.
- The bank has an adequate level of qualified investments benefiting this assessment area exhibiting adequate responsiveness to community development needs, and it makes occasional use of innovative and/or complex investments to support community development initiatives within this assessment area.
- Delivery systems and branch locations are readily accessible to all segments of the assessment area. Bank services and branch hours do not vary in a way that inconveniences low- and moderate-income people or census tracts within the assessment area. Changes in branch locations have not adversely affected the accessibility of delivery systems, particularly to low-and-moderate-income areas or individuals.
- UB has provided an adequate level of community development services within the area.

## SCOPE OF EXAMINATION

The institution's lending test evaluation includes analysis of all reported HMDA and small business loan data for loans either originated or purchased during calendar years 2020 and 2021. Community development loans made and community development services provided from the date of the previous evaluation through the evaluation date were also considered. All qualified investments made during this same period or outstanding as of the evaluation date, regardless of when made, were considered.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLOTTE-CONCORD-GASTONIA, NC-SC ASSESSMENT AREA

UB operates seven branches and six ATMs within the assessment area, which includes the counties of Gaston, Iredell, Mecklenburg, and Lincoln, North Carolina, and York County, South Carolina. During the review period, the bank closed a branch office in Lancaster County, South Carolina, and as a result no longer delineates the county within this assessment area; further discussion is located in the services test section for this assessment area. The complete composition of the assessment area is detailed in Appendix E. All of the bank's products and services are offered within the market.

<sup>&</sup>lt;sup>4</sup> This rating reflects performance within the multistate metropolitan area. The statewide evaluations are adjusted and do not reflect performance in the parts of those states contained in the multistate metropolitan area.

Tract					DEMOGRAPHICS					
Income	Bra	nches	ATMS		Census	s Tracts	Households	Total		
Levels					Census Tracts		110 000 1110 1000	Businesses		
Levels	#	%	#	%	#	%	%	%		
Low	0	0.0%	0	0.0%	38	9.4%	7.6%	7.5%		
Moderate	2	28.6%	2	33.3%	102	25.1%	23.9%	19.4%		
Middle	1	14.3%	1	16.7%	126	31.0%	31.9%	27.5%		
Upper	4	57.1%	3	50.0%	135	33.3%	36.5%	44.8%		
Unknown	0	0.0%	0	0.0%	5	1.2%	0.1%	0.8%		
Totals	7	100%	6	100%	406	100%	100%	100%		

Based on 2015 ACS data, the assessment area served by the bank has a total population of 1,684,815 and a median housing value of \$167,348. Within the assessment area, the owner-occupancy rate is 57.2%, which is slightly higher than the owner-occupancy rate for the state of North Carolina (55.7%) and similar to the state of South Carolina (57.3%). The percentage of families living below the poverty level in the assessment area (11.6%) is lower than the rates in the state of North Carolina (12.8%) and the state of South Carolina (13.5%). The Charlotte-Concord-Gastonia, NC-SC MSA median family income during 2020 and 2021 equaled \$74,200 and \$77,300, respectively. The following tables include pertinent demographic data for the assessment area. Given the delineation change between 2020 and 2021 regarding Lancaster County, demographic tables are presented separately for each year.

	2020 CI	harlotte-Cor	ncord-Gastor	nia, NC-SC	AA Demogra	phics				
Income Categories	Tract Dis	tribution	Families by T	Γract Income		overty Level lies by Tract	Families b Inco	,		
	#	%	#	%	#	%	#	%		
Low	39	9.3	29,342	6.7	10,503	35.8	100,402	22.8		
Moderate	109	26.0	102,490	23.3	20,515	20.0	73,268	16.6		
Middle	131	31.2	145,183	33.0	13,740	9.5	80,325	18.2		
Upper	136	32.4	163,132	37.1	6,774	4.2	186,305	42.3		
Unknown	5	1.2	153	0.0	69	45.1	0	0.0		
Total AA	420	100.0	440,300	100.0	51,601	11.7	440,300	100.0		
	Housing			Hous	sing Type by	Γract				
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	58,453	14,178	3.3	24.3	36,052	61.7	8,223	14.1		
Moderate	184,329	87,454	20.6	47.4	77,015	41.8	19,860	10.8		
Middle	237,247	150,000	35.3	63.2	66,223	27.9	21,024	8.9		
Upper	256,668	173,597	40.8	67.6	64,603	25.2	18,468	7.2		
Unknown	669	90	0.0	13.5	438	65.5	141	21.1		
Total AA	737,366	425,319	100.0	57.7	244,331	33.1	67,716	9.2		
				Busi	nesses by Tra	ct & Revenue	venue Size			
	Total Busines	sses by Tract	Less Than or	Less Than or = \$1 Million		Million	Revenue No	ot Reported		
	#	%	#	%	#	%	#	%		
Low	6,728	7.3	5,912	7.0	786	11.6	30	3.6		
Moderate	18,144	19.8	16,535	19.7	1,457	21.4	152	18.4		
Middle	25,191	27.5	23,255	27.7	1,725	25.4	211	25.6		
Upper	40,871	44.6	37,777	45.0	2,667	39.2	427	51.8		
Unknown	690	0.8	521	0.6	164	2.4	5	0.6		
Total AA	91,624	100.0	84,000	100.0	6,799	100.0	825	100.0		
Perce	entage of Tota	al Businesses:		91.7		7.4		0.9		
				Fa	rms by Tract	& Revenue Si	ize			
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported		
	#	%	#	%	#	%	#	%		
Low	27	3.3	25	3.1	2	14.3	0	0.0		
Moderate	167	20.3	165	20.4	2	14.3	0	0.0		
Middle	374	45.5	367	45.4	7	50.0	0	0.0		
Upper	251	30.5	248	30.7	3	21.4	0	0.0		
Unknown	3	0.4	3	0.4	0	0.0	0	0.0		
Total AA	822	100.0	808	100.0	14	100.0	0	0.0		
I	Percentage of	Total Farms:		98.3		1.7		0.0		
Source: 2020 FFIEC Census D	) a ta									

Source: 2020 FFIEC Census Data

2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

ote: Percentages may not total 100.0 percent due to rounding.

	2021 C	harlotte-Cor	ncord-Gasto	nia, NC-SC	AA Demogra	aphics		
Income Categories	Tract Distribution		Families by Tract Income		Families < Poverty Level as % of Families by Tract		Families by Family Income	
	#	%	#	%	#	%	#	%
Low	38	9.4	28,602	6.8	10,164	35.5	94,709	22.6
Moderate	102	25.1	94,446	22.5	18,763	19.9	69,258	16.5
Middle	126	31.0	136,625	32.5	13,025	9.5	76,351	18.2
Upper	135	33.3	160,154	38.1	6,536	4.1	179,662	42.8
Unknown	5	1.2	153	0.0	69	45.1	0	0.0
Total AA	406	100.0	419,980	100.0	48,557	11.6	419,980	100.0
	Housing	Housing Type by Tract						
	Units by	Owner-occupi		d	Rental		Vacant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	56,592	13,654	3.4	24.1	35,154	62.1	7,784	13.8
Moderate	170,678	79,329	19.7	46.5	73,641	43.1	17,708	10.4
Middle	223,890	139,766	34.7	62.4	64,255	28.7	19,869	8.9
Upper	252,073	169,891	42.2	67.4	64,037	25.4	18,145	7.2
Unknown	669	90	0.0	13.5	438	65.5	141	21.1
Total AA	703,902	402,730	100.0	57.2	237,525	33.7	63,647	9.0
	Total Businesses by Tract		Businesses by Tract & Revenue Size					
			Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	6,817	7.5	6,009	7.2	772	11.9	36	4.3
Moderate	17,581	19.4	16,092	19.3	1,343	20.8	146	17.3
Middle	24,903	27.5	23,022	27.6	1,664	25.7	217	25.7
Upper	40,657	44.8	37,683	45.2	2,533	39.1	441	52.2
Unknown	706	0.8	542	0.7	159	2.5	5	0.6
Total AA	90,664	100.0	83,348	100.0	6,471	100.0	845	100.0
Perce	entage of Tota	al Businesses:		91.9		7.1		0.9
			Farms by Tract & Revenue Size					
T otal Farn		s by Tract	Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	21	2.8	20	2.7	1	8.3	0	0.0
Moderate	133	18.0	131	18.0	2	16.7	0	0.0
Middle	346	46.8	339	46.6	7	58.3	0	0.0
Upper	238	32.2	236	32.4	2	16.7	0	0.0
Unknown	2	0.3	2	0.3	0	0.0	0	0.0
Total AA	740	100.0	728	100.0	12	100.0	0	0.0
	Percentage of	Total Farms:		98.4		1.6		0.0
Source: 2021 FFIEC Census Data								

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Government and private sector employment opportunities are presented below by employees by industry. Retail, construction, finance and insurance, health care, manufacturing, and professional and technical services provide a large portion of area employment for residents. In addition, real estate, utilities, arts, and entertainment industries provide employment opportunities.

Charlotte-C	oncord-Gasto	onia, NC-SC E	mployees by	Industry				
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3	
Government	118,072	113,492	112,258	116,937	113,396	114,562	110,023	
Private Sector								
Private Sector Total, all industries	909,725	818,113	861,790	892,490	884,537	902,523	910,834	
Agriculture, forestry, fishing and hunting	256*	394*	338*	1,262*	1,225*	1,276*	1,228*	
Mining, quarrying, and oil and gas extraction	53*	54*	36*	215*	230*	237*	232*	
Utilities	3,813*	3,810*	3,854*	3,871*	3,950*	3,948*	3,867	
Construction	52,390	50,997	51,373	51,391*	51,328*	53,585	52,938*	
Manufacturing	80,341	73,269	76,073	77,559	79,581	79,532	79,888	
Wholesale trade	48,592	45,796	46,229	47,260	47,566	48,336	48,969	
Retail Trade	101,880	91,019	97,657	103,790	102,040	103,353	100,897	
Transportation and warehousing	51,740*	50,941*	54,472*	60,093*	56,463*	56,747*	56,110	
Information	22,968	21,789	21,578	22,117	22,824	22,820	23,168	
Finance and insurance	84,441	86,024	87,058	87,621	88,224	87,797	89,625	
Real estate and rental and leasing	17,437	16,521	16,672	16,864	17,333	17,883	18,238	
Professional and technical services	70,069*	67,331*	67,548*	69,304*	69,309*	70,193*	71,883*	
Management of companies and enterprises	37,353*	36,156*	35,874*	35,968*	35,606*	36,047*	34,899*	
Administrative and waste services	80,768	70,438	75,301	81,159	76,828	78,922	80,739	
Educational services	15,160	12,091	12,438	13,847	14,694	14,856	14,619	
Health care and social assistance	90,225	81,739	85,651	87,706	88,613	88,776	88,628	
Arts, entertainment, and recreation	19,935	15,215	18,378	17,024	14,039	18,804	21,342	
Accommodation and food services	94,722	61,806	75,221	78,624	77,880	82,429	85,629	
Other services, except public administration	26,583	21,471	24,408	25,286	25,396	26,312	26,602	
Public administration	0	0	0	0	0	0	0	
Unclassified 1 0 0								
Source: Bureau of Labor Statistics (BLS), Quarterly Cen.	sus of Employ	ment and Way	ges					
"Indicates that some or all of the data for this category w	as suppresse	d for confiden	tiality reasons					

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Charlotte-Concord-Gastonia, NC-SC Une	Charlotte-Concord-Gastonia, NC-SC Unemployment Rates									
Area	2020	2021								
Charlotte-Concord-Gastonia, NC-SC	7.15%	4.68%								
Gaston County, NC	7.76%	5.19%								
Iredell County, NC	7.05%	4.61%								
Lincoln County, NC	6.34%	4.07%								
Mecklenburg County, NC	7.46%	4.89%								
Lancaster County, SC	6.61%	4.36%								
York County, SC	5.84%	3.71%								
Charlotte-Concord-Gastonia, NC-SC MSA	7.03%	4.63%								
North Carolina	7.08%	4.81%								
South Carolina	5.99%	4.00%								
Source: Bureau of Labor Statistics (BLS), Local Area U	nemploymen	t Statistics								

Overall, unemployment rates across the assessment area have decreased during 2021 since the previous evaluation reflecting levels more aligned with pre-pandemic levels. In addition, the MSA has had higher unemployment rates than the state of South Carolina but has been more in line with the state of North Carolina.

Charlotte-Concord-C	Gastonia, NC-SC Median I	Family Income Change	
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Charlotte-Concord-Gastonia, NC-SC	\$67,352	\$64,813	-3.77%
Gaston County, NC	\$58,113	\$52,227	-10.13%
Iredell County, NC	\$64,944	\$63,109	-2.83%
Lincoln County, NC	\$59,636	\$60,810	1.97%
Mecklenburg County, NC	\$73,368	\$70,774	-3.54%
Lancaster County, SC	\$50,514	\$53,739	6.38%
York County, SC	\$70,987	\$66,273	-6.64%
Charlotte-Concord-Gastonia, NC-SC			
MSA	\$67,528	\$64,187	-4.95%
North Carolina	\$61,148	\$57,856	-5.38%
South Carolina	\$59,046	\$56,343	-4.58%

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, with the exception of Lincoln County, North Carolina and Lancaster County, South Carolina, the MSA, county, and state median family income amounts within the assessment area have decreased from 2010 to 2015. As presented in the following chart, during the review period, housing cost burden percentages remained higher than 30 percent or more of household income for a majority of both low-and-moderate-income renters and owners within the assessment area.

Charlotte-Concord-Gastonia, NC-SC Housing Cost Burden										
	Cos	t Burden - Rent	ters	Cost	Burden - Own	ers				
	Low	Moderate	All	Low	Moderate	All				
Area	Income	Income	Renters	Income	Income	Owners				
Charlotte-Concord-Gastonia, NC-										
SC	78%	48%	42%	60%	37%	19%				
Gaston County, NC	75%	21%	43%	52%	26%	19%				
Iredell County, NC	73%	40%	37%	58%	34%	19%				
Lincoln County, NC	64%	41%	35%	57%	32%	18%				
Mecklenburg County, NC	81%	56%	42%	70%	44%	20%				
Lancaster County, SC	66%	32%	40%	47%	34%	16%				
York County, SC	77%	41%	44%	52%	31%	16%				
Charlotte-Concord-Gastonia, NC-										
SC MSA	77%	46%	41%	60%	36%	19%				
North Carolina	75%	49%	42%	60%	36%	20%				
South Carolina	72%	52%	42%	58%	34%	19%				

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

An economic development official whose organization focuses on partnering with new and expanding businesses seeking to invest capital in the market. The contact stated that the office offers a selection of local and state incentives generally consisting of property tax and fee incentives. The office also works to provide state incentives such as employer tax credit programs, corporate headquarters tax credit, research and development tax credit, sales tax exemptions, and a job development credit. Currently, the office is working to help expand three local businesses as well as two out of area businesses who are exploring the possibility of establishing a footprint in the assessment area. According to the contact, these five businesses are expected to bring 500 new jobs to the area with a median income of \$30,000, providing much needed relief since the new jobs created year-to-date during 2022 is lower when compared to 2020 (689) and 2021 (1,238). In discussions with the potential businesses, the contact stated that the number one topic of discussion with those businesses was the outlook of the economy.

The contact indicated the top three employers for the area are private sector employers and indicated that the unemployment rate has been trending downward recently after doubling during 2020 when compared to local average rates. The official also noted that the area experienced significant layoffs in 2021 from two private sector corporations and which most likely increase the number of households below the poverty level. The contact indicated that the office does not work directly with financial institutions but noted that small businesses in the area would like to see more competitive product packages catered towards small and moderate-sized commercial businesses. The interviewee was unaware of any discriminatory practices or hearing of any discriminatory practices from their business partners.

A second contact that works for an area non-profit was also contacted during the evaluation. The nonprofit is committed to working with new and existing businesses through one-on-one assistance for expansion, workforce development, permitting assistance, site placement, as well as securing grant and financial incentives. Since 2021, the contact indicated that its office has helped attract 15 new businesses. The office receives all of its funding through private donations as well as state and federal grants. The contact noted that the top industries within the area are manufacturing and retail trade and that the top employers are area school systems and as well as health and retail companies. Recently, the area the office serves had two companies close their facilities, one health services partner and one retail company whose combined exit totaled 85 jobs lost. The contact indicated that since 2020 the unemployment rate has been trending downward and that in July 2020 the unemployment rate was more than double that of the August 2022 rate for the area. The contact stated that small business owners have noted the lack of local financial institutions that participate and offer 7(a) SBA loans, noting that only two out of ten area banks participate in the program. The contact noted that this is an area where there is ample opportunity for local financial institutions to engage with the community and assist small businesses by participating in the 7(a)SBA program. While the contact stated that there is concern locally about smaller financial institutions being acquired by larger firms, the office was not aware of any discriminatory practices by financial institutions.

UB holds a modest deposit market share within the assessment area (15<sup>th</sup> of 41 banks operating within the assessment area) having 0.2% of all deposits from the June 30, 2022, FDIC deposit market share report. Overall, there is considerable opportunity for community development loans and investments within the market area. Despite a competitive market, especially from large institutions, the bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its array of banking services and products; as noted above, all the bank's services and products are offered in this assessment area, which included 12 community development loans totaling \$43.9 million, as well as four qualified investments totaling \$2.6 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 90 customer's loan interest (119 loans) in the amount of \$576,687. Furthermore, during the pandemic, within this assessment area the bank waived 11 customer's ATM cash bank fees totaling \$22.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLOTTE-CONCORD-GASTONIA, NC-SC ASSESSMENT AREA

The bank's Lending Test performance in the Charlotte-Concord-Gastonia, NC-SC assessment area is considered high satisfactory. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans is good, the geographic distribution is excellent, and based on its relative size and presence in the market, the bank is a leader in providing community development loans.

The Investment Test performance is low satisfactory. The bank's qualified investment securities and community development investment donations are adequate. The bank exhibits adequate responsiveness to credit and community development needs.

Under the Service Test, the bank's performance is considered high satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank has provided an adequate level of community development services.

#### LENDING TEST

The institution's overall lending performance within this assessment area is considered high satisfactory. This conclusion is based on an evaluation of the bank's lending activity, its geographic and its borrower distribution of lending, and its level of community development lending, while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. Excellent geographic, good borrower distribution, and excellent CD lending performance are the primary drivers for the overall lending test rating in this market. The bank makes use of flexible lending practices, specifically detailed earlier in the evaluation, in serving the credit needs of the assessment area, and there were no gaps in UB's lending patterns within the market.

## **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number and dollar (3.7% and 3.9%) is slightly greater than the percentage of branch offices (3.2%), and the percentage of deposits (2.3%) in the assessment area. As of June 30, 2022, the institution ranked 15<sup>th</sup> out of 41 financial institutions in deposit market share with 0.2% of the assessment area's available FDIC insured deposits (credit union deposits are not included). When compared to 2021 aggregate data, the institution ranked 125<sup>th</sup> of 830 reporters of mortgage lending with a .09% market share and ranked 25<sup>th</sup> of 216 reporters of small business loans with a 0.4% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered adequate.

### **Geographic Distribution:**

The bank's geographic distribution performance is considered excellent for both HMDA and small business lending within the assessment area.

Part   Part							
# #% #% \$ \$ \$ \$ \$ #   # #%   #%   \$ \$ \$ \$ \$ \$ \$ #		2021					Owner Occupied
Home Purchase Lox	Bank		Agg	Bank	I.	Agg	Units %
Low	#	#%	#%	\$(000)	\$%	\$%	
Moderate	oans						
Middle 21 32.3 31.7 6.024 24.8 26.7 Upper 29 44.6 47.8 14.956 61.6 58.0 Unknown 1 1.5 0.0 68 0.3 0.0 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 Total 65 100.0 100.0 24.270 100.0 100.0 Ending the Middle 12 34.3 28.1 1.593 29.6 22.4 Upper 12 34.3 57.6 1.692 31.5 67.1 Unknown 0 0.0 0.0 0.0 0.0 0.0 0.0 Total 35 100.0 100.0 5.378 100.0 100.0 End Individudle 3 27.3 25.6 142 14.4 19.0 Upper 4 36.4 58.5 367 37.3 70.0 Unknown 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	1	2.1	3.8	324	2.2	3.0	3
Upper         29         44.6         47.8         14,956         61.6         58.0           Unknown         1         1.5         0.0         68         0.3         0.0           Tract-Unk         0         0.0         0.0         0         0.0         100.0           Refinance Loans           Refinance Loans           Low         1         2.9         2.0         299         5.6         1.7           Moderate         10         28.6         12.2         1,794         33.4         8.9           Middle         12         34.3         28.1         1,593         29.6         22.4           Upper         12         34.3         57.6         1,692         31.5         67.7           Unknown         0         0.0         0.0         0.0         0.0         0.0         0.0           Tract-Unk         0         0.0         0.0         0.0         0.0         0.0         1.4           Low         0         0.0         2.3         0         0.0         1.4           Home Improvement Line         1.0         0.0         0.0         0.0         1.4	12	25.5	18.0	2,769	19.1	13.6	19
Unknown 1 1.5 0.0 68 0.3 0.0  Tract-Unk 0 0.0 0.0 0.0 0.0 0.0  Total 65 100.0 100.0 24,270 100.0 100.0    Refinance Loans   Refinance Loans	18	38.3	31.1	4,206	29.0	26.1	34
Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         65         100.0         100.0         24,270         100.0         100.0           Refinance Loans           Low         1         2.9         2.0         299         5.6         1.7           Moderate         10         28.6         12.2         1,794         33.4         8.9           Middle         12         34.3         28.1         1,593         29.6         22.4           Upper         12         34.3         57.6         1,692         31.5         67.1           Unknown         0         0.0         0.0         0         0.0         0.0           Tract-Unk         0         0.0         0.0         0.0         0.0         100.0           Home Improvement L         Low         0         0.0         2.3         0         0.0         1.4           Moderate         4         36.4         13.6         475         48.3         9.6           Middle         3         27.3         25.6         142         14.4         19.0           Upper         4         36.4<	16	34.0	47.0	7,185	49.6	57.2	42
Total   65   100.0   100.0   24,270   100.0   100.0	0	0.0	0.1	0	0.0	0.1	0.
Name	0	0.0	0.0	0	0.0	0.0	
Low	47	100.0	100.0	14,484	100.0	100.0	100
Moderate         10         28.6         12.2         1,794         33.4         8.9           Middle         12         34.3         28.1         1,593         29.6         22.4           Upper         12         34.3         57.6         1,692         31.5         67.1           Unknown         0         0.0         0.0         0.0         0.0         0.0           Tract-Unk         0         0.0         0.0         0.0         0.0         0.0           Home Improvement Least           Low         0         0.0         2.3         0         0.0         1.4           Moderate         4         36.4         13.6         475         48.3         9.6           Middle         3         27.3         25.6         142         14.4         19.0           Upper         4         36.4         58.5         367         37.3         70.0           Unknown         0         0.0         0.1         0         0.0         0.0           Total         1         100.0         100.0         984         100.0         100.0           Moderate         7         53.8         37.6							П
Middle	0	0.0	2.3	0	0.0	1.8	3.
Upper	13	39.4	14.4	2,220	39.2	10.2	19
Unknown 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	10	30.3	29.7	1,624	28.7	23.2	34.
Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         35         100.0         100.0         5,378         100.0         100.0           Home Improvement Lead           Low         0         0.0         2.3         0         0.0         1.4           Moderate         4         36.4         13.6         475         48.3         9.6           Middle         3         27.3         25.6         142         14.4         19.0           Upper         4         36.4         58.5         367         37.3         70.0           Unknown         0         0.0         0.1         0         0.0         0.0           Total         1         100.0         100.0         98.4         100.0         100.0           Moderate         7         53.8         37.6         5,791         62.5         33.1           Middle         3         23.1         24.7         1,530         16.5         33.8           Upper         2         15.4         16.5         1,505         16.2         18.9           Unknown         0         0.0         0.0 <td>10</td> <td>30.3</td> <td>53.5</td> <td>1,819</td> <td>32.1</td> <td>64.7</td> <td>42.</td>	10	30.3	53.5	1,819	32.1	64.7	42.
Total   35	0	0.0	0.0	0	0.0	0.0	0.
Home Improvement L.	0	0.0	0.0	0	0.0	0.0	
Low	33	100.0	100.0	5,663	100.0	100.0	100
Moderate         4         36.4         13.6         475         48.3         9.6           Middle         3         27.3         25.6         142         14.4         19.0           Upper         4         36.4         58.5         367         37.3         70.0           Unknown         0         0.0         0.1         0         0.0         0.0           Tract-Unk         0         0.0         0.0         0         0.0         0.0           Multifamily Loans           Low         1         7.7         20.6         439         4.7         11.8           Moderate         7         53.8         37.6         5,791         62.5         33.1           Middle         3         23.1         24.7         1,530         16.5         33.8           Upper         2         15.4         16.5         1,505         16.2         18.9           Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0.0         0.0           Total         13         100.0         100.0         9,265 <td></td> <td></td> <td></td> <td>_</td> <td></td> <td></td> <td></td>				_			
Middle         3         27.3         25.6         142         14.4         19.0           Upper         4         36.4         58.5         367         37.3         70.0           Unknown         0         0.0         0.1         0         0.0         0.0           Tract-Unk         0         0.0         0.0         0         0.0         0.0           Multifamily Loans           Low         1         7.7         20.6         439         4.7         11.8           Moderate         7         53.8         37.6         5,791         62.5         33.1           Middle         3         23.1         24.7         1,530         16.5         33.8           Upper         2         15.4         16.5         1,505         16.2         18.5           Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Loans           Low         4	0	0.0	2.4	0	0.0	1.8	3.
Upper         4         36.4         58.5         367         37.3         70.0           Unknown         0         0.0         0.1         0         0.0         0.0           Tract-Unk         0         0.0         0.0         0         0.0         0.0           Multifamily Loans           Low         1         7.7         20.6         439         4.7         11.8           Moderate         7         53.8         37.6         5,791         62.5         33.1           Middle         3         23.1         24.7         1,530         16.5         33.8           Upper         2         15.4         16.5         1,505         16.2         18.5           Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Loans         0         0.2         2.4         1.5         1.5         1.5         1.5         1.5         1.5         1.5         1.5         1.5	5	26.3	12.4	549	28.8	8.7	19
Unknown	8	42.1	25.0	620	32.5	19.2	34.
Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         11         100.0         100.0         984         100.0         100.0           Multifamily Loans           Low         1         7.7         20.6         439         4.7         11.8           Moderate         7         53.8         37.6         5,791         62.5         33.1           Middle         3         23.1         24.7         1,530         16.5         33.8           Upper         2         15.4         16.5         1,505         16.2         18.9           Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0.0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Loans           Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,14         27.3         11.5 <th< td=""><td>6</td><td>31.6</td><td>60.1</td><td>740</td><td>38.8</td><td>70.3</td><td>42.</td></th<>	6	31.6	60.1	740	38.8	70.3	42.
Total	0	0.0	0.0	0	0.0	0.0	0.
Multifamily Loans		0.0	0.0		0.0	0.0	400
Total   Low   4   3.0   2.5   1,098   2.7   2.4	19	100.0	100.0	1,909	100.0	100.0	100 Multi-family
Moderate         7         53.8         37.6         5,791         62.5         33.1           Middle         3         23.1         24.7         1,530         16.5         33.8           Upper         2         15.4         16.5         1,505         16.2         18.9           Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,14         27.3         11.8           Middle         42         31.6         29.6         9,518         23.3         24.6	ns -						Units %
Middle         3         23.1         24.7         1,530         16.5         33.8           Upper         2         15.4         16.5         1,505         16.2         18.9           Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Low           Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,147         27.3         11.5           Middle         42         31.6         29.6         9,518         23.3         24.6	3	42.9	20.4	2,600	19.7	14.	14
Upper         2         15.4         16.5         1,505         16.2         18.5           Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Low           Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,147         27.3         11.5           Middle         42         31.6         29.6         9,518         23.3         24.6	2	28.6	35.9	9,505	72.1	31.6	26.
Unknown         0         0.0         0.6         0         0.0         2.4           Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Low           Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,147         27.3         11.5           Middle         42         31.6         29.6         9,518         23.3         24.6	1	14.3	22.7	491	3.7	14.4	23.
Tract-Unk         0         0.0         0.0         0         0.0         0.0           Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Low           Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,147         27.3         11.5           Middle         42         31.6         29.6         9,518         23.3         24.6	1	14.3	19.9	581	4.4	39.5	34.
Total         13         100.0         100.0         9,265         100.0         100.0           Total Home Mortgage Low           Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,147         27.3         11.5           Middle         42         31.6         29.6         9,518         23.3         24.6	0	0.0	1.1	0	0.0	0.5	0.
Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,147         27.3         11.5           Middle         42         31.6         29.6         9,518         23.3         24.6	0	0.0	0.0	0	0.0	0.0	
Low         4         3.0         2.5         1,098         2.7         2.4           Moderate         36         27.1         14.4         11,147         27.3         11.8           Middle         42         31.6         29.6         9,518         23.3         24.6	7	100.0	100.0	13,177	100.0	100.0	100
Moderate         36         27.1         14.4         11,147         27.3         11.5           Middle         42         31.6         29.6         9,518         23.3         24.6	Loans						Owner Occupied Units %
Middle 42 31.6 29.6 9,518 23.3 24.6	4	3.3	2.9	2,924	7.9	2.9	3.
	37	30.6	15.6	15,334	41.2	12.6	19
Upper 50 37.6 53.5 19,057 46.6 61.4	43	35.5	30.0	7,951	21.4	23.8	34.
	37	30.6	51.4	10,970	29.5	60.6	42.
Unknown 1 0.8 0.0 68 0.2 0.1	0	0.0	0.1	0	0.0	0.1	0
Tract-Unk 0 0.0 0.0 0 0.0 0.0	0	0.0	0.0	0	0.0	0.0	
Total 133 100.0 100.0 40,888 100.0 100.0	121	100.0	100.0	37,179	100.0	100.0	100

The bank's home purchase loans were the leading HMDA product by number followed by refinance loans in 2020 and 2021. Multifamily and home improvement lending were the smallest products by number in each year and carried the smallest weight in the overall conclusions within each year. In both 2020 when considering both demographic and aggregate proxies for demand, the bank's performance for home purchase and multifamily lending are considered good, while refinance and home improvement lending are considered excellent. In 2021, performance for all of the products is considered excellent.

On a combined product basis, UB's level of lending in low-income census tracts (3%) was greater than the level of aggregate lending in such tracts (2.5%) and similar to the owner-occupied housing units located in low-income census tracts (3.3%). The bank's level of lending in moderate-income census tracts (27.1%) was substantially higher than both the level of aggregate lending in such tracts (14.4%) and the owner-occupied housing units located in moderate-income census tracts (20.6%). Overall, the performance during 2020 is considered excellent, and its lending performance in 2021 was substantially similar.

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Charlotte-Concord-Gastonia, NC-SC												
Caagraphia	Bank And Aggregate Loans By Year												
Geographic		20			2021								
Income Level	Bank		Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	25	8.2	7.3	4,960	11.8	10.2	13	5.2	7.3	3,578	9.4	9.8	7.5
Moderate	129	42.4	17.7	15,641	37.3	19.7	90	36.3	18.3	15,052	39.5	19.6	19.4
Middle	86	28.3	25.8	11,780	28.1	24.1	71	28.6	26.7	9,321	24.5	23.0	27.5
Upper	64	21.1	47.9	9,600	22.9	44.0	74	29.8	46.6	10,134	26.6	45.8	44.8
Unknown	0	0.0	0.7	0	0.0	1.4	0	0.0	0.6	0	0.0	1.7	0.8
Tract-Unk	0	0.0	0.7	0	0.0	0.5	0	0.0	0.5	0	0.0	0.1	
Total	304	100.0	100.0	41,981	100.0	100.0	248	100.0	100.0	38,085	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 7.3% of all area businesses are located in low- income census tracts. Aggregate lenders originated 7.3% of small business loans in low-income census tracts during 2020. The bank's lending performance in low-income tracts (8.2%) exceeds demographic and aggregate data. D&B data from 2020, indicates that 19.8% of all area businesses are located in moderate- income census tracts, and aggregate lenders reported extending 17.7% of small business loans in moderate-income census tracts during 2020. The bank's lending performance in moderate-income tracts (42.4%) significantly exceeds demographic and aggregate data. Overall, the bank's level of small business lending is considered excellent, and its lending performance in 2021 was substantially similar.

## Distribution by Borrower Income and Revenue Size of the Business:

UB's borrower distribution performance is considered good for both HMDA and small business lending in the assessment area.

	Distribu						~ ~	_			Incom	e Lev	el el
	1		Asses				e-Conco		stonia,	, NC-SC			T
			2020	Ban	k And A	ggregate	Loans By Year 2021						
Borrower Income Level	Bank	Bank Agg			,	Agg	Bank	,	Agg	Bank	7	Agg	Families by Family Income %
	#	#%	#%	Bank	\$%	\$%	#	#%	#%		-		,,
	#	# 70	# 70	\$(000)		• • • •	ase Loans	# 70	# 70	\$(000)	\$%	\$%	
Low		1.5	5.5	57	0.2	2.7	ase Loans	2.1	4.4	114	0.8	2.1	22.6
Moderate	6	9.2	18.0	1,481	6.1	12.3	8	17.0	16.0	2,167	15.0	10.5	16.5
Middle	4	6.2	22.0	904	3.7	18.7	4	8.5	20.2	1,120	7.7	16.9	18.2
	32	49.2	44.9	18,308	75.4	56.6	15	31.9	45.6	5,054	34.9	57.0	42.8
Upper Unknown	22	33.8	9.6	3,520	14.5	9.6	19	40.4	13.9	6,029	41.6	13.5	0.0
Total	65	100.0	100.0	24,270	100.0	100.0	47	100.0	100.0	14,484	100.0	100.0	100.0
Total	03	100.0	100.0	24,270		Refinanc	ļ	100.0	100.0	14,404	100.0	100.0	100.0
Low	5	14.3	3.4	257	4.8	1.5	3	9.1	4.9	403	7.1	2.4	22.6
Moderate	3	8.6	10.5	789	14.7	6.4	7	21.2	13.7	950	16.8	8.8	16.5
Middle	4	11.4	10.5	659	12.3	13.3	7	21.2	18.8	963	17.0	14.9	18.2
	14	40.0	50.8	2,259	42.0	60.8	11	33.3	45.2	2,034	35.9	56.5	42.8
Upper Unknown	9	25.7	18.2	1,414	26.3	17.9	5	15.2	17.3	1,313	33.9	17.3	0.0
Total	35	100.0	100.0	5,378	100.0	100.0	33	100.0	100.0	5.663	100.0	100.0	100.0
Total	33	100.0	100.0	5,576			ment Loans		100.0	5,003	100.0	100.0	100.0
Low		9.1	3.8	15	1.5	1.9	0	0.0	4.2	0	0.0	2.0	22.6
Moderate	3	27.3	10.3	197	20.0	6.3	2	10.5	9.6	75	3.9	5.8	16.5
Middle	1	9.1	16.8	20	2.0	11.	5 5	26.3	15.7	249	13.0	10.4	18.2
Upper	5	45.5	64.8	552	56.1	74.4	11	57.9	67.2	1,472	77.1	77.8	42.8
Unknown	1	9.1	4.4	200	20.3	5.9	1	5.3	3.2	1,472	5.9	4.0	0.0
Total	11	100.0	100.0	984	100.0	100.0	19	100.0	100.0	1,909	100.0	100.0	100.0
Total		100.0	100.0	304			່ຶ  tgage Loans		100.0	1,909	100.0	100.0	100.0
Low	7	5.8	4.2	329	1.0	2.0	5	4.4	4.7	552	2.3	2.3	22.6
Moderate	12	10.0	13.1	2,467	7.8	8.7	18	15.8	14.3	3,209	13.4	9.4	16.5
Middle	13	10.0	18.6	1,820	5.8	15.3	18	15.8	19.1	2,589	10.8	15.6	18.2
Upper	56	46.7	48.4	21,873	69.2	58.9	48	42.1	46.4	10,197	42.5	57.3	42.8
Unknown	32	26.7	15.8	5,134	16.2	15.0	25	21.9	15.6	7,455	31.1	15.4	0.0
Total	120	100.0	100.0	31,623	10.2	100.0	114	100.0	100.0	24,002	100.0	100.0	100.0
Source: 2021 FF			100.0	31,023	100.0	100.0	<u> ''</u>	100.0	100.0	۷٦,002	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, the bank's HMDA lending to low-income borrowers (5.8%) exceeds the percentage of aggregate lending (4.2%) to such borrowers, although it lags the percentage of low-income families residing in the assessment area (22.8%). The bank's level of lending to moderate-income borrowers (10%) is less than both the aggregate lending (13.1%) to such borrowers and the percentage of moderate-income families in the assessment area (16.6%). Overall, the bank's HMDA lending performance during 2020 is considered good, and its performance during 2021 is similar.

Distrib	Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses												
Assessment Area: Charlotte-Concord-Gastonia, NC-SC													
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear				Total
_			20	20			2021						Businesses
	Bank Agg Bank Agg		Ban	k	Agg	Ban	k	Agg	%				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	126	41.4	40.7	14,894	35.5	27.1	105	42.3	46.9	17,879	46.9	30.2	91.9
Over \$1 Million	83	27.3		15,772	37.6		50	20.2		13,635	35.8		7.1
Revenue Unknown	95	31.3		11,315	27.0		93	37.5		6,571	17.3		0.9
Total	304	100.0		41,981	100.0		248	100.0		38,085	100.0		100.0
By Loan Size													
\$100,000 or Less	197	64.8	87.8	7,364	17.5	31.9	156	62.9	92.1	5,565	14.6	35.3	
\$100,001 - \$250,000	61	20.1	6.8	10,593	25.2	19.1	44	17.7	4.3	7,298	19.2	17.6	
\$250,001 - \$1 Million	46	15.1	5.5	24,024	57.2	48.9	48	19.4	3.6	25,222	66.2	47.1	
Total	304	100.0	100.0	41,981	100.0	100.0	248	100.0	100.0	38,085	100.0	100.0	
		J	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	92	73.0		3,572	24.0		61	58.1		2,444	13.7		
\$100,001 - \$250,000	17	13.5		3,205	21.5		17	16.2		2,916	16.3		
\$250,001 - \$1 Million	17	13.5		8,117	54.5		27	25.7		12,519	70.0		
Total	126	100.0		14,894	100.0		105	100.0		17,879	100.0		
Source: 2021 FFIEC C 2021 Dun & B 2011-2015 11 S	ra dstreet I	Da ta	Amorica	и Сомии	aitu Sura	n <i>o</i> n							

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 91.7% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 31.3% involved loans for which revenues were unknown and 41.4% were to businesses with revenues of \$1 million or less. 60.3% of the bank's loans where revenue was known (126 of 209 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 40.7% of reported loans being made to businesses with revenues of \$1 million or less.

In 2021, D&B data indicates that 91.9% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 42.3% were to businesses with revenues of \$1 million or less, and 37.5% involved loans for which revenues were unknown. However, 67.7% of the bank's loans where revenue was known (105 of 155 loans) were to businesses with revenues of \$1 million or less. This level of lending exceeds the 2021 aggregate lending level of 46.9%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

# PPP Loans with no reported revenue

Charlotte-Concor	Charlotte-Concord-Gastonia, NC-SC 2020									
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	63	74.1%	1,466	16.9%						
\$100,001 - \$250,000	13	15.3%	2,086	24.1%						
\$250,001 - \$1 Million	9	10.6%	5,099	58.9%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	85	100.0%	8,651	100.0%						

During 2020, 64.8% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 87.8% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 74.1% had loan amounts of \$100,000 or less.

Charlotte-Concor	Charlotte-Concord-Gastonia, NC-SC 2021								
By Loan Size	#	%	\$(000s)	%					
\$100,000 or less	70	88.6%	1,828	52.3%					
\$100,001 - \$250,000	7	8.9%	860	24.6%					
\$250,001 - \$1 Million	2	2.5%	809	23.1%					
Over \$1 Million	0	0.0%	0	0.0%					
Total	79	100.0%	3,497	100.0%					

In 2021, 62.9% of the small business loans reported were \$100,000 and less, and the aggregate reported 92.1% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 88.6% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good.

## **Community Development Loans:**

As previously mentioned, opportunities for community development lending are considerable within the Charlotte-Concord-Gastonia, NC-SC assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, UB originated 11 loans totaling \$42.8 million that provided nine affordable housing loans, of which \$9.3 million helped to preserve 128 affordable housing units, as well as two loans for services to low-and-moderate-income residents of the assessment area. In addition, the bank originated one loan totaling \$1.1 million as a part of the PPP. Given its relatively small presence within this assessment area, the bank is a leader in originating community development loans during the evaluation period.

#### **INVESTMENT TEST**

Overall, the bank has an adequate level of qualified community development investments, which exhibit adequate responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, including the multistate assessment area, the bank holds four qualified investments totaling \$2.6 million that directly benefit the Charlotte-Concord-Gastonia, NC-SC assessment area for the evaluation period and holds \$10.1 million in committed investments that haven't been funded.

During the evaluation period, the bank held investments that support affordable housing. These investments demonstrate adequate responsiveness to the affordable housing needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$92,450. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the assessment area									
United Bank	#	\$							
Affordable Housing	1	1,000							
Community Service	30	88,450							
Economic	3	3,000							
Revitalize or Stabilize	0	0							
Total	34	92,450							

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

#### **SERVICE TEST**

Within the assessment area, UB's performance under the service test is rated high satisfactory. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. Additionally, the bank has provided an adequate level of qualified services to community development organizations. The assessment area is new for UB since the previous evaluation. No branch office was opened, and three were closed within the assessment area during the review period; two located in moderate-income census tracts and one located in a middle-income tract; however, the changes did not adversely affect low- and-moderate-income geographies or individuals of the assessment area.

#### **Retail Services:**

Delivery systems are readily accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail, online banking, and mobile banking services are also offered by the institution. In addition, UB provides customers with 24-hour telephone access to their accounts through an automated system. Additionally, the bank's business hours and services offered do not vary in a way that inconveniences low- or moderate-income geographies or individuals within the area.

Since the previous evaluation, UB is new to this market and operates seven full-service branch offices in the assessment area, including two (28.6%) located in moderate-income census tracts. The distribution of branches is good when considering that according to census data, 7.6% and 23.9% of the assessment area's households reside in low- and-moderate-income areas. Branch locations and business hours do not vary in a way that inconveniences low- and-moderate-income geographies and/or individuals and meet the needs of the assessment area. Since the previous evaluation, no branch office has been opened, and two of three branch closings were closed within moderate-income census tracts. The changes do not adversely affect the assessment area as the bank's branch distribution in moderate-income census tracts remains higher than the percentage of households in those tracts.

# **Community Development Services:**

The bank provides an adequate level of community development services in the assessment area. Fourteen bank employees provided 97 hours of community development services during the evaluation period for 15 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as affordable housing, health care, food, financial services, and financial education, which is responsive to the assessment area.

Community Development Services in the assessment area							
	#						
Affordable Housing	1						
Community Services	14						
Economic Development	0						
Revitalize or Stabilize	0						
Total	15						

#### STATE OF WEST VIRGINIA

# CRA RATING FOR WEST VIRGINIA<sup>5</sup>: Satisfactory

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>Outstanding</u>
The Service Test is rated: <u>High Satisfactory</u>

Major factors supporting the rating include:

- Lending activity is considered good.
- While performance varies by year, product, and market area, the geographic and borrower distributions are each considered good overall.
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas as well as very small businesses.
- The bank makes use of flexible lending practices in serving the credit needs of the assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution*, *Conclusions with Respect to Performance* section at the beginning of this document.
- UB is a leader in providing community development loans in West Virginia.
- Qualified community development investment activity within the state is considered excellent.
   Additionally, the bank makes occasional use of innovative and/or complex investments within
   the state. UB exhibits excellent responsiveness to credit and community development needs
   within West Virginia.
- Delivery systems and branch locations are readily accessible to all segments of the assessment areas. Retail banking services do not vary in a way that inconveniences the bank's assessment areas, particularly low- and moderate-income areas and people.
- Branch closures have not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income people and areas.
- The bank is a leader within its market areas in West Virginia in providing community development services.

#### SCOPE OF EXAMINATION

Reported HMDA and small business loans from calendar years 2020 and 2021 were analyzed to determine the geographic and borrower distribution of the bank's lending. Community development loans made during this period, and community development services provided during the review period, were considered. All qualified investments extended during the review period or outstanding as of the evaluation date, regardless of when made, were also considered.

When excluding activity in the multistate CSA and MSA assessment areas, the West Virginia assessment areas account for 21.5%, 16.7%, and 21.3% of the institution's overall lending, branches, and deposit volume, respectively. Within the state of West Virginia, the Charleston-Huntington-

<sup>&</sup>lt;sup>5</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

Ashland, WV CSA and Morgantown, WV MSA assessment areas account for 14.1% of lending considered in this evaluation, 9% of branches, and 13.7% of deposits. Performance in the state was evaluated by applying the full-scope interagency examination procedures to both of these markets. All other assessment areas within the state were reviewed using limited scope interagency examination procedures.

To arrive at an overall state rating, the full-scope assessment areas were generally weighted based on the dollar volume of lending as well as the percentage of loans originated within the market. The greatest weight was given to the Charleston-Huntington-Ashland, WV CSA assessment area, as it accounted for 7.3% of loans by dollar volume and 9.1% of the number of loans evaluated. For the remaining assessment areas subject to limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN WEST VIRGINIA

The institution operates 37 full-service branch offices throughout the statewide assessment areas. One (2.7%) office is located in a low-income census tract and six (16.2%) are located in moderate-income areas. These 37 branch offices account for approximately \$5 billion of the bank's total deposit based on the June 30, 2022, FDIC deposit market share report.

Based on 2015 census data, the West Virginia assessment areas served by the bank have a total population of 1.1 million, including 269,815 families. A majority of the families continue to be middle-and upper-income (61.8%), while low- and moderate-income families each comprise 21.2% and 17% of the total, respectively. Within these assessment areas, the owner-occupancy rate is 61.5%, which is slightly higher than the average rate for the entire state of West Virginia (60.8%). The poverty rate of the assessment areas served by the bank is 13.1% of families, which equals the statewide rate. The 2020 median family incomes within the MSAs range from \$54,600 (Beckley, WV MSA) to \$73,900 (Morgantown, WV MSA), while the median family income for nonmetropolitan areas of West Virginia equals \$54,000. The 2021 median family incomes within the MSAs range from \$54,900 (Beckley, WV MSA) to \$76,200 (Morgantown, WV MSA), while the median family income for nonmetropolitan areas of West Virginia equals \$54,600. As described in the applicable assessment areas, there are underserved and/or distressed middle-income census tracts within the state of West Virginia's assessment areas.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN WEST VIRGINIA

The bank's Lending Test performance in the state of West Virginia is considered high satisfactory. Lending activities show good responsiveness to assessment area credit needs. Overall, the borrower distribution of loans is good. The geographic distribution and dispersion of loans is also good. The bank is a leader in originating community development loans.

The Investment Test performance is outstanding. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs and makes occasional use of innovative and/or complex investments.

Under the Service Test, the bank's performance is considered high satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank is a leader in providing community development services.

#### LENDING TEST

Overall, the statewide lending test is rated high satisfactory. As previously mentioned, conclusions of the lending test for West Virginia were based upon the performance within the two full-scope assessment areas, which both received the same overall lending, investment, and service test ratings. Lending activity is considered good and is measured primarily by proportion of lending in the bank's markets. The borrower and geographic distribution of loans are also considered good, and the bank is a leader is making community development loans.

## **Lending Activity:**

UB's HMDA and small business lending within the state of West Virginia assessment areas, as measured by number of loans (21.5%) exceeds both the percentage of branch offices (16.7%) and the percentage of deposits (21.3%) in the West Virginia assessment areas. Conversely, lending by dollar volume (15.8%) is less than the percentage of branch offices and deposits. As of June 30, 2022, the institution ranked 1<sup>st</sup> out of 44 financial institutions in deposit market share with 17.9% of the state of West Virginia's assessment areas' available FDIC insured deposits (credit union deposits are not included). When compared to 2020 aggregate data, the institution ranked 9<sup>th</sup> of 312 reporters of mortgage lending with a 3.4% market share and ranked 1<sup>st</sup> of 131 reporters of small business loans with a 11.8% market share. When compared to 2021 aggregate data, the institution ranked 9<sup>th</sup> of 377 reporters of mortgage lending with a 2.5% market share and ranked 4<sup>th</sup> of 123 reporters of small business loans with an 8.2% market share. All market share rankings consider originated and purchased loans. Overall, lending activity is considered good.

To help address the housing burden in West Virginia, during 2020, 2021, and year to date 2022, UB has helped 115 customers totaling \$12.3 million obtain funds through the West Virginia Housing Development Fund to assist with affordable housing within the state.

# **Geographic and Borrower Distribution:**

Overall, UB's geographic and borrower distribution of lending are considered good. When reaching overall conclusions, the level of performance for each product is typically weighted by the dollar volume of each product by year and overall. Within the markets reviewed, HMDA loans generally were the largest product by dollar volume followed by small business loans. Therefore, HMDA lending performance generally received the greatest weight.

### **Community Development Loans:**

The bank has been a leader in originating loans that qualify as community development loans. During the evaluation period, UB funded or renewed 22 community development loans totaling \$46 million in West Virginia including loans for affordable housing, social services, and economic development. The loans helped to address a variety of needs including job creation, workforce development, affordable housing, and social services targeted to low- and moderate-income residents. The bank also originated 18 loans totaling \$30.1 million as a part of the PPP throughout the state. Overall, lending opportunities are reasonably available when considering competition, bank size, economic conditions, and other area relevant factors. The institution faces no lending constraints relative to its size and business strategy.

#### INVESTMENT TEST

UB's investment test performance in the State of West Virginia is outstanding. The bank has an excellent level of qualified community development investments and grants. In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives and exhibits excellent responsiveness to credit and CD needs. The bank holds 62 allocations from 120 qualified investments totaling \$33.5 million throughout the state. Additionally, 250 charitable donations totaling approximately \$1.1 million were made during the review period to organizations providing community development programs, affordable housing, and economic development and/or revitalization or stabilization throughout West Virginia. In addition to the previous mentioned qualified investments benefitting the statewide and regional areas, investments specific to or shared within the State of West Virginia include:

- \$6 million in one CRA qualified investment fund with allocations to various assessment areas in each applicable section of the evaluation, including \$1.9 million in regional activity. This investment fund primarily invests in affordable housing initiatives throughout the bank's assessment areas.
- \$10 million in 13 SBIC investments which invest in small businesses throughout regional and statewide presence.
- An equity investment throughout West Virginia (\$500,000), where the proceeds are used to help small businesses, social service non-profits, and small farms grow operations.
- \$250,000 in an equity investment that provides rural areas in West Virginia access to health care, many of which have low-and-moderate-income residents.

## **SERVICE TEST**

The institution's statewide rating under the service test is high satisfactory. Two branch office closures within the State of West Virginia were located in an upper-income census tract and middle-income tract; no branch offices were opened. Overall, these branch office changes did not adversely affect the bank's branch footprint. Products and services offered within West Virginia markets evaluated using the full-scope procedures are representative of those offered by the institution overall. In addition, business hours and services do not vary in a way that inconveniences the needs in any of its assessment areas. Delivery systems are readily accessible to all portions of the bank's assessment areas and to people of varying income levels.

The institution and its employees are leaders in the provision of community development services. Activities include participation in approximately 149 organizations that provide either economic development, affordable housing, revitalization and/or stabilization, and other community services to low- and moderate-income residents. Examples of community development services that were consistent across the State of West Virginia include Boys & Girls Club, CASA, Charleston Area Alliance, Coalfield Development, Mountaineer Food Bank, Putnam County Planning Commission, Workforce WV, Seed WV, and Downtown PKB.

## METROPOLITAN AREA FULL-SCOPE REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLESTON-HUNTINGTON-ASHLAND, WV CSA ASSESSMENT AREA

The bank operates 14 branches and 22 ATMs within the area and all of its products and services are available. UB serves a portion of the Charleston-Huntington-Ashland, WV CSA assessment area, all located in West Virginia, including portions of the Charleston, WV MSA, Huntington-Ashland, WV-OH-KY MSA, and the Mount Gay-Shamrock, WV micro-area. Within the assessment area, four census tracts all located in Logan County are considered distressed middle-income tracts due to both poverty and unemployment. The complete composition of the assessment area is detailed in Appendix E.

Two of					DEMOGRAPHICS						
Tract Income Levels	Bra	nches	ATMS		Census	s Tracts	Households	Total Businesses			
Levels	#	%	#	%	#	%	%	%			
Low	1	7.1%	1	4.5%	7	5.3%	3.5%	7.5%			
Moderate	2	14.3%	3	13.6%	28	21.4%	15.7%	11.6%			
Middle	9	64.3%	14	63.6%	63	48.1%	53.4%	52.3%			
Upper	2	14.3%	3	13.6%	32	24.4%	27.2%	28.4%			
Unknown	0	0.0%	1	4.5%	1	0.8%	0.3%	0.2%			
Totals	14	100%	22	100%	131	100%	100%	100%			

Based on 2015 ACS data, the assessment area served by the bank has a total population of 496,276 and a median housing value of \$103,123. Within the assessment area, the owner-occupancy rate is 62.4%, which is slightly higher than the owner-occupancy rate for the state of West Virginia (60.8%). The percentage of families living below the poverty level in the assessment area (13.3%) is similar to the state of West Virginia (13.1%). Median family incomes for the MSAs that comprise the assessment area are detailed in the table below.

Median Family Income by MSA	2020	2021
Charleston, WV MSA	\$59,200	\$59,800
Huntington-Ashland, WV-OH-KY MSA	\$60,500	\$61,000

The following table provides family and household demographic information for the assessment area, as well as the tract and owner-occupied housing unit distribution by tract income level. The table also provides D&B business data.

	2021 Char	leston-Hunt	ington-Ashl	and, WV CS	A AA Demo	graphics			
Income Categories	Tract Dis	tribution	Families by T	Tract Income	Families < Po	overty Level ilies by Tract	Families I		
	#	%	#	%	#	%	#	%	
Low	7	5.3	3,110	2.4	1,307	42.0	28,687	22.0	
Moderate	28	21.4	19,717	15.1	4,513	22.9	21,987	16.8	
Middle	63	48.1	71,156	54.5	8,818	12.4	24,788	19.0	
Upper	32	24.4	36,435	27.9	2,664	7.3	55,031	42.2	
Unknown	1	0.8	75	0.1	44	58.7	0	0.0	
Total AA	131	100.0	130,493	100.0	17,346	13.3	130,493	100.0	
	Housing			Hous	sing Type by	Tract			
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	9,203	2,458	1.7	26.7	4,683	50.9	2,062	22.4	
Moderate	37,812	20,215	13.9	53.5	11,620	30.7	5,977	15.8	
Middle	124,578	80,531	55.5	64.6	28,044	22.5	16,003	12.8	
Upper	60,472	41,959	28.9	69.4	13,304	22.0	5,209	8.6	
Unknown	586	17	0.0	2.9	492	84.0	77	13.1	
Total AA	232,651	145,180	100.0	62.4	58,143	25.0	29,328	12.6	
					nesses by Tra	ct & Revenue	Size		
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	1,141	7.5	952	7.1	174	11.4	15	4.8	
Moderate	1,769	11.6	1,531	11.4	202	13.2	36	11.4	
Middle	7,996	52.3	7,013	52.1	787	51.6	196	62.2	
Upper	4,351	28.4	3,929	29.2	355	23.3	67	21.3	
Unknown	37	0.2	29	0.2	7	0.5	1	0.3	
Total AA	15,294	100.0	13,454	100.0	1,525	100.0	315	100.0	
Perce	entage of Tota	ıl Businesses:		88.0		10.0		2.1	
				Fa	rms by Tract	& Revenue S	ize		
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	22	10.3	22	10.4	0	0.0	0	0.0	
Middle	131	61.5	130	61.3	1	100.0	0	0.0	
Upper	60	28.2	60	28.3	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	213	100.0	212	100.0	1	100.0	0	0.0	
1	Percentage of	Total Farms:		99.5		0.5		0.0	
Source: 2021 FFIEC Census D	Pa ta								

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The following chart depicts government and private sector employees by industry for the assessment area. A large portion of area employment for residents comes from government, health care, retail trade, and accommodation and food services. In addition, construction and manufacturing industries provide significant employment opportunities.

Charleston-Huntingto	n-Ashland,	WV CSA E	mployees	by Industr	у		
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q
Government	41,053	38,630	34,858	39,600	39,046	39,647	35,524
Private Sector							
Private Sector Total, all industries	158,377	140,749	149,816	151,550	149,813	153,684	154,83
Agriculture, forestry, fishing and hunting	66*	98*	97*	102*	68*	108*	107
Mining, quarrying, and oil and gas extraction	1,702*	1,358*	1,113*	1,285*	1,265*	1,249*	1,328
Utilities	1,406*	1,399*	1,392*	1,373*	1,377*	1,375*	1,371
Construction	7,938	8,108	9,180	8,525	8,075	9,086	9,53
Manufacturing	12,884	11,935*	11,947*	12,112*	12,322	12,478	12,51
Wholesale trade	6,202*	5,686*	5,737*	5,373*	5,238*	5,241*	5,236
Retail Trade	23,171	20,897	22,339	23,042	22,553	22,834	22,72
Transportation and warehousing	3,993*	3,664*	3,795*	4,490	4,399	4,501	4,59
Information	2,233*	1,962*	2,004*	1,992*	1,560*	1,997*	2,049
Finance and insurance	6,111*	5,942*	5,840*	5,807*	5,956*	5,947*	5,954
Real estate and rental and leasing	2,423*	2,174*	2,280*	2,298*	2,251*	2,249*	2,303
Professional and technical services	8,268	7,716	7,840	8,013	8,289	8,356	8,31
Management of companies and enterprises	2,390	2,216	2,315	2,312	2,262	2,269*	2,323
Administrative and waste services	10,223	9,544	9,644	9,812	9,543	9,843*	9,706
Educational services	1,532*	1,297*	1,205*	1,378*	1,308*	1,386*	1,300
Health care and social assistance	38,043*	33,584*	35,352*	37,493*	36,249*	36,244*	34,686
Arts, entertainment, and recreation	2,326*	1,458	2,243	1,896*	1,792*	2,296	2,47
Accommodation and food services	17,921*	12,182	15,566	15,666*	15,205*	16,382	16,73
Other services, except public administration	4,944	4,055	4,454	4,462	4,503	4,677	4,73
Public administration	0	0	0	0	0	0	
Unclassified	13	13	17	17	17*	20	1
Source: Bureau of Labor Statistics (BLS), Quarterly Cer	isus of Emp	loyment and	d Mages				

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Charleston-Huntington-Ashland, WV CSA Unemployment Rates										
Area	2020	2021								
Charleston-Huntington-Ashland, WV CSA	8.51%	5.13%								
Boone County, WV	10.26%	6.08%								
Cabell County, WV	7.79%	4.63%								
Jackson County, WV	8.46%	5.68%								
Kanawha County, WV	8.63%	5.19%								
Lincoln County, WV	9.87%	6.56%								
Logan County, WV	11.85%	6.62%								
Putnam County, WV	7.23%	4.20%								
Wayne County, WV	8.24%	5.15%								
Charleston, WV MSA	8.90%	5.46%								
Huntington-Ashland, WV-KY-OH MSA	8.06%	5.27%								
NonMSA West Virginia	8.96%	5.65%								
West Virginia 8.15% 5.03%										
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics										

Unemployment rates across the assessment area decreased between 2020 and 2021. While counties within the assessment have fluctuated during this time, the assessment area overall has unemployment rates similar to that of the state of West Virginia.

Charleston-Huntington-Ashland, WV CSA Median Family Income Change												
	2010 Median Family	2015 Median Family	Percent									
Area	Income	Income	Change									
Charleston-Huntington-Ashland, WV CSA	\$55,229	\$54,932	-0.54%									
Boone County, WV	\$52,249	\$50,777	-2.82%									
Cabell County, WV	\$52,621	\$54,671	3.90%									
Jackson County, WV	\$53,789	\$56,384	4.82%									
Kanawha County, WV	\$59,024	\$57,069	-3.31%									
Lincoln County, WV	\$41,018	\$43,990	7.25%									
Logan County, WV	\$47,342	\$46,928	-0.87%									
Putnam County, WV	\$69,303	\$67,353	-2.81%									
Wayne County, WV	\$48,879	\$46,827	-4.20%									
Charleston, WV MSA	\$53,678	\$54,658	1.83%									
Huntington-Ashland, WV-KY-OH MSA	\$51,825	\$54,584	5.32%									
NonMSA West Virginia	\$46,461	\$48,107	3.54%									
West Virginia	\$53,245	\$52,866	-0.71%									

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, approximately half of the counties denote a decrease of median family income amounts within the assessment area during the evaluation period; with Lincoln County increasing the most at 7.3%. Counties within the assessment area show both slight increases and decreases in family income change from 2010 to 2015. Overall, the CSA notes a slight decrease from 2010 to 2015. Housing cost burden for low-income renters and owners within the assessment area during the review period equals 30 percent or more of household income. While moderate-income renters housing cost burden for a majority of the localities equals 30 percent or more of household income. All moderate-income areas have a housing cost burden less than 30 percent of household income.

Charleston-Huntington-Ashland, WV CSA Housing Cost Burden												
	Cos	t Burden - Ren	ters	Cost	Burden - Own	ers						
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners						
Charleston-Huntington-Ashland, WV												
CSA	64%	40%	38%	47%	18%	14%						
Boone County, WV	65%	48%	40%	45%	13%	15%						
Cabell County, WV	68%	57%	46%	48%	26%	16%						
Jackson County, WV	53%	22%	28%	53%	18%	17%						
Kanawha County, WV	66%	39%	37%	49%	17%	13%						
Lincoln County, WV	54%	19%	32%	38%	16%	12%						
Logan County, WV	55%	29%	34%	46%	18%	14%						
Putnam County, WV	64%	28%	30%	40%	19%	13%						
Wayne County, WV	52%	27%	32%	48%	14%	16%						
Charleston, WV MSA	64%	37%	36%	47%	16%	13%						
Huntington-Ashland, WV-KY-OH												
MSA	65%	45%	40%	50%	24%	16%						
NonMSA West Virginia	58%	33%	33%	46%	17%	14%						
West Virginia	64%	36%	37%	47%	20%	14%						

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local community official was recently contacted to assist in evaluating UB's CRA performance. The official's organization has a focus on community education, financial stability, health, and basic safety needs, as well as providing grants to organizations. The contact indicated that the area is currently stable after experiencing an overall decline in population and employment due to the ongoing departure of the coal industry, which started during 2009 and had slowly but steadily decreased many of the jobs that had incomes that could support a family within the assessment area. One major employer and benefactor of the area is Marshall University, located in Huntington, WV, with a student population of about 13,000. Another major industry employer is healthcare, with the local hospitals in association with Marshall University hiring many local residents and providing employment with a supportive family income and benefits. The contact noted that although the area experienced increased unemployment rates during the COVID-19 pandemic, the rates have since stabilized. The contact did mention the resurgence of the opioid crisis as a consequence of the pandemic.

Affordable housing financing is much needed in the area, and the contact described how the city of Huntington has an active program to demolish abandoned housing stock and rebuild new affordable housing; however, this activity has faced financing challenges along the way from some larger banks to help finance the construction. They have been more successful with many of the local community

banks who, according to the contact, are more willing to engage, and the contact noted that during the pandemic in particular, their organization experienced a significant level of support from community banks. The contact also spoke about the excitement regarding the prospect of partnering with a local institution to offer a first-time home-buyers loan product with no interest and down payment assistance. The contact stated that generally local financial institutions are meeting the credit needs of the community; however, there is opportunity for increased participation through affordable housing and product offerings. The contact was not aware of any discriminatory actions made by financial institutions in the local area.

UB holds a strong deposit market share within the assessment area (2<sup>nd</sup> of 21 banks operating within the assessment area) having 15% of all deposits from the June 30, 2022, FDIC deposit market share report. Overall, there is reasonable opportunity for community development loans and investments within the market area. The bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its banking services and products; as noted above, all the bank's services and products are offered in this assessment area, which included 17 community development loans totaling \$33.5 million, as well as 17 qualified investments totaling \$19.7 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 786 customer's loan interest, which totaled 882 loans to the amount of \$1.7 million. Furthermore, during the pandemic, from this assessment area, the bank waived 1,655 customer's ATM cash bank fees totaling \$3,310 and increased 71 customer's ATM withdrawal limits.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLESTON-HUNTINGTON-ASHLAND, WV CSA ASSESSMENT AREA:

The bank's Lending Test performance in the Charleston-Huntington-Ashland, WV CSA assessment area is considered good. Lending levels show good responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution of loans is good, and the bank is a leader in originating community development loans.

The Investment Test performance is excellent. UB's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs.

Under the Service Test, the bank's performance is considered good, and its delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or have adversely affected any particular individuals or areas. Further, the bank is a leader in providing community development services.

#### LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of the bank's lending activity, the geographic and borrower lending distribution and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area, and there were no gaps in the geographic dispersion of loans.

# **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number (9.1%) is greater than the percentage of branch offices (6.3%) and the percentage of deposits (8.5%) in the assessment area. Additionally, lending by dollar volume (7.3%) is greater than the percentage of branch offices but less than deposits. As of June 30, 2022, the institution ranked 2<sup>nd</sup> out of 21 financial institutions in deposit market share with 15% of the assessment area's available FDIC insured deposits (credit union deposits are not included). When compared to 2021 aggregate data, the institution ranked 14<sup>th</sup> of 250 reporters of mortgage lending with a 2.5% market share and ranked 4<sup>th</sup> of 92 reporters of small business loans with a 7.1% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered good.

# **Geographic Distribution:**

The geographic distribution of HMDA loans is considered adequate, while the geographic distribution for small business loans is good. Overall, the distribution is considered good when considering the relative strengths of performance and comparable dollar volumes of each lending product over the two-year period.

	1						Loans By Y			d, WV CS			
Coommunic			202		K Allu Aş	gregate	Loans by 1		202	21			Owner Occupied
Geographic Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hon	ne Purcha	ase Loans						
Low	4	2.9	1.1	244	0.9	0.8	5	3.9	1.4	705	2.7	0.9	1
Moderate	9	6.5	9.0	864	3.0	6.0	9	7.1	10.5	1,069	4.1	6.7	13
Middle	56	40.6	48.9	9,530	33.6	45.1	47	37.0	49.9	8,355	31.8	46.9	55.
Upper	69	50.0	40.9	17,723	62.5	48.2	66	52.0	38.1	16,172	61.5	45.4	28.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	138	100.0	100.0	28,361	100.0	100.0	127	100.0	100.0	26,301	100.0	100.0	100
	,	•			F	Refinance	Loans						
Low	1	0.5	0.6	57	0.1	0.5	1	0.7	0.8	61	0.2	0.5	1
Moderate	11	5.8	6.8	1,175	2.9	4.6	10	7.1	7.3	912	3.1	4.7	13
Middle	70	36.6	46.6	15,691	38.1	42.5	55	39.3	48.2	7,709	26.3	44.5	55.
Upper	109	57.1	46.0	24,256	58.9	52.5	74	52.9	43.6	20,653	70.4	50.2	28.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	191	100.0	100.0	41,179	100.0	100.0	140	100.0	100.0	29,335	100.0	100.0	100
Home Improvement Loans													
Low	0	0.0	1.8	0	0.0	1.3	0	0.0	2.0	0	0.0	1.3	1
Moderate	1	4.8	7.9	20	1.8	6.2	1	3.8	6.4	15	1.4	4.5	13
Middle	14	66.7	49.7	754	68.9	45.4	15	57.7	47.5	569	52.2	47.2	55.
Upper	6	28.6	40.7	320	29.3	47.2	10	38.5	44.1	505	46.4	47.0	28.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	1,094	100.0	100.0	26	100.0	100.0	1,089	100.0	100.0	100
					М	ultifamily	Loans						Multi-family
Low	1	33.3	10.2	1,327	42.4	6.9	0	0.0	10.8	0	0.0	11.6	<u>Units %</u>
Moderate	0	0.0	14.8	0	0.0	4.3	0	0.0	6.0	0	0.0	10.9	15
Middle	2	66.7	45.5	1,804	57.6	55.9	3	75.0	51.8	8,730	85.1	41.0	42.
Upper	0	0.0	25.0	0	0.0	30.3	1	25.0	26.5	1,531	14.9	31.9	27.
Unknown	0	0.0	4.5	0	0.0	2.6	0	0.0	4.8	0	0.0	4.6	1
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	3,131	100.0	100.0	4	100.0	100.0	10,261	100.0	100.0	100
Total Home Mortgage Loans										Owner Occupied			
Low	7	1.8	1.0					1.0	1.0	766		4.	Units %
Low Moderate	24	6.0	8.2	1,688 2,307	3.0	1.1 5.3	22	1.9 7.0	1.2 8.9	2,068	3.0	6.0	13
	160	40.3	48.0		37.8	44.8			49.1			45.7	
Middle		40.3 51.9	48.0	29,113	57.0	44.8	125	39.9 51.1	49.1	25,893	37.8	45.7 47.0	55.
Upper	206	-		43,919			160			39,838	58.1		28
Unknown	0	0.0	0.0	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0.
Tract-Unk Total	397	0.0 100.0	0.0	77,027	0.0	0.0	0	0.0	0.0	0	100.0	100.0	

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

In both years, refinance loans were the leading HMDA product by number followed by home purchase loans. Given their limited volumes within the assessment area, home improvement and multifamily lending were not significant factors in the analysis. In both years, UB's home purchase lending performance is considered good, and its refinance lending performance is considered adequate.

Overall, and as reflected in the preceding table, the bank's percentage of 2020 HMDA lending in low-income census tracts (1.8%) exceeded both the aggregate lending level and the percentage of owner-occupied housing units located in such tracts (1% and 1.7%, respectively). UB's level of lending in moderate-income census tracts (6%) is less than the level of aggregate lending in such tracts (8.2%) and less than the owner-occupied housing units located in moderate-income census tracts (13.9%). Overall, the bank's 2020 performance is considered adequate, and its performance during 2021 is similar.

Di	istributio	on of 2	2020 aı	nd 2021 S	Small	Busin	ess Lend	ing By	/ Incor	ne Level	of Ge	ograp	hy
		Ass	essme	nt Area:	Charl	eston-	Hunting	ton-A	shland	l, WV CS	SA		
. 1:	Bank And Aggregate Loans By Year											Total	
Geographic		2020 2021											Total
Income	Bank Agg Bank Agg Bank Agg Bank Agg									Businesses			
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	79	9.9	8.3	13,331	14.5	9.9	35	7.1	6.9	3,039	5.6	7.7	7.5
Moderate	77	9.7	9.9	9,129	9.9	9.8	50	10.1	9.8	5,333	9.8	10.1	11.6
Middle	394	49.4	49.5	48,126	52.2	51.8	245	49.7	50.4	29,619	54.6	54.8	52.3
Upper	247	31.0	31.5	21,612	23.4	28.0	161	32.7	31.8	16,128	29.7	26.6	28.4
Unknown	0	0.0	0.0	0	0.0	0.2	2	0.4	0.2	95	0.2	0.7	0.2
Tract-Unk	0	0.0	0.8	0	0.0	0.3	0	0.0	0.9	0	0.0	0.2	
Total	797	100.0	100.0	92,198	100.0	100.0	493	100.0	100.0	54,214	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

UB's level of 2020 small business lending in low-income census tracts (9.9%) exceeded both the aggregate reporters' lending levels (8.3%), and the percentage of businesses located in such tracts (7.5%). The bank's lending level in moderate-income census tracts (9.7%) is nearly equal to the aggregate lending (9.9%) and is slightly less than the percentage of businesses in such tracts (11.6%). Overall, the level of small business lending performance in 2020 is considered good, and its performance during 2021 is similar.

### **Distribution by Borrower Income and Revenue Size of the Business:**

The borrower distribution of HMDA loans is considered adequate, while the borrower distribution for small business loans is good. Overall, the distribution is considered good when considering the relative strengths of performance and dollar volumes of each lending product during the years analyzed.

	Distribu						~ ~	_	•			e Lev	el
	T	Ass	sessme				-Hunting		shland	a, wv cs	5A		
_			2020	Бап	k And Aç	ggregate	Loans By Y	ear	20:	21			
Borrower Income Level	Bank	(	Agg	Agg Bank		Agg	Bank	(	Agg	Bank	(	Agg	Families by Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
				*(****)	-		ase Loans	,		*(****)	477	***	
Low	7	5.1	7.0	466	1.6	3.6	7	5.5	6.7	626	2.4	3.3	22.0
Moderate	24	17.4	21.8	2,778	9.8	15.	28	22.0	20.7	3,11	1 11.8	14.3	16.8
Middle	27	19.6	24.4	3,702	13.1	21.7	17	13.4	23.7	2,647	10.1	21.	19.0
Upper	73	52.9	38.5	20,491	72.3	52.3	66	52.0	37.9	18,11	68.9	51.3	42.2
Unknown	7	5.1	8.3	924	3.3	7.3	9	7.1	11.	1 1,801	6.8	10.0	0.0
Total	138	100.0	100.0	28,361	100.0	100.0	127	100.0	100.0	26,301	100.0	100.0	100.0
Refinance Loans													
Low	4	2.1	3.2	294	0.7	1.2	7	5.0	4.6	436	1.5	2.3	22.0
Moderate	14	7.3	10.0	1,480	3.6	5.8	23	16.4	11.2	2,113	7.2	7.1	16.8
Middle	27	14.1	17.6	2,769	6.7	13.0	24	17.1	20.0	3,372	11.5	5 15.5	19.0
Upper	126	66.0	51.6	33,290	80.8	61.3	79	56.4	47.0	22,447	76.5	56.8	42.2
Unknown	20	10.5	17.6	3,346	8.1	18.7	7	5.0	17.3	967	3.3	18.4	0.0
Total	191	100.0	100.0	41,179	100.0	100.0	140	100.0	100.0	29,335	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	3.8	0	0.0	2.4	1	3.8	5.3	18	1.7	2.5	22.0
Moderate	2	9.5	13.9	75	6.9	10.	3	11.5	14.2	211	19.4	10.8	16.8
Middle	4	19.0	21.6	243	22.2	18.8	7	26.9	16.9	137	12.6	12.7	19.0
Upper	14	66.7	58.9	726	66.4	67.1	14	53.8	60.3	703	64.6	70.5	42.2
Unknown	1	4.8	1.8	50	4.6	1.6	1	3.8	3.3	20	1.8	3.4	0.0
Total	21	100.0	100.0	1,094	100.0	100.0	26	100.0	100.0	1,089	100.0	100.0	100.0
	1			· · · · · · · · · · · · · · · · · · ·	Total Ho	ome Mor	tgage Loans	3	1	1			T
Low	12	3.0	5.0	780	1.1	2.3	16	5.2	5.6	1,15	1 2.0	2.8	22.0
Moderate	45	11.4	15.5	4,687	6.3	10.2	56	18.1	15.8	5,507	9.4	10.7	16.8
Middle	69	17.5	20.7	7,531	10.2	17.0	48	15.5	21.4	6,156	10.6	18.2	19.0
Upper	238	60.4	44.9	56,449	76.4	56.5	170	55.0	42.9	42,579	73.0	54.1	42.2
Unknown	30	7.6	13.9	4,449	6.0	14.0	19	6.1	14.3	2,911	5.0	14.2	0.0
Total	394	100.0	100.0	73,896	100.0	100.0	309	100.0	100.0	58,304	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, UB's level of lending to low-income borrowers (3%) was less than both the percentage of aggregate lending levels to such borrowers (5%) and the percentage of low-income families within the assessment area (22%). The bank's lending to moderate-income borrowers (11.4%) was also less than the percentage of aggregate lending levels (15.5%) and the percentage of moderate-income families (16.8%). Overall, the bank's performance during 2020 is considered adequate.

In 2021, the bank's level of lending to low-income borrowers (5.2%) was lower than aggregate lending to such borrowers (5.6%) as well as the percentage of low-income families (22%) within the assessment area. Conversely, the bank's level of lending to moderate-income borrowers (18.1%) was greater than aggregate lending levels to such borrowers (15.8%) as well as the percentage of moderate-income families (16.8%) in the assessment area. Overall, the bank's performance during 2021 is considered good.

UB's overall HMDA lending is considered adequate. In reaching this conclusion, more weight was given to HMDA lending during 2020, as the dollar volume during 2020 was greater than in 2021.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
	Assessment Area: Charleston-Huntington-Ashland, WV CSA												
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear				
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, ,
By Revenue													
\$1 Million or Less	57	7.2	32.9	10,435	11.3	23.9	78	15.8	45.7	9,023	16.6	30.7	88.0
Over \$1 Million	64	8.0		19,031	20.6		97	19.7		24,165	44.6		10.0
Revenue Unknown	676	84.8		62,732	68.0		318	64.5		21,026	38.8		2.1
Total	797	100.0		92,198	100.0		493	100.0		54,214	100.0		100.0
-					By L	oan Si	ze						
\$100,000 or Less	567	71.1	82.1	17,693	19.2	25.7	348	70.6	86.4	11,500	21.2	26.8	
\$100,001 - \$250,000	121	15.2	9.8	19,180	20.8	20.8	86	17.4	7.2	14,344	26.5	19.6	
\$250,001 - \$1 Million	109	13.7	8.1	55,325	60.0	53.5	59	12.0	6.3	28,370	52.3	53.6	
Total	797	100.0	100.0	92,198	100.0	100.0	493	100.0	100.0	54,214	100.0	100.0	
	,	Ī	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	33	57.9		1,696	16.3		52	66.7		2,077	23.0		
\$100,001 - \$250,000	12	21.1		2,254	21.6		16	20.5		2,917	32.3		
\$250,001 - \$1 Million	12	21.1		6,485	62.1		10	12.8		4,029	44.7		
Total	57	100.0		10,435	100.0		78	100.0		9,023	100.0		
Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data													

2011-2015 U.S. Census Bureau: American Community Survey

Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 87.9% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 84.8% involved loans for which revenues were unknown and 7.2% were to businesses with revenues of \$1 million or less. However, 47.1% of the bank's loans where revenue was known (57 pf 121 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 32.9% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 88% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 15.8% were to businesses with revenues of \$1 million or less, and 64.5% involved loans for which revenues were unknown. However, 44.6% of the bank's loans where revenue was known (78 of 175 loans) were to businesses with revenues of \$1 million or less. This level of lending is comparable to the 2021 aggregate lending level of 45.7%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

PPP Loans with no reported revenue

Charleston-Hunting	Charleston-Huntington-Ashland, WV CSA 2020												
By Loan Size	#	%	\$(000s)	%									
\$100,000 or less	503	77.3%	14,556	25.0%									
\$100,001 - \$250,000	82	12.6%	12,429	21.3%									
\$250,001 - \$1 Million	66	10.1%	31,297	53.7%									
Over \$1 Million	0	0.0%	0	0.0%									
Total	651	100.0%	58,282	100.0%									

During 2020, 71.1% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 82.1% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 77.3% had loan amounts of \$100,000 or less.

Charleston-Hunting	Charleston-Huntington-Ashland, WV CSA 2021											
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	243	82.7%	6,498	38.3%								
\$100,001 - \$250,000	38	12.9%	5,806	34.2%								
\$250,001 - \$1 Million	13	4.4%	4,678	27.5%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	294	100.0%	16,982	100.0%								

During 2021, 70.6% of the small business loans reported were \$100,000 and less, and the aggregate reported 86.4% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 82.7% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

# **Community Development Lending:**

As previously discussed, opportunities for community development lending are reasonably available within the Charleston-Huntington-Ashland, WV CSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank was a leader in making community development loans within this market. Eleven community development loans totaling \$22.5 million were originated within the assessment area during the evaluation period. Of the 11 loans, five were to organizations providing a social service to low- and moderate-income residents, one was to an organization providing affordable housing, and five were to organizations promoting economic development and revitalization/stabilization. The loans provided funding for organizations whose primary purpose is either economic development, affordable housing, or the provision of services to low- and moderate-income individuals. Additionally, the bank originated six loans totaling \$11 million as a part of the PPP within this assessment area.

#### INVESTMENT TEST

Overall, the bank has an excellent level of qualified community development investments which exhibit excellent responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the bank holds 17 investments totaling \$19.7 million that directly benefit the Charleston-Huntington-Ashland, WV CSA assessment area, \$10 million that is committed but not yet funded for the evaluation period. This includes \$714,000 in new investments.

During the evaluation period, the bank holds four new investments that support affordable housing and community services. These investments demonstrate excellent responsiveness to the affordable housing and community needs in the assessment area. The bank's prior-period investments also support affordable housing, as well as community service needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$322,871. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development, revitalize or stabilize low- and moderate-income geographies, and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the assessment area										
United Bank	#	\$								
Affordable Housing	4	4,250								
Community Service	70	249,260								
Economic	7	25,131								
Revitalize or Stabilize	9	44,230								
Total	90	322,871								

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

The institution's performance under the service test within this assessment area is considered good. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low and moderate-income areas. Since the previous evaluation, no branch office has been opened or closed within a low- or moderate-income census tract. One branch office was closed in a middle-income census tract, and one was also closed in an upper-income census tract. Overall, the bank's changes in branch locations have not adversely affected the accessibility of its delivery systems. Business hours and services do not vary in a way that inconveniences the needs of the assessment area. Additionally, the bank is a leader in providing community development services.

#### **Retail Services:**

Delivery systems and branch locations are readily accessible to geographies and individuals of different income levels within the assessment area. Alternative delivery systems are available through various mechanisms including 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the institution.

Within this assessment area, UB operates 14 full-service branch offices. One (7.1%) branch is located in a low-income census tract, while two (14.3%) branch offices are located within moderate-income census tracts. The distribution of branches is excellent when considering that 3.5% and 15.7% of the assessment area's households are in low- and moderate-income areas respectively. Branch locations and business hours do not vary in a way that inconveniences the needs of the assessment area, particularly

low- and-moderate-income geographies and individuals. As previously mentioned, the bank did not open a branch office during the review period, while closing a branch office in a middle-income tract and one in an upper-income census tract since the previous evaluation, and the accessibility of its delivery systems, particularly to low-and-moderate-income geographies and/or individuals, are not adversely affected.

# **Community Development Services:**

The bank is a leader in providing community development services in the assessment area. 130 bank employees provided 1,285 hours of community development services during the evaluation period for 61 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as affordable housing, health care, food, economic development and job creation, financial services, and financial education which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area							
	#						
Affordable Housing	2						
Community Services	38						
Economic Development	12						
Revitalize or Stabilize	9						
Total	61						

# METROPOLITAN AREA FULL-SCOPE REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MORGANTOWN, WV MSA ASSESSMENT AREA

All of the bank's products and services are available within the six branch offices that UB operates within the Morgantown, WV MSA assessment area, which includes all of Monongalia and Preston Counties, West Virginia, which comprises the entire MSA. The complete composition of the assessment area is detailed in Appendix E. Sixteen ATMs are located throughout the assessment area.

Tract						DEMOGRAPHICS					
Income	Bra	inches	A	TMS	Census	s Tracts	Households	Total Businesses % 0.3% 22.8% 42.8%			
Levels	#	%	#	%	#	%	%	%			
Low	0	0.0%	0	0.0%	1	3.1%	0.4%	0.3%			
Moderate	2	33.3%	9	56.3%	8	25.0%	25.4%	22.8%			
Middle	2	33.3%	4	25.0%	15	46.9%	47.7%	42.8%			
Upper	2	33.3%	3	18.8%	8	25.0%	26.5%	34.2%			
Unknown	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%			
Totals	6	100%	16	100%	32	100%	100%	100%			

According to the most current census data, the assessment area has a population of 135,477 and a median housing value of \$150,257. The owner-occupancy rate in the assessment area equals 52.5%, which is significantly less than the rate for the state of West Virginia (60.8%). The overall family poverty rate within the assessment area (10.8%) is also less than that of the state (13.1%). The Morgantown, WV MSA median family income during 2020 and 2021 equaled \$73,900 and \$76,200, respectively. The following table includes pertinent demographic data for the assessment area.

	2	2021 Morga	ntown, WV	MSA AA De	mographics			
Income Categories	Tract Dis	tribution	Families by	Tract Income		overty Level ilies by Tract	Families l	,
	#	%	#	%	#	%	#	%
Low	1	3.1	15	0.1	9	60.0	6,212	22.1
Moderate	8	25.0	6,349	22.6	1,065	16.8	4,624	16.5
Middle	15	46.9	13,940	49.7	1,342	9.6	6,174	22.0
Upper	8	25.0	7,771	27.7	626	8.1	11,065	39.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	32	100.0	28,075	100.0	3,042	10.8	28,075	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	292	10	0.0	3.4	187	64.0	95	32.5
Moderate	15,141	6,745	21.7	44.5	5,830	38.5	2,566	16.9
Middle	28,578	15,588	50.1	54.5	8,003	28.0	4,987	17.5
Upper	15,216	8,773	28.2	57.7	4,371	28.7	2,072	13.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	59,227	31,116	100.0	52.5	18,391	31.1	9,720	16.4
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Businesses by			by Tract Less Than or = \$1 Million			Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	13	0.3	13	0.3	0	0.0	0	0.0
Moderate	1,163	22.8	1,033	22.3	113	30.1	17	19.1
Middle	2,182	42.8	1,990	42.9	141	37.5	51	57.3
Upper	1,746	34.2	1,603	34.6	122	32.4	21	23.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,104	100.0	4,639	100.0	376	100.0	89	100.0
Perc	centage of Tota	al Businesses:		90.9		7.4		1.7
				Fa	rms by Tract			
	Total Farm	is by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	32	26.7	32	26.7	0	0.0	0	0.0
Middle	70	58.3	70	58.3	0	0.0	0	0.0
Upper	18	15.0	18	15.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	120	100.0	120	100.0	0	0.0	0	0.0
	Percentage of	Total Farms:		100.0		0.0		0.0
Source: 2021 FFIEC Census								-

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

As noted below, employment opportunities at government and private sector, in addition to healthcare, tourism, and retail industries, provide a large portion of area employment for residents. West Virginia University is located in Morgantown and provides a majority of employment opportunities for local residents.

Morgantown	, WV MSA	Employee	s by Indust	try			
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3
Government	14,034	13,371	12,491	13,620	13,526	13,688	12,794
Private Sector							
Private Sector Total, all industries	49,701	43,435	47,124	48,193	47,994	49,053	49,725
Agriculture, forestry, fishing and hunting	41	51	48	49	48	16*	48
Mining, quarrying, and oil and gas extraction	532	469	463	456	534	483*	525
Utilities	507	490	493	506	519	513	505
Construction	2,702	2,557	2,848	2,866	2,791	3,032	3,137
Manufacturing	3,462	3,264	3,328	3,316	3,364	3,330	3,382
Wholesale trade	988	939	961	969	978	1,000	1,046
Retail Trade	6,559	5,646	6,336	6,703	6,455	6,502	6,626
Transportation and warehousing	986	754	922	937	995	1,044	1,026
Information	658	603	599	603	601	621	625
Finance and insurance	898	869	877	874	882	884	878
Real estate and rental and leasing	763	729	686	682	703	730	744
Professional and technical services	2,885	2,599	2,649	2,696	2,781	2,895	2,674*
Management of companies and enterprises	1,143	1,134	1,271	1,304	1,262*	1,123*	1,025*
Administrative and waste services	3,139	2,838	2,998	3,166	2,988*	2,893*	3,130
Educational services	468*	348*	368*	410*	415*	435*	424*
Health care and social assistance	14,524*	13,674*	14,210*	14,340*	14,291*	14,475*	14,609*
Arts, entertainment, and recreation	475	337	557	526	481	584	630
Accommodation and food services	6,363	3,953	5,136	5,400	5,417	5,770	6,012
Other services, except public administration	1,810	1,459	1,625	1,615	1,597	1,712	1,738
Public administration	0	0	0	0	0	0	0
Unclassified	3	3	8	9	34	36	36
Source: Bureau of Labor Statistics(BLS), Quarterly Cen.	sus of Empl	bymentano	fivlages				
"Indicates that some or all of the data for this category w	as suppres	sed for con	fidentiality i	easons			

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Morgantown, WV MSA Unemployment Rates										
Area 2020 2021										
Morgantown, WV MSA	6.42%	4.05%								
Monongalia County, WV	6.21%	3.92%								
Preston County, WV	7.18%	4.51%								
West Virginia 8.15% 5.03%										
Source: Bureau of Labor Statistics (	(BLS), Local Area Unem	ployment Statistics								

Overall, unemployment rates decreased between 2020 and 2021 for the Morgantown, WV MSA. The assessment area's unemployment rates have consistently been lower than that of the state of West Virginia given the greater employment opportunities in the area.

Morgantown, WV MSA Median Family Income Change											
Area	2010 Median Family Income	2015 Median Family Income	<b>Percent Change</b>								
Morgantown, WV MSA	\$61,141	\$63,745	4.26%								
Monongalia County, WV	\$68,567	\$68,981	0.60%								
Preston County, WV	\$50,769	\$54,931	8.20%								
West Virginia	\$53,245	\$52,866	-0.71%								

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, the MSA, as well as the counties within the assessment area denote an increase in median family income amounts from 2010 to 2015. The state of West Virginia notes a slight decrease from 2010 to 2015. As noted below, housing cost burden for low-income renters and owners is equal to or exceeds 30 percent or more of household income for the MSA, counties, and state. While for moderate-income renters the housing cost burden equals 30 percent or more of household income for all localities with the exception of Preston County. Housing cost burden is less than 30 percent or more of household income for moderate-income owners for the assessment area.

Morgantown, WV MSA Housing Cost Burden												
	Co	st Burden - Rente	rs	Co	ost Burden - Owner	rs						
Area	Low Income	ow Income Moderate Income All Renters Low Income Moderate Income A										
Morgantown, WV MSA	73%	35%	44%	43%	17%	12%						
Monongalia County, WV	75%	39%	45%	46%	17%	11%						
Preston County, WV	60%	12%	34%	40%	17%	13%						
West Virginia	64%	36%	37%	47%	20%	14%						

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local economic development/affordable housing official was contacted during the evaluation to assist in evaluating the bank's CRA performance. The contact stated that the mission of the organization is to strategically place charitable resources for optimal use from local residents, fund grant programs, as well as promote economic development by funding programs that specifically promote entrepreneurship and accessibility to new capital for businesses in distressed communities and areas of high unemployment. The contact indicated that the office also funds grants which promote community development, economic wellbeing, and quality of life within the assessment area. To encourage community development the Foundation funds grants which provide decent, safe, and affordable housing through home construction, repair, financing, and education programs. According to the interviewee, since 2019, the organization has provided funding to 11 grants which focused on serving low-income communities and individuals throughout West Virginia. An example of a low-income focused grant included funding a \$40,000 grant to a partner to address economic impacts of COVID-19 in low-income communities. The contact noted that affordable housing is a main concern for many residents within the assessment area, and overall market growth within the area has increased the housing cost burden for low-and-moderate-income residents in recent years. The contact stated that West Virginia University (WVU), as well as the WVU Medicine is the largest health network within West Virginia and includes the Morgantown J. W. Ruby Memorial Hospital. Collectively, these entities drive a large part of the local economy and provide many residents with good, stable paying

jobs and benefits. Conversely, rural communities surrounding the city of Morgantown are forced to find ways to the city for healthcare options. The contact detailed two opportunities for local financial institutions to engage with the local community: access and funding for small business loans, especially in low- and moderate- income areas and education of the ongoing shift in banking technology to a more mobile, internet-based platform. While innovation is necessary, the contact believes that local financial institutions must not overlook the less technologically advanced residents. When asked if local banks interact well with the community, the contact noted that it appears that smaller community banks are serving rural needs well and that no discriminatory acts or practices have been identified.

UB holds a strong deposit market share within the assessment area (2<sup>nd</sup> of 13 banks operating within the assessment area) having 23.3% of all deposits from the June 30, 2022, FDIC deposit market share report. Overall, there is reasonable opportunity for community development loans and investments within the market area. The bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its banking services and products; as noted above, all the bank's services and products are offered in this assessment area, which included six community development loans totaling \$15.6 million, as well as 12 qualified investments totaling \$10.7 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 272 customer's loan interest, which totaled 435 loans to the amount of \$2.1 million. Furthermore, during the pandemic, from this assessment area, the bank waived 661 customer's ATM cash bank fees totaling \$1,322 and increased 22 customer's ATM withdrawal limits.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE MORGANTOWN, WV MSA ASSESSMENT AREA:

The bank's Lending Test performance in the Morgantown, WV MSA assessment area is considered good. Lending levels show good responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution of loans is excellent, and the bank is a leader in making community development loans.

The Investment Test performance is excellent. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs and makes occasional use of community development initiatives.

Under the Service Test, the bank's performance is considered good. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank is a leader in providing community development services.

#### **LENDING TEST**

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of lending activity, geographic and borrower distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. There were no gaps in lending, and the geographic distribution and dispersion of loans is good.

### **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number (5%) exceeds the percentage of branch offices (2.7%) and is similar to the percentage of deposits (5.2%) in the assessment area. Lending by dollar volume (4.2%) is greater than the percentage of branch offices and lower than deposits. As of June 30, 2022, UB ranked 2<sup>nd</sup> out of 13 financial institutions in deposit market share having 23.3% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 9<sup>th</sup> of 215 reporters of mortgage lending with a 3.6% market share and ranked 2<sup>nd</sup> of 69 reporters of small business loans with a 11.7% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered good.

# **Geographic Distribution:**

The bank's geographic distribution performance is considered excellent for HMDA lending and good for small business lending within the assessment area. This assessment area contains one low-income census tract. As such, performance was primarily determined by the bank's level of lending within moderate-income census tracts after considering the low level of demand within the low-income census tract. Given the greater dollar volume of the bank's HMDA lending compared to small business lending and relative strength of HMDA lending performance, UB's geographic distribution performance is considered excellent overall.

				Assessm		_	age Leno organto	_	•			8	r )
				Ban	k And Ag	gregate	Loans By Y	ear					
Geographic									20:	21			Owner Occupied
Income Level	Bank		Agg	Bank		Agg	Bank	Ĭ	Agg	Bank	Ĭ	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	1			1	Hon	e Purch	ase Loans			1			T
Low	1	1.3	0.1	174	1.0	0.0	0	0.0	0.2	0	0.0	0.1	0.0
Moderate	15	18.8	13.9	2,528	14.7	9.8	14	23.0	15.6	2,308	15.6	10.9	21.
Middle	24	30.0	40.6	4,860	28.2	36.4	22	36.1	40.4	4,566	30.9	38.3	50.
Upper	40	50.0	45.5	9,683	56.1	53.8	25	41.0	43.9	7,882	53.4	50.7	28.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	80	100.0	100.0	17,245	100.0	100.0	61	100.0	100.0	14,756	100.0	100.0	100.0
	, ,				F	Refinance	Loans						T
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.0
Moderate	12	12.5	10.9	1,823	8.0	7.9	24	27.3	13.8	4,031	21.8	9.6	21.7
Middle	31	32.3	45.1	6,541	28.6	41.4	23	26.1	44.0	4,740	25.6	41.7	50.
Upper	53	55.2	44.0	14,484	63.4	50.7	41	46.6	42.1	9,721	52.6	48.6	28.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	96	100.0	100.0	22,848	100.0	100.0	88	100.0	100.0	18,492	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	0.0	0	0.0	0.0	1	7.7	0.7	152	14.4	1.0	0.0
Moderate	0	0.0	9.6	0	0.0	11.	1 1	7.7	12.8	59	5.6	9.3	21.7
Middle	6	60.0	50.4	198	40.8	35.6	5	38.5	44.7	469	44.5	43.3	50.
Upper	4	40.0	40.0	287	59.2	53.3	6	46.2	41.8	375	35.5	46.4	28.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	485	100.0	100.0	13	100.0	100.0	1,055	100.0	100.0	100.0
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	2.0	0	0.0	2.7	0	0.0	2.0	0	0.0	0.3	1.0
Moderate	3	100.0	34.7	1,488	100.0	33.4	7	53.8	28.6	6,906	31.0	18.3	31.5
Middle	0	0.0	30.6	0	0.0	14.4	4	30.8	49.0	13,786	61.9	60.5	36.8
Upper	0	0.0	32.7	0	0.0	49.6	2	15.4	20.4	1,582	7.1	20.9	30.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	1,488	100.0	100.0	13	100.0	100.0	22,274	100.0	100.0	100.0
							gage Loans						Owner Occupied Units %
Low	1	0.5	0.0	174	0.4	0.3	1	0.5	0.2	152	0.3	0.1	0.0
Moderate	34	16.2	12.5	6,485	14.6	11.8	46	24.7	14.8	13,304	23.2	10.8	21.7
Middle	65	31.0	43.3	11,780	26.5	36.4	57	30.6	42.4	23,701	41.3	41.	50.
Upper	110	52.4	44.2	26,021	58.5	51.5	82	44.1	42.7	20,224	35.2	47.9	28.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	210	100.0	100.0	44,460	100.0	100.0	186	100.0	100.0	57,381	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

In both 2020 and 2021, refinance loans were the leading HMDA product by number followed by home purchase loans. Home improvement and multifamily lending were not significant factors in the analysis due to limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for refinance lending in 2020 is considered good and in 2021 it is considered excellent. For home purchase lending, UB's performance is considered in both years.

As reflected in the preceding table, UB's percentage of 2020 HMDA lending in the low-income census tract (.5%) exceeded the aggregate lending level (0%) as well as the percentage of owner-occupied housing units located in such tracts (0%); there are only ten owner-occupied housing units located in such tracts. The bank's level of lending in moderate-income census tracts (16.2%) exceeded the level of aggregate lending in such tracts (12.5%), but was lower than the owner-occupied housing units located in moderate-income census tracts (21.7%). Overall, the bank's 2020 performance is considered excellent, and its performance in 2021 is substantially similar.

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Morgantown, WV MSA												
Geographic	Bank And Aggregate Loans By Year Seographic 2020 2021												Total
Income	Ban	k	Agg	20 Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	0.3
Moderate	87	21.6	22.7	8,188	22.8	23.7	74	24.1	21.2	9,600	33.0	25.5	22.8
Middle	144	35.7	42.7	12,866	35.8	41.8	115	37.5	42.9	10,335	35.5	41.0	42.8
Upper	172	42.7	34.1	14,917	41.5	34.2	118	38.4	35.1	9,172	31.5	33.4	34.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.5	0	0.0	0.1	0	0.0	0.6	0	0.0	0.1	
Total	403	100.0	100.0	35,971	100.0	100.0	307	100.0	100.0	29,107	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank did not originate any small business loans in low-income census tracts during 2020, given the low demand of small business lending; there are only 14 small businesses located in low-income census tracts. UB's level of lending in moderate-income census tracts (21.6%) is similar to the aggregate lending level (22.7%) and the percentage of businesses located in such tracts (23.1%). Overall, the bank's small business lending performance during 2020 is considered good, and its performance during 2021 is substantially similar.

#### **Distribution by Borrower Income and Revenue Size of the Business:**

UB's distribution by borrower income and small business revenue performance is considered good for both HMDA lending and small business lending within the assessment area.

	Distribu	tion o	f 2020	and 2021	1 Hor	ie Moi	rtgage Le	ending	g By Bo	orrower	Incom	e Lev	el
				Assessm	ent A	rea: M	organto	wn, W	V MS	A			
				Ban	k And A	ggregate	Loans By Y	ear					
Borrower			2020						20:				Families by
Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hon	ne Purch	ase Loans						
Low	4	5.0	4.4	557	3.2	2.2	3	4.9	6.2	452	3.1	3.0	22
Moderate	15	18.8	20.1	2,497	14.5	13.8	15	24.6	18.9	2,828	19.2	13.7	16.
Middle	12	15.0	20.7	2,075	12.0	17.3	7	11.5	19.5	1,715	11.6	16.7	22.0
Upper	37	46.3	45.9	9,662	56.0	58.2	26	42.6	42.9	8,035	54.5	54.3	39.4
Unknown	12	15.0	8.9	2,454	14.2	8.6	10	16.4	12.5	1,726	11.7	12.4	0.0
Total	80	100.0	100.0	17,245	100.0	100.0	61	100.0	100.0	14,756	100.0	100.0	100.
		,				Refinanc	e Loans	,		·			
Low	7	7.3	3.0	600	2.6	1.2	4	4.5	5.3	389	2.1	2.5	22.
Moderate	10	10.4	10.2	1,744	7.6	6.3	10	11.4	12.6	1,009	5.5	8.0	16.
Middle	12	12.5	18.2	2,055	9.0	14.0	17	19.3	20.4	2,996	16.2	16.2	22.0
Upper	60	62.5	55.2	17,036	74.6	65.2	38	43.2	46.4	9,580	51.8	56.8	39.4
Unknown	7	7.3	13.4	1,413	6.2	13.3	19	21.6	15.3	4,518	24.4	16.5	0.0
Total	96	100.0	100.0	22,848	100.0	100.0	88	100.0	100.0	18,492	100.0	100.0	100.
					Home	Improve	ment Loans						
Low	1	10.0	7.2	17	3.5	6.3	1	7.7	7.8	59	5.6	5.2	22.
Moderate	0	0.0	13.6	0	0.0	13.	3	23.1	12.8	105	10.0	8.2	16.
Middle	2	20.0	16.0	94	19.4	16.5	0	0.0	13.5	0	0.0	12.4	22.0
Upper	4	40.0	58.4	217	44.7	56.8	7	53.8	62.4	580	55.0	70.3	39.4
Unknown	3	30.0	4.8	157	32.4	7.3	2	15.4	3.5	311	29.5	3.8	0.0
Total	10	100.0	100.0	485	100.0	100.0	13	100.0	100.0	1,055	100.0	100.0	100.
					Total H	ome Mor	tgage Loans	5		•			
Low	12	5.8	3.7	1,174	2.7	1.7	9	5.2	5.8	950	2.7	2.8	22.
Moderate	25	12.1	14.4	4,241	9.9	9.6	28	16.2	15.5	3,942	11.2	10.9	16.
Middle	33	15.9	19.1	4,602	10.7	15.4	27	15.6	19.6	4,851	13.8	16.3	22.
Upper	114	55.1	51.0	28,889	67.2	61.9	78	45.1	45.5	18,809	53.6	55.8	39.
Unknown	23	11.	1 11.7	4,066	9.5	11.	31	17.9	13.6	6,555	18.7	14.2	0.0
Total	207	100.0	100.0	42,972	100.0	100.0	173	100.0	100.0	35,107	100.0	100.0	100.

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, the bank's level of lending to low-income borrowers (5.8%) was greater than the percentage of aggregate lending levels to such borrowers, but lower than the percentage of low-income families within the assessment area (3.7% and 22.1%, respectively). Conversely, UB's lending to moderate-income borrowers (12.1%) is similar to the percentage of aggregate lending levels (14.4%) and lower than the percentage of moderate-income families (16.5%). Overall, the bank's performance during 2020 is considered good, and its performance during 2021 is substantially similar.

Note:

Percentages may not total 100.0 percent due to rounding

Distrib	Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses												
Assessment Area: Morgantown, WV MSA													
				Bank	And A	ggreg	ate Loai	ns By Y	(ear				T-1-1
<u> </u>			20	20					20				Total Businesses
<u> </u>	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	<b>\$</b> %	\$%	
-					By F	Revenu	1e						
\$1 Million or Less	48	11.9	27.8	4,813	13.4	22.0	89	29.0	45.0	8,647	29.7	31.1	90.9
Over \$1 Million	24	6.0		5,193	14.4		56	18.2		11,699	40.2		7.4
Revenue Unknown	331	82.1		25,965	72.2		162	52.8		8,761	30.1		1.7
Total	403	100.0		35,971	100.0		307	100.0		29,107	100.0		100.0
By Loan Size													
\$100,000 or Less	320	79.4	87.6	9,870	27.4	33.2	234	76.2	90.4	7,280	25.0	35.6	
\$100,001 - \$250,000	42	10.4	6.8	6,790	18.9	19.3	44	14.3	5.8	7,719	26.5	22.3	
\$250,001 - \$1 Million	41	10.2	5.6	19,311	53.7	47.6	29	9.4	3.8	14,108	48.5	42.2	
Total	403	100.0	100.0	35,971	100.0	100.0	307	100.0	100.0	29,107	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	36	75.0		1,370	28.5		74	83.1		2,892	33.4		
\$100,001 - \$250,000	7	14.6		1,250	26.0		9	10.1		1,714	19.8		
\$250,001 - \$1 Million	5	10.4		2,193	45.6		6	6.7		4,041	46.7		
Total	48	100.0		4,813	100.0		89	100.0		8,647	100.0		
2021 Dun & B													

D&B data from 2020, indicates that 90.7% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 82.1% involved loans for which revenues were unknown and 11.9% were to businesses with revenues of \$1 million or less. However, 66.7% of the bank's loans where revenue was known (48 of 72 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 27.8% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 90.9% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 29% were to businesses with revenues of \$1 million or less, and 52.8% involved loans for which revenues were unknown. However, 61.4% of the bank's loans where revenue was known (89 of 145 loans) were to businesses with revenues of \$1 million or less. This level of lending is greater than the 2021 aggregate lending level of 45%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

# PPP Loans with no reported revenue

Morgantown, WV MSA 2020						
By Loan Size	#	%	\$(000s)	%		
\$100,000 or less	268	83.0%	7,745	31.9%		
\$100,001 - \$250,000	30	9.3%	4,725	19.5%		
\$250,001 - \$1 Million	25	7.7%	11,784	48.6%		
Over \$1 Million	0	0.0%	0	0.0%		
Total	323	100.0%	24,254	100.0%		

During 2020, 79.4% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 87.6% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 83% had loan amounts of \$100,000 or less.

Morgantown, WV MSA 2021						
By Loan Size	#	%	\$(000s)	%		
\$100,000 or less	134	88.2%	3,120	39.8%		
\$100,001 - \$250,000	12	7.9%	2,081	26.5%		
\$250,001 - \$1 Million	6	3.9%	2,644	33.7%		
Over \$1 Million	0	0.0%	0	0.0%		
Total	152	100.0%	7,845	100.0%		

During 2021, 76.2% of the small business loans reported were \$100,000 and less, and the aggregate reported 90.4% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 88.2% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

## **Community Development Lending:**

As previously discussed, opportunities for community development lending are reasonably available within the Morgantown, WV MSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period the bank was a leader in making community development loans within this market. Six community development loans totaling \$15.6 million were originated within the assessment area during the evaluation period. Three of the loans provided funding for organizations whose purpose primarily promotes revitalization/stabilization efforts in the assessment area, while three loans were to an organization providing social services to low- and moderate-income residents. In addition, UB originated two loans totaling \$3 million as a part of the PPP within this assessment area.

#### INVESTMENT TEST

Overall, the bank has an excellent level of qualified community development investments and donations, which exhibit excellent responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the institution maintained 12 qualified investments totaling \$10.7 million that directly benefit the Morgantown, WV MSA assessment area for the evaluation period and holds an additional \$1.4 million in committed funding.

The bank has an excellent level of qualified investments. During the evaluation period, the bank made investments that support affordable housing and economic development. These investments demonstrate excellent responsiveness to the affordable housing needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$82,290. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that revitalize or stabilize low- and moderate-income geographies, and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the assessment area						
United Bank	#	\$				
Affordable Housing	1	500				
Community Service	35	75,550				
Economic	0	0				
Revitalize or Stabilize	5	6,240				
Total	41	82,290				

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

UB's performance under the service test in this assessment area is considered good. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low and moderate-income areas. No branch changes have occurred since the previous evaluation. Changes in branch locations have not adversely affected the accessibility of delivery systems, particularly to low-and-moderate-income areas or individuals. Business hours and services do not vary in a way that inconveniences the needs of its assessment area, particularly low- and-moderate-income geographies and individuals. In addition, the bank is a leader in providing community development services.

### **Retail Services:**

Delivery systems and branch locations are readily accessible to geographies and individuals of different income levels within the assessment area. Alternative delivery systems are available through 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the institution.

The bank operates six full-service branch offices within the market, none of which are located in low-income census tracts, and two (33.3%) of are located in moderate-income census tracts. The distribution of branches is excellent when considering that .4% and 25.4% of the assessment area's households are in low- and moderate-income areas according to the 2015 census. The assessment area has one low-income census tract and West Virginia University is located within the tract. A peer bank of UB has an exclusive branching agreement with the university. Branch locations and business hours do not vary in a way that inconveniences the needs of the assessment area. No branches have been opened or closed since the previous evaluation.

# **Community Development Services:**

The bank is a leader in providing qualified community development services in the assessment area. Ninety-eight bank employees provided 2,108 hours of community development services during the evaluation period for approximately 29 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as affordable housing, health care, food, financial services, and financial education which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area				
	#			
Affordable Housing	1			
Community Services	27			
Economic Development	0			
Revitalize or Stabilize	1			
Total	29			

## METROPOLITAN AREAS LIMITED REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE PARKERSBURG-VIENNA, WV ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Parkersburg-Vienna, WV assessment area. The bank's lending performance in this assessment area is below the statewide performance, and is adequate overall. UB's investment and service performances in this assessment area are consistent with the statewide performance levels.

This assessment area consists of Wood County in West Virginia. In 2021, the assessment area included five moderate-income, 15 middle-income, and six upper-income census tracts. According to the most current census data, the population of the assessment area is 86,559.

The bank operates four branch offices in the assessment area, all of which are located in middle-income census tracts. This assessment area contains 1.8% of the institution's branches and included 3.2% of their deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area based on 2015 ACS data.

Assessment Area Demographics – Parkersburg-Vienna, WV Assessment Area							
	Tract Dis	Tract Distribution   Percenta   Familia		Percentage of Families by			
Income Category	#	%	Tract	Income Level			
Low Income	0	0.0	0.0	20.5			
Moderate Income	5	19.2	9.0	17.1			
Middle Income	15	57.7	68.6	20.3			
Upper Income	6	23.1	22.4	42.1			
Total	26	100.0	100.0	100.0			

The following table shows the bank's HMDA and small business lending activity in the assessment area during the evaluation period.

Lending Activity in the Parkersburg-Vienna, WV Assessment Area							
Loan Type	2020	2021	Total				
HMDA	89	82	171				
Small Business	302	258	560				
Total	381	340	731				

As a percentage by number and dollar, respectively, the Parkersburg-Vienna, WV assessment area accounts for 3.3% and 2.2% of the bank's overall lending during the evaluation period, and 15.4% and 14.1% of the bank's lending by number and dollar volume in the West Virginia assessment areas, respectively. In 2020, the bank ranked ninth out of 128 HMDA reporters, with 3.9% of the area's total HMDA volume. UB also ranked ninth in 2021 out of 134 reporters, with 3.2% of the area's HMDA lending. In 2020, the bank ranked first out of 47 institutions reporting small business loans in the assessment area, and in 2021 it ranked first out of 48 reporters. The bank extended 22.8% of small business loans reported by the aggregate in the assessment area in 2020 and 18.6% in 2021.

Within this limited scope assessment area, the bank extended four community development loans totaling \$7.7 million for the benefit of social services to low-and-moderate-income residents, and it originated two PPP loans totaling \$3.2 million.

Qualified investments for this limited scope assessment area amount to \$6.8 million and the bank has also committed \$4.7 million which is not yet funded. Qualified donations in the assessment area equal \$675,795, and the bank had 20 qualified community development services during the evaluation period.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BECKLEY, WV MSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance was conducted in the Beckley, WV MSA assessment area. UB's lending, investment, and service performances in this assessment area are consistent with the statewide performance conclusions.

This assessment area consists of Fayette and Raleigh Counties. In 2021, the assessment area included three moderate-income, 23 middle-income, and three upper-income census tracts. According to the most current census data, the population of the assessment area is 124,027.

The bank operates six branch offices in the assessment area. One of the branches is located in a moderate-income tract, and five are in middle-income tracts. This assessment area contains 2.7% of the institution's branches and 2.1% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area based on 2015 ACS data.

Assessment Area Demographics – Beckley, WV MSA Assessment Area							
	Tract Distribution		Percentage of Families by	Percentage of Families by			
Income Category	#	%	Tract	Income Level			
Low Income	0	0.0	0.0	20.7			
Moderate Income	3	10.3	8.6	18.1			
Middle Income	23	79.3	80.8	20.7			
Upper Income	3	10.3	10.6	40.5			
Total	29	100.0	100.0	100.0			

The following table shows the bank's HMDA and small business lending activity in the assessment area during the evaluation period.

Lending Activity in the Beckley, WV MSA Assessment Area								
Loan Type	2020	2021	Total					
HMDA	79	49	128					
Small Business	199	100	299					
Total	278	149	427					

As a percentage by number and dollar, respectively, the Beckley, WV MSA assessment area accounts for 1.9% and 1.2% of the bank's overall lending and 9% and 7.8% of its lending in the West Virginia assessment areas. In 2020, the bank ranked ninth out of 126 HMDA reporters with 3.3% of the area's total HMDA volume. UB ranked 15th in 2021 out of 141 reporters with 1.9% of the area's HMDA lending. In 2020, the bank ranked third out of 63 institutions reporting small business loans in the assessment area, and in 2021 it ranked seventh out of 66 reporters. The bank extended 10.5% of small business loans reported by the aggregate in the assessment area in 2020 and 5.4% in 2021. Within this limited scope assessment area, the bank extended five community development loan totaling \$6.7 million, four of which were PPP loans and the remaining loan was for affordable housing needs.

Qualified investments in the assessment area amount to \$2.7 million, and UB has committed another \$5.9 million in qualified investments that has not yet been funded. The bank made qualified donations totaling \$17,030 and had 16 qualified community development service activities.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WEIRTON-STEUBENVILLE, WV MSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Weirton-Steubenville, WV MSA assessment area was conducted and the bank's lending, investment, and service performances in this assessment area are below the bank's statewide performance levels.

The assessment area includes all of Brooke and Hancock Counties in West Virginia and Jefferson County, Ohio. The bank no longer delineates Jefferson County, Ohio within this assessment area. During 2021, it consists of Brooke and Hancock Counites, West Virginia. The current assessment area includes one moderate-income, 11 middle-income, and two upper-income census tracts. According to the most current census data, the population of the assessment area is 121,919 during 2020 and 53,866 during 2021, respectively.

The bank operates two branch offices in the assessment area, and both are located in middle-income census tracts. This assessment area contains 0.9% of the institution's branches and 0.6% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area during 2021 and the 2020 data is included in the combined demographic charts, based on 2015 ACS data.

Assessment Area Demographics – Weirton-Steubenville, WV MSA Assessment Area							
	Tract Distribution		Tract Distribution		Percentage of Families by	Percentage of Families by	
Income Category	#	%	Tract	Income Level			
Low Income	0	0.0	0.0	17.8			
Moderate Income	1	7.1	5.4	18.8			
Middle Income	11	78.6	78.7	21.5			
Upper Income	2	14.3	15.8	41.9			
Total	14	100.0	100.0	100.0			

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Weirton-Steubenville, WV MSA Assessment Area							
Loan Type	2020	2021	Total				
HMDA	14	13	27				
Small Business	46	25	71				
Total	17	31	98				

As a percentage by number and dollar, respectively, the Weirton-Steubenville, WV MSA assessment area accounts for 0.5% and 0.1% of the bank's overall lending during the evaluation period and 2.1% and 0.9% of the bank's lending in the West Virginia assessment areas. In 2020, the bank ranked 24<sup>th</sup> out of 144 HMDA reporters with 0.4% of the area's total HMDA volume. UB ranked 18<sup>th</sup> in 2021 out of 106 reporters with 0.9% of the area's HMDA lending. In 2020, the bank ranked 9<sup>th</sup> out of 73 institutions reporting small business loans in the assessment area, and in 2021 it ranked 6<sup>th</sup> out of 52 reporters. The bank extended 2.9% of small business loans reported by the aggregate in the assessment area in 2020 and 4.2% in 2021.

There were no community development loans or donations in the assessment area, and the bank held a qualified investment for \$282,087 and had one qualified community development service during the evaluation period.

#### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in Appendix C of this evaluation. Conclusions regarding performance, which did not impact the state of West Virginia's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	<b>Lending Test</b>	<b>Investment Test</b>	Service Test
Parkersburg-Vienna, WV	Below	Consistent	Consistent
Beckley, WV MSA	Consistent	Consistent	Consistent
Weirton-Steubenville, WV MSA	Below	Below	Below

# NONMETROPOLITAN STATEWIDE AREA LIMITED REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE BRAXTON, WV NONMSA ASSESSMENT AREA

A limited scope review was made in the Braxton, WV NonMSA assessment area. The bank's lending performance in the assessment area was below the bank's statewide performance while its investment and service performances were consistent with the statewide performance levels.

This assessment area consists of Braxton, Gilmer, Harrison, Lewis, Nicholas, Ritchie, and Webster Counties. The assessment area includes six moderate-income, 28 middle-income, and 11 upper-income census tracts. According to the most current census data, the population of the assessment area is 153,539.

The bank operates five branch offices in the assessment area. One branch is located in a moderate-income tract, three are in middle-income tracts, and one in an upper-income tract. This assessment area contains 2.3% of the institution's branches and 1.6% of the deposits from the June 30, 2022, FDIC summary of deposits report. During 2020, 18 distressed middle-income census tracts (all 18 are distressed due to high rates of unemployment and six of the 18 are additionally distressed due to high rates of poverty) were located in the assessment area. Furthermore, nine of the 18 are also considered underserved. During 2021, nine underserved middle-income tracts are contained within this assessment area, and three of those underserved tracts are considered distressed due to high rates of poverty. The following table provides information regarding the demographic characteristics of the assessment area based on 2015 ACS data.

Assessment Area Demographics – Braxton, WV NonMSA Assessment Area											
	Tra Distrib		Percentage of Families	Percentage of Families by							
Income Category	#	%	by Tract	Income Level							
Low Income	0	0.0	0.0	20.4							
Moderate Income	6	13.3	11.1	15.8							
Middle Income	28	62.2	62.1	20.3							
Upper Income	11	24.5	26.8	43.5							
Total	45	100.0	100.0	100.0							

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Braxton, WV NonMSA Assessment										
Area										
Loan Type	2020	2021	Total							
HMDA	51	50	101							
Small	150	114	264							
Business										
Total	201	164	365							

By number and dollar volume respectively, the Braxton, WV NonMSA assessment area accounts for 1.7% and 0.8% of the bank's overall lending during the evaluation period and 7.8% and 5.2% of the bank's lending in West Virginia. In 2020, the bank ranked 16<sup>th</sup> out of 151 HMDA reporters with 1.7% of the area's total HMDA volume. UB ranked 18<sup>th</sup> in 2021 out of 178 reporters with 1.6% of the area's HMDA lending. In 2020, the bank ranked sixth out of 70 institutions reporting small business loans in the assessment area, and in 2021 it ranked ninth out of 74 reporters. The bank extended 6.5% of small business loans reported by the aggregate in the assessment area in 2020 and 4.7% in 2021.

The bank made one community development loan (a PPP loan) for \$2 million. Qualified investments for this limited scope assessment area amount to \$2.5 million and UB has an additional commitment of \$5.4 million which has not yet been funded. The bank made qualified donations totaling \$20,550 and had 29 community development service activities during the evaluation period.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS

Facts and data reviewed for this assessment area, including performance and demographic information, can be found in Appendix C of this evaluation. Conclusions regarding performance, which did not impact the state of West Virginia's overall rating, are included in the following table. For each test, the conclusion conveys whether performance in the assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	Lending Test	<b>Investment Test</b>	Service Test
Braxton, WV NonMSA	Below	Consistent	Consistent

### STATE OF NORTH CAROLINA

# CRA RATING FOR NORTH CAROLINA<sup>6</sup>: Satisfactory

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>High Satisfactory</u>
The Service Test is rated: High Satisfactory

Major factors supporting the rating include:

• Lending activity is considered adequate for the state of North Carolina.

- While performance varies by year, product, and market area, the geographic distribution is considered excellent overall and the borrower lending distribution is considered good overall.
- The bank exhibits a good record of serving the credit needs of low-income individuals and areas as well as very small businesses.
- The bank makes use of flexible lending practices in serving the credit needs of the assessment areas. A summary of each of the bank's innovative and/or flexible products is included in the *Institution, Conclusions with Respect to Performance* section at the beginning of this document.
- UB provided an adequate level of community development loans in North Carolina.
- Qualified community development investment activity within the state is significant in the state Additionally, the bank makes occasional use of innovative and/or complex investments within the state. UB exhibits good responsiveness to credit and community development needs within North Carolina.
- Delivery systems and branch locations are readily accessible to all segments of the assessment areas. Retail banking services do not vary in a way that inconveniences the bank's assessment areas, particularly low- and moderate-income areas and people.
- Branch closures have not adversely affected the accessibility of its delivery systems, particularly to low- and moderate-income people and areas.
- Within its market areas in North Carolina the bank has provided a relatively high level of community development services.

#### SCOPE OF EXAMINATION

Reported HMDA and small hus

Reported HMDA and small business loans from calendar years 2020 and 2021 were analyzed to determine the geographic and borrower distribution of the bank's lending. Community development loans made during this period, and community development services provided during the review period, were considered. All qualified investments extended during the review period or outstanding as of the evaluation date, regardless of when made, were also considered.

When excluding activity in the multistate assessment areas, the North Carolina assessment areas account for 13.5%, 15.4%, and 6.6% of the institution's overall lending, branches, and deposit volume, respectively. Within the state of North Carolina, the Fayetteville-Sanford-Lumberton, NC, Greenville-Kinston-Washington, NC CSA, Raleigh-Durham-Cary, NC, and Wilmington, NC MSA assessment

<sup>&</sup>lt;sup>6</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

areas account for 51.9% of lending, 47.1% of branches, and 43.2% of deposits within the state. Performance in the state was evaluated by applying the full-scope interagency examination procedures to these four markets. All other assessment areas within the state were reviewed using limited scope interagency examination procedures.

To arrive at an overall state rating, the full-scope assessment areas were generally weighted based on the dollar volume of lending as well as the percentage of loans originated within the market. The greatest weight was given to the Greenville-Kinston-Washington, NC CSA assessment area, as it accounted for 13.6% of loans by dollar volume and 17.7% of the number of loans evaluated within the state. For the remaining assessment areas subject to limited review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN NORTH CAROLINA

The institution operates 34 full-service branch offices throughout the statewide assessment areas. Two (5.9%) offices are located in low-income census tracts and six (17.7%) are located in moderate-income areas. These 34 branch offices account for approximately \$1.5 billion of the bank's total deposit base from the June 30, 2022, FDIC deposit market share report.

Based on 2015 census data, the North Carolina assessment areas served by the bank have a total population of 3.5 million, including 886,290 families. A majority of the families continue to be middle-and upper-income (60.6%), while low- and moderate-income families each comprise 22.1% and 17.3% of the total, respectively. Within these assessment areas, the owner-occupancy rate is 53.7%, which is similar to the rate for the entire state of North Carolina (55.7%). The poverty rate of the assessment areas served by the bank is 12.8% of families, which equals that of the entire state. The 2020 median family incomes within the MSAs range from \$54,100 (Goldsboro, NC MSA) to \$79,900 (Durham-Chapel Hill, NC MSA), while the median family income for nonmetropolitan areas of North Carolina equals \$53,700. The 2021 median family incomes within the MSAs range from \$50,500 (Goldsboro, NC MSA) to \$81,500 (Durham-Chapel Hill, NC MSA), while the median family income for nonmetropolitan areas of North Carolina equals \$55,300. There are underserved and/or distressed middle-income census tracts within the state of North Carolina's assessment areas and they are discussed withing those specific areas.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NORTH CAROLINA

The bank's Lending Test performance in the state of North Carolina is considered high satisfactory. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans is good, and the geographic distribution is excellent. The bank makes an adequate level of qualified community development loans.

The Investment Test performance is high satisfactory. The bank's level of qualified investment securities and community development investment donations is significant. The bank exhibits good responsiveness to credit and community development needs and makes occasional use of community development initiatives.

Under the Service Test, the bank's performance is considered high satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank has provided a relatively high level of qualified community development services.

#### LENDING TEST

Overall, the statewide lending test is rated high satisfactory. As previously mentioned, conclusions of the lending test for North Carolina were based upon the performance within the four full-scope assessment areas which each received the same overall lending, investment, and service test ratings. Lending activity is considered adequate and is measured primarily by the proportion of lending in the bank's markets. The borrower distribution of loans is considered good, while the geographic distribution of loans is considered excellent. The bank originated an adequate level of community development loans and has provided adequate lending activity and good responsiveness to credit needs of the communities including low-income individuals and very small businesses.

## **Lending Activity:**

UB's HMDA and small business lending within the North Carolina assessment areas, as measured by number of loans (13.5%) and dollar volume (9.8%) are less than the percentage of branch offices (15.4%), but exceed the percentage of deposits (6.6%) in the assessment areas. As of June 30, 2022, the institution ranked 13<sup>th</sup> out of 51 financial institutions in deposit market share with 1.2% of the state of North Carolina's assessment areas' available FDIC insured deposits (credit union deposits are not included). When compared to 2020 aggregate data, the institution ranked 104<sup>th</sup> of 893 reporters of mortgage lending with a .1% market share and ranked 21<sup>st</sup> of 257 reporters of small business loans with a 1.3% market share. When compared to 2021 aggregate data, the institution ranked 85<sup>th</sup> of 974 reporters of mortgage lending with a .2% market share and ranked 21<sup>st</sup> of 226 reporters of small business loans with a 1% market share. All market share rankings consider originated and purchased loans. Overall, lending activity is considered adequate.

To help address the housing burden in North Carolina, during 2020, 2021, and year to date 2022, UB has helped 21 customers totaling \$1.9 million obtain funds through the North Carolina Homeowners Assistance Fund to assist with the purchase of a mortgage.

# Geographic and Borrower Distribution:

Overall, UB's geographic distribution is considered excellent, while the borrower distribution of lending is considered good. When reaching overall conclusions, the level of performance for each product is typically weighted by the dollar volume of each product by year and overall. Within the markets reviewed, small business loans generally were the largest product by dollar volume followed by HMDA loans. Therefore, in most instances, small business lending performance received the greatest weight.

### **Community Development Loans:**

The bank made an adequate level of qualified community development loans. During the evaluation period, UB funded or renewed 21 community development loans totaling \$27.2 million in North Carolina. The loans helped to address a variety of needs including job creation, workforce development, affordable housing, and social services targeted to low- and moderate-income residents. The bank also originated two loans totaling \$2.8 million as a part of the PPP throughout the state. Local lending opportunities are reasonably available when considering competition, bank size, economic conditions, and other area relevant factors. The institution faces no lending constraints relative to its size and business strategy.

#### INVESTMENT TEST

UB's investment test performance in the State of North Carolina is high satisfactory. The bank has a significant level of qualified community development investments and grants. In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives and exhibits good responsiveness to credit and CD needs. The bank holds 18 allocations from 120 qualified investments totaling \$11.3 million throughout the state. Additionally, 75 charitable donations totaling approximately \$245,867 were made during the review period to organizations providing community development programs, affordable housing, revitalization and/or stabilization, and economic development throughout North Carolina. In addition to the previously mentioned qualified investments benefitting the statewide and regional areas, investments specific to the State of North Carolina include:

- \$10 million in 13 SBIC investments which invest in small businesses throughout regional and statewide presence.
- \$1 million in an equity investment throughout North Carolina, where the proceeds are used to help small businesses, social service non-profits, and small farms grow operations.

## **SERVICE TEST**

The institution's statewide rating under the service test is high satisfactory. During the review period, two branch office closures within the state of North Carolina were noted, of which none were located in either a low- or moderate-income census tract. Overall, these branch office changes did not adversely affect the bank's branch footprint. Products and services offered within North Carolina markets evaluated using the full-scope procedures are representative of those offered by the institution overall. In addition, business hours and services do not vary in a way that inconveniences the needs of its assessment areas. Delivery systems are readily accessible to all portions of the bank's assessment areas and to people of varying income levels.

When taking into consideration performance context and UB's peers, the institution and its employees have provided a relatively high level of services in the provision of community development services. The pandemic's effect on staff to perform service activities was also considered as an aspect of performance context when evaluating the assessment areas. Activities include participation in 70 organizations that provide economic development, affordable housing, revitalization and/or stabilization, and other community services to low- and moderate-income residents. Examples of community development services that were consistent across the State of North Carolina include Washington Housing Authority, Habitat for Humanity, Boys & Girls Club, Downtown Ayden, and Center for Economic Empowerment and Development (CEED).

# METROPOLITAN AREA FULL-SCOPE REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE FAYETTEVILLE-SANFORD-LUMBERTON, NC ASSESSMENT AREA

All of the bank's products and services are available within the four branch offices that UB operates within the Fayetteville-Sanford-Lumberton, NC assessment area, which includes census tracts from the Fayetteville, NC MSA and the Lumberton, NC micro-area. The assessment area includes all of Cumberland and Robeson Counties, North Carolina. The complete composition of the assessment area is detailed in Appendix E. Additionally, four ATMs are located within the census tracts the bank serves.

Tuest						DEM(	OGRAPHICS	
Tract Income	Bra	nches	A	ATMS		s Tracts	Households	Total
Levels						3 114013	Trousenoids	Businesses
Levels	#	%	#	%	% # %		%	%
Low	0	0.0%	0	0.0%	4	4.0%	2.8%	4.1%
Moderate	1	25.0%	1	25.0%	31	31.3%	24.7%	24.2%
Middle	2	50.0%	2	50.0%	50	50.5%	60.0%	54.7%
Upper	1	25.0%	1	25.0%	10	10.1%	12.5%	16.9%
Unknown	0	0.0%	0	0.0%	4	4.0%	0.0%	0.1%
Totals	4	100%	4	100%	99 100%		100%	100%

According to the most current census data, the assessment area has a population of 459,474 and a median housing value of \$111,346. The owner-occupancy rate in the assessment area equals 48%, which is significantly less than the rate for the state of North Carolina (55.7%). The overall family poverty rate within the assessment area (17.6%) is higher than that of the state (12.8%). The Fayetteville, NC MSA median family income during 2020 and 2021 equaled \$57,800 and \$58,800, respectively. During 2020 and 2021, 12 distressed (due to poverty) middle-income census tracts are contained within this assessment area. All of the middle-income tracts are located in Robeson County. The following table includes pertinent demographic data for the assessment area.

	2021 Fa	yetteville-S	anford-Lum	berton, NC	AA Demogr	aphics			
Income Categories	Tract Dis	stribution	Families by	Tract Income		overty Level ilies by Tract	Families l	oy Family ome	
	#	%	#	%	#	%	#	%	
Low	4	4.0	2,637	2.3	1,235	46.8	27,801	24.7	
Moderate	31	31.3	27,352	24.3	6,858	25.1	20,297	18.0	
Middle	50	50.5	66,820	59.4	10,533	15.8	21,498	19.1	
Upper	10	10.1	15,746	14.0	1,132	7.2	42,959	38.2	
Unknown	4	4.0	0	0.0	0	0.0	0	0.0	
Total AA	99	100.0	112,555	100.0	19,758	17.6	112,555	100.0	
	Housing			Hous	sing Type by	Γract			
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	5,631	1,305	1.4	23.2	3,440	61.1	886	15.7	
Moderate	48,953	20,273	21.7	41.4	21,257	43.4	7,423	15.2	
Middle	116,308	55,706	59.7	47.9	45,333	39.0	15,269	13.1	
Upper	23,681	16,095	17.2	68.0	5,007	21.1	2,579	10.9	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	194,573	93,379	100.0	48.0	75,037	38.6	26,157	13.4	
				Busi	nesses by Tra	ct & Revenue	Size		
	Total Busines	Total Businesses by Tract		r = \$1 Million	Over \$1	Million	Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	637	4.1	559	3.8	71	8.3	7	4.3	
Moderate	3,802	24.2	3,469	23.7	293	34.2	40	24.4	
Middle	8,582	54.7	8,114	55.4	383	44.7	85	51.8	
Upper	2,646	16.9	2,507	17.1	110	12.8	29	17.7	
Unknown	12	0.1	9	0.1	0	0.0	3	1.8	
Total AA	15,679	100.0	14,658	100.0	857	100.0	164	100.0	
Perc	entage of Tota	al Businesses:		93.5		5.5		1.0	
				Fa	rms by Tract	& Revenue S	ize		
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	3	1.0	3	1.0	0	0.0	0	0.0	
Moderate	72	24.3	70	24.4	2	25.0	0	0.0	
Middle	175	59.1	169	58.9	5	62.5	1	100.0	
Upper	46	15.5	45	15.7	1	12.5	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	296	100.0	287	100.0	8	100.0	1	100.0	
	Percentage of	Total Farms:		97.0		2.7		0.3	
Source: 2021 FFIEC Census I	Data								

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

As depicted below government and private sector employment opportunities are available in the assessment area. Government, tourism, health care, retail trade, and manufacturing provide a large portion of area employment for residents.

Fayetteville-Sanfor	d-Lumbert	on, NC Em	ployees by	Industry			
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	<b>2021 - Q</b> 3
Government	45,472	43,892	42,094	43,765	43,374	43,955	42,416
Private Sector							
Private Sector Total, all industries	114,573	102,834	107,769	110,775	110,926	112,195	112,249
Agriculture, forestry, fishing and hunting	514	550	518	375*	329*	354*	336*
Mining, quarrying, and oil and gas extraction	0*	0*					
Utilities	628	627	621	606	623	622	612
Construction	6,080	5,817	5,781	5,835	5,837	6,089	6,086
Manufacturing	13,868	12,946	13,378	13,201	12,987	13,155	13,388
Wholesale trade	2,970	2,975	3,079	3,140	3,079	3,043	3,033
Retail Trade	20,619	19,426	20,442	21,226	21,151	21,428	21,284
Transportation and warehousing	4,402	4,299	4,462	4,993	5,085	4,932	4,958
Information	1,178	1,065	958	945	903	939	934
Finance and insurance	2,895	2,860	2,863	2,843	2,845	2,856	2,843
Real estate and rental and leasing	1,792	1,713	1,723	1,709	1,749	1,770	1,816
Professional and technical services	5,914	5,603	5,574	5,925	6,686	6,557	6,312
Management of companies and enterprises	477	473	498	546	467	465	427
Administrative and waste services	8,381	7,381	7,636	8,044	7,684	7,661	7,761
Educational services	1,581	1,306	1,362	1,500	1,477	1,470	1,384
Health care and social assistance	20,038	18,282	18,493	18,937	18,912	19,014	18,841
Arts, entertainment, and recreation	1,331	790	915	985	875	999	1,106
Accommodation and food services	18,449	13,783	16,223	16,536	16,773	17,305	17,581
Other services, except public administration	3,455	2,937	3,241	3,290	3,268	3,308	3,336
Public administration	0	0	0	0	0	0	0
Unclassified							
Source: Bureau of Labor Statistics (BLS), Quarterly Cert	sus of Empl	byment and	f Wages				
"Indicates that some or all of the data for this category w	as suppres	sed for oon	fidentiality r	easons			

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Fayetteville-Sanford-Lumberton, NC Unemployment Rates											
Area	2020	2021									
Fayetteville-Sanford-Lumberton, NC	8.97%	7.07%									
Cumberland County, NC	9.13%	6.88%									
Robeson County, NC	8.55%	7.57%									
Fayetteville, NC MSA	8.54%	6.41%									
NonMSA North Carolina	7.27%	5.37%									
North Carolina	7.08%	4.81%									
Source: Bureau of Labor Statistics (BLS), Local A	rea Unemploymen	t Statistics									

Overall, unemployment rates decreased from 2020 to 2021 for each of the counties, MSA, and state of North Carolina due to the pandemic. The MSA unemployment rates consistently have been higher than that of the state of North Carolina given the opportunities within the area.

Fayetteville-Sanford-Lumberton, NC Median Family Income Change										
Area	2010 Median Family Income	2015 Median Family Income	Percent Change							
Fayetteville-Sanford-Lumberton, NC	\$49,808	\$47,541	-4.55%							
Cumberland County, NC	\$55,439	\$51,870	-6.44%							
Robeson County, NC	\$37,882	\$36,903	-2.59%							
Fayetteville, NC MSA	\$55,266	\$52,485	-5.03%							
NonMSA North Carolina	\$49,876	\$47,217	-5.33%							
North Carolina	\$61,148	\$57,856	-5.38%							

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, the MSA, nonMSA parts of North Carolina, as well as the counties within the assessment area denote a decrease in median family income amounts from 2010 to 2015. As depicted below, housing cost burden for low-and-moderate income renters and owners is generally equal to or exceeds 30 percent or more of household income for the MSA, nonMSA parts of North Carolina, the counties within the assessment area, and state of North Carolina.

Fayetteville-Sanford-Lumberton, NC Housing Cost Burden											
	Cos	st Burden - Rent	ers	Cost	Burden - Owne	ers					
Area	Low Moderate All Income Income Renters			Low Income	Moderate Income	All Owners					
Fayetteville-Sanford-Lumberton, NC	74%	67%	45%	62%	39%	23%					
Cumberland County, NC	79%	75%	47%	70%	49%	24%					
Robeson County, NC	61%	32%	38%	52%	26%	21%					
Fayetteville, NC MSA	77%	70%	45%	67%	46%	23%					
NonMSA North Carolina	68%	42%	41%	56%	33%	21%					
North Carolina	75%	49%	42%	60%	36%	20%					

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

One local economic development official was contacted during the evaluation to assist in evaluating the bank's CRA performance. The contact stated that the organization helps local residents', many who are low- and-moderate-income, attain economic security through various housing, hunger, child development, education, and empowerment services programs. He stated that the organization offers clients employment workshops, readiness training, educational assistance, financial services education, and household budgeting knowledge. The contact also indicated that within the local community the services offered ultimately are the pathways to tackling poverty and helping residents to be able to help themselves. The contact further indicated that the primary industries for residents to obtain employment are federal government, local public schools, and health care.

During 2020, the contact indicated that three large employers within the market area were forced to close permanently. Fortunately, a major national retailer plans to open a distribution center within the market that will introduce approximately 500 employment opportunities in 2023. He stated that local financial institutions could serve local residents by offering basic deposit accounts, providing loans, as well as financial literacy. The contact was not aware of any discriminatory practices from local financial institutions. Overall, the contact believes local financial institutions are meeting the community's credit needs.

UB holds an adequate deposit market share within the assessment area (8th of 14 banks operating within the assessment area) having 2.6% of all deposits from the June 30, 2022, FDIC deposit market share report when compared to the other banking institutions that operate within the assessment area. Overall, there is limited opportunity for qualified community development loans and investments within the market area. However, considering the market and local economic conditions, UB faces some constraints in taking advantage of available community development opportunities. UB is new to this market since the previous evaluation and serves the assessment area through its array of banking services and products; as noted above, all the bank's services and products are offered in this assessment area, which include community development loans, originations of two totaling \$3.5 million, as well as qualified investments totaling \$1.4 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 25 customer's loan interest, which totaled 33 loans to the amount of \$98,379.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE FAYETTEVILLE-SANFORD-LUMBERTON, NC ASSESSMENT AREA:

The bank's Lending Test performance in the Fayetteville-Sanford-Lumberton, NC assessment area is considered good. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution of loans is excellent. The bank originates an adequate amount of community development loans.

The Investment Test performance is adequate. The bank's qualified investment securities and community development investment donations are adequate. The bank exhibits adequate responsiveness to credit and community development needs and occasionally makes use of community development initiatives.

Under the Service Test, the bank's performance is considered good. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. The bank has provided an adequate amount of community development services.

#### LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of lending activity, geographic and borrower distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. There were no gaps in lending, and the geographic distribution and dispersion of loans is good.

### **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number (1.4%) and dollar volume (1.2%) are less than the percentage of branch offices (1.8%) and greater than the percentage of deposits (.7%) in the assessment area. As of June 30, 2022, UB ranked 8<sup>th</sup> out of 14 financial institutions in deposit market share having 2.6% of the assessment area's available FDIC

insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 75<sup>th</sup> of 433 reporters of mortgage lending with a .2% market share and ranked 21<sup>st</sup> of 92 reporters of small business loans with a 1.2% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered adequate.

# **Geographic Distribution:**

The bank's geographic distribution performance is considered excellent for both HMDA lending and for small business lending within the assessment area.

Di	istributio					_	age Len ille-Sanf	_	-		el of G	eogra	phy
						-	Loans By Y						
Geographic			202	0					20:	21			Owner Occupied
Income Level	Bank		Agg	Bank	•	Agg	Bank	•	Agg	Bank	•	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hom	ne Purch	ase Loans						
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	1.4
Moderate	4	33.3	12.5	281	18.9	7.7	1	14.3	12.4	44	2.6	8.5	21.7
Middle	2	16.7	63.5	147	9.9	58.5	3	42.9	64.1	1,037	62.3	59.1	59.7
Upper	6	50.0	23.7	1,061	71.3	33.7	3	42.9	23.2	583	35.0	32.1	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.1	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,489	100.0	100.0	7	100.0	100.0	1,664	100.0	100.0	100.0
					F	Refinanc	e Loans						
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	1.4
Moderate	0	0.0	7.6	0	0.0	5.0	4	26.7	9.2	473	18.3	6.3	21.7
Middle	5	62.5	57.3	557	57.2	51.6	8	53.3	59.7	1,357	52.4	54.4	59.7
Upper	3	37.5	34.9	416	42.8	43.2	3	20.0	30.8	758	29.3	39.0	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	973	100.0	100.0	15	100.0	100.0	2,588	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.8	0	0.0	0.5	1.4
Moderate	0	0.0	18.3	0	0.0	15.	0	0.0	15.0	0	0.0	8.8	21.7
Middle	0	0.0	56.3	0	0.0	56.0	2	66.7	57.9	105	67.7	59.9	59.7
Upper	0	0.0	25.3	0	0.0	28.9	1	33.3	26.4	50	32.3	30.9	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	155	100.0	100.0	100.0
					М	ultifamily	Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	4.6	0	0.0	6.9	5.9
Moderate	1	33.3	21.4	1,187	53.0	5.3	0	0.0	26.4	0	0.0	32.6	16.8
Middle	2	66.7	69.6	1,054	47.0	90.6	7	100.0	62.1	9,823	100.0	52.9	75.4
Upper	0	0.0	8.9	0	0.0	4.0	0	0.0	6.9	0	0.0	7.6	1.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	2,241	100.0	100.0	7	100.0	100.0	9,823	100.0	100.0	100.0
					Total Ho	me Mort	gage Loans						Owner Occupied Units %
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.8	1.4
Moderate	5	20.8	10.6	1,468	29.6	6.5	5	15.6	11.2	2 517	3.6	10.	21.7
Middle	9	37.5	61.1	1,758	35.5	56.8	20	62.5	62.2	12,322	86.6	56.8	59.7
Upper	10	41.7	28.1	1,727	34.9	36.5	7	21.9	26.3	1,391	9.8	32.2	17.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	24	100.0	100.0	4,953	100.0	100.0	32	100.0	100.0	14,230	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Home purchase and refinance loans were the leading HMDA products by number followed by multifamily lending during 2020 and 2021. Given the limited volume within the assessment area, home improvement lending was not a factor in the analysis. In 2020, home purchase and multifamily lending are considered excellent, while refinance lending is considered very poor. During 2021, refinance lending is considered excellent, home purchase lending good, and multifamily lending very poor.

On a combined basis and as reflected in the preceding table, UB's lack of HMDA lending (0%) during 2020 in the low-income census tracts was only slightly less than the aggregate lending level (0.3%). D&B data from 2020 suggests that only 1.4% of owner-occupied housing units are located in such tracts. The bank's level of lending in moderate-income census tracts (20.8%) significantly exceeded the level of aggregate lending in such tracts (10.6%) and was similar to the level of owner-occupied housing units located in such tracts (21.7%). Overall, the bank's 2020 performance is considered excellent, and its performance in 2021 is substantially similar.

Di	istributio	on of 2	2020 aı	nd 2021 S	Small	Busine	ess Lend	ing By	/ Incor	ne Level	of Ge	ograp	hy
		F	Assess	ment Ar	ea: Fa	yettevi	ille-Sanf	ord-Lu	ımber	ton, NC			
C 1.1.	Bank And Aggregate Loans By Year												Total
Geographic		20			20	21							
Income	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	13	8.7	4.4	1,887	10.1	6.5	7	7.3	3.3	1,319	12.6	5.8	4.1
Moderate	43	28.9	21.6	5,270	28.2	22.4	25	26.0	21.0	2,667	25.5	22.5	24.2
Middle	69	46.3	54.0	8,793	47.0	51.5	47	49.0	55.7	4,167	39.9	52.6	54.7
Upper	24	16.1	19.4	2,756	14.7	19.3	17	17.7	19.3	2,296	22.0	18.9	16.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.1
Tract-Unk	0	0.0	0.6	0	0.0	0.3	0	0.0	0.7	0	0.0	0.1	
Total	149	100.0	100.0	18,706	100.0	100.0	96	100.0	100.0	10,449	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank's level of small business loans (8.7%) in low-income census tracts during 2020 was significantly greater than the aggregate level of lending (4.4%) and the total percentage of businesses located in such tracts (4.1%). UB's level of lending in moderate-income census tracts (28.9%) was also greater than the aggregate lending level (21.6%) and the percentage of businesses in such tracts (24.3%). Overall, the bank's small business lending performance during 2020 is considered excellent, and its performance during 2021 is substantially similar.

### **Distribution by Borrower Income and Revenue Size of the Business:**

UB's distribution by borrower income and small business revenue performance is considered excellent for HMDA lending and good for small business lending within the assessment area. Overall, the bank's borrower distribution is considered good when taking into account the relative performance by product and greater dollar volume of small business lending over the two-year period analyzed.

Moderate   3   25.0   16.6   207   13.8   10.4   0   0.0   14.8   0   0.0   10.2   18.8		Distribu	tion o	f 2020	and 202	1 Hom	ie Moi	rtgage Lo	ending	g By Bo	orrower	Incom	e Lev	el
Pamily   Pamily				Assess	ment Ar	ea: Fa	yettev	ille-Sanf	ford-L	umber	ton, NC			
					Ban	k And A	ggregate	Loans By Y	'ear					
# #% \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$													_	
Home Purchase Loans	Income Level	Bank	(	Agg	Bank	(	Agg	Banl	K	Agg	Bank	(	Agg	Family Income %
Low		#	#%	#%	\$(000)				#%	#%	\$(000)	\$%	\$%	
Moderate   3   25.0   16.6   207   13.8   10.4   0   0.0   14.8   0   0.0   10.2   18.8		Home Purchase Loans												
Middle	Low	1		3.3		5.6	1.5		0.0	3.3		0.0	1.6	
Upper         7         58.3         34.6         1.123         75.4         44.3         4         57.1         34.2         956         57.5         41.0         38.8           Unknown         0         0.0         19.5         0         0.0         20.2         3         42.9         24.6         708         42.5         26.6         0.0           Total         12         100.0         100.0         1,489         100.0         100.0         7         100.0         100.0         1,664         100.0         100.0         100.0           Total         12         100.0         1.2         0         0.0         0.5         3         20.0         1.8         302         11.7         1.4         24.           Moderate         1         12.5         3.9         104         110.7         2.2         2         113.3         6.2         272         10.5         3.8         18.           Middle         4         500.0         7.1         301         30.9         4.7         3         20.0         10.1         445         17.2         7.7         199           Upper         3         37.5         20.8	Moderate	3	25.0	16.6		13.9	10.4	0	0.0		0	0.0	10.2	18.0
Unknown   0   0.0   19.5   0   0.0   20.2   3   42.9   24.6   708   42.5   26.1   0.0	Middle	1	8.3	26.1	76	5.1	23.6	0	0.0	23.2	0	0.0	21.	19.
Total	Upper	7	58.3	34.6	1,123	75.4	44.3	4	57.1	34.2	956	57.5	41.0	38.2
Low	Unknown	0	0.0	19.5	0	0.0	20.2	3	42.9	24.6	708	42.5	26.1	0.0
Low	Total	12	100.0	100.0	1,489	100.0	100.0	7	100.0	100.0	1,664	100.0	100.0	100.0
Moderate         1         12.5         3.9         104         10.7         2.2         2         13.3         6.2         272         10.5         3.8         18.           Middle         4         50.0         7.1         301         30.9         4.7         3         20.0         10.1         445         17.2         7.7         19           Upper         3         37.5         20.8         568         58.4         20.6         6         40.0         26.6         1,316         50.9         28.1         38.3           Unknown         0         0.0         67.1         0         0.0         72.0         1         6.7         55.3         253         9.8         59.4         0.0           Home Improvement Loans           Low         0         0.0         2.6         0         0.0         1.4         0         0.0         3.9         0         0.0         3.0         24.1           Moderate         0         0.0         1.4         0         0.0         3.9         0         0.0         3.0         24.1           Moderate         0         0.0         1.0         0         0.0 <t< td=""><td></td><td></td><td></td><td></td><td></td><td>ı</td><td>Refinanc</td><td>e Loans</td><td></td><td>1</td><td></td><td></td><td></td><td></td></t<>						ı	Refinanc	e Loans		1				
Middle         4         50.0         7.1         301         30.9         4.7         3         20.0         10.         445         17.2         7.7         19           Upper         3         37.5         20.8         568         58.4         20.6         6         40.0         26.6         1,316         50.9         28.1         38.           Unknown         0         0.0         67.1         0         0.0         72.0         1         6.7         55.3         253         9.8         59.4         0.0           Home Improvement Loans           Low         0         0.0         2.6         0         0.0         1.4         0         0.0         3.9         0         0.0         3.0         24.1           Moderate         0         0.0         10.0         0         0.0         1.4         0         0.0         3.9         0         0.0         3.0         24.1           Middle         0         0.0         11.4         0         0.0         11.4         0         0.0         6.6         18.           Upper         0         0.0         65.1         0         0.0         67.9	Low	0	0.0	1.2	0	0.0	0.5	3	20.0	1.8	302	11.7	1.0	24.7
Upper         3         37.5         20.8         568         58.4         20.6         6         40.0         26.6         1,316         50.9         28.1         38.1           Unknown         0         0.0         67.1         0         0.0         72.0         1         6.7         55.3         253         9.8         59.4         0.0           Home Improvement Loans           Home Improvement Loans           Low         0         0.0         2.6         0         0.0         1.4         0         0.0         3.9         0         0.0         3.0         24.           Moderate         0         0.0         17.0         0         0.0         15.8         1         33.3         19.3         55         35.5         17.3         19           Upper         0         0.0         65.1         0         0.0         67.9         2         66.7         62.6         100         64.5         71.0         38.           Unknown         0         0.0         5.2         0         0.0         67.9         2         66.7         62.6         100         64.5         71.0         38.	Moderate	1	12.5	3.9	104	10.7	2.2	2	13.3	6.2	272	10.5	3.8	18.0
Unknown	Middle	4	50.0	7.1	301	30.9	4.7	3	20.0	10.1	445	17.2	7.7	19.1
Total   8   100.0   100.0   973   100.0   100.0   15   100.0   100.0   2,588   100.0   100.0   100.0   100.0	Upper	3	37.5	20.8	568	58.4	20.6	6	40.0	26.6	1,316	50.9	28.1	38.2
Home Improvement Loans   Low   0   0.0   2.6   0   0.0   1.4   0   0.0   3.9   0   0.0   3.0   24.	Unknown	0	0.0	67.1	0	0.0	72.0	1	6.7	55.3	253	9.8	59.4	0.0
Low         0         0.0         2.6         0         0.0         1.4         0         0.0         3.9         0         0.0         3.0         24:           Moderate         0         0.0         10.0         0         0.0         8.4         0         0.0         11.4         0         0.0         6.6         18.           Middle         0         0.0         17.0         0         0.0         15.8         1         33.3         19.3         55         35.5         17.3         19           Upper         0         0.0         65.1         0         0.0         67.9         2         66.7         62.6         100         64.5         71.0         38.3           Unknown         0         0.0         5.2         0         0.0         6.5         0         0.0         2.8         0         0.0         2.1         0.0           Total         0         0.0         100.0         0         0.0         100.0         3         100.0         100.0         155         100.0         100.0         100.0           Total Home Mortgage Loans           Low         1         4.8         2.2	Total	8	100.0	100.0	973	100.0	100.0	15	100.0	100.0	2,588	100.0	100.0	100.0
Moderate         0         0.0         10.0         0         0.0         8.4         0         0.0         11.4         0         0.0         6.6         18.           Middle         0         0.0         17.0         0         0.0         15.8         1         33.3         19.3         55         35.5         17.3         19           Upper         0         0.0         65.1         0         0.0         67.9         2         66.7         62.6         100         64.5         71.0         38.           Unknown         0         0.0         5.2         0         0.0         6.5         0         0.0         2.8         0         0.0         2.1         0.0           Total         0         0.0         100.0         0         0.0         100.0         3         100.0         100.0         155         100.0         100.0         100.0           Total Home Mortgage Loans           Low         1         4.8         2.2         83         3.1         1.0         3         12.0         2.6         302         6.9         1.3         24.           Moderate         4         19.0         10.0						Home	Improve	ment Loans	,					
Middle         0         0.0         17.0         0         0.0         15.8         1         33.3         19.3         55         35.5         17.3         19           Upper         0         0.0         65.1         0         0.0         67.9         2         66.7         62.6         100         64.5         71.0         38.3           Unknown         0         0.0         5.2         0         0.0         6.5         0         0.0         2.8         0         0.0         2.1         0.0           Total         0         0.0         100.0         0         100.0         3         100.0         100.0         155         100.0         100.0         100.0           Total Home Mortgage Loans           Low         1         4.8         2.2         83         3.1         1.0         3         12.0         2.6         302         6.9         1.3         24.           Moderate         4         19.0         10.0         311         11.5         6.2         2         8.0         10.8         272         6.2         7.4         18.           Middle         5         23.8         16.2	Low	0	0.0	2.6	0	0.0	1.4	0	0.0	3.9	0	0.0	3.0	24.7
Upper         0         0.0         65.1         0         0.0         67.9         2         66.7         62.6         100         64.5         71.0         38.3           Unknown         0         0.0         5.2         0         0.0         6.5         0         0.0         2.8         0         0.0         2.1         0.1           Total         0         0.0         100.0         0         100.0         3         100.0         100.0         155         100.0         100.0         100.0           Total Home Mortgage Loans           Low         1         4.8         2.2         83         3.1         1.0         3         12.0         2.6         302         6.9         1.3         24.           Moderate         4         19.0         10.0         311         11.5         6.2         2         8.0         10.8         272         6.2         7.4         18.           Middle         5         23.8         16.2         377         13.9         13.8         4         16.0         17.2         500         11.3         15.4         19           Upper         1         52.4	Moderate	0	0.0	10.0	0	0.0	8.4	0	0.0	11.4	0	0.0	6.6	18.0
Unknown 0 0.0 5.2 0 0.0 6.5 0 0.0 2.8 0 0.0 2.1 0.0  Total 0 0.0 100.0 0 0.0 100.0 3 100.0 100.0 155 100.0 100.0 100.0   Total Home Mortgage Loans  Low 1 4.8 2.2 83 3.1 1.0 3 12.0 2.6 302 6.9 1.3 24.  Moderate 4 19.0 10.0 311 11.5 6.2 2 8.0 10.8 272 6.2 7.4 18.  Middle 5 23.8 16.2 377 13.9 13.8 4 16.0 17.2 500 11.3 15.4 19  Upper 1 52.4 27.4 1,94 71.6 31.8 12 48.0 31.2 2,372 53.8 35.7 38.  Unknown 0 0.0 44.2 0 0.0 47.3 4 16.0 38.3 961 21.8 40.2 0.1	Middle	0	0.0	17.0	0	0.0	15.8	1	33.3	19.3	55	35.5	17.3	19.
Total         0         0.0         100.0         0         0.0         100.0         3         100.0         100.0         155         100.0         100.0         100.0           Total Home Mortgage Loans           Low         1         4.8         2.2         83         3.1         1.0         3         12.0         2.6         302         6.9         1.3         24.           Moderate         4         19.0         10.0         311         11.5         6.2         2         8.0         10.8         272         6.2         7.4         18.           Middle         5         23.8         16.2         377         13.9         13.8         4         16.0         17.2         500         11.3         15.4         19           Upper         1         52.4         27.4         1,94         71.6         31.8         12         48.0         31.2         2,372         53.8         35.7         38.           Unknown         0         0.0         44.2         0         0.0         47.3         4         16.0         38.3         961         21.8         40.2         0.0	Upper	0	0.0	65.1	0	0.0	67.9	2	66.7	62.6	100	64.5	71.0	38.2
Total Home Mortgage Loans           Low         1         4.8         2.2         83         3.1         1.0         3         12.0         2.6         302         6.9         1.3         24.           Moderate         4         19.0         10.0         31         11.5         6.2         2         8.0         10.8         272         6.2         7.4         18.           Middle         5         23.8         16.2         377         13.9         13.8         4         16.0         17.2         500         11.3         15.4         19           Upper         11         52.4         27.4         1,94         71.6         31.8         12         48.0         31.2         2,372         53.8         35.7         38.           Unknown         0         0.0         44.2         0         0.0         47.3         4         16.0         38.3         961         21.8         40.2         0.0	Unknown	0	0.0	5.2	0	0.0	6.5	0	0.0	2.8	0	0.0	2.1	0.0
Low         1         4.8         2.2         83         3.1         1.0         3         12.0         2.6         302         6.9         1.3         24.           Moderate         4         19.0         10.0         311         11.5         6.2         2         8.0         10.8         272         6.2         7.4         18.           Middle         5         23.8         16.2         377         13.9         13.6         4         16.0         17.2         500         11.3         15.4         19           Upper         11         52.4         27.4         1,94         71.6         31.8         12         48.0         31.2         2,372         53.8         35.7         38.           Unknown         0         0.0         44.2         0         0.0         47.3         4         16.0         38.3         961         21.8         40.2         0.0	Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	155	100.0	100.0	100.0
Moderate         4         19.0         10.0         311         11.5         6.2         2         8.0         10.8         272         6.2         7.4         18.           Middle         5         23.8         16.2         377         13.9         13.8         4         16.0         17.2         500         11.3         15.4         19           Upper         1         52.4         27.4         1,94         71.6         31.8         12         48.0         31.2         2,372         53.8         35.7         38.           Unknown         0         0.0         44.2         0         0.0         47.3         4         16.0         38.3         961         21.8         40.2         0.0						Total H	ome Mor	tgage Loans	5					
Middle         5         23.8         16.2         377         13.9         13.8         4         16.0         17.2         500         11.3         15.4         19           Upper         11         52.4         27.4         1,94         71.6         31.8         12         48.0         31.2         2,372         53.8         35.7         38.           Unknown         0         0.0         44.2         0         0.0         47.3         4         16.0         38.3         961         21.8         40.2         0.0	Low	1	4.8	2.2	83	3.1	1.0	3	12.0	2.6	302	6.9	1.3	24.7
Upper         1         52.4         27.4         1,94         71.6         31.8         12         48.0         31.2         2,372         53.8         35.7         38.3           Unknown         0         0.0         44.2         0         0.0         47.3         4         16.0         38.3         961         21.8         40.2         0.0	Moderate	4	19.0	10.0	311	11.5	6.2	2	8.0	10.8	272	6.2	7.4	18.0
Unknown 0 0.0 44.2 0 0.0 47.3 4 16.0 38.3 961 21.8 40.2 0.0	Middle	5	23.8	16.2	377	13.9	13.8	4	16.0	17.2	500	11.3	15.4	19. <sup>-</sup>
	Upper	11	52.4	27.4	1,941	71.6	31.8	12	48.0	31.2	2,372	53.8	35.7	38.2
Total 21 100.0 100.0 2,712 100.0 100.0 25 100.0 100.0 4,407 100.0 100.0 100.0	Unknown	0	0.0	44.2	0	0.0	47.3	4	16.0	38.3	961	21.8	40.2	0.0
	Total	21	100.0	100.0	2,712	100.0	100.0	25	100.0	100.0	4,407	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, the bank's level of lending to low-income borrowers (4.8%) was greater than the percentage of aggregate lending levels to such borrowers and lower than the percentage of low-income families within the assessment area (2.2% and 24.7%, respectively). UB's lending to moderate-income borrowers (19%) is greater than the percentage of aggregate lending levels (10%) and higher than the percentage of moderate-income families (18%). Overall, the bank's performance during 2020 is considered excellent, and its performance during 2021 is substantially similar.

Distrib	Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses												
Assessment Area: Fayetteville-Sanford-Lumberton, NC													
				Bank	And A	ggreg	ate Loar	ns By Y	(ear				Total
			20						20				Businesses
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					By F	Reveni	1e						
\$1 Million or Less	61	40.9	41.1	5,884	31.5	30.3	43	44.8	46.4	6,697	64.1	36.6	93.5
Over \$1 Million	44	29.5		7,660	40.9		9	9.4		1,795	17.2		5.5
Revenue Unknown	44	29.5		5,162	27.6		44	45.8		1,957	18.7		1.0
Total	149	100.0		18,706	100.0		96	100.0		10,449	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	102	68.5	87.2	3,940	21.1	30.4	71	74.0	93.1	2,156	20.6	38.0	
\$100,001 - \$250,000	27	18.1	7.4	4,814	25.7	20.9	13	13.5	3.6	2,066	19.8	15.8	
\$250,001 - \$1 Million	20	13.4	5.4	9,952	53.2	48.6	12	12.5	3.3	6,227	59.6	46.2	
Total	149	100.0	100.0	18,706	100.0	100.0	96	100.0	100.0	10,449	100.0	100.0	
		I	By Loa	n Size a	nd Rev	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	49	80.3		1,525	25.9		26	60.5		751	11.2		
\$100,001 - \$250,000	4	6.6		828	14.1		8	18.6		1,344	20.1		
\$250,001 - \$1 Million	8	13.1		3,531	60.0		9	20.9		4,602	68.7		
Total	61	100.0		5,884	100.0		43	100.0		6,697	100.0		
Source: 2021 FFIEC C 2021 Dun & B													

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 93.2% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 29.5% involved loans for which revenues were unknown and 40.9% were to businesses with revenues of \$1 million or less. Additionally, 58.1% of the bank's loans where revenue was known (61 of 105 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 41.1% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 93.5% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 44.8% were to businesses with revenues of \$1 million or less, and 45.8% involved loans for which revenues were unknown. However, 82.7% of the bank's loans where revenue was known (43 of 52 loans) were to businesses with revenues of \$1 million or less. This level of lending is greater than the 2021 aggregate lending level of 46.4%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

# PPP Loans with no reported revenue

Fayetteville-Sanfo	rd-L	umbertor	, NC 2020	0
By Loan Size	#	%	\$(000s)	%
\$100,000 or less	8	57.1%	289	14.2%
\$100,001 - \$250,000	4	28.6%	724	35.6%
\$250,001 - \$1 Million	2	14.3%	1,023	50.2%
Over \$1 Million	0	0.0%	0	0.0%
Total	14	100.0%	2,036	100.0%

During 2020, 68.5% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 87.2% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 57.1% had loan amounts of \$100,000 or less.

Fayetteville-Sanford-Lumberton, NC 2021								
By Loan Size	#	%	\$(000s)	%				
\$100,000 or less	36	92.3%	971	72.6%				
\$100,001 - \$250,000	3	7.7%	367	27.4%				
\$250,001 - \$1 Million	0	0.0%	0	0.0%				
Over \$1 Million	0	0.0%	0	0.0%				
Total	39	100.0%	1,338	100.0%				

During 2021, 74% of the small business loans reported were \$100,000 and less, and the aggregate reported 93.1% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 92.3% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

# **Community Development Lending:**

As previously discussed, opportunities for community development lending are limited within the Fayetteville-Sanford-Lumberton, NC assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank originated an adequate level of community development loans within this market. Two community development loans totaling \$3.5 million were originated within the assessment area during the evaluation period that provided affordable housing to low- and moderate-income residents.

### **INVESTMENT TEST**

Overall, the bank has an adequate level of qualified community development investments and donations, which exhibit adequate responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the institution maintained two qualified investments totaling \$1.4 million that directly benefit the Fayetteville-Sanford-

Lumberton, NC assessment area for the evaluation period, both of which support affordable housing. UB also holds a commitment of \$2.1 million in qualified investments within this assessment area that hasn't yet been funded. These investments demonstrate adequate responsiveness to the affordable housing needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$12,000. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made a donation to an organization that promotes economic development.

Qualified Investment Donations in the assessment area							
United Bank	#	\$					
Affordable Housing	0	0					
Community Service	2	7,000					
Economic	1	5,000					
Revitalize or Stabilize	0	0					
Total	3	12,000					

### **SERVICE TEST**

UB's performance under the service test in this assessment area is considered good. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low and moderate-income areas. The assessment area is new since the previous evaluation, and no branch changes have occurred in the market. Delivery systems to its customers have not been adversely affected, particularly to low- and-moderate-income geographies and individuals. In addition, the bank has provided an adequate level of community development services.

#### **Retail Services:**

Delivery systems and branch locations are readily accessible to geographies and individuals of different income levels within the assessment area. Alternative delivery systems are available through 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the institution.

The bank operates four full-service branch offices within the market, none in low-income census tracts, and one (25%) located in a moderate-income census tract. The distribution of branches is good when considering that 2.8% and 24.7% of the assessment area's households are located in low- and moderate-income areas according to the 2015 census. Branch locations and business hours do not vary in a way that inconveniences the needs of the assessment area. No branches have been opened or closed since the previous evaluation and the accessibility of its delivery systems, particularly to low-and-moderate-income geographies and/or individuals are not adversely affected with its entrance into this new market.

#### **Community Development Services:**

The bank provides an adequate level of community development services in the assessment area. Seven bank employees provided 51 hours of community development services during the evaluation period for seven different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, economic development, financial services, and financial education, which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area					
	#				
Affordable Housing	0				
Community Services	4				
Economic Development	3				
Revitalize or Stabilize	0				
Total	7				

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREENVILLE-KINSTON-WASHINGTON, NC CSA ASSESSMENT AREA

All of the bank's products and services are available within the seven branch offices that UB operates within the assessment area, which includes census tracts from the Greenville, NC MSA, as well as, the Kinston, NC and Washington, NC micro-areas. Eight ATMs are located in this assessment area. All of Beaufort, Lenoir, and Pitt Counties, North Carolina are included in the assessment area. The complete composition of the assessment area is detailed in Appendix E.

Two of	Branches		ATMS		DEMOGRAPHICS					
Tract Income Levels					Census	s Tracts	Households	Total Businesses		
Leveis	#	%	#	%	#	%	%	%		
Low	0	0.0%	0	0.0%	6	10.3%	8.4%	10.0%		
Moderate	2	28.6%	2	25.0%	13	22.4%	21.4%	19.5%		
Middle	4	57.1%	5	62.5%	23	39.7%	43.0%	42.1%		
Upper	1	14.3%	1	12.5%	16	27.6%	27.2%	28.3%		
Unknown	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%		
Totals	7	100%	8	100%	58	100%	100%	100%		

According to the most current census data, the assessment area has a population of 280,141 and a median housing value of \$120,508. The owner-occupancy rate in the assessment area equals 48.8%, which is significantly less than the rate for the state of North Carolina (55.7%). The overall family poverty rate within the assessment area (15.9%) is higher than that of the state (12.8%). The Greenville, NC MSA median family income during 2020 and 2021 equaled \$66,700 and \$59,400, respectively. During 2020 and 2021, six distressed (due to poverty) middle-income census tracts are contained within this assessment area. All of the distressed middle-income census tracts are located in Lenoir County. The following table includes pertinent demographic data for the assessment area.

	2021 Gree	nville-Kinst	ton- Washing	gton, NC CS	SA AA Demo	graphics		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	-
	#	%	#	%	#	%	#	%
Low	6	10.3	3,970	5.9	1,620	40.8	15,410	22.8
Moderate	13	22.4	12,979	19.2	3,562	27.4	11,465	17.0
Middle	23	39.7	30,583	45.3	4,204	13.7	12,367	18.3
Upper	16	27.6	19,997	29.6	1,328	6.6	28,287	41.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	58	100.0	67,529	100.0	10,714	15.9	67,529	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	11,211	1,751	2.8	15.6	7,431	66.3	2,029	18.1
Moderate	26,760	10,620	16.9	39.7	12,731	47.6	3,409	12.7
Middle	55,991	28,769	45.8	51.4	18,277	32.6	8,945	16.0
Upper	34,809	21,673	34.5	62.3	8,101	23.3	5,035	14.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	128,771	62,813	100.0	48.8	46,540	36.1	19,418	15.1
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or = \$1 Million		Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1,135	10.5	1,021	10.3	105	13.4	9	7.2
Moderate	2,165	19.9	1,936	19.5	206	26.3	23	18.4
Middle	4,472	41.2	4,129	41.5	286	36.5	57	45.6
Upper	3,087	28.4	2,864	28.8	187	23.9	36	28.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10,859	100.0	9,950	100.0	784	100.0	125	100.0
Per	centage of Tota	al Businesses:		91.6		7.2		1.2
				Fa	rms by Tract			
	Total Farm	is by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	2	0.4	2	0.5	0	0.0	0	0.0
Moderate	48	10.4	45	10.3	3	13.0	0	0.0
Middle	297	64.3	281	64.6	14	60.9	2	50.0
Upper	115	24.9	107	24.6	6	26.1	2	50.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	462	100.0	435	100.0	23	100.0	4	100.0
	Percentage of	Total Farms:		94.2		5.0		0.9

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

As depicted in the chart below, employment opportunities with government and the private sector are from government (all industries), manufacturing, retail trade, health services, and tourism and provide a large portion of area employment for residents.

Greenville-Kinston- V	Vashington	, NC CSA E	mployees	by Industr	у		
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3
Government	34,201	32,819	31,906	33,146	32,453	32,593	31,668
Private Sector							
Private Sector Total, all industries	87,186	79,631	84,720	86,136	86,079	87,399	87,886
Agriculture, forestry, fishing and hunting	0*	0*	0*	0*	0*	0*	0*
Mining, quarrying, and oil and gas extraction	0*	0*	0*	0	0	0	0*
Utilities	107*	106*	104*	99*	102*	97*	105*
Construction	5,633	5,467	5,657	5,672	5,829	6,142	5,971
Manufacturing	16,717	16,207	16,482	16,387	16,341	16,373	16,590
Wholesale trade	3,044	2,808	3,035	3,021	3,318	3,477	3,494
Retail Trade	14,016	13,071	13,901	14,353	13,990	14,141	14,146
Transportation and warehousing	1,750*	1,744*	1,867*	2,263*	2,090*	2,066*	2,134*
Information	702	609	575	580	687	685	751
Finance and insurance	2,197	2,158	2,225	2,219	2,227	2,245	2,221
Real estate and rental and leasing	1,205	1,168	1,221	1,252	1,292	1,324	1,327
Professional and technical services	2,787	2,451	2,579	2,711	2,868	2,888	2,894
Management of companies and enterprises	1,279	1,147	1,152	1,126	1,099	1,100	1,138
Administrative and waste services	6,408	6,061	6,997	7,388	7,263	7,234	7,446
Educational services	1,130	883	980	1,067	1,061	1,057	1,022
Health care and social assistance	13,170	12,493	12,715	13,004	12,921	12,807	12,660
Arts, entertainment, and recreation	769	547	660	692	705	885	967
Accommodation and food services	12,081	8,842	10,457	10,162	10,311	10,820	11,021
Other services, except public administration	2,236	1,893	2,151	2,183	2,134	2,198	2,222
Public administration	0	0	0	0	0	0	0
Unclassified	Unclassified						
Source: Bureau of Labor Statistics(BLS), Quarterly Cen.	sus of Empl	byment and	l Wages				
Indicates that some or all of the data for this category w	as suppres	sed for con	fidentiality i	easons			

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Greenville-Kinston- Washington, NC CSA U	Inemploym	ent Rates
Area	2020	2021
Greenville-Kinston- Washington, NC CSA	6.38%	4.99%
Beaufort County, NC	6.14%	4.80%
Lenoir County, NC	5.96%	4.95%
Pitt County, NC	6.56%	5.04%
Greenville, NC MSA	6.56%	5.04%
NonMSA North Carolina	7.27%	5.37%
North Carolina	7.08%	4.81%
Source: Bureau of Labor Statistics (BLS), Local Area Une	mployment St	atistics

Unemployment rates have decreased from 2020 to 2021, and the MSA's rates were higher than the assessment area and the state of North Carolina, but not the NonMSA areas of the state.

Greenville-Kinston- Washi	ington, NC CSA Median I	Family Income Change	
	2010 Median Family	2015 Median Family	Percent
Area	Income	Income	Change
Greenville-Kinston- Washington, NC CSA	\$54,498	\$52,336	-3.97%
Beaufort County, NC	\$54,086	\$51,361	-5.04%
Lenoir County, NC	\$46,081	\$43,844	-4.85%
Pitt County, NC	\$58,185	\$56,239	-3.34%
Greenville, NC MSA	\$58,185	\$56,239	-3.34%
NonMSA North Carolina	\$49,876	\$47,217	-5.33%
North Carolina	\$61,148	\$57,856	-5.38%

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, the CSA, MSA, nonMSA parts of North Carolina, state, as well as the counties within the assessment area denote a decrease in median family income amounts from 2010 to 2015. As depicted below, housing cost burden for low-and-moderate income renters and owners is equal to or exceeds 30 percent or more of household income for the CSA, MSA, nonMSA parts of North Carolina, the counties within the assessment area, and state of North Carolina.

Greenville-Kinston- Washington, NC CSA Housing Cost Burden											
	Cost Burden - Renters			Cost	Burden - Own	ers					
	Low	Moderate	All	Low	Moderate	All					
Area	Income	Income	Renters	Income	Income	Owners					
Greenville-Kinston- Washington, NC											
CSA	78%	54%	48%	69%	45%	22%					
Beaufort County, NC	64%	47%	43%	69%	50%	25%					
Lenoir County, NC	72%	45%	41%	60%	36%	22%					
Pitt County, NC	83%	58%	51%	75%	46%	20%					
Greenville, NC MSA	83%	58%	51%	75%	46%	20%					
NonMSA North Carolina	68%	42%	41%	56%	33%	21%					
North Carolina	75%	49%	42%	60%	36%	20%					

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local economic development official was recently contacted to assist in evaluating the bank's CRA performance and indicated the organization helps with the recruitment, retention, and expansion of industries within the county. The contact stated that representatives of the company work with local leaders to promote workforce development within the assessment area. The organization also owns and manages industrial parks, builds structures to sell to small businesses, and participates in consulting and trade shows. Additionally, he stated that the organization facilitates the creation of quality jobs for residents who live within the market area. The contact described how the organization sells many of the spec buildings at a discount or loss as incentive for new businesses to locate to the area; and most recently sold a speculative shell building to a start-up business in the area. Additionally, the organization has been looking for land to bring rail service to the area and he indicated that interest from potential businesses looking to locate to the area would improve tremendously with such access.

Another project the office has been working on is the establishment of a food commercialization center in the area and the contact believes this will assist in facilitating the process of retaining and enticing agriculture resources to the market and that the facility would assist in manufacturing, processing, and packaging. Recently a state highway was designated as a federal interstate within the assessment area, and this helped to add access to the county as an area that can support new commercial activities. He believes all the above projects will not only help the local economy, but also to provide stable jobs to local residents. The main limitation faced by the organization is infrastructure; as land is available, but the cost of developing the site for readiness with various utilities has been slow due to a lack of funding in recent years. Many workforce development resources are available within the market, but they are underutilized due to a lack of public awareness. The area has a diverse economic profile with the primary industries being manufacturing, education, and health care. Manufacturing consists of pharmaceuticals, boats, small motors, and healthcare products. Pharmaceuticals comprise the bulk of manufacturing jobs with more than one third being in this industry. A great majority of manufacturing in the area involves advanced or highly automated manufacturing processes. The area also has a major university, East Carolina University (ECU), as well as a community college providing good paying jobs with benefits. A major health care provider has more than 1,000 beds located in Greenville and is in the process of merging with ECU to create ECU Health; the contact believes this will be a great expansion and partnership for economic spillover as well as creating new jobs. Agriculture remains a part in the local economy, particularly tobacco and livestock. The contact stated that there is a daily influx of commuters who travel into the area to work in the industries previously mentioned and that some local residents also commute to outlying counties with similar employment opportunities.

According to the contact, unemployment rates were trending downward before the COVID-19 pandemic and increased during the pandemic, but have returned to below pre-pandemic unemployment rate levels. The county remains below the state and national averages. He stated that overall area population and workforce have grown within the previous year. The interviewee indicated that there is currently a low level of housing stock within the area for sale which in turn raises home prices. The contact indicated that local financial institutions could help the area by offering loan funding to small and mid-sized businesses, particularly for gap funding and bridge loans to smaller entities who get into a bind from time to time; larger industry needs are met by incentive packages at state and county levels. He further stated that the credit need of smaller businesses are always harder to fulfill and the county has previously offered grants to meet the needs, but cannot provide grants to all businesses. The organization does not participate in any activities with financial institutions; however, the contact believed that if local financial institutions could provide additional needed funding for small and minority-owned businesses, it would be a way in which banks could serve the area. No discriminatory acts or practices were noted by the contact.

UB holds a good deposit market share within the assessment area (6<sup>th</sup> of 13 banks operating within the assessment area) having 6.6% of all deposits from the June 30, 2022, FDIC deposit market share report when compared to the other banking institutions that operate within the assessment area. Overall, there is reasonable opportunity for community development loans and investments within the market area. The bank faces no significant constraints in taking advantage of all available community development opportunities. While this assessment area is new to UB since the previous evaluation it serves the area through its banking services and products; as noted above, all of the bank's services and products are offered in this assessment area, which includes community development loans, of which the bank originated four totaling \$2 million, as well as four qualified investments totaling \$3.1 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 36 customer's loan interest, which totaled 47 loans to the amount of \$181,982.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE GREENVILLE-KINSTON-WASHINGTON, NC CSA ASSESSMENT AREA:

The bank's Lending Test performance in the Greenville-Kinston-Washington, NC CSA assessment area is considered good. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution of loans is excellent. The bank originates an adequate amount of community development loans.

The Investment Test performance is considered good. The bank's qualified investment securities and community development investment donations are good, and the bank exhibits good responsiveness to credit and community development needs.

Under the Service Test, the bank's performance is considered good. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank is a leader in providing community development services.

#### LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of lending activity, geographic and borrower distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. There were no gaps in lending, and the geographic distribution and dispersion of loans is good.

# **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number (2.4%) is less than the percentage of branch offices (3.2%) and exceeds the percentage of deposits (1.5%) in the assessment area. Lending by dollar volume (1.3%) is below the percentage of branch offices and deposits. As of June 30, 2022, UB ranked 6<sup>th</sup> out of 13 financial institutions in deposit market share having 6.6% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 24<sup>th</sup> of 365 reporters of mortgage lending with a 0.8% market share and ranked 10<sup>th</sup> of 92 reporters of small business loans with a 3.1% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered adequate.

# **Geographic Distribution:**

The bank's geographic distribution performance is considered excellent for HMDA lending and good for small business lending within the assessment area. Overall, the combined geographic distribution performance is considered excellent given the relative strengths of performance by product and year.

Mathematical   Mat			Ass	sessm	ent Area:	Gree	nville-	Kinston	- Wash	ningto	n, NC CS	SA			
Note   Part	_					k And A	ggregate	Loans By Y	ear						
									1					Owner Occupied	
Note   Purchase   Low   0   0.0   5.3   0   0.0   3.6   3   9.1   4.4   710   13.5   2.9	income Level													Units %	
Low		#	#%	#%	\$(000)				#%	#%	\$(000)	\$%	\$%		
Moderate															
Middle														2.	
Upper														16.	
Unknown								_						45.i	
Track-Unk														0.	
Total														0.	
Note											_			100	
Low	Total	14	100.0	100.0	3,100				100.0	100.0	3,234	100.0	100.0	100	
Moderate   3   18.8   7.8   423   27.0   6.3   5   13.8   9.0   533   11.3   7.6   Middle   9   56.3   44.8   693   44.3   43.2   16   44.4   45.0   1.62   34.3   43.8   Upper   3   18.8   44.3   305   19.5   48.6   1   30.6   42.1   1.403   29.7   45.8   Unknown   0   0.0	Low	1	63	2 1	1/1/				11	1 30	1 17	1 2/12	2 Ω	2.	
Middle 9 56.3 44.8 693 44.3 43.2 16 44.4 45.0 1,620 34.3 43.8 Upper 3 18.8 44.3 305 19.5 48.6 11 30.6 42.1 1,403 29.7 45.8 Unknown 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0		3						-						16	
Upper														45.	
Unknown														34.5	
Tract-Unk         0         0.0         1.0         0         0.0         4.727         100.0         100.0         100.0         100.0         100.0         100.0         100.0         100.0         100.0         1.6         0         0.0         3.5         0         0.0         2.2         Moderate         0         0.0         1.1         0         0.0         3.5         0         0.0         2.2         Moderate         0         0.0         1.0         0         0.0         7.1         1         1.2.5         1.0         1.5         5.2         1.0         0								<b>—</b>			-			0.0	
Total   16														G.	
Home   Improvement   Loams   Low   0   0.0   4.4   0   0.0   1.6   0   0.0   3.5   0   0.0   2.2														100	
Low															
Moderate         0         0.0         10.0         0         0.0         7.1         1         12.5         10.9         15         5.2         10.0           Middle         3         75.0         41.9         229         90.2         45.8         3         37.5         44.7         84         28.9         44.4           Upper         1         25.0         44.0         25         9.8         45.4         4         50.0         40.9         192         66.0         43.4           Unknown         0         0.0 <th< td=""><td>Low</td><td>0</td><td>0.0</td><td>4.1</td><td>0</td><td></td><td></td><td></td><td>0.0</td><td>3.5</td><td>0</td><td>0.0</td><td>2.2</td><td>2.</td></th<>	Low	0	0.0	4.1	0				0.0	3.5	0	0.0	2.2	2.	
Upper					0			1			15			16.	
Unknown	Middle	3	75.0	41.9	229	90.2	45.8	3	37.5	44.7	84	28.9	44.4	45.	
Tract-Unk	Upper	1	25.0	44.0	25	9.8	45.4	4	50.0	40.9	192	66.0	43.4	34.:	
Total	Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.	
Multifamily   Loans   Low   0   0.0   17.9   0   0.0   28.7   3   42.9   25.7   1,978   73.3   32.9	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		
Low	Total	4	100.0	100.0	254	100.0	100.0	8	100.0	100.0	291	100.0	100.0	100.	
Low 0 0 0.0 17.9 0 0.0 28.7 3 42.9 25.7 1,978 73.3 32.9    Moderate 1 100.0 17.9 212 100.0 5.8 2 28.6 31.4 255 9.4 35.1    Middle 0 0 0.0 40.3 0 0.0 36.5 1 14.3 22.9 284 10.5 24.6    Upper 0 0 0.0 23.9 0 0.0 29.0 1 14.3 20.0 182 6.7 7.4    Unknown 0 0 0.0 0.0 0 0 0.0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0    Tract-Unk 0 0 0.0 0.0 0 0 0.0 0 0 0 0 0 0 0 0 0	•			<u> </u>		М	ultifamily	Loans						Multi-family	
Moderate         1         100.0         17.9         212         100.0         5.8         2         28.6         31.4         255         9.4         35.1           Middle         0         0.0         40.3         0         0.0         36.5         1         14.3         22.9         284         10.5         24.6           Upper         0         0.0         23.9         0         0.0         29.0         1         14.3         20.0         182         6.7         7.4           Unknown         0         0.0 <th< td=""><td>Low</td><td>0</td><td>0.0</td><td>17.9</td><td>0</td><td></td><td></td><td></td><td>42 9</td><td>25.7</td><td>1 978</td><td>73.3</td><td>32.9</td><td>Units % 20.</td></th<>	Low	0	0.0	17.9	0				42 9	25.7	1 978	73.3	32.9	Units % 20.	
Middle         0         0.0         40.3         0         0.0         36.5         1         14.3         22.9         284         10.5         24.6           Upper         0         0.0         23.9         0         0.0         29.0         1         14.3         20.0         182         6.7         7.4           Unknown         0         0.0 <td></td> <td>23.</td>														23.	
Upper         0         0.0         23.9         0         0.0         29.0         1         14.3         20.0         182         6.7         7.4           Unknown         0         0.0 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>1</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>39.</td>								1						39.	
Unknown 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0								1						16	
Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0								0						0.0	
Total         1         100.0         100.0         212         100.0         100.0         7         100.0         100.0         2,699         100.0         100.0         Owner           Total Hower Mortswere Loans           Low         1         2.4         4.3         144         2.5         4.8         10         11.2         4.2         3,859         28.9         5.3           Moderate         6         14.6         9.2         971         17.7         7.3         11         12.4         10.8         870         6.5         11.3           Middle         24         58.5         46.1         3,672         64.6         44.2         39         43.8         45.5         5,301         39.7         42.6           Upper         10         24.4         40.4         896         15.8         43.6         29         32.6         39.5         3,325         24.9         40.9           Unknown         0         0.0         0         0         0         0         0         0         0         0         0											_			G.	
Total Home Mortgage Loans         Owne           Low         1         2.4         4.3         144         2.5         4.8         10         11.2         4.2         3,859         28.9         5.3           Moderate         6         14.6         9.2         971         17.         7.3         1         12.4         10.8         870         6.5         11.3           Middle         24         58.5         46.1         3,672         64.6         44.2         39         43.8         45.5         5,301         39.7         42.6           Upper         10         24.4         40.4         896         15.8         43.6         29         32.6         39.5         3,325         24.9         40.9           Unknown         0         0.0         0.0         0.0         0 </td <td></td> <td>1</td> <td>100.0</td> <td>100.0</td> <td>212</td> <td>100.0</td> <td>100.0</td> <td>7</td> <td>100.0</td> <td>100.0</td> <td>2,699</td> <td>100.0</td> <td>100.0</td> <td>100</td>		1	100.0	100.0	212	100.0	100.0	7	100.0	100.0	2,699	100.0	100.0	100	
Low         1         2.4         4.3         144         2.5         4.8         10         11.2         4.2         3,859         28.9         5.3           Moderate         6         14.6         9.2         971         17.         7.3         11         12.4         10.8         870         6.5         11.3           Middle         24         58.5         46.1         3,672         64.6         44.2         39         43.8         45.5         5,301         39.7         42.6           Upper         10         24.4         40.4         896         15.8         43.6         29         32.6         39.5         3,325         24.9         40.9           Unknown         0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0	<u> </u>	!				Total Ho	me Morte	nage Loans			·			Owner Occupied	
Moderate         6         14.6         9.2         971         17.         7.3         1         12.4         10.8         870         6.5         11.2           Middle         24         58.5         46.1         3,672         64.6         44.2         39         43.8         45.5         5,301         39.7         42.6           Upper         10         24.4         40.4         896         15.8         43.6         29         32.6         39.5         3,325         24.9         40.9           Unknown         0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0	l our I	اد	اء ہ	4.0					44.	4.0	2.050	20.0	F 0	Units %	
Middle         24         58.5         46.1         3,672         64.6         44.2         39         43.8         45.5         5,301         39.7         42.6           Upper         10         24.4         40.4         896         15.8         43.6         29         32.6         39.5         3,325         24.9         40.9           Unknown         0         0.0         0.0         0.0         0         0.0         0.0         0         0.0         0.0         0         0         0.0         0         0         0.0         0 <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td><b>—</b></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>2.</td>								<b>—</b>						2.	
Upper         10         24.4         40.4         896         15.8         43.6         29         32.6         39.5         3,325         24.9         40.9           Unknown         0         0.0         <			-					-						16. 45.	
Unknown 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 0.0														34.	
														0.	
Traction I OI OOI OOI OO OOI OOI OO OOI OOI	Tract-Unk	0	0.0	0.0	0	0.0		0	0.0	0.0	0	0.0	0.0	0.0	
Total 41 100.0 100.0 5,683 100.0 100.0 89 100.0 100.0 13,355 100.0 100.0														100.	

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

For UB, refinance loans were the leading HMDA product by number followed by home purchase loans during 2020 and 2021; home improvement and multifamily lending were not factors in the analysis due to limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for refinance lending is considered excellent, while home purchase lending is considered good in both years.

On a combined product basis, UB's percentage of 2020 HMDA lending in the low-income census tracts (2.4%) was slightly less than both the aggregate lending level (4.3%) as well as the percentage of owner-occupied housing units located in such tracts (2.8%). The bank's level of lending in moderate-income census tracts (14.6%) significantly exceeded the level of aggregate lending in such tracts (9.2%) but was less than the owner-occupied housing units located in moderate-income census tracts (16.9%). Overall, the bank's 2020 performance is considered excellent, and its performance during 2021 is substantially similar.

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
	Assessment Area: Greenville-Kinston- Washington, NC CSA														
	Bank And Aggregate Loans By Year														
Geographic			20	20					Total						
Income	Bank		Agg	Bank		Agg	Ban	Bank		Bank		Agg	Businesses		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%		
Low	7	3.5	9.7	1,447	9.2	11.1	19	9.8	8.4	2,719	14.6	11.8	10.5		
Moderate	53	26.5	18.8	2,511	16.0	21.4	40	20.7	18.6	4,632	24.8	21.5	19.9		
Middle	81	40.5	41.0	8,229	52.6	39.1	70	36.3	41.4	5,742	30.7	38.6	41.2		
Upper	59	29.5	29.2	3,465	22.1	27.3	64	33.2	30.7	5,588	29.9	28.0	28.4		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	1.3	0	0.0	1.0	0	0.0	1.0	0	0.0	0.1			
Total	200	100.0	100.0	15,652	100.0	100.0	193	100.0	100.0	18,681	100.0	100.0	100.0		

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank's percentage (3.5%) of small business loans in low-income census tracts during 2020 lagged both the aggregate (9.7%) and the total percentage of businesses in such tracts (10.6%). UB's level of lending in moderate-income census tracts (26.5%) was significantly greater than the aggregate lending (18.8%) and the percentage of businesses in such tracts (19.7%). Overall, the bank's small business lending performance during 2020 is considered good, and the performance during 2021 is substantially similar.

## Distribution by Borrower Income and Revenue Size of the Business:

UB's distribution by small business revenue performance is considered good, while its distribution of HMDA lending by borrower income is considered adequate. Overall, the distribution is considered good when taking into account the greater volume of small business lending in the years analyzed along with the relative performance of each product.

	Distribu						~ ~	_				e Lev	el
		Ass	sessmo				Kinston		ungto	n, NC CS	5A		Ī
_			2020	Вап	K And Aç	ggregate	Loans By Y	ear	20:	21			
Borrower Income Level	Bank	(	Agg	Bank	Rank		Bank	(	Agg	Bank		Agg	Families by Family Income %
	#	#%	#%	\$(000)	1		#	#%	#%	\$(000)	\$%	\$%	-
# #%   \$(000)   \$%   \$%   #   #%   \$(000)   \$%   \$%    Home Purchase Loans													
Low	1	7.1	4.7	179	5.8	2.6	0	0.0	3.0	0	0.0	1.4	22.8
Moderate	1	7.1	19.2	225	7.2	14.2	6	18.2	14.8	821	15.6	10.	17.0
Middle	2	14.3	22.4	279	9.0	20.6	2	6.1	21.5	398	7.6	18.8	18.0
Upper	6	42.9	41.8	1,889	60.8	51.7	4	12.1	44.3	1,307	24.9	54.1	41.9
Unknown	4	28.6	12.1	534	17.2	11.0	21	63.6	16.4	2,728	51.9	15.5	0.0
Total	14	100.0	100.0	3,106	100.0	100.0	33	100.0	100.0	5,254	100.0	100.0	100.0
					F	Refinanc	e Loans						l
Low	0	0.0	2.0	0	0.0	0.8	1	2.8	2.0	54	1.1	1.	22.8
Moderate	2	12.5	8.9	90	5.8	5.6	3	8.3	9.5	176	3.7	6.1	17.0
Middle	4	25.0	16.7	355	22.7	12.9	10	27.8	18.2	1,146	24.2	14.3	18.3
Upper	7	43.8	49.5	707	45.2	56.5	19	52.8	50.6	2,335	49.4	57.2	41.9
Unknown	3	18.8	23.0	413	26.4	24.2	3	8.3	19.7	1,016	21.5	21.3	0.0
Total	16	100.0	100.0	1,565	100.0	100.0	36	100.0	100.0	4,727	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	2.5	0	0.0	1.0	1	12.5	4.2	15	5.2	2.0	22.8
Moderate	0	0.0	10.8	0	0.0	6.5	0	0.0	9.3	0	0.0	6.4	17.0
Middle	1	25.0	19.9	50	19.7	15.6	0	0.0	16.9	0	0.0	15.0	18.3
Upper	3	75.0	66.0	204	80.3	76.2	7	87.5	68.4	276	94.8	74.7	41.9
Unknown	0	0.0	0.8	0	0.0	0.8	0	0.0	1.3	0	0.0	1.9	0.0
Total	4	100.0	100.0	254	100.0	100.0	8	100.0	100.0	291	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	;					
Low	1	2.5	3.2	179	3.3	1.7	2	2.4	2.6	69	0.6	1.3	22.8
Moderate	3	7.5	13.4	315	5.8	9.7	10	12.2	11.8	1,022	9.6	8.2	17.0
Middle	7	17.5	19.0	684	12.5	16.5	13	15.9	19.5	1,569	14.7	16.5	18.3
Upper	22	55.0	45.7	3,346	61.2	53.6	33	40.2	48.7	4,252	39.9	56.0	41.9
Unknown	7	17.5	18.7	947	17.3	18.5	24	29.3	17.4	3,744	35.1	18.	0.0
Total	40	100.0	100.0	5,471	100.0	100.0	82	100.0	100.0	10,656	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, the bank's level of lending to low-income borrowers (2.5%) was less than both the percentage of aggregate lending levels to such borrowers and the percentage of low-income families within the assessment area (3.2% and 22.8%, respectively). UB's lending to moderate-income borrowers (7.5%) is less than the percentage of aggregate lending levels (13.4%) and the percentage of moderate-income families (17%). Overall, the bank's performance during 2020 is considered adequate.

During 2021, the bank's level of lending to low-income borrowers (2.4%) was similar to the aggregate lending level, but less than the percentage of low-income families within the assessment area (2.6% and 22.8%, respectively). UB's lending to moderate-income borrowers (12.2%) is greater than the percentage of aggregate lending levels (11.8%) and less than the percentage of moderate-income families (17%). The bank's performance during 2021 is considered good.

UB's overall HMDA lending is considered adequate and takes into account the relative performance over the two-year period.

Assessment Area: Greenville-Kinston- Washington, NC CSA  Bank And Aggregate Loans By Year													
-			20		1 <b>111 (</b> 11	88108		13 Dy 1	20	21			Total
	Ban	ık	Agg			Agg	Bank		Agg Ban		ık Agg		Businesses
-	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
					By F	Reveni	ıe						
\$1 Million or Less	101	50.5	37.7	5,180	33.1	25.1	51	26.4	50.5	8,914	47.7	36.3	91.6
Over \$1 Million	48	24.0		7,571	48.4		24	12.4		4,612	24.7		7.2
Revenue Unknown	51	25.5		2,901	18.5		118	61.1		5,155	27.6		1.2
Total	200	100.0		15,652	100.0		193	100.0		18,681	100.0		100.0
By Loan Size													
\$100,000 or Less	159	79.5	84.2	4,476	28.6	29.2	148	76.7	89.0	3,530	18.9	30.0	
\$100,001 - \$250,000	27	13.5	9.3	4,385	28.0	21.6	22	11.4	5.8	4,030	21.6	18.6	
\$250,001 - \$1 Million	14	7.0	6.6	6,791	43.4	49.2	23	11.9	5.1	11,121	59.5	51.4	
Total	200	100.0	100.0	15,652	100.0	100.0	193	100.0	100.0	18,681	100.0	100.0	
,		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	93	92.1		2,285	44.1		32	62.7		898	10.1		
\$100,001 - \$250,000	2	2.0		462	8.9		4	7.8		628	7.0		
\$250,001 - \$1 Million	6	5.9		2,433	47.0		15	29.4		7,388	82.9		
Total	101	100.0		5,180	100.0		51	100.0		8,914	100.0		

D&B data from 2020, indicates that 91.6% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 25.5% involved loans for which revenues were unknown and 50.5% were to businesses with revenues of \$1 million or less. Additionally, 67.8% of the bank's loans where revenue was known (101 of 149 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 37.7%.

D&B data from 2021, indicates that 91.6% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 26.4% were to businesses with revenues of \$1 million or less, and 61.1% involved loans for which revenues were unknown. However, 68% of the bank's loans where revenue was known (51 of 75 loans) were to businesses with revenues of \$1 million or less. This level of lending is greater than the 2021 aggregate lending level of 50.5%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

# PPP Loans with no reported revenue

Greenville-Kinston- Washington, NC CSA 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	20	90.9%	452	54.3%							
\$100,001 - \$250,000	2	9.1%	381	45.7%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	22	100.0%	833	100.0%							

During 2020, 79.5% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 84.2% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 90.9% had loan amounts of \$100,000 or less.

Greenville-Kinston- Washington, NC CSA 2021											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	94	93.1%	1,666	53.0%							
\$100,001 - \$250,000	6	5.9%	1,202	38.2%							
\$250,001 - \$1 Million	1	1.0%	278	8.8%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	101	100.0%	3,146	100.0%							

During 2021, 76.7% of the small business loans reported were \$100,000 and less, and the aggregate reported 89% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 93.1% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

## **Community Development Lending:**

As previously discussed, opportunities for community development lending are reasonably available within the Greenville-Kinston-Washington, NC CSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank originated an adequate level of community development loans within this market. Four community development loans totaling \$2 million were originated within the assessment area during the evaluation period. One of the loans provided funding for affordable housing, while three loans were to organizations providing social services to low- and moderate-income residents.

#### INVESTMENT TEST

Overall, the bank has a significant level of qualified community development investments and donations, which exhibit good responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the institution maintained four qualified investments totaling \$3.1 million that directly benefit the Greenville-Kinston-Washington, NC CSA assessment area for the evaluation period. The bank also holds \$5.4 million in committed funds but not yet funded within this assessment area.

During the evaluation period, the bank holds four low-income housing investments that support lowand moderate-income multifamily housing complexes. These investments demonstrate good responsiveness to the affordable housing needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$66,100. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development, revitalize or stabilize low- and moderate-income geographies, and support affordable housing efforts, which are needed in the assessment area. Out of the \$66,100, a donation of \$25,000 was to a service non-profit that helps minority-owned businesses in technical assistance during the height of the pandemic.

Qualified Investment Donations in the assessment area											
United Bank # \$											
Affordable Housing	1	250									
Community Service	11	31,350									
Economic	2	30,000									
Revitalize or Stabilize	4	4,500									
Total	18	66,100									

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

### SERVICE TEST

UB's performance under the service test in this assessment area is considered good. Systems for delivering retail banking services are accessible to all portions of the assessment area, including low and moderate-income areas. The assessment area is new since the previous evaluation, and no branch closings or openings have occurred. In addition, the bank is a leader in providing qualified community development services.

### **Retail Services:**

Delivery systems and branch locations are accessible to geographies and individuals of different income levels within the assessment area. Alternative delivery systems are available through 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the institution.

The bank operates seven full-service branch offices within the market, none are located in low-income census tracts, and two (28.6%) are located in moderate-income census tracts. The distribution of branches is good when considering that 8.4% and 21.4% of the assessment area's households are in low-and moderate-income areas according to the 2015 census. Branch locations and business hours do not vary in a way that inconveniences the needs of the assessment area. No branches have been opened or closed since the previous evaluation within the area.

### **Community Development Services:**

The bank is a leader in providing community development services in the assessment area. Twenty-six bank employees provided 457 hours of community development services during the evaluation period for 18 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, economic development, financial services, and financial education, which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area							
	#						
Affordable Housing	1						
Community Services	13						
Economic Development	3						
Revitalize or Stabilize	1						
Total	18						

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RALEIGH-DURHAM-CARY, NC ASSESSMENT AREA

The bank operates two branches, two ATMs, and one loan production office within the area and all of its products and services are available. UB serves the Raleigh-Durham-Cary, NC assessment area that includes census tracts from the Durham-Chapel Hill, NC MSA and the Raleigh-Cary, NC MSA. All of Durham, Wake, and Johnston Counties, North Carolina are included in the assessment area. The complete composition of the assessment area is detailed in Appendix E.

Two of					DEMOGRAPHICS							
Tract Income Levels	Bra	nches	A	TMS	Census	s Tracts	Households	Total Businesses				
Levels	#	%	#	%	#	%	%	%				
Low	1	50.0%	1	50.0%	24	8.8%	6.9%	5.0%				
Moderate	0	0.0%	0	0.0%	68	25.0%	27.3%	23.7%				
Middle	1	50.0%	1	50.0%	75	27.6%	31.7%	32.1%				
Upper	0	0.0%	0	0.0%	99	36.4%	34.1%	38.7%				
Unknown	0	0.0%	0	0.0%	6	2.2%	0.0%	0.6%				
Totals	2	100%	2	100%	272	100%	100%	100%				

Based on 2015 ACS data, the assessment area served by the bank has a total population of 1,443,232 and a median housing value of \$209,691. Within the assessment area, the owner-occupancy rate is 57.9%, which is slightly higher than the owner-occupancy rate for the state of North Carolina (55.7%). The percentage of families living below the poverty level in the assessment area (9.3%) is similar to the state of North Carolina (12.8%). Median family incomes for the MSAs that comprise the assessment area are detailed in the table below.

Median Family Income by MSA	2020	2021
Durham-Chapel Hill, NC MSA	\$79,900	\$81,500
Raleigh-Cary, NC MSA	\$94,100	\$95,700

The following table provides family and household demographic information for the assessment area, as well as the tract and owner-occupied housing unit distribution by tract income level. The table also provides D&B business data.

	20	21 Raleigh-	Durham-Cai	y, NC AA D	emographic	es		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	-
	#	%	#	%	#	%	#	%
Low	24	8.8	20,078	5.6	6,712	33.4	78,931	22.1
Moderate	68	25.0	93,712	26.2	14,358	15.3	60,421	16.9
Middle	75	27.6	113,621	31.8	8,139	7.2	67,282	18.8
Upper	99	36.4	130,176	36.4	3,855	3.0	151,028	42.2
Unknown	6	2.2	75	0.0	3	4.0	0	0.0
Total AA	272	100.0	357,662	100.0	33,067	9.2	357,662	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	42,473	8,544	2.5	20.1	29,020	68.3	4,909	11.6
Moderate	162,551	81,860	24.1	50.4	66,041	40.6	14,650	9.0
Middle	185,318	113,652	33.4	61.3	58,564	31.6	13,102	7.1
Upper	197,434	136,084	40.0	68.9	48,688	24.7	12,662	6.4
Unknown	152	56	0.0	36.8	85	55.9	11	7.2
Total AA	587,928	340,196	100.0	57.9	202,398	34.4	45,334	7.7
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	= \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	# %		# %		%
Low	4,315	5.0	3,899	4.9	387	7.3	29	3.7
Moderate	20,500	23.7	18,974	23.6	1,362	25.7	164	20.9
Middle	27,705	32.1	25,822	32.1	1,656	31.3	227	29.0
Upper	33,414	38.7	31,290	38.9	1,765	33.4	359	45.8
Unknown	503	0.6	377	0.5	121	2.3	5	0.6
T otal AA	86,437	100.0	80,362	100.0	5,291	100.0	784	100.0
Per	centage of Tota	l Businesses:		93.0		6.1		0.9
				Fa	rms by Tract			
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	32	3.7	31	3.7	1	4.8	0	0.0
Moderate	260	29.9	247	29.2	13	61.9	0	0.0
Middle	301	34.6	295	34.9	3	14.3	3	100.0
Upper	276	31.8	272	32.2	4	19.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	869	100.0	845	100.0	21	100.0	3	100.0
	Percentage of	Total Farmer		97.2		2.4		0.3

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

As noted in the chart below, employment opportunities by industry exist with government, professional and technical services, health care, tourism, manufacturing, and construction and provide a large portion of area employment for residents.

Raleigh-Durha	m-Cary, N	C Employe	es by Indu	stry			
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3
Government	113,750	110,754	109,693	110,989	109,277	111,830	111,134
Private Sector							
Private Sector Total, all industries	732,173	659,295	696,581	721,420	722,663	742,234	752,775
Agriculture, forestry, fishing and hunting	1,549*	1,595*	1,546*	1,528*	1,516*	1,625*	1,589*
Mining, quarrying, and oil and gas extraction	289*	320*	315*	351*	338*	360°	316*
Utilities	2,686*	2,641*	2,613*	2,894*	2,614*	2,602*	2,543*
Construction	45,906	44,842	45,709	46,785	47,236	48,269	48,277
Manufacturing	57,317	55,182	55,603	55,898	57,432	58,382	58,642
Wholesale trade	34,487	30,884*	30,882*	31,543*	33,459	33,814	34,296
Retail Trade	82,409	75,667	81,711	86,256	83,439	83,496	82,684
Transportation and warehousing	16,025*	16,842	19,812	25,132*	22,985*	24,609*	24,148*
Information	27,001	26,376	26,151	26,411	27,382	28,121	28,721
Finance and insurance	33,140	33,309	33,563	32,643	37,461	37,530	38,003
Real estate and rental and leasing	13,004	12,129	12,287	12,513	12,440	12,951	13,268
Professional and technical services	93,693	90,741	93,226	94,939	95,967	98,698	100,844
Management of companies and enterprises	12,566	12,270	12,381	12,362	9,794	9,696	9,858
Administrative and waste services	56,753	52,322	57,869	59,967	58,556	60,165	61,921
Educational services	33,679	30,568	30,239	31,070	31,523	32,021	31,623
Health care and social assistance	104,604	96,921	101,075	103,771	104,853	106,101	106,941
Arts, entertainment, and recreation	14,691	6,150	8,281	8,950	9,066	11,883	13,720
Accommodation and food services	74,907	48,195	57,961	60,549	60,907	65,414	68,656
Other services, except public administration	25,443	20,409	23,492	24,128	23,847	24,597	24,702
Public administration	0	0	0	0	0	0	0
Unclassified							
Source: Bureau of Labor Statistics (BLS), Quarterly Cert	sus of Emp	bymentani	d Wages				
"Indicates that some or all of the data for this category w	as suppres	sed for con	fidentiality i	easons			

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Raleigh-Durham-Cary,	NC Unemployn	nent Rates
Area	2020	2021
Raleigh-Durham-Cary, NC	6.21%	4.03%
Durham County, NC	6.21%	4.10%
Johnston County, NC	6.08%	4.20%
Wake County, NC	6.24%	3.98%
Durham-Chapel Hill, NC MSA	5.85%	3.93%
Raleigh-Cary, NC MSA	6.23%	4.04%
North Carolina	7.08%	4.81%
Source: Bureau of Labor Statistics (BLS), Lo	ocal Area Unemplo	yment Statistics

Overall, unemployment rates have fluctuated for the MSA; however, the assessment area's unemployment rates have consistently been lower than that of the state given the greater employment opportunities in the area. The table also reflects the recent decline in unemployment rates between 2020 and 2021.

Raleig	Raleigh-Durham-Cary, NC Median Family Income Change											
Area	2010 Median Family Income	2015 Median Family Income	<b>Percent Change</b>									
Raleigh-Durham-Cary, NC	\$80,089	\$77,197	-3.61%									
Durham County, NC	\$68,484	\$67,880	-0.88%									
Johnston County, NC	\$63,363	\$59,775	-5.66%									
Wake County, NC	\$88,707	\$84,442	-4.81%									
Durham-Chapel Hill, NC												
MSA	\$69,816	\$68,020	-2.57%									
Raleigh-Cary, NC MSA	\$81,435	\$78,057	-4.15%									
North Carolina	\$61,148	\$57,856	-5.38%									

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, the MSAs, state, as well as the counties within the assessment area denote a decrease in median family income amounts from 2010 to 2015. As depicted below, with the exception of Johnston County moderate-income renters and owners, housing cost burden for low-and-moderate income renters and owners is equal to or exceeds 30 percent or more of household income for the MSAs, counties, and state of North Carolina within the assessment area.

	Raleigh-Durham-Cary, NC Housing Cost Burden											
	Co	st Burden - Rent	ers	Cost Burden - Owners								
	Low	Moderate	All	Low	Moderate							
Area	Income	Income	Renters	Income	Income	All Owners						
Raleigh-Durham-Cary, NC	79%	43%	41%	64%	36%	17%						
Durham County, NC	77%	42%	44%	64%	43%	18%						
Johnston County, NC	70%	22%	43%	55%	29%	19%						
Wake County, NC	82%	47%	40%	68%	36%	16%						
Durham-Chapel Hill, NC												
MSA	74%	45%	44%	63%	37%	19%						
Raleigh-Cary, NC MSA	79%	43%	41%	62%	34%	16%						
North Carolina	75%	49%	42%	60%	36%	20%						

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local affordable housing/economic development official was recently contacted to assist in evaluating the bank's CRA performance. The contact indicated that the organization sponsors initiatives to provide funding and spur affordable housing and economic development activities within the assessment area. He stated that the area has had an explosion of population in recent years due to the influx of businesses that are opening there and with the opportunity for higher paying jobs. Moreover, since the assessment area is part of the North Carolina Research Triangle, businesses such as Apple Inc., have brought higher income job opportunities; however, the presence of these types of employment opportunities have

placed a strain on the area's affordable housing market. The contact stated that because the housing demand is so high in the area, housing burden costs have increased significantly over the past five years. He went on to explain, as housing prices have increased, rental market pricing has also increased, which has caused naturally occurring affordable housing to become scarce. However, area leaders are introducing ways to reduce the housing cost burden and to generate affordable housing by approving affordable housing bonds to provide financing for lower rent single family residences to be built, creating a subsidy program that incentivizes landlords to keep rents affordable. Additionally, market leaders have taken measures to combat its homelessness and affordable housing availability problem by purchasing a local hotel and using it to rent out rooms to individuals and families at an affordable, income-based weekly rate. The contact stated that there are opportunities for local financial institutions to join in the efforts by participating in the recent bond issuing and by providing financial literacy and first time home buyer classes so individuals can move from renting to homeownership status. He also mentioned that two larger banks within the assessment area have committed to helping meet this endeavor. The contact said he believed that local financial institutions are performing well and there haven't been any known instances of discrimination or fair lending issues.

UB holds a limited deposit market share within the assessment area (25<sup>th</sup> of 38 banks operating within the assessment area) having 0.1% of all deposits from the June 30, 2022, FDIC deposit market share report when compared to the other banking institutions that operate within the assessment area. Overall, there is significant opportunity for community development loans and investments within the market area. Despite a competitive market, the bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its array of banking services and products; as noted above, all of the bank's services and products are offered in this assessment area, which includes community development loans, of which the bank originated four totaling \$5.6 million, as well as four qualified investments totaling \$4.3 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 64 customer's loan interest, which totaled 76 loans to the amount of \$1.1 million.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE RALEIGH-DURHAM-CARY, NC ASSESSMENT AREA:

The bank's Lending Test performance in the Raleigh-Durham-Cary, NC assessment area is considered good. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is excellent. The geographic distribution and dispersion of loans is also excellent. The bank originates an adequate amount of community development loans.

The Investment Test performance is good. The bank's qualified investment securities and community development investment donations are good. The bank exhibits good responsiveness to credit and community development needs and makes occasional use of community development initiatives.

Under the Service Test, the bank's performance is considered high satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank has provided a relatively high level of community development services.

#### LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of lending activity, geographic and borrower distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. There were no gaps in lending.

### **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number and dollar (1.7% and 1.9%) exceeds both the percentage of branch offices (0.9%) and the percentage of deposits (0.4%) in the assessment area. As of June 30, 2022, UB ranked 25<sup>th</sup> out of 38 financial institutions in deposit market share having 0.1% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 129<sup>th</sup> of 790 reporters of mortgage lending with a .07% market share and ranked 36<sup>th</sup> of 192 reporters of small business loans with a .2% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered adequate.

## **Geographic Distribution:**

The bank's geographic distribution performance is considered excellent for HMDA lending and good for small business lending within the assessment area. UB's overall geographic distribution performance is considered excellent based upon the relative performance and greater dollar volume of HMDA lending over the two-year review period.

				Ban	k And Ag	gregate	Loans By Yo	ear					
Geographic			20:		Bank And Aggregate Loans By Year					21			Owner Occupied
Income Level	Bank		Agg Bank		1	Agg	Bank		Agg	Bank	Agg		Units %
-	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	Į.			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			se Loans			,,,,,,	,	• • • •	
Low	1	4.0	2.7	479	6.3	2.1	7	11.7	3.3	2,649	13.3	2.6	2.5
Moderate	13	52.0	21.8	3,457	45.8	17.2	22	36.7	23.9	6,767	33.9	18.8	24.
Middle	7	28.0	37.8	2,271	30.1	34.9	15	25.0	35.3	4,010	20.1	32.6	33.4
Upper	4	16.0	37.7	1,349	17.9	45.7	16	26.7	37.5	6,528	32.7	46.0	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	7,556	100.0	100.0	60	100.0	100.0	19,954	100.0	100.0	100.
						Refinance	Loans						
Low	5	20.0	1.9	1,406	17.9	1.5	1	3.4	1.9	440	6.2	1.5	2.5
Moderate	6	24.0	15.6	1,658	21.1	11.9	10	34.5	18.4	2,162	30.3	14.	24.
Middle	6	24.0	32.8	1,945	24.7	29.3	9	31.0	34.9	1,623	22.8	31.4	33.4
Upper	8	32.0	49.7	2,857	36.3	57.2	9	31.0	44.8	2,907	40.8	53.0	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	7,866	100.0	100.0	29	100.0	100.0	7,132	100.0	100.0	100.
				!	Home	Improve	ment Loans						1
Low	0	0.0	1.8	0	0.0	1.9	0	0.0	1.7	0	0.0	1.3	2.5
Moderate	0	0.0	17.2	0	0.0	13.6	1	20.0	17.3	84	12.3	12.8	24.
Middle	0	0.0	32.4	0	0.0	26.5	1	20.0	31.8	250	36.5	26.9	33.4
Upper	1	100.0	48.6	146	100.0	58.0	3	60.0	49.2	350	51.2	59.0	40.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	146	100.0	100.0	5	100.0	100.0	684	100.0	100.0	100.
<u>.</u>				!	М	ultifamily	Loans						Multi-family
Low	0	0.0	17.0	0	0.0	11.	0	0.0	21.6	0	0.0	15.4	<u>Units %</u> 14.
Moderate	3	100.0	41.2	1,821	100.0	29.6	1	100.0	35.7	945	100.0	21.0	26.
Middle	0	0.0	29.4	0	0.0	31.5	0	0.0	25.1	943	0.0	31.	29.0
Upper	0	0.0	11.8	0	0.0	24.6	0	0.0	17.0	0	0.0	32.5	30.
Unknown	0	0.0	0.7	0	0.0	2.8	0	0.0	0.6	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total		100.0			100.0			100.0	100.0	945	100.0	100.0	100.
10.01	3	100.0	100.0				l l	100.0	100.0	340	100.0	100.0	Owner Occupied
					TOTAL HO		age Loans						Units %
Low	6	11.	1 2.2	1,885	10.8	2.1	9	9.4	2.4	3,189	11.	1 2.5	2.5
Moderate	22	40.7	18.3	6,936	39.9	14.7	34	35.4	20.4	9,958	34.6	16.3	24.
Middle	13	24.1	34.6	4,216	24.2	31.5	25	26.0	34.8	5,883	20.4	31.7	33.4
Upper	13	24.1	44.9	4,352	25.0	51.6	28	29.2	42.4	9,785	34.0	49.4	40.0
Unknown	0	0.0	0.0	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	54	100.0	100.0	17,389	100.0	100.0	96	100.0	100.0	28,815	100.0	100.0	100.

During both 2020 and 2021, refinance loans and home purchase loans were the leading HMDA products by number followed by multifamily lending and home improvement; however, both home improvement and multifamily loans had such small volumes that they did not significantly impact the conclusions. Considering both demographic and aggregate proxies for demand, the bank's performance for refinance and home purchase lending are both considered excellent in both years.

As reflected in the preceding tables, UB's percentage of 2020 HMDA lending in the low-income census tract (11.1%) significantly exceeded the aggregate lending level (2.2%) and the percentage of owner-occupied housing units located in such tracts (2.5%). The bank's level of lending in moderate-income census tracts (40.7%) significantly exceeded the level of aggregate lending in such tracts (18.3%) as well as the owner-occupied housing units located in moderate-income census tracts (24.1%). Overall, the bank's 2020 performance is considered excellent, and its performance in 2021 is substantially similar.

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Raleigh-Durham-Cary, NC													
Geographic			20		And A	ggreg	ate Loar		Total					
Income Level	Bank		Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%	
Low	6	4.8	4.7	501	3.5	5.5	7	6.6	4.5	1,370	9.3	5.9	5.0	
Moderate	35	28.0	22.4	4,560	31.6	22.4	27	25.5	23.0	4,943	33.7	22.6	23.7	
Middle	20	16.0	31.7	2,297	15.9	32.6	27	25.5	32.7	3,293	22.4	32.1	32.1	
Upper	60	48.0	40.4	6,338	43.9	38.3	43	40.6	39.0	4,654	31.7	38.7	38.7	
Unknown	4	3.2	0.4	752	5.2	0.9	2	1.9	0.3	419	2.9	0.6	0.6	
Tract-Unk	0	0.0	0.4	0	0.0	0.4	0	0.0	0.5	0	0.0	0.1		
Total	125	100.0	100.0	14,448	100.0	100.0	106	100.0	100.0	14,679	100.0	100.0	100.0	

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank's level of lending in low-income census tracts during 2020 (4.8%) was similar to both the aggregate level of lending (4.7%) and the percentage of businesses located in such tracts (4.9%). UB's level of lending in moderate-income census tracts (28%) is greater than aggregate lending (22.4%) and the percentage of businesses in such tracts (23.5%). Overall, the bank's small business lending performance during 2020 is considered excellent.

The bank's level of lending in low-income census tracts during 2021 (6.6%) was greater than both the aggregate level of lending (4.5%) as well as the percentage of businesses located in such tracts (5%). UB's level of lending in moderate-income census tracts (25.5%) is similar to the aggregate lending (23%) and the percentage of businesses located in such tracts (23.7%). Overall, the bank's small business lending performance during 2021 is considered good.

Overall, the bank's small business lending performance is considered good based upon the relative performance for each year and similar dollar volume of lending.

### Distribution by Borrower Income and Revenue Size of the Business:

UB's distribution by borrower income and small business revenue performance is considered excellent for HMDA lending and good for small business lending within the assessment area. Overall, the bank's borrower distribution is considered excellent and takes into account the relative performance as well as the larger HMDA dollar volume of lending.

	Distribu	tion o					rtgage Le	•	, ,		Incom	e Lev	el
	1		A				eigh-Du		Cary, 1	NC			T
			2020	Ban	k And A	ggregate	e Loans By Year 2021						
Borrower Income Level	Bank	_		Bank		A	Bank			21 Bank		A	Families by Family Income %
IIICOIIIe Level			Agg			Agg			Agg			Agg	Failing income /6
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hon	ne Purch	ase Loans			1			П
Low	1	4.0	7.7	175	2.3	4.6	3	5.0	5.7	595	3.0	3.2	22.1
Moderate	13	52.0	21.8	3,088	40.9	17.2	22	36.7	18.0	5,961	29.9	13.8	16.9
Middle	2	8.0	22.5	676	8.9	21.5	8	13.3	21.2	2,262	11.3	19.8	18.8
Upper	7	28.0	38.4	3,038	40.2	47.4	13	21.7	41.1	5,757	28.9	49.4	42.2
Unknown	2	8.0	9.5	579	7.7	9.3	14	23.3	14.0	5,379	27.0	13.7	0.0
Total	25	100.0	100.0	7,556	100.0	100.0	60	100.0	100.0	19,954	100.0	100.0	100.0
	Refinance Loans												
Low	2	8.0	4.7	366	4.7	2.5	5	17.2	6.4	538	7.5	3.6	22.1
Moderate	4	16.0	13.7	856	10.9	9.9	11	37.9	16.2	2,157	30.2	11.9	16.9
Middle	4	16.0	20.7	1,054	13.4	18.7	2	6.9	20.8	471	6.6	18.9	18.8
Upper	14	56.0	45.0	5,310	67.5	52.5	9	31.0	40.5	3,036	42.6	48.8	42.2
Unknown	1	4.0	16.0	280	3.6	16.3	2	6.9	16.2	930	13.0	16.8	0.0
Total	25	100.0	100.0	7,866	100.0	100.0	29	100.0	100.0	7,132	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	5.8	0	0.0	3.3	0	0.0	4.6	0	0.0	2.5	22.1
Moderate	0	0.0	14.4	0	0.0	9.9	0	0.0	13.7	0	0.0	8.6	16.9
Middle	0	0.0	21.2	0	0.0	18.	2	40.0	19.4	334	48.8	15.0	18.8
Upper	1	100.0	55.9	146	100.0	64.4	3	60.0	59.6	350	51.2	70.5	42.2
Unknown	0	0.0	2.7	0	0.0	4.4	0	0.0	2.7	0	0.0	3.4	0.0
Total	1	100.0	100.0	146	100.0	100.0	5	100.0	100.0	684	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	5					l
Low	3	5.9	5.8	541	3.5	3.4	8	8.4	6.0	1,133	3 4.1	3.4	22.1
Moderate	17	33.3	16.3	3,944	25.3	12.7	33	34.7	16.5	8,118	3 29.1	12.6	16.9
Middle	6	11.8	3 21.0	1,730	11.	1 19.6	13	13.7	20.7	3,167	11.4	19.	18.8
Upper	22	43.1	42.7	8,494	54.6	50.3	25	26.3	41.9	9,143	32.8	49.6	42.2
Unknown	3	5.9	14.2	859	5.5	14.	16	16.8	14.8	6,309	22.6	15.3	0.0
Total	51	100.0	100.0	15,568	100.0	100.0	95	100.0	100.0	27.870	100.0	100.0	100.0
	TIFC Comm			. 5,556						,			1

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, the bank's level of lending to low-income borrowers (5.9%) was similar to the percentage of aggregate lending levels to such borrowers and less than the percentage of low-income families within the assessment area (5.8% and 22.1%, respectively). Conversely, UB's lending to moderateincome borrowers (33.3%) is greater than the percentage of aggregate lending levels (16.3%) as well as the percentage of moderate-income families (16.9%). Overall, the bank's performance during 2020 is considered excellent, and lending during 2021 is substantially similar.

			Assess	sment A	rea: Ka	ileigh-	Durham	ı-Cary,	, NC				
		Bank And Aggregate Loans By Year											
			20	20					20	21			Total Businesses
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	,,,
<u>,</u>					By F	Revenu	ıe						•
\$1 Million or Less	53	42.4	42.2	4,765	33.0	28.9	36	34.0	46.5	5,479	37.3	32.0	93.0
Over \$1 Million	46	36.8		7,222	50.0		30	28.3		5,910	40.3		6.1
Revenue Unknown	26	20.8		2,461	17.0		40	37.7		3,290	22.4		0.9
Total	125	100.0		14,448	100.0		106	100.0		14,679	100.0		100.0
By Loan Size													
\$100,000 or Less	82	65.6	87.1	3,642	25.2	32.2	62	58.5	91.6	2,450	16.7	34.4	
\$100,001 - \$250,000	32	25.6	7.4	5,282	36.6	20.5	29	27.4	4.6	5,043	34.4	18.5	
\$250,001 - \$1 Million	11	8.8	5.5	5,524	38.2	47.2	15	14.2	3.8	7,186	49.0	47.2	
Total	125	100.0	100.0	14,448	100.0	100.0	106	100.0	100.0	14,679	100.0	100.0	
•		I	By Loa	n Size a	nd Rev	venues	\$1 Mill	ion or	Less				
\$100,000 or Less	46	86.8		1,953	41.0		24	66.7		929	17.0		
\$100,001 - \$250,000	4	7.5		602	12.6		5	13.9		848	15.5		
\$250,001 - \$1 Million	3	5.7		2,210	46.4		7	19.4		3,702	67.6		
ψ <b>2</b> 50,001 - ψ1 Willion		100.0		4,765	100.0		36	100.0		5,479	100.0		

D&B data from 2020, indicates that 92.8% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 20.8% involved loans for which revenues were unknown and 42.4% were to businesses with revenues of \$1 million or less. However, 53.5% of the bank's loans where revenue was known (53 of 99 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 42.2% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 93% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 34% were to businesses with revenues of \$1 million or less, and 37.7% involved loans for which revenues were unknown. Additionally, 54.6% of the bank's loans where revenue was known (36 of 66 loans) were to businesses with revenues of \$1 million or less. This level of lending is greater than the 2021 aggregate lending level of 46.5%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

PPP Loans with no reported revenue

Raleigh-Dur	ham-	Cary, NC	2020	
By Loan Size	#	%	\$(000s)	%
\$100,000 or less	12	80.0%	350	35.5%
\$100,001 - \$250,000	3	20.0%	637	64.5%
\$250,001 - \$1 Million	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%
Total	15	100.0%	987	100.0%

During 2020, 65.6% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 87.1% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 80% had loan amounts of \$100,000 or less.

Raleigh-Dur	ham-	Cary, NC	2021	
By Loan Size	#	%	\$(000s)	%
\$100,000 or less	27	73.0%	995	37.1%
\$100,001 - \$250,000	10	27.0%	1,686	62.9%
\$250,001 - \$1 Million	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%
Total	37	100.0%	2,681	100.0%

During 2021, 58.5% of the small business loans reported were \$100,000 and less, and the aggregate reported 91.6% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 73% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

### **Community Development Lending:**

As previously discussed, opportunities for community development lending are significantly available within the Raleigh-Durham-Cary, NC assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank originated an adequate level of community development loans within this market. Three community development loans totaling \$4.3 million were originated within the assessment area during the evaluation period that provided funds for affordable housing needs. In addition, UB originated one loan totaling \$1.3 million as a part of the PPP within this assessment area.

#### **INVESTMENT TEST**

Overall, the bank has a significant level of qualified community development investments and donations, which exhibit good responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the institution maintained two qualified investments totaling \$3.4 million that directly benefit the Raleigh-Durham-Cary, NC assessment area for the evaluation period. UB also holds \$1 million in committed affordable housing qualified investments for this assessment area. The investments support low- and moderate-income multifamily housing complexes. These investments demonstrate good responsiveness to the affordable housing needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$89,022. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the assessment area										
United Bank # \$										
Affordable Housing	1	3,000								
Community Service	14	36,022								
Economic	1	50,000								
Revitalize or Stabilize	0	0								
Total	16	89,022								

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

### **SERVICE TEST**

UB's performance under the service test in this assessment area is considered good. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low and moderate-income areas. The assessment area is new to UB since the previous evaluation. No branch changes have occurred since UB entered the market. In addition, the bank provided a relatively high level of qualified community development services.

#### **Retail Services:**

Delivery systems and branch locations are readily accessible to geographies and individuals of different income levels within the assessment area. Alternative delivery systems are available through 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the institution.

The bank operates two full-service branch offices within the market, one in a low-income census tract (50%) and none located in moderate-income census tracts. The distribution of branches is excellent when considering that 6.9% and 27.3% of the assessment area's households reside in low- and moderate-income areas according to the 2015 census. Branch locations and business hours do not vary in a way that inconveniences the needs of the assessment area. No branches have been opened or closed since the previous evaluation.

### **Community Development Services:**

The bank provides a relatively high level of community development services in the assessment area. Eighteen bank employees provided 110 hours of community development services during the evaluation period for 12 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, economic development, financial services, and financial education, which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area						
	#					
Affordable Housing	2					
Community Services	9					
Economic Development	1					
Revitalize or Stabilize	0					
Total	12					

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE WILMINGTON, NC MSA ASSESSMENT AREA

All of the bank's products and services are available within the three branch offices that UB operates within the assessment area, which includes all of New Hanover and Pender Counties, North Carolina. Three ATMs are available within the tracts the bank serves. The complete composition of the assessment area is detailed in Appendix E.

Tract					DEMOGRAPHICS					
Income	Bra	inches	ATMS		Census Tracts		Households	Total Businesses		
Levels	#	%	#	%	#	%	%	%		
Low	0	0.0%	0	0.0%	9	14.8%	13.0%	13.2%		
Moderate	0	0.0%	0	0.0%	11	18.0%	16.1%	12.7%		
Middle	0	0.0%	0	0.0%	18	29.5%	40.3%	35.6%		
Upper	3	100.0%	3	100.0%	20	32.8%	30.5%	38.3%		
Unknown	0	0.0%	0	0.0%	3	4.9%	0.0%	0.2%		
Totals	3	100%	3	100%	61	100%	100%	100%		

According to the most current census data, the assessment area has a population of 268,257 and a median housing value of \$200,223. The owner-occupancy rate in the assessment area equals 50.4%, which is significantly less than the rate for the state of North Carolina (55.7%). The overall family poverty rate within the assessment area (11.7%) is also less than that of the state (12.8%). The Wilmington, NC MSA median family income during 2020 and 2021 equaled \$80,700 and \$75,200, respectively. The following table includes pertinent demographic data for the assessment area.

		2021 Wilmi	ngton, NC M	ISA AA Der	nographics			
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract		oy Family ome
	#	%	#	%	#	%	#	%
Low	9	14.8	5,989	9.2	2,193	36.6	14,864	22.7
Moderate	11	18.0	10,136	15.5	1,699	16.8	11,517	17.6
Middle	18	29.5	27,338	41.8	2,602	9.5	12,052	18.4
Upper	20	32.8	21,961	33.6	1,147	5.2	26,991	41.3
Unknown	3	4.9	0	0.0	0	0.0	0	0.0
Total AA	61	100.0	65,424	100.0	7,641	11.7	65,424	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	16,534	3,213	4.9	19.4	10,922	66.1	2,399	14.5
Moderate	20,314	9,537	14.4	46.9	7,978	39.3	2,799	13.8
Middle	49,312	29,350	44.4	59.5	14,404	29.2	5,558	11.3
Upper	45,052	24,028	36.3	53.3	9,101	20.2	11,923	26.5
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	131,212	66,128	100.0	50.4	42,405	32.3	22,679	17.3
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	otal Businesses by Tract		r = \$1 Million	Over \$1	Million	Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	2,105	13.2	1,896	12.9	186	17.9	23	13.2
Moderate	2,019	12.7	1,848	12.6	156	15.0	15	8.6
Middle	5,665	35.6	5,227	35.6	389	37.4	49	28.2
Upper	6,087	38.3	5,698	38.8	303	29.1	86	49.4
Unknown	31	0.2	24	0.2	6	0.6	1	0.6
Total AA	15,907	100.0	14,693	100.0	1,040	100.0	174	100.0
Perc	entage of Tota	al Businesses:		92.4		6.5		1.1
				Fa	rms by Tract			
T otal Far		s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	7	4.2	7	4.4	0	0.0	0	0.0
Moderate	71	42.3	66	41.3	5	83.3	0	0.0
Middle	45	26.8	42	26.3	1	16.7	2	100.0
Upper	45	26.8	45	28.1	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	168	100.0	160	100.0	6	100.0	2	100.0
	Percentage of	Total Farms:		95.2		3.6		1.2
Source: 2021 FFIEC Census I	D (					I		

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

As noted in the chart below, employment opportunities in government, professional and technical services, retail trade, health care, tourism, and manufacturing and construction provide a large portion of area employment for residents.

Wilmington	, NC MSA	Employees	by Industr	у			
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3
Government	23,462	22,108	21,999	22,908	16,505	16,050	15,991
Private Sector							l ,
Private Sector Total, all industries	107,529	94,228	103,155	105,582	111,812	114,914	116,345
Agriculture, forestry, fishing and hunting	0*	0*	0*	0*	0*	0*	0*
Mining, quarrying, and oil and gas extraction	0*	0*	0*	0*	0*	0*	0*
Utilities	290*	290*	288*	296*	301*	304*	295*
Construction	9,452	9,286	9,307	9,355	9,584	9,729	9,796
Manufacturing	5,826	4,869	5,157	5,268	5,563	5,598	5,709
Wholesale trade	4,668	4,553	4,647	4,647	4,680	4,780	4,804
Retail Trade	17,458	15,698	16,892	17,706	17,208	17,308	17,341
Transportation and warehousing	3,123*	3,073*	3,017*	3,417*	3,326*	3,254*	3,319*
Information	3,285	3,157	3,097	3,235	3,436	2,549	2,597
Finance and insurance	3,371	3,302	3,368	3,471	3,446	3,436	3,460
Real estate and rental and leasing	2,707	2,535	2,763	2,771	2,709	3,007	3,036
Professional and technical services	9,148	8,523*	8,783*	9,100*	9,124*	9,291*	9,425*
Management of companies and enterprises	646*	450°	588*	588*	632*	653*	677*
Administrative and waste services	6,626*	6,552	7,136	6,754*	7,497	7,702	7,655
Educational services	1,110	902	1,180	1,058	1,114	1,165	1,194
Health care and social assistance	14,917	13,704	14,409	14,858	21,258	21,140	21,001
Arts, entertainment, and recreation	1,975	1,327	1,645	1,691	1,642	2,027	2,107
Accommodation and food services	17,460	11,436	15,831	15,621	15,189	17,422	18,245
Other services, except public administration	4,449	3,468	4,075	4,105	4,068	4,361	4,603
Public administration	0	0	0	0	0	0	0
Unclassified							
Source: Bureau of Labor Statistics(BLS), Quarterly Cent	sus of Empl	byment and	f Wages				· ·
"Indicates that some or all of the data for this category w	as suppres	sed for con	fidentiality r	easons			

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Wilmington, N	MSA Unemployn	nent Rates		
Area	2020	2021		
Wilmington, NC MSA	6.88%	4.23%		
New Hanover County, NC	7.02%	4.24%		
Pender County, NC	6.30%	4.21%		
North Carolina	7.08%	4.81%		
Source: Bureau of Labor Statistics	(BLS), Local Area Unem	ployment Statistics		

Overall, unemployment rates have decreased from 2020 to 2021, and the MSA's unemployment rates were lower than that of the state of North Carolina during this same time period.

Wilmington, NC MSA Median Family Income Change									
Area	2010 Median Family Income	2015 Median Family Income	<b>Percent Change</b>						
Wilmington, NC MSA	\$67,031	\$64,357	-3.99%						
New Hanover County, NC	\$70,987	\$66,764	-5.95%						
Pender County, NC	\$58,898	\$56,277	-4.45%						
North Carolina	\$61,148	\$57,856	-5.38%						

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the preceding table, the MSAs, state, as well as the counties within the assessment area denote a decrease in median family income amounts from 2010 to 2015. As depicted below, housing cost burden for low-and-moderate income renters and owners is equal to or exceeds 30 percent or more of household income for the MSAs, counties, and state of North Carolina within the assessment area.

	Wilmington, NC MSA Housing Cost Burden										
	Cost Burden - Renters Cost Burden - Owners										
Area	Low Income	Moderate Income	All Renters	Low Income	<b>Moderate Income</b>	All Owners					
Wilmington, NC MSA	76%	59%	48%	69%	48%	26%					
New Hanover County, NC	78%	60%	49%	71%	52%	26%					
Pender County, NC	56%	51%	38%	66%	33%	24%					
North Carolina	75%	49%	42%	60%	36%	20%					

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

One local affordable housing official was contacted during the evaluation to assist in evaluating the bank's CRA performance and indicated that the organization's mission is to repair, rebuild, and make homes accessible to low-income and elderly residents within the assessment area who do not have the resources to make the costly roof, ceiling, floor, electrical, and plumbing repairs. The interviewee indicated that a client's home must be located in a qualified county with a total household income below 50% of their county's median income. The organization relies primarily on state and federal grants, along with disaster recovery funds to provide their services within the community. While the organization does not rely on funding from financial institutions, he stated that access to traditional banking services, including financial literacy, are always helpful to their clients, many of whom could also benefit from periodic household budgeting education workshops sponsored from area financial institutions. The contact was not aware of any discriminatory practices from local financial institutions. The organization believes local financial institutions are meeting the community's credit needs.

UB holds a limited deposit market share within the assessment area (16<sup>th</sup> of 21 banks operating within the assessment area) having 0.3% of all deposits from the June 30, 2022, FDIC deposit market share report. Overall, there is reasonable opportunity for community development loans and investments within the market area. Despite a competitive market from state peers, the bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its all of its banking services and products, all of which are offered in this assessment area. While UB is new to this assessment area it holds \$1 million in qualified investments, as well as an additional \$62,500 in committed, but not yet funded, qualified investments. During the COVID-19 emergency within this assessment area, the bank deferred 22 customer's loan interest, which totaled 24 loans to the amount of \$138,078.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE WILMINGTON, NC MSA ASSESSMENT AREA:

The bank's Lending Test performance in the Wilmington, NC MSA assessment area is considered good. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution is excellent, and the bank did not originate any community development loans.

The Investment Test performance is adequate. The bank's qualified investment securities and community development investment donations are adequate. The bank exhibits adequate responsiveness to credit and community development needs and makes occasional use of community development initiatives.

Under the Service Test, the bank's performance is considered good. The bank's delivery systems are accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank has provided a relatively high level of community development services.

#### **LENDING TEST**

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of lending activity, geographic and borrower distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. There were no gaps in lending, and the geographic distribution and dispersion of loans is excellent.

### **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by number and dollar volume (1.5% and 1.4%) are similar to the percentage of branch offices (1.4%) and greater than the percentage of deposits (0.2%) in the assessment area. As of June 30, 2022, UB ranked 16<sup>th</sup> out of 21 financial institutions in deposit market share having 0.3% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 61<sup>st</sup> of 546 reporters of mortgage lending with a 0.2% market share and ranked 19<sup>th</sup> of 117 reporters of small business loans with a 1% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered adequate.

## **Geographic Distribution:**

The bank's geographic distribution performance is considered excellent for HMDA lending and good for small business lending within the assessment area. UB's geographic distribution performance is considered excellent overall based upon the relative performance and similar dollar volume of lending for each product during 2020 and 2021.

				Ban	k And Ad	ggregate	Loans By Y	ear					
Geographic		2020				333	2021					Owner Occupied	
Income Level	Bank		Agg	Bank		Agg	Bank	:	Agg	Bank		Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
				, (()			ase Loans			,,,,,,		,	
Low	2	9.5	5.6	200	2.5	3.7	8	20.0	4.8	1,980	16.3	3.2	4
Moderate	2	9.5	7.9	590	7.5	5.2	11	27.5	8.1	1,957	16.1	5.1	14
Middle	6	28.6	46.9	2,297	29.2	41.1	12	30.0	49.3	3,286	27.1	43.5	44
Upper	11	52.4	39.6	4,772	60.7	50.0	9	22.5	37.8	4,903	40.4	48.1	36
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	7,859	100.0	100.0	40	100.0	100.0	12,126	100.0	100.0	100
					F	Refinance	Loans						
Low	3	37.5	3.2	640	35.7	2.3	0	0.0	3.9	0	0.0	2.8	4
Moderate	1	12.5	6.5	117	6.5	4.4	0	0.0	7.5	0	0.0	5.0	14
Middle	1	12.5	46.8	137	7.6	41.5	6	66.7	46.3	932	56.2	40.4	44
Upper	3	37.5	43.5	900	50.2	51.9	3	33.3	42.2	725	43.8	51.8	36
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	1,794	100.0	100.0	9	100.0	100.0	1,657	100.0	100.0	100
					Home	Improve	ment Loans						
Low	0	0.0	3.6	0	0.0	3.5	0	0.0	4.0	0	0.0	2.7	4
Moderate	0	0.0	7.8	0	0.0	6.2	2	100.0	7.5	115	100.0	5.8	14
Middle	1	50.0	40.9	50	13.9	32.4	0	0.0	39.7	0	0.0	31.8	44
Upper	1	50.0	47.7	311	86.1	57.9	0	0.0	48.8	0	0.0	59.7	36
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	361	100.0	100.0	2	100.0	100.0	115	100.0	100.0	100
	-				М	ultifamily	Loans						Multi-family
Low	1	100.0	25.0	480	100.0	11.	1	100.0	36.2	1,200	100.0	33.8	<b>Units %</b> 25
Moderate	0	0.0	20.0	0	0.0	12.7	0	0.0	21.3	0	0.0	8.5	1:
Middle	0	0.0	25.0	0	0.0	42.6	0	0.0	19.1	0	0.0	19.0	34
Upper	0	0.0	30.0	0	0.0	33.1	0	0.0	23.4	0	0.0	38.6	28
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	480	100.0	100.0	1	100.0	100.0	1,200	100.0	100.0	100
							gage Loans						Owner Occupied
l au	ا م	46	4.2				9	46	4 4	2.400	20.3		Units %
Low Moderate	6 4	16.7 11.	1 7.3	1,320 757	12.2 7.0	3.5 5.3	13	16.1 23.2	4.4 7.8	3,180 2,072	13.2	5.2 5.3	14
Middle	9	25.0		2,504	23.1	41.2	20	35.7			27.6	40.0	44
			46.4		57.8	50.0			47.1 40.7	4,324	38.8		36
Upper	17 0	47.2	42.0	6,264			14 0	25.0		6,078		49.5	
Unknown	0	0.0	0.0	0	0.0	0.0		0.0	0.0	0	0.0	0.0	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

For UB, home purchase loans were the leading HMDA product by number followed by refinance loans during both 2020 and 2021; home improvement and multifamily lending were not factors in the analysis due to limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for home purchase lending is considered excellent in both 2020 and 2021, while refinance lending is excellent in 2020 but very poor in 2021.

On a combined basis, and as reflected in the preceding table, UB's percentage of 2020 HMDA lending in low-income census tracts (16.7%) significantly exceeded the aggregate lending level and proportion of owner-occupied housing units located in low-income census tracts (4.2% and 4.9%, respectively). The bank's level of lending in moderate-income census tracts (11.1%) exceeded the level of aggregate lending in such tracts (7.3%), but was less than the percentage of owner-occupied housing units located in moderate-income census tracts (14.4%). Overall, the bank's 2020 performance is considered excellent, and its performance in 2021 is substantially similar.

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Wilmington, NC MSA												
Geographic										Total			
Income	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	25	20.3	12.5	3,005	25.7	16.6	23	20.2	11.3	2,904	17.8	15.2	13.2
Moderate	2	1.6	10.7	302	2.6	11.4	9	7.9	11.2	1,237	7.6	10.4	12.7
Middle	41	33.3	35.6	4,072	34.8	33.2	27	23.7	38.3	4,641	28.5	35.2	35.6
Upper	55	44.7	39.9	4,312	36.9	37.6	55	48.2	38.1	7,527	46.2	38.3	38.3
Unknown	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.4	0.2
Tract-Unk	0	0.0	1.1	0	0.0	1.0	0	0.0	0.9	0	0.0	0.5	
Total	123	100.0	100.0	11,691	100.0	100.0	114	100.0	100.0	16,309	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank's level of loans in low-income census tracts during 2020 (20.3%) is greater than the level of aggregate lending (12.5%) and the percentage of businesses located in such tracts (13.1%). UB's level of lending in moderate-income census tracts (1.6%) is less than aggregate lending (10.7%) and the percentage of businesses in such tracts (12.9%). The bank's small business lending performance during 2020 is considered good.

The bank's level of loans in low-income census tracts during 2021 (20.2%) is significantly greater than the level of aggregate lending (11.3%) and the percentage of businesses located in such tracts (13.2%). UB's level of lending in moderate-income census tracts (7.9%) is less than aggregate lending (11.2%) and the percentage of businesses located in such tracts (12.7%). Overall, the bank's small business lending performance during 2021 is considered excellent.

Overall, the performance is considered good based upon the relative performance for each year.

#### Distribution by Borrower Income and Revenue Size of the Business:

UB's distribution by borrower income and small business revenue performance is considered good for both HMDA and small business lending within the assessment area.

	Distribu	tion o	f 2020					_	-		Incom	e Lev	el
	T						Vilmingt		C MSA	<b>L</b>			
				Ban	k And A	ggregate	Loans By Y	ear					
Borrower Income Level			2020			I			20:				Families by Family Income %
income Level	Banl		Agg	Bank		Agg	Bank		Agg	Bank		Agg	railing income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	1			1			ase Loans			1			
Low	0	0.0	6.4	0	0.0	3.3	0	0.0	3.7	0	0.0	1.7	22.7
Moderate	2	9.5	18.5	502	6.4	13.0	8	20.0	14.1	1,91	1 15.8	9.2	17.6
Middle	2	9.5	20.1	615	7.8	17.3	3	7.5	18.2	896	7.4	14.8	18.4
Upper	10	47.6	43.5	5,222	66.4	55.3	10	25.0	48.5	6,333	52.2	58.8	41.3
Unknown	7	33.3	11.5	1,520	19.3	11.	1 19	47.5	15.5	2,986	24.6	15.5	0.0
Total	21	100.0	100.0	7,859	100.0	100.0	40	100.0	100.0	12,126	100.0	100.0	100.0
					l	Refinanc	e Loans						_
Low	1	12.5	4.5	117	6.5	2.3	1	11.	1 4.4	90	5.4	2.2	22.7
Moderate	1	12.5	14.3	137	7.6	9.7	3	33.3	14.5	486	29.3	9.5	17.6
Middle	0	0.0	17.7	0	0.0	14.9	1	11.	1 17.8	196	11.8	14.4	18.4
Upper	3	37.5	41.3	1,130	63.0	49.8	3	33.3	42.7	442	26.7	52.7	41.3
Unknown	3	37.5	22.2	410	22.9	23.3	1	11.	1 20.6	443	26.7	21.	0.0
Total	8	100.0	100.0	1,794	100.0	100.0	9	100.0	100.0	1,657	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	4.6	0	0.0	5.0	0	0.0	3.6	0	0.0	1.9	22.7
Moderate	0	0.0	16.3	0	0.0	12.	1	50.0	11.0	50	43.5	6.6	17.6
Middle	1	50.0	20.8	50	13.9	16.8	0	0.0	20.5	0	0.0	13.	18.4
Upper	1	50.0	55.0	311	86.1	59.9	0	0.0	62.3	0	0.0	73.3	41.3
Unknown	0	0.0	3.3	0	0.0	6.2	1	50.0	2.6	65	56.5	5.1	0.0
Total	2	100.0	100.0	361	100.0	100.0	2	100.0	100.0	115	100.0	100.0	100.0
	•				Total H	ome Mor	tgage Loans	3					
Low	1	2.9	5.2	117	1.1	2.8	1	1.8	4.0	90	0.6	1.9	22.7
Moderate	3	8.6	15.8	639	6.2	11.	1 12	21.8	14.0	2,447	16.9	9.2	17.6
Middle	4	11.4	18.5	696	6.7	15.8	4	7.3	18.0	1,092	7.6	14.5	18.4
Upper	17	48.6	42.6	6,983	67.4	52.4	17	30.9	46.5	7,331	50.7	56.5	41.3
Unknown	10	28.6	17.7	1,930	18.6	17.9	21	38.2	17.5	3,494	24.2	17.9	0.0
Total	35	100.0	100.0	10,365	100.0	100.0	55	100.0	100.0	14,454	100.0	100.0	100.0
l	-						L						

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

During 2020, the bank's level of lending to low-income borrowers (2.9%) was less than both the percentage of aggregate lending levels to such borrowers and the percentage of low-income families within the assessment area (5.2% and 22.7%, respectively). UB's lending to moderate-income borrowers (8.6%) was also less than the percentage of aggregate lending levels (15.8%) and the percentage of moderate-income families (17.6%). Overall, the bank's performance during 2020 is considered poor.

During 2021, the bank's level of lending to low-income borrowers (1.8%) was less than both the percentage of aggregate lending levels to such borrowers and the percentage of low-income families within the assessment area (4% and 22.7%, respectively). Conversely, UB's lending to moderate-income borrowers (21.8%) was significantly greater than the percentage of aggregate lending levels (14%) and the percentage of moderate-income families (17.6%). Overall, the bank's performance during 2021 is considered excellent.

Overall, the level of lending is considered good based upon the relative performance and dollar volume of lending for each year.

Distrib	Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses												
	Assessment Area: Wilmington, NC MSA												
	Bank And Aggregate Loans By Year												
		2020						20	21			Total Businesses	
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					By F	Revenu	1e						
\$1 Million or Less	55	44.7	39.6	3,219	27.5	29.2	48	42.1	47.0	9,671	59.3	34.4	92.4
Over \$1 Million	36	29.3		5,912	50.6		27	23.7		4,082	25.0		6.5
Revenue Unknown	32	26.0		2,560	21.9		39	34.2		2,556	15.7		1.1
Total	123	100.0		11,691	100.0		114	100.0		16,309	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	88	71.5	87.7	3,297	28.2	36.8	72	63.2	91.5	2,930	18.0	38.3	
\$100,001 - \$250,000	27	22.0	7.7	4,290	36.7	22.3	22	19.3	4.9	3,549	21.8	18.4	
\$250,001 - \$1 Million	8	6.5	4.6	4,104	35.1	41.0	20	17.5	3.6	9,830	60.3	43.4	
Total	123	100.0	100.0	11,691	100.0	100.0	114	100.0	100.0	16,309	100.0	100.0	
		J	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	49	89.1		1,583	49.2		24	50.0		762	7.9		
\$100,001 - \$250,000	4	7.3		836	26.0		11	22.9		1,781	18.4		
\$250,001 - \$1 Million	2	3.6		800	24.9		13	27.1		7,128	73.7		
Total	55	100.0		3,219	100.0		48	100.0		9,671	100.0		
Source: 2021 FFIEC C 2021 Dun & E													

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 92.2% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 26% involved loans for which revenues were unknown and 44.7% were to businesses with revenues of \$1 million or less. However, 60.4% of the bank's loans where revenue was known (55 of 91 loans) were to businesses with revenues of \$1 million or less. The percentage is greater than the 2020 aggregate lending level of 39.6% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 92.4% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 42.1% were to businesses with revenues of \$1 million or less, and 34.2% involved loans for which revenues were unknown. Additionally, 64% of the bank's loans where revenue was known (48 of 75 loans) were to businesses with revenues of \$1 million or less. This level of lending is greater than the 2021 aggregate lending level of 47%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

PPP	Loans	with 1	no re	ported	revenue

Wilmington, NC MSA 2020							
By Loan Size	#	%	\$(000s)	%			
\$100,000 or less	12	75.0%	355	35.8%			
\$100,001 - \$250,000	3	18.8%	383	38.6%			
\$250,001 - \$1 Million	1	6.3%	255	25.7%			
Over \$1 Million	0	0.0%	0	0.0%			
Total	16	100.0%	993	100.0%			

During 2020, 71.5% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 87.7% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 75% had loan amounts of \$100,000 or less.

Wilmington, NC MSA 2021							
By Loan Size	#	%	\$(000s)	%			
\$100,000 or less	24	88.9%	763	54.7%			
\$100,001 - \$250,000	2	7.4%	275	19.7%			
\$250,001 - \$1 Million	1	3.7%	357	25.6%			
Over \$1 Million	0	0.0%	0	0.0%			
Total	27	100.0%	1,395	100.0%			

During 2021, 63.2% of the small business loans reported were \$100,000 and less, and the aggregate reported 91.5% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 88.9% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

#### **Community Development Lending:**

As previously discussed, opportunities for community development lending are reasonably available within the Wilmington, NC MSA assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period the bank did not originate a community development loan within this market and is considered poor.

#### **INVESTMENT TEST**

Overall, the bank has an adequate level of qualified community development investments and donations, which exhibit adequate responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the institution maintained three qualified investments totaling \$1 million that directly benefit the Wilmington, NC MSA assessment area for the evaluation period; additionally, \$62,500 is held in committed funds that benefit the assessment area. The investments support affordable housing and small business development. These investments demonstrate adequate responsiveness to the needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$32,500. The donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education.

Qualified Investment Donations in the assessment area						
United Bank # \$						
Affordable Housing	0	0				
Community Service	7	32,500				
Economic	0	0				
Revitalize or Stabilize	0	0				
Total	7	32,500				

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

#### **SERVICE TEST**

UB's performance under the service test in this assessment area is considered good. Systems for delivering retail banking services are reasonably accessible to all portions of the assessment area, including low and moderate-income areas. Branch services and business hours do not vary in a way that inconveniences the needs of the assessment area. The assessment area is new since the previous evaluation, and no branch closings have occurred. In addition, the bank provides a relatively high level of community development services.

#### **Retail Services:**

Delivery systems are reasonably accessible to geographies and individuals of different income levels within the assessment area. Alternative delivery systems are available through 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the institution.

The bank operates three full-service branch offices within the market, all of which are located in upper-income census tracts. The distribution of branches is adequate when considering that 13% and 16.1% of the assessment area's households reside in low- and moderate-income areas according to the 2015 census. Branch services and business hours do not vary in a way that inconveniences the needs of the assessment area. No branches have closed since the previous evaluation, and UB's entrance into the market has not adversely affected the accessibility of its delivery systems to its customers, particularly low-and-moderate-income geographies and individuals.

### **Community Development Services:**

The bank provides a relatively high level of community development services in the assessment area. Seven bank employees provided 70 hours of community development services during the evaluation period for nine different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, financial services, and financial education, which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area				
	#			
Affordable Housing	0			
Community Services	9			
Economic Development	0			
Revitalize or Stabilize	0			
Total	9			

## METROPOLITAN AREAS LIMITED REVIEW

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GOLDSBORO, NC MSA ASSESSMENT AREA

A limited-scope review was conducted in the Goldsboro, NC MSA assessment area. Overall, the bank's lending, investment, and service test performances in the assessment area were below its statewide performance levels.

This assessment area consists of Wayne County. The assessment area included ten moderate-income, 13 middle-income and three upper-income census tracts. According to the most current census data, the population of the assessment area is 124,355.

The bank operates two branch offices in the assessment area. One is located in a moderate-income tract and one in a middle-income tract. This assessment area contains 0.9% of the institution's branches and 0.2% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Goldsboro, NC MSA Assessment Area								
	Tract Dis	tribution	Percentage of Families by	Percentage of Families by				
Income Category	#	%	Tract	Income Level				
Low Income	0	0.0	0.0	22.8				
Moderate Income	10	38.5	30	17.9				
Middle Income	13	50	56.6	19.4				
Upper Income	3	11.5	13.5	39.9				
Total	26	100.0	100.0	100.0				

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Goldsboro, NC MSA Assessment Area								
Loan Type 2020 2021 Total								
HMDA	5	9	14					
Small Business	15	24	39					
Total	20	33	53					

As a percentage by number and dollar, respectively, the Goldsboro, NC MSA assessment area accounts for 0.2% and 0.1% of the bank's overall lending during the evaluation period and 1.8% and 0.6% of the bank's lending in its North Carolina assessment areas. In 2020, the bank ranked 38th out of 239 HMDA reporters with 0.1% of the area's total HMDA volume. UB ranked 40th in 2021 out of 251 reporters with 0.2% of the area's HMDA lending. In 2020, the bank ranked 16<sup>th</sup> out of 59 institutions reporting small business loans in the assessment area, and in 2021 it ranked 15<sup>th</sup> out of 73 reporters. The bank extended 0.8% of small business loans reported by the aggregate in the assessment area in 2020 and 1.2% in 2021.

UB made no community development loans or services, and made qualified donations totaling \$2,000. While not yet funded, the bank has also committed \$740,670 to a qualified investment. No community development loans.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HICKORY-LENOIR-MORGANTOWN, NC ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Hickory-Lenoir-Morgantown, NC assessment area was conducted. Overall, the bank's lending, investment, and service test performances in the assessment area were below the bank's statewide performance levels.

This assessment area consists of Catawba County, and includes five moderate income, 18 middle-income, and eight upper-income census tracts. According to the most current census data, the population of the assessment area is 154,610.

The bank operates one branch office in the assessment area, and it is located in an upper-income tract. This assessment area contains 0.5% of the institution's branches and 0.3% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Hickory-Lenoir-Morgantown, NC Assessment Area								
	Tract Dis	tribution	Percentage of Families by	Percentage of Families by				
Income Category	#	%	Tract	Income Level				
Low Income	0	0.0	0.0	18.1				
Moderate Income	5	16.1	10.8	17.8				
Middle Income	18	58.1	62.1	20.4				
Upper Income	8	25.8	27.2	43.8				
Total	21	100.0	100.0	100.0				

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Hickory-Lenoir-Morgantown, NC Assessment								
Area								
Loan Type	2020	2021	Total					
HMDA	31	31	62					
Small Business	107	96	203					
Total	138	117	265					

As a percentage by number and dollar, respectively, the Hickory-Lenoir-Morgantown, NC assessment area accounts for 1.2% and 0.9% of the bank's overall lending during the evaluation period and 9.2% and 8.8% of the bank's lending in North Carolina. In 2020, the bank ranked 37th out of 349 HMDA reporters with 0.4% of the area's total HMDA volume. UB ranked 39th in 2021 out of 367 reporters with 0.4% of the area's HMDA lending. In 2020, the bank ranked 10th out of 90 institutions reporting small business loans in the assessment area, and in 2021 it ranked 12th out of 86 reporters. The bank extended 3.1% of small business loans reported by the aggregate in the assessment area in 2020 and 2.6% in 2021.

Two community development loans totaling \$1.9 million were originated in this limited scope assessment area, one of which preserved an affordable housing project and the other provided services to low- and moderate-income households through community. While there are no qualified investments for this assessment area, the bank has committed, but not yet funded \$62,500 for a qualifying investment. UB's qualified donations equal \$2,100, and it had one qualified community development service.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NEW BERN-MOREHEAD CITY, NC CSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the New Bern-Morehead City, NC CSA assessment area was conducted. The bank's lending, investment, and service performance levels were below the statewide performance levels for each test.

This assessment area consists of Carteret, Craven, Jones, and Pamlico Counties. The assessment area contains two low-income, seven moderate-income, 29 middle-income, and 26 upper-income census tracts. According to the most current census data, the population of the assessment area is 195,826.

The bank operates three branch offices in the assessment area. One is located in a low-income tract, one in a middle-income tract, and one in an upper-income tract. This assessment area contains 1.4% of the institution's branches and 0.7% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – New Bern-Morehead City, NC CSA Assessment Area					
	Tract Distribution Percentage of Families by Percentage of Families by				
Income Category	#	%	Tract	Income Level	
Low Income	2	2.9	2.2	18.8	
Moderate Income	7	10.3	12.7	17.2	
Middle Income	29	42.6	47	18.4	
Upper Income	26	38.2	38.2	45.6	
Total	64	100.0	100.0	100.0	

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the New Bern-Morehead City, NC CSA Assessment						
	Area					
Loan Type	2020	2021	Total			
HMDA	39	42	81			
Small Business	90	61	151			
Total	129	103	232			

As a percentage by number and dollar, respectively, the New Bern-Morehead City, NC CSA assessment area accounts for 1.1% and 0.8% of the bank's overall lending during the evaluation period and 8% and 8.6% of the bank's lending in the North Carolina assessment areas. In 2020, the bank ranked 45th out of 410 HMDA reporters with 0.3% of the area's total HMDA volume. UB ranked 42nd in 2021 out of 441 reporters with 0.3% of the area's HMDA lending. In 2020, the bank ranked 12th out of 90 institutions reporting small business loans in the assessment area, and in 2021 it ranked 14th out of 84 reporters. The bank extended 2% of small business loans reported by the aggregate in the assessment area in 2020 and 1.2% in 2021.

One community development loan totaling \$100,000 was originated during the review period that was used to provide social services to low-and-moderate income households within this limited scope assessment area. Additionally, the bank held one qualified investment for \$720,447 and has committed another \$3 million in qualified investments that has not yet been funded. The bank made qualified donations totaling \$20,800 and had seven community development services during the evaluation period.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ROCKY MOUNT-WILSON-ROANOKE RAPIDS, NC ASSESSMENT AREA

A limited-scope review was conducted in the in the Rocky Mount-Wilson-Roanoke Rapids, NC assessment area. UB's lending, investment, and service test performances in the assessment area were below the statewide performance levels.

During 2020, this assessment area consisted of Nash and Wilson Counties; and currently includes both Nash and Wilson Counties, as well as the addition of Edgecombe County in 2021. During 2020, the assessment area included two low-income, five moderate-income, 20 middle-income and 10 upper-income census tracts. The current delineation includes two low-income, 11 moderate-income, 27 middle-income, and 11 upper-income census tracts. According to the most current census data, the population of the assessment area was 176,303 during 2020 and is currently 231,583 after the inclusion of Edgecombe County.

The bank operates three branch offices in the assessment area, and all are located in middle-income tracts. This assessment area contains 1.4% of the institution's branches and 0.6% of the deposits during the evaluation period. During 2020, eight distressed middle-income census tracts in Wilson County (for both poverty and unemployment) are contained within this assessment area. During 2021, eight distressed middle-income census tracts are contained within this assessment area. All of the tracts are located in Wilson County and are considered distressed due to poverty. The following table provides information regarding the current demographic characteristics of the assessment area, based on 2015 ACS data, and the 2020 demographic characteristics are located in Appendix C.

Assessment Area Demographics – Rocky Mount-Wilson-Roanoke Rapids, NC Assessment Area					
	Tract Distribution   Percentage of Families by   Percentage of Families by   Families by				
Income Category	#	%	Tract	Income Level	
Low Income	2	3.9	1.0	22.1	
Moderate Income	11	21.6	18.9	16.6	
Middle Income	27	52.9	52.4	19.6	
Upper Income	11	21.6	27.8	41.7	
Total	51	100.0	100.0	100.0	

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Rocky Mount-Wilson-Roanoke Rapids, NC						
	Assessment Area					
Loan Type 2020 2021 Total						
HMDA	19	17	26			
Small Business         118         88         206						
Total	137	105	232			

As a percentage by number and dollar, respectively, the Rocky Mount-Wilson-Roanoke Rapids, NC assessment area accounts for 1.2% and 0.7% of the bank's overall lending during the evaluation period and 8.6% and 7.6% of the bank's lending in the North Carolina assessment areas. In 2020, the bank ranked 36th out of 285 HMDA reporters with 0.3% of the area's total HMDA volume. UB ranked 46th in 2021 out of 337 reporters with 0.3% of the area's HMDA lending. In 2020, the bank ranked 9th out of 82 institutions reporting small business loans in the assessment area, and in 2021 it ranked 15th out of 80 reporters. The bank extended 3.6% of small business loans reported by the aggregate in the assessment area in 2020 and 2% in 2021.

The bank made one community development loan (a PPP loan) for \$1.5 million during the evaluation period. Qualified investments for this limited scope assessment area amount to \$425,087, and UB has also committed \$74,913, which has not yet been funded. UB made qualified donations of \$12,300 and had six community development services.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN METROPOLITAN AREAS OF NORTH CAROLINA

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in Appendix C of this evaluation. Conclusions regarding performance, which did not impact the state of North Carolina's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	<b>Lending Test</b>	<b>Investment Test</b>	Service Test
Goldsboro, NC MSA	Below	Below	Below
Hickory-Lenoir-Morgantown, NC	Below	Below	Below
New Bern-Morehead City, NC CSA	Below	Below	Below
Rocky Mount-Wilson-Roanoke Rapids, NC	Below	Below	Below

### NONMETROPOLITAN STATEWIDE AREA LIMITED REVIEW

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBUS, NC NONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Columbus, NC NonMSA assessment area was conducted. Overall, the bank's lending, investment, and service test performances were below the statewide performance levels.

This assessment area consists of Bladen, Columbus, Duplin, and Sampson Counties. The assessment area includes ten moderate-income, 29 middle-income and two upper-income census tracts. According to the most current census data, the population of the assessment area is 215,276.

The bank operates five branch offices in the assessment area, and one is located in a moderate-income tract and four are located in middle-income tracts. The assessment area contains 2.3% of the institution's branches and 1% of the deposits during the review period. During 2020, 29 distressed middle-income census tracts (poverty) are contained within this assessment area. During 2021, 13 distressed middle-income census tracts (poverty) are contained within this assessment area. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Columbus, NC NonMSA Assessment					
		Area			
Tract Percentage Percentage of Distribution of Families Families by					
Income Category	#	%	by Tract	Income Level	
Low Income	0	0.0	0.0	24.4	
Moderate Income	10	24.4	24.1	18.6	
Middle Income	29	70.7	72.3	19.4	
Upper Income	2	4.9	3.7	37.6	
Total	41	100.0	100.0	100.0	

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Columbus, NC NonMSA Assessment Area					
Loan Type	2020	2021	Total		
HMDA	8	18	26		
Small Business	97	99	196		
Total	105	117	222		

As a percentage by number and dollar, respectively, the Columbus, NC NonMSA assessment area accounts for 1.1% and 0.5% of the bank's overall lending during the evaluation period and 8.3% and 4.7% of the bank's lending in the North Carolina assessment areas. In 2020, the bank ranked 39th out of 249 HMDA reporters with 0.2% of the area's total HMDA volume. UB ranked 37th in 2021 out of 258 reporters with 0.4% of the area's HMDA lending. In 2020, the bank ranked tenth out of 79 institutions reporting small business loans in the assessment area, and in 2021 it ranked 12th out of 76 reporters. The bank extended 2.6% of small business loans reported by the aggregate in the assessment area in 2020 and 2.4% in 2021.

One community development loan totaling \$63,663 was made that supports essential infrastructure in a distressed census tract. While there were no qualified investments, UB made qualified donations totaling \$7,695 and had five community development service activities during the evaluation period.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE DARE-PASQUOTANK COUNTY, NC NONMSA ASSESSMENT AREA

A limited-scope review was conducted in the Dare-Pasquotank County, NC NonMSA assessment area. Overall, the lending, investment, and service tests were below the statewide performance levels.

This assessment area consists of Dare and Pasquotank Counties and includes one low-income, one moderate-income, five middle-income and 12 upper-income census tracts. According to the most current census data, the population of the assessment area is 74,881.

The bank operates three branch offices in the assessment area, one of which is located in a moderate-income tract and the remaining two are located in upper-income tracts. During the review period, the assessment area contains 1.4% of the institution's branches and 0.5% of the deposits within the assessment area. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Dare-Pasquotank County, NC NonMSA Assessment Area						
	Tract Distribution Percentage of Families by Percentage of Families by					
Income Category	#	%	Tract	Income Level		
Low Income	1	4.8	3.2	14.2		
Moderate Income	1	4.8	1.5	13.8		
Middle Income	5	23.8	23.5	19.8		
Upper Income	12	57.1	71.9	52.2		
Unknown	2	9.5	0.0	0.0		
Total	21	100.0	100.0	100.0		

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Dare-Pasquotank County, NC NonMSA							
	Assessment Area						
Loan Type 2020 2021 Total							
HMDA 6 18 24							
Small Business 88 65 153							
Total	94	83	177				

As a percentage by number and dollar, respectively, the Dare-Pasquotank County, NC NonMSA assessment area accounts for 0.8% and 0.5% of the bank's overall lending during the evaluation period and 6% and 5.4% of the bank's lending in the North Carolina assessment areas. In 2020, the bank ranked 56th out of 346 HMDA reporters with .09% of the area's total HMDA volume. UB ranked 49th in 2021 out of 402 reporters with 0.2% of the area's HMDA lending. In 2020, the bank ranked 11th out of 72 institutions reporting small business loans in the assessment area, and in 2021 it ranked 15th out of 69 reporters. The bank extended 3.1% of small business loans reported by the aggregate in the assessment area in 2020 and 2.1% in 2021.

While UB made no community development loans, it made qualified donations of \$11,250 and had two community development service activities.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE MARTIN COUNTY, NC NONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Martin County, NC NonMSA assessment area was conducted. The bank's lending, investment, and service performances in the assessment area were below its statewide performance levels.

This assessment area consists of Martin County, and one moderate-income, four middle-income and one upper-income census tracts. According to the most current census data, the population of the assessment area is 23,729.

During the review period, the bank operated one branch office located in a middle-income census tract in this assessment area and it was closed during 2021. Currently, the assessment area contains 0% of the institution's branches and 0% of the deposits. During 2020 and 2021, four distressed middle-income census tracts (poverty) are contained within this assessment area. One branch office was closed in a middle-income census tract. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Martin County, NC NonMSA Assessment						
		Area				
	Tract Distribution Percentage of Families by Families by					
Income Category	#	%	Tract	Income Level		
Low Income	0	0.0	0.0	22.9		
Moderate Income	1	16.7	11.6	18.4		
Middle Income	4	66.7	69.2	18.2		
Upper Income	1	16.7	19.1	40.4		
Total	6	100.0	100.0	100.0		

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Martin County, NC NonMSA Assessment Area						
Loan Type	2020 2021 Total					
HMDA	0	0	0			
Small Business	7	4	11			
Total	7	4	11			

As a percentage by number and dollar, respectively, the Martin County, NC NonMSA assessment area accounts for 0.05% and 0.02% of the bank's overall lending during the evaluation period and 0.4% and 0.2% of the bank's lending in the North Carolina assessment areas. As noted above, the bank did not extend a HMDA loan in this assessment area during the review period. In 2020, the bank ranked 15th out of 41 institutions reporting small business loans in the assessment area and extended 1.3% of small business loans reported by the aggregate. The bank had no community development loan, investment, donation, or service activities during the evaluation period.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RUTHERFORD COUNTY, NC NONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Rutherford County, NC NonMSA assessment area was conducted. The bank's lending, service, and investment performances in the assessment area were below statewide performance levels.

This assessment area consists of Rutherford County, and consists of three moderate-income, nine middle-income, and one upper-income census tracts. According to the most current census data, the population of the assessment area is 66,865.

The bank operates one branch office in the assessment area, and it is located in a middle-income tract. During 2021, the bank closed one branch office in an upper-income tract. This assessment area contains 0.5% of the institution's branches and 0.4% of the deposits within the assessment area. One branch office was closed in an upper-income census tract. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Rutherford County, NC NonMSA Assessment Area						
Tract Distribution Percentage of Families by						
Income Category	#	%	Tract	Income Level		
Low Income	0	0.0	0.0	21.7		
Moderate Income	3	23.1	22.3	21.5		
Middle Income	9	69.2	73.2	21.9		
Upper Income	1	7.7	4.5	35		
Total	13	100.0	100.0	100.0		

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Rutherford County, NC NonMSA Assessment Area					
Loan Type	2020	2021	Total		
HMDA	29	20	49		
Small Business	32	21	53		
Total	61	41	102		

As a percentage by number and dollar, respectively, the Rutherford County, NC NonMSA assessment area accounts for 0.8% and 0.5% of the bank's overall lending during the evaluation period and 5.8% and 5.5% of the bank's lending in the North Carolina assessment areas. In 2020, the bank ranked 20th out of 239 HMDA reporters with 0.8% of the area's total HMDA volume. UB ranked 16th in 2021 out of 246 reporters with 1.1% of the area's HMDA lending. In 2020, the bank ranked fifth out of 60 institutions reporting small business loans in the assessment area, and in 2021 it ranked eighth out of 60 reporters. The bank extended 6.8% of small business loans reported by the aggregate in the assessment area in 2020 and 4.2% in 2021.

One community development loan totaling \$150,000 was originated that will help to preserve affordable housing within this limited scope assessment area. Additionally, the bank has no qualified investments, but has a commitment to fund \$62,500. UB made qualified donations of \$1,350 and had three community development services during the evaluation period.

## CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN NONMETROPOLITAN AREAS OF NORTH CAROLINA

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in Appendix C of this evaluation. Conclusions regarding performance, which did not impact the state of North Carolina's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	<b>Lending Test</b>	Investment Test	Service Test
Columbus, NC NonMSA	Below	Below	Below
Dare-Pasquotank County, NC NonMSA	Below	Below	Below
Martin County, NC NonMSA	Below	Below	Below
Rutherford County, NC NonMSA	Below	Below	Below

## STATE OF SOUTH CAROLINA

**CRA RATING FOR SOUTH CAROLINA**<sup>7</sup>: Satisfactory

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

Major factors supporting the rating include:

Lending activity reflects an adequate responsiveness to community credit needs given the bank's capacity within a highly competitive market.

- While performance varies by product, market area, and year, the geographic and borrower distribution performances are both considered excellent overall.
- The bank exhibits an adequate responsiveness to local credit needs of low-income individuals and areas as well as very small businesses.
- The bank makes use of flexible lending practices in serving the credit needs of the assessment areas.
- UB made an adequate level of community development loans in South Carolina.
- The bank has an excellent level of qualified investments benefiting the statewide and regional area, including assessment areas within the state. Additionally, the bank makes occasional use of innovative and/or complex investments. UB exhibits excellent responsiveness to credit and community development needs within the state.
- Delivery systems and branch locations are readily accessible to all segments of the assessment areas. Retail banking services do not vary in a way that inconveniences the bank's assessment areas, particularly low- and moderate-income areas and people. There have been no branch closures during the review period.
- The bank has provided a relatively high level of community development services within the assessment areas of South Carolina.

#### SCOPE OF EXAMINATION

UB's reported HMDA and small business loans from calendar years 2020 and 2021 were used to evaluate lending performance for borrower and geographic distributions. As previously mentioned, small farm loans were not evaluated given the limited volume of lending. Community development loans made during this period, and qualified community development services provided during the review period, were considered. All qualified investments extended during the review period or outstanding as of the evaluation date, regardless of when made, were also considered.

When excluding activity in both the Charlotte-Concord-Gastonia, NC-SC and Myrtle Beach-Conway, SC-NC CSA multi-state assessment areas, the South Carolina assessment areas account for 6.1%, 6.8%, and 4.3% of the institution's overall dollar volume of lending, branches, and deposits, respectively. The performance in the state was evaluated by applying the full scope interagency examination procedures to the Charleston-North Charleston, SC MSA which accounts for 44.2% of lending by dollar volume in the state, 53.3% of branches, and 51.1% of deposits. For the remaining assessment areas subject to limited scope review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

#### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE STATE OF SOUTH CAROLINA

The institution operates 15 branch offices located throughout the state of South Carolina (excluding branches in the multistate assessment area) and all of its products and services are offered. None of the offices are located in low-income areas; however, five (33.3%) are located in moderate-income geographies. These 15 branch offices account for approximately \$1 million of the bank's \$23.2 billion total deposit base.

According to ACS data from 2015, the bank's combined assessment areas within South Carolina have a population of 2,150,117, including 531,393 families. The majority of families are middle- and upperincome (61.8%), while 21.9% of families are low-income and 16.3% of families are moderate-income. The percentage of families living below the poverty level within the market is highest in Charleston (12.2%), Richland County (12.3%), and Spartanburg (13.5%), but the combined market's overall rate (11.8%) is lower than the rate for the entire state (13.5%). The owner-occupancy rate within (58.2%) is slightly higher than the rate for South Carolina (57.3%). There are no underserved or distressed areas within these assessment areas. The 2021 median family incomes within the MSAs range from \$68,800 (Spartanburg, SC MSA) to \$82,100 (Charleston-North Charleston, SC MSA), while the median family income for nonmetropolitan areas of South Carolina equals \$52,100 during 2021.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE STATE OF SOUTH CAROLINA

The bank's Lending Test performance in the state of South Carolina's assessment areas is considered high satisfactory. Lending levels show adequate responsiveness to assessment area credit needs. Overall, both the borrower and geographic distributions of loans is excellent. The bank originates an adequate level of community development loans.

The Investment Test performance is Outstanding. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits good responsiveness to credit and community development needs and makes occasional use of community development initiatives.

Under the Service Test, the bank's performance is considered High Satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or has adversely affected any particular individuals or areas. The bank has provided a relatively high level of community development services.

### LENDING TEST

Overall, the statewide lending test is rated high satisfactory. As previously mentioned, the rating of the state of South Carolina is based upon the performance within the Charleston-North Charleston, SC MSA assessment area. Lending activity is considered adequate and is measured primarily by proportion of lending in the bank's markets. The borrower distribution of loans, as well as the geographic distribution of loans, are both considered excellent. The provision of community development loans is also considered adequate.

## **Lending Activity:**

The institution's HMDA and small business lending within the state, as measured by both number (5.9%) and dollar volume (6.1%) is less than the percentage of branch offices (6.8%), but exceeds the percentage of deposits (4.3%) in the state. As of June 30, 2022, when excluding the multi-state assessment areas that include South Carolina counties, the institution ranked 12<sup>th</sup> out of 51 financial institutions in deposit market share with 1.4% of the state of South Carolina's assessment areas' available FDIC insured deposits (credit union deposits are not included). When compared to 2020 aggregate data, the institution ranked 126<sup>th</sup> of 800 reporters of mortgage lending with a .1% market

share and ranked 25<sup>th</sup> of 255 reporters of small business loans with a .8% market share. According to 2021 aggregate data, the institution ranked 109<sup>th</sup> of 862 reporters of mortgage lending with a .2% market share and ranked 23<sup>rd</sup> of 232 reporters of small business loans with a .6% market share. All market share rankings consider originated and purchased loans. Overall, lending activity is considered adequate.

### Geographic and Borrower Distribution:

Geographic and borrower distribution varies by product and year but are considered excellent overall. When reaching overall conclusions, the state performance is reflective of the Charleston-North Charleston, SC MSA as this was the only market reviewed using full-scope examination procedures. Additionally, HMDA loans generally were the largest product by dollar volume compared to small business loans. As such, HMDA lending performance received the greatest weight when reaching overall conclusions.

### **Community Development Loans:**

The bank originates an adequate level of loans that qualify as community development loans. During the evaluation period, UB funded 11 community development loans totaling \$25.6 million in South Carolina. The loans helped to address a variety of needs including affordable housing, and services targeted to low- and moderate-income residents, and included one PPP loan totaling \$1.2 million. Local lending opportunities are reasonably available when considering competition, bank size, economic conditions, and other area relevant factors. The institution faces no lending constraints relative to its size and business strategy.

### **INVESTMENT TEST**

The institution's level of qualified investments benefiting the state of South Carolina is rated outstanding. In addition to the previously mentioned investments that benefit the statewide and regional areas, the bank holds 18 allocations from its 120 qualified investments totaling \$14.2 million that directly benefit assessment areas within the state. Additionally, 79 charitable donations totaling \$253,950 were made during the review period to organizations providing community development programs, affordable housing, and economic development throughout South Carolina.

### SERVICE TEST

The statewide rating for the institution under the service test is high satisfactory. There were no branch openings or closings during the review period. Products and services offered within the South Carolina markets were evaluated using the full-scope procedures and are representative of those offered by the institution overall. In addition, services do not vary in a way that inconveniences the bank's assessment areas. Delivery systems are readily accessible to all portions of the bank's market areas and to people of varying income levels.

The institution and its employees have provided a relatively high level of the provision of community development services. Activities include participation in approximately 52 organizations that provide economic development, affordable housing, revitalization and/or stabilization, and other community services to low- and moderate-income residents. More specifically, the bank provided services to organizations that are located throughout the bank's assessment areas within the state of South Carolina such as Increasing Hope, United Housing Connections, Greenville Housing Futures, Community Works, and SC Association for Community and Economic Development. The small percentage of the bank's total staff located in the South Carolina assessment areas is also considered as an aspect of performance context, as was the pandemic's effect on staff to perform service activities.

### METROPOLITAN AREAS FULL-SCOPE REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLESTON-NORTH CHARLESTON, SC MSA ASSESSMENT AREA

UB operates eight branch offices and eight ATMs within the assessment area, which includes all of Charleston, Berkeley, and Dorchester Counties, South Carolina. The complete composition of the assessment area is detailed in Appendix E. All of the bank's products and services are available in this market.

Tweet					DEMOGRAPHICS						
Tract Income Levels	Bra	inches	ATMS		Census	s Tracts	Households	Total Businesses			
Leveis	#	%	#	%	#	%	%	%			
Low	0	0.0%	0	0.0%	14	9.0%	6.5%	7.5%			
Moderate	3	37.5%	3	37.5%	35	22.4%	21.0%	18.4%			
Middle	2	25.0%	2	25.0%	59	37.8%	41.7%	35.2%			
Upper	2	25.0%	2	25.0%	44	28.2%	30.1%	37.5%			
Unknown	1	12.5%	1	12.5%	4	2.6%	0.7%	1.5%			
Totals	8	100%	8	100%	156	100%	100%	100%			

According to the most current census data, the assessment area has a population of 712,232 and a median housing value of \$189,569. The owner-occupancy rate in the assessment area equals 56.3%, which is lower than the rate for South Carolina (57.3%). The overall family poverty rate within the assessment area (11.4%) is lower than that of the state (13.5%). Median family income for the Charleston-North Charleston, SC MSA during 2020 and 2021 were \$81,000 and \$82,100, respectively.

The following table provides family and household demographic information for the assessment area, as well as the tract and owner-occupied housing unit distribution by tract income level. The table also provides D&B business data.

	2021 Ch	arleston-No	rth Charlesto	on, SC MSA	AA Demog	raphics			
Income Categories	Tract Dis	tribution	Families by T	Γract Income		overty Level ilies by Tract			
	#	%	#	%	#	%	#	%	
Low	14	9.0	9,808	5.7	3,693	37.7	39,244	22.6	
Moderate	35	22.4	36,022	20.8	5,758	16.0	28,979	16.7	
Middle	59	37.8	73,974	42.6	7,546	10.2	34,451	19.9	
Upper	44	28.2	53,062	30.6	2,546	4.8	70,851	40.8	
Unknown	4	2.6	659	0.4	269	40.8	0	0.0	
Total AA	156	100.0	173,525	100.0	19,812	11.4	173,525	100.0	
	Housing								
	Units by	C	)wner-occupie	d	Rei	ntal	Vac	cant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	20,815	5,728	3.3	27.5	11,833	56.8	3,254	15.6	
Moderate	65,623	33,275	19.1	50.7	23,148	35.3	9,200	14.0	
Middle	124,182	73,762	42.4	59.4	38,413	30.9	12,007	9.7	
Upper	95,998	60,743	34.9	63.3	20,172	21.0	15,083	15.7	
Unknown	2,495	491	0.3	19.7	1,339	53.7	665	26.7	
Total AA	309,113	173,999	100.0	56.3	94,905	30.7	40,209	13.0	
				Busi	nesses by Tra	ct & Revenue	Size		
	Total Busine		Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	2,855	7.5	2,555	7.2	281	12.0	19	5.8	
Moderate	6,982	18.4	6,404	18.1	522	22.2	56	17.1	
Middle	13,356	35.1	12,584	35.6	669	28.5	103	31.4	
Upper	14,279	37.5	13,305	37.6	831	35.3	143	43.6	
Unknown	564	1.5	509	1.4	48	2.0	7	2.1	
Total AA	38,036	100.0	35,357	100.0	2,351	100.0	328	100.0	
Per	centage of Tota	al Businesses:		93.0		6.2		0.9	
				Fa	rms by Tract	& Revenue S	ize		
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue Not Reported		
	#	%	#	%	#	%	#	%	
Low	8	2.4	8	2.5	0	0.0	0	0.0	
Moderate	74	22.6	71	22.2	3	37.5	0	0.0	
Middle	145	44.2	141	44.1	4	50.0	0	0.0	
Upper	100	30.5	99	30.9	1	12.5	0	0.0	
Unknown	1	0.3	1	0.3	0	0.0	0	0.0	
Total AA	328	100.0	320	100.0	8	100.0	0	0.0	
	Percentage of Total Farms					2.4		0.0	
Source: 2021 FFIEC Census	Data					l l			

Source: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

As depicted in the chart below, government, tourism, retail trade, health services, and manufacturing employment opportunities provide a large portion of area employment for residents.

Charleston-North Charleston, SC MSA Employees by Industry										
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3			
Government	63,732	62,100	62,410	62,545	62,227	62,886	61,848			
Private Sector										
Private Sector Total, all industries	285,739	249,982	265,888	274,620	273,259	280,121	282,826			
Agriculture, forestry, fishing and hunting	349*	389*	386*	354*	402	442	479			
Mining, quarrying, and oil and gas extraction	61*	59*	58*	57*	181	182	177			
Utilities	1,068*	1,058*	1,060*	1,074*	1,034*	1,021*	1,027*			
Construction	19,762	18,998	19,075	19,174	19,671	19,886	19,934			
Manufacturing	29,280	26,644	27,185	27,445	27,722	27,487	27,599			
Wholesale trade	9,089	8,728	8,755	8,988	9,210	9,351	9,368			
Retail Trade	42,311	38,481	40,730	42,358	40,809	40,808	40,554			
Transportation and warehousing	13,374*	11,755*	12,012*	13,801*	12,810*	13,162*	13,408*			
Information	4,903	4,645	4,733	4,817	5,826	5,888	6,013			
Finance and insurance	8,087	8,138	8,168	8,286	8,090	8,116	8,164			
Real estate and rental and leasing	6,555	6,132	6,396	6,487	6,412	6,644	6,758			
Professional and technical services	25,732	24,956	25,114	25,604	24,267	24,550	24,702			
Management of companies and enterprises	2,496	2,435	2,401	2,455	2,569	2,643	2,576			
Administrative and waste services	23,061	19,566	21,246	22,737	23,003	23,982	23,384			
Educational services	4,163	3,512	3,793	3,995	4,015	4,060	4,036			
Health care and social assistance	35,923	32,732	34,489	35,139	35,445	35,549	36,054			
Arts, entertainment, and recreation	5,675	3,815	4,586	4,458	4,568	5,548	5,679			
Accommodation and food services	43,254	28,902	35,671	37,086	37,162	40,580	42,554			
Other services, except public administration	9,669	8,001	8,986	9,169	9,182	9,364	9,460			
Public administration	0	0	0	0	0	0	C			
Unclassified	0	3	0	0						
Source: Bureau of Labor Statistics(BLS), Quarterly Census	of Employm	ent and Wa	ges							
"Indicates that some or all of the data for this category was s	ndicates that some or all of the data for this category was suppressed for confidentiality reasons									

Recent and historical unemployment rates since the previous evaluation are included in the following table.

al I						
Charleston-North Charleston, SC MSA L	Jnemployn	nent Rates				
Area	2020	2021				
Charleston-North Charleston, SC MSA	5.85%	3.62%				
Berkeley County, SC	5.38%	3.62%				
Charleston County, SC	6.15%	3.61%				
Dorchester County, SC	5.65%	3.63%				
South Carolina	5.99%	4.00%				
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics						

Overall, unemployment rates across the assessment area have decreased from 2020 to 2021, and the MSA's unemployment rates are slightly lower than that of the state of South Carolina.

Charleston-North Ch	arleston, SC MSA Median	Family Income Change	
Area	2010 Median Family Income	2015 Median Family Income	Percent Change
Charleston-North Charleston, SC MSA	\$65,968	\$65,558	-0.62%
Berkeley County, SC	\$61,928	\$60,312	-2.61%
Charleston County, SC	\$66,998	\$69,774	4.14%
Dorchester County, SC	\$69,526	\$64,936	-6.60%
South Carolina	\$59,046	\$56,343	-4.58%

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

With the exception of Charleston County, as noted in the above chart, the MSA, state, as well as the remaining counties within the assessment area denote a decrease in median family income amounts from 2010 to 2015. As depicted below, housing cost burden for low-and-moderate income renters and owners is equal to or exceeds 30 percent or more of household income for the MSAs, counties, and state of South Carolina within the assessment area.

Charlesto	Charleston-North Charleston, SC MSA Housing Cost Burden										
	Cos	t Burden - Rent	ers	Cost Burden - Owners							
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners					
Charleston-North Charleston, SC MSA	74%	64%	45%	66%	45%	23%					
Berkeley County, SC	74%	57%	40%	58%	40%	20%					
Charleston County, SC	74%	67%	46%	71%	45%	25%					
Dorchester County, SC	77%	68%	45%	65%	53%	24%					
South Carolina	72%	52%	42%	58%	34%	19%					

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local economic development official was contacted during the evaluation to assist in the evaluation of UB's CRA performance and indicated the organization provides local residents with business educational services, help in finding quality housing, and funding for small businesses to generate economic development. The contact stated that its organization generates economic development by helping to grow small businesses, in particular, African American small businesses within the assessment area. The organization currently partners with many of the local small businesses and other local non-profits to provide the resources to help grow small businesses. The contact noted that funding mainly comes from private philanthropists, but can come by means of government grants, nongovernment grants, and rental income from affordable housing units. The interviewee identified that one of the challenges the organization faces is that its low-income clients typically lack access to affordable housing options. According to the contact, one way the organization has worked to bridge this gap is by working to increase the stock of affordable housing options in the area. The contact noted that several opportunities for participation from local financial institutions include financial literacy education, general funding, or any sort of available mentorship or sponsorship towards job development. He indicated that previous examples of his organization partnering with local financial institutions included: a local community bank sponsored a financial literacy workshop, another large bank had sponsored a college tour for first generation college students to visit colleges of their choice, as well as

general funds for organizational programs from three financial firms who are located within the assessment area. The contact stated that CRA officers from local financial institutions have been proactive in reaching out to the organization about opportunities for funding or involvement with their respected firms and that the office was not aware of discriminatory practices from local institutions.

UB holds an adequate deposit market share within the assessment area (11<sup>th</sup> of 34 banks operating within the assessment area) having 2.3% of all deposits from the June 30, 2022, FDIC deposit market share report. Overall, there is reasonable opportunity for community development loans and investments within the market area. Despite a competitive market, the bank faces no significant constraints in taking advantage of all available community development opportunities. While UB is new to this assessment area since the previous evaluation, it serves it through its full array of banking services and products; as noted above, all the bank's services and products are offered in this assessment area, which includes two community development loans totaling approximately \$291,000 and seven qualified investments totaling \$5.8 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 79 customer's loan interest, which totaled 98 loans to the amount of \$1.2 million. Furthermore, during the pandemic from this assessment area, the bank waived five customer's ATM cash bank fees totaling \$10.

### CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE CHARLESTON-NORTH CHARLESTON, SC MSA ASSESSMENT AREA:

The bank's Lending Test performance in the Charleston-North Charleston, SC MSA assessment area is considered good. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is excellent. The geographic distribution and dispersion of loans is also excellent. The bank originated an adequate level of community development loans.

The Investment Test performance is excellent. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs and makes occasional use of initiatives.

Under the Service Test, the bank's performance is considered good. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank provides a relatively high level of community development services.

### **LENDING TEST**

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of the bank's lending activity, the geographic and borrower lending distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. There were no gaps in the geographic dispersion of the bank's lending.

### **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by both the number and dollar volume (2.9% and 2.7%), is less than the percentage of branch offices (3.6%), but slightly greater than the percentage of deposits (2.2%) in the assessment area. As of June 30, 2022, the bank ranked 11<sup>th</sup> out of 34 financial institutions in deposit market share having 2.3% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 98<sup>th</sup> of 715 reporters of mortgage lending with a .2% market share and ranked 22<sup>nd</sup> of 164 reporters of small business loans with a .7% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered adequate.

# **Geographic Distribution:**

UB's geographic distribution performance is considered good for HMDA and excellent for small business lending. Overall performance is considered excellent based upon the relative strengths of performance for each product during 2020 and 2021.

Company   Comp	#%  0.0 17.6 52.9 29.4 0.0 0.0 100.0  6.4 42.6 51.7 0.0 100.0  100.0	202 Agg #%  2.3 11.\$ 47.1 38.9 0.3 0.0 100.0  1.4 9.3 43.1 45.8 0.4 0.0 100.0  1.5 9.1	0 Bank (000)  0 1,164 5,400 3,540 0 0 10,104  0 651 4,767 7,575 0 0 12,993	\$%  Horr  0.0  11.5  53.4  35.0  0.0  100.0  5.0  36.7  58.3  0.0  100.0  Home  0.0	1.8 8.0 38.9 50.8 0.4 0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5	0 4 14 12 0 0 30	5.5 14.5 32.7 47.3 0.0 0.0 100.0 13.3 46.7 40.0 0.0	#%  3.2 12.1 47.3 37.0 0.4 0.0 100.0  1.6 10.4 44.0 43.8 0.3 0.0	21 Bank \$(000)  1,126 2,434 5,330 9,016 0 17,906  0 1,046 3,314 5,118 0 0	\$% 6.3 13.6 29.8 50.4 0.0 0.0 100.0  100.0  35.0 54.0 0.0	Agg \$% 2.4 8.5 38.9 49.6 0.6 0.0 100.0 1.4 7.1 35.7 55.4 0.4	Owner Occupied Units %  3.3 19. 42.4 34.9 0.3 100.0 42.4 34.9 0.3 0.3						
Bank	0.0 17.6 52.9 29.4 0.0 0.0 100.0 6.4 42.6 51. 0.0 0.0 100.0	#%  2.3 11.5 47.1 38.9 0.3 0.0 100.0  1.4 9.3 43.1 45.8 0.4 0.0 100.0	\$(000) 0 1,164 5,400 0 0 10,104 0 651 4,767 7,575 0 0 12,993	\$%  Horr  0.0  11.5  53.4  35.0  0.0  100.0  5.0  36.7  58.3  0.0  100.0  Home  0.0	\$% 1.8 3.8.9 50.8 0.4 0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5 0.0 100.0 Improve	# 388 Loans 38 18 26 0 0 55 De Loans 0 4 14 12 0 0 0 30 30	#% 5.5 14.5 32.7 47.3 0.0 0.0 100.0 13.3 46.7 40.0 0.0	#%  3.2 12.1 47.3 37.0 0.4 0.0 100.0  1.6 10.4 44.0 43.8 0.3	\$(000) 1,126 2,434 5,330 9,016 0 17,906 0 1,046 3,314 5,118 0	\$% 6.3 13.6 29.8 50.4 0.0 0.0 100.0  100.0  35.0 54.0 0.0	\$%  2.4  8.5  38.9  49.6  0.6  0.0  100.0  1.4  7.1  35.7  55.4	Units %  3.3  19.  42.4  34.9  100.6  3.3  19.  42.4  34.9						
Low 0  Moderate 6  Middle 18  Upper 10  Unknown 0  Tract-Unk 0  Total 34  Low 0  Moderate 3  Middle 20  Upper 24  Unknown 0  Tract-Unk 0  Total 47  Low 0  Moderate 3  Middle 20  Upper 24  Unknown 0  Tract-Unk 0  Total 47  Low 0  Moderate 0  Middle 0  Upper 3  Unknown 0  Tract-Unk 0  Moderate 0  Middle 0  Upper 3  Unknown 0  Tract-Unk 0  Middle 0  Upper 3  Unknown 0  Tract-Unk 0  Total 3	0.0 17.6 52.9 29.4 0.0 0.0 100.0 6.4 42.6 51. 0.0 0.0 100.0	2.3 11.5 47.1 38.9 0.3 0.0 100.0 1.4 9.3 43.1 45.8 0.4 0.0	0 1,164 5,400 3,540 0 0 10,104 0 651 4,767 7,575 0 0 12,993	Hom  0.0  111.5  53.4  35.0  0.0  100.0  5.0  36.7  58.3  0.0  100.0  Home  0.0	1.8 8.0 38.9 50.8 0.4 0.0 100.0 Refinance 6.6 36.0 55.6 0.5 0.0	3 8 18 26 0 0 55 December 14 12 0 0 30	5.5 14.5 32.7 47.3 0.0 0.0 100.0 0.0 13.3 46.7 40.0 0.0	3.2 12.1 47.3 37.0 0.4 0.0 100.0 1.6 10.4 44.0 43.8 0.3	1,126 2,434 5,330 9,016 0 0 17,906 0 1,046 3,314 5,118	6.3 13.6 29.8 50.4 0.0 0.0 100.0 0.0 11.0 35.0 54.0	2.4 8.5 38.9 49.6 0.6 0.0 100.0 1.4 7.1 35.7 55.4	19. 42.4 34.9 0.3 100.0 3.3 19. 42.4 34.9						
Moderate         6           Middle         18           Upper         10           Unknown         0           Tract-Unk         0           Total         34           Low         0           Moderate         3           Middle         20           Upper         24           Unknown         0           Tract-Unk         0           Total         47           Low         0           Middle         0           Upper         3           Unknown         0           Total         3           Low         0           Moderate         0           Middle         0           Upper         0           Unknown         0	17.6 52.9 29.4 0.0 0.0 100.0 6.4 42.6 51.1 0.0 0.0 100.0	11.8 47.1 38.9 0.3 0.0 100.0 1.4 9.3 43.1 45.8 0.4 0.0	0 0 10,104 0 0 10,104 0 651 4,767 7,575 0 0 12,993	0.0 11.5 53.4 35.0 0.0 100.0 5.0 36.7 58.3 0.0 100.0 Home	1.8 8.0 38.9 50.8 0.4 0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5 0.0 100.0	3 8 18 26 0 0 55 • Loans 0 4 14 12 0 0	14.5 32.7 47.3 0.0 0.0 100.0 0.0 13.3 46.7 40.0 0.0	12.1 47.3 37.0 0.4 0.0 100.0 1.6 10.4 44.0 43.8 0.3	2,434 5,330 9,016 0 0 17,906 0 1,046 3,314 5,118	13.6 29.8 50.4 0.0 0.0 100.0 0.0 11.0 35.0 54.0	8.5 38.9 49.6 0.6 0.0 100.0 1.4 7.1 35.7 55.4	19. 42.4 34.9 0.3 100.0 3.3 19. 42.4 34.9						
Moderate         6           Middle         18           Upper         10           Unknown         0           Tract-Unk         0           Total         34           Low         0           Moderate         3           Middle         20           Upper         24           Unknown         0           Tract-Unk         0           Total         47           Low         0           Middle         0           Upper         3           Unknown         0           Total         3           Low         0           Moderate         0           Middle         0           Upper         0           Unknown         0	17.6 52.9 29.4 0.0 0.0 100.0 6.4 42.6 51.1 0.0 0.0 100.0	11.8 47.1 38.9 0.3 0.0 100.0 1.4 9.3 43.1 45.8 0.4 0.0	0 0 10,104 0 0 10,104 0 651 4,767 7,575 0 0 12,993	11.5 53.4 35.0 0.0 100.0 100.0 5.0 36.7 58.3 0.0 100.0 Home	8.0 38.9 50.8 0.4 0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5 0.0 100.0	8 18 26 0 0 55 • Loans 0 4 14 12 0 0	14.5 32.7 47.3 0.0 0.0 100.0 0.0 13.3 46.7 40.0 0.0	12.1 47.3 37.0 0.4 0.0 100.0 1.6 10.4 44.0 43.8 0.3	2,434 5,330 9,016 0 0 17,906 0 1,046 3,314 5,118	13.6 29.8 50.4 0.0 0.0 100.0 0.0 11.0 35.0 54.0	8.5 38.9 49.6 0.6 0.0 100.0 1.4 7.1 35.7 55.4	19. 42.4 34.9 0.3 100.0 3.3 19. 42.4 34.9						
Middle	52.9 29.4 0.0 100.0 100.0 6.4 42.6 51.7 0.0 0.0 100.0	47.1 38.9 0.3 0.0 100.0 1.4 9.3 43.1 45.8 0.4 0.0	5,400 3,540 0 0 10,104 0 651 4,767 7,575 0 0 12,993	53.4 35.0 0.0 100.0 100.0 5.0 36.7 58.3 0.0 100.0 Home	38.9 50.8 0.4 0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5 100.0 Improve	18 26 0 0 55 • Loans 0 4 14 12 0 0	32.7 47.3 0.0 0.0 100.0 0.0 13.3 46.7 40.0 0.0	47.3 37.0 0.4 0.0 100.0 1.6 10.4 44.0 43.8 0.3	5,330 9,016 0 0 17,906 0 1,046 3,314 5,118	29.8 50.4 0.0 0.0 100.0 0.0 11.0 35.0 54.0	38.9 49.6 0.6 0.0 100.0 1.4 7.1 35.7 55.4	42.4 34.9 0.3 100.0 3.3 19. 42.4 34.9						
Upper	29.4 0.0 100.0 100.0 6.4 42.6 51.7 0.0 100.0 100.0	38.9 0.3 0.0 100.0 1.4 9.3 43.1 45.8 0.4 0.0 100.0	3,540 0 0 10,104 0 651 4,767 7,575 0 0 12,993	35.0 0.0 100.0 100.0 5.0 36.7 58.3 0.0 100.0 Home	50.8 0.4 0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5 100.0 Improve	26 0 0 55 9 Loans 0 4 14 12 0 0	47.3 0.0 0.0 100.0 0.0 13.3 46.7 40.0 0.0	37.0 0.4 0.0 100.0 1.6 10.4 44.0 43.8 0.3	9,016 0 0 17,906 0 1,046 3,314 5,118	50.4 0.0 0.0 100.0 0.0 11.0 35.0 54.0	49.6 0.6 0.0 100.0 1.4 7.1 35.7 55.4	34.9 0.3 100.0 3.3 19 42.4 34.9						
Unknown 0 Tract-Unk 0 Total 34  Low 0 Moderate 3 Middle 20 Upper 24 Unknown 0 Tract-Unk 0 Total 47  Low 0 Moderate 0 Middle 0 Upper 3 Unknown 0 Tract-Unk 0 Total 3  Low 0 Moderate 0 Middle 0 Upper 3 Unknown 0 Tract-Unk 0 Upper 0 Upper 0 Upper 0 Unknown 0 Tract-Unk 0 Total 0 Tot	0.0 0.0 100.0 0.0 6.4 42.6 51. 0.0 0.0 100.0	0.3 0.0 100.0 1.4 9.3 43.1 45.8 0.4 0.0	0 0 10,104 0 651 4,767 7,575 0 0 12,993	0.0 0.0 100.0 5.0 36.7 58.3 0.0 100.0 Home	0.4 0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5 0.0	0 0 55 Loans 0 4 14 12 0 0	0.0 0.0 100.0 0.0 13.3 46.7 40.0 0.0	0.4 0.0 100.0 1.6 10.4 44.0 43.8 0.3	0 17,906 0 1,046 3,314 5,118	0.0 0.0 100.0 0.0 11.0 35.0 54.0	0.6 0.0 100.0 1.4 7.1 35.7 55.4	0.3 100.0 3.3 19. 42.4 34.9						
Tract-Unk	0.0 100.0 0.0 6.4 42.6 51.7 0.0 0.0 100.0	0.0 100.0 1.4 9.3 43.1 45.8 0.4 0.0 100.0	0 10,104 0 651 4,767 7,575 0 0 12,993	0.0 100.0 5.0 36.7 58.3 0.0 100.0 Home	0.0 100.0 Refinance 1.2 6.6 36.0 55.6 0.5 0.0	0 55 <b>Loans</b> 0 4 14 12 0 0	0.0 100.0 0.0 13.3 46.7 40.0 0.0	0.0 100.0 1.6 10.4 44.0 43.8 0.3	0 17,906 0 1,046 3,314 5,118	0.0 100.0 0.0 11.0 35.0 54.0	0.0 100.0 1.4 7.1 35.7 55.4	3.3 19. 42.4 34.9						
Total	0.0 6.4 42.6 51.1 0.0 0.0 100.0	100.0 1.4 9.3 43.1 45.8 0.4 0.0 100.0	10,104 0 651 4,767 7,575 0 0 12,993	100.0 0.0 5.0 36.7 58.3 0.0 100.0 Home	100.0 Refinance 1.2 6.6 36.0 55.6 0.5 0.0 100.0 Improve	55 Loans  0 4 14 12 0 0 30	0.0 13.3 46.7 40.0 0.0	100.0 1.6 10.4 44.0 43.8 0.3	17,906 0 1,046 3,314 5,118	100.0 0.0 11.0 35.0 54.0 0.0	100.0 1.4 7.1 35.7 55.4	3.3 19. 42.4 34.9						
Low 0  Moderate 3  Middle 20  Upper 24  Unknown 0  Tract-Unk 0  Total 47  Low 0  Moderate 0  Middle 0  Upper 3  Unknown 0  Tract-Unk 0  Moderate 0  Middle 0  Upper 3  Unknown 0  Tract-Unk 0  Total 0  Tract-Unk 0  Total 0  Total 0  Total 0  Moderate 0  Middle 0  Upper 0  Moderate 0  Middle 0  Upper 0  Unknown 0	0.0 6.4 42.6 51. 0.0 0.0 100.0	1.4 9.3 43.1 45.8 0.4 0.0 100.0	0 651 4,767 7,575 0 0 12,993	0.0 5.0 36.7 58.3 0.0 0.0 100.0 Home	1.2 6.6 36.0 55.6 0.5 0.0 100.0	0 4 14 12 0 0 30	0.0 13.3 46.7 40.0 0.0	1.6 10.4 44.0 43.8 0.3	0 1,046 3,314 5,118	0.0 11.0 35.0 54.0	1.4 7.1 35.7 55.4	3.3 19. 42.4 34.9						
Moderate         3           Middle         20           Upper         24           Unknown         0           Tract-Unk         0           Total         47           Low         0           Moderate         0           Middle         0           Upper         3           Unknown         0           Tract-Unk         0           Total         3           Low         0           Moderate         0           Middle         0           Upper         0           Unknown         0	6.4 42.6 51.1 0.0 0.0 100.0	9.3 43.1 45.8 0.4 0.0 100.0	651 4,767 7,575 0 0 12,993	0.0 5.0 36.7 58.3 0.0 0.0 100.0 Home	1.2 6.6 36.0 55.6 0.5 0.0 100.0	0 4 14 12 0 0 30	13.3 46.7 40.0 0.0	10.4 44.0 43.8 0.3	1,046 3,314 5,118	11.0 35.0 54.0 0.0	7.1 35.7 55.4	19. 42.4 34.9						
Moderate         3           Middle         20           Upper         24           Unknown         0           Tract-Unk         0           Total         47           Low         0           Moderate         0           Middle         0           Upper         3           Unknown         0           Tract-Unk         0           Total         3           Low         0           Moderate         0           Middle         0           Upper         0           Unknown         0	6.4 42.6 51.1 0.0 0.0 100.0	9.3 43.1 45.8 0.4 0.0 100.0	651 4,767 7,575 0 0 12,993	5.0 36.7 58.3 0.0 0.0 100.0 <b>Home</b>	6.6 36.0 55.6 0.5 0.0 100.0	4 14 12 0 0 30	13.3 46.7 40.0 0.0	10.4 44.0 43.8 0.3	1,046 3,314 5,118	11.0 35.0 54.0 0.0	7.1 35.7 55.4	19. 42.4 34.9						
Middle	42.6 51.1 0.0 0.0 100.0	43.1 45.8 0.4 0.0 100.0	4,767 7,575 0 0 12,993	36.7 58.3 0.0 0.0 100.0 Home	36.0 55.6 0.5 0.0 100.0	14 12 0 0 30	46.7 40.0 0.0 0.0	44.0 43.8 0.3	3,314 5,118 0	35.0 54.0 0.0	35.7 55.4	42.4 34.9						
Upper	51.1 0.0 0.0 100.0	45.8 0.4 0.0 100.0	7,575 0 0 12,993	58.3 0.0 0.0 100.0 <b>Home</b> 0.0	55.6 0.5 0.0 100.0 Improve	12 0 0 30	40.0 0.0 0.0	43.8 0.3	5,11 <b>8</b> 0	54.0 0.0	55.4	34.9						
Unknown 0 Tract-Unk 0 Total 47  Low 0 Moderate 0 Middle 0 Upper 3 Unknown 0 Tract-Unk 0 Total 3  Low 0 Moderate 0 Upper 0 Unknown 0 Moderate 0 Middle 0 Upper 0 Moderate 0 Middle 0 Upper 0 Unknown 0	0.0 0.0 100.0 0.0	0.4 0.0 100.0	0 0 12,993	0.0 0.0 100.0 <b>Home</b> 0.0	0.5 0.0 100.0 Improve	0 0 30	0.0	0.3	0	0.0		34.9 0.3						
Tract-Unk	0.0 100.0 0.0 0.0	0.0 100.0	0 12,993 0	0.0 100.0 <b>Home</b> 0.0	0.0 100.0 Improve	0 30	0.0				0.4	0.3						
Low	0.0	100.0	12,993	100.0 <b>Home</b>	100.0	30		0.0	О									
Low	0.0	1.5	0	<b>Home</b> 0.0	Improve		100.0		-	0.0	0.0							
Moderate	0.0			0.0		nent Loans		100.0	9,478	100.0	100.0	100.0						
Moderate	0.0				1.8		Home Improvement Loans											
Middle		9.1	0	~ ~		0	0.0	1.5	0	0.0	1.5	3.3						
Upper 3 Unknown 0 Tract-Unk 0 Total 3  Low 0 Moderate 0 Middle 0 Upper 0 Unknown 0	0.0			0.0	6.6	1	6.3	8.4	100	4.6	5.9	19.						
Unknown 0 Tract-Unk 0 Total 3  Low 0 Moderate 0 Middle 0 Upper 0 Unknown 0	0.0	34.1	0	0.0	25.0	5	31.3	35.5	447	20.6	24.7	42.4						
Tract-Unk	100.0	54.8	410	100.0	65.8	10	62.5	54.1	1,623	74.8	67.5	34.9						
Total   3	0.0	0.6	0	0.0	0.8	0	0.0	0.5	0	0.0	0.4	0.3						
Low 0  Moderate 0  Middle 0  Upper 0  Unknown 0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0							
Moderate 0 Middle 0 Upper 0 Unknown 0	100.0	100.0	410	100.0	100.0	16	100.0	100.0	2,170	100.0	100.0	100.0						
Moderate 0 Middle 0 Upper 0 Unknown 0				М	ultifamily	Loans						Multi-family Units %						
Middle 0 Upper 0 Unknown 0	0.0	25.8	0	0.0	22.6	2	66.7	23.0	5,640	91.9	17.	10.7						
Upper 0 Unknown 0	0.0	22.6	0	0.0	23.3	1	33.3	20.3	500	8.1	6.8	20.7						
Unknown 0	0.0	27.4	0	0.0	38.2	0	0.0	33.8	0	0.0	63.9	39.1						
<del>-</del>	0.0	12.9	0	0.0	2.1	0	0.0	18.9	0	0.0	11.	27.6						
Tract-Unk 0	0.0	11.3	0	0.0	13.8	0	0.0	4.1	0	0.0	0.5	2.0						
	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0							
Total 0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	6,140	100.0	100.0	100.0						
<u> </u>				Total Ho	me Morto	age Loans						Owner Occupied Units %						
Low 0	0.0	1.8	0	0.0	2.0	5	4.5	2.3	6,766	18.6	2.5	3.3						
Moderate 11	11.7	10.4	1,975	8.0	7.7	14	12.6	11.	1 4,080	11.2	7.7	19.						
Middle 43	45.7	44.4	10,524	42.4	37.1	41	36.9	45.0	9,311	25.6	37.9	42.4						
Upper 40	42.6	43.0	12,312	49.6	52.5	51	45.9	41.2	16,257	44.6	51.4	34.9						
Unknown 0	0.0	0.4	0	0.0	0.8	0	0.0	0.4	0	0.0	0.5	0.3						
Tract-Unk 0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0							
Total 94	100.0	100.0	24,811	100.0	100.0	11	1 100.0	100.0	36,414	100.0	100.0	100.0						

In both 2020 and 2021, home purchase and refinance loans were the leading HMDA product by number of loans. Given their comparatively small volumes, home improvement and multifamily lending were not significant factors in the analysis. UB's home purchase lending is considered excellent in both years, while its refinance lending in 2020 is considered poor, but it is considered good in 2021.

On a combined basis, the bank's lack of 2020 HMDA lending in low-income census tracts (0%) is lower than the aggregate lending level (1.8%) and the percentage of owner-occupied housing units located in such tracts (3.3%). Conversely, the bank's level of lending in moderate-income census tracts (11.7%) is greater than the level of aggregate lending in such tracts (10.4%), but lower than the owner-occupied housing units located in moderate-income census tracts (19.1%). Overall, the bank's 2020 performance is considered good.

Overall during 2021, UB's lending in low-income census tracts (4.5%) is greater than both aggregate lending levels (2.3%) and the percentage of owner-occupied housing units located in such tracts (3.3%). The bank's lending in moderate-income tracts (12.6%) exceeds aggregate lending levels (11.1%), but is lower than the proportion of owner-occupied housing units located in such tracts (19.1%). Performance during 2021 is considered excellent.

Overall, the bank's HMDA lending performance is considered good based upon the relative performance and dollar volume of lending over the two-year period.

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography Assessment Area: Charleston-North Charleston, SC MSA												hy	
Geographic				Bank	And A	ggreg	ate Loan	ıs By Y	Year				Total
			20	20					20	21			
Income Level	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	30	12.3	7.5	3,491	18.8	10.6	18	9.5	7.0	3,930	13.5	10.3	7.5
Moderate	43	17.7	15.8	3,675	19.8	19.1	39	20.5	15.9	6,508	22.4	18.5	18.4
Middle	75	30.9	32.0	5,027	27.1	25.6	65	34.2	33.8	7,139	24.6	27.2	35.1
Upper	92	37.9	42.6	6,244	33.7	42.4	63	33.2	41.1	11,076	38.1	41.3	37.5
Unknown	3	1.2	1.5	102	0.6	2.0	5	2.6	1.6	425	1.5	2.5	1.5
Tract-Unk	0	0.0	0.6	0	0.0	0.4	0	0.0	0.7	0	0.0	0.1	
Total	243	100.0	100.0	18,539	100.0	100.0	190	100.0	100.0	29,078	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

During 2020, the bank's small business lending in low-income census tracts (12.3%) was greater than the aggregate reporters' lending levels (7.5%) and the percentage of businesses located in such tracts (7.4%). UB's level of lending in moderate-income census tracts (17.7%) exceeds the aggregate lending levels (15.8%), but slightly lags the percentage of businesses located in such tracts (18.2%). Overall, the bank's small business lending performance during 2020 is considered excellent, and its performance during 2021 is substantially similar.

### Distribution by Borrower Income and Revenue Size of the Business:

The overall distribution by borrower income and business revenue within this assessment area is considered excellent for HMDA and good for small business lending. Overall, the performance is considered excellent based upon the relative strengths of performance and larger HMDA dollar volume of lending during the two-year period of analysis.

	Distribu						~ ~	_				e Lev	el
	_	A	ssessi	nent Are	a: Cha	arlesto	n-North	Charl	eston,	SC MSA	1		
				Ban	k And A	ggregate	Loans By Y	'ear					
Borrower			2020			-	2021					_	Families by
Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hon	ne Purch	ase Loans			1			T
Low	4	11.8	6.2	783	7.7	3.2		7.3	5.5	870	4.9	2.6	22.6
Moderate	7	20.6	21.0	1,563	15.5	14.3	13	23.6	19.1	3,618	20.2	12.5	16.7
Middle	9	26.5	21.6	2,262	22.4	18.5	11	20.0	20.8	2,982	16.7	16.8	19.9
Upper	12	35.3	34.6	4,840	47.9	48.3	22	40.0	37.4	9,092	50.8	51.7	40.8
Unknown	2	5.9	16.6	656	6.5	15.7	5	9.1	17.2	1,344	7.5	16.4	0.0
Total	34	100.0	100.0	10,104	100.0	100.0	55	100.0	100.0	17,906	100.0	100.0	100.0
Refinance Loans													
Low	2	4.3	3.5	313	2.4	1.8	3	10.0	5.1	523	5.5	2.5	22.6
Moderate	9	19.1	11.7	1,837	14.1	7.7	5	16.7	14.9	879	9.3	9.8	16.7
Middle	4	8.5	17.6	742	5.7	14.4	6	20.0	19.0	1,150	12.1	15.6	19.9
Upper	24	51.1	36.9	7,953	61.2	47.4	14	46.7	36.0	6,548	69.1	48.3	40.8
Unknown	8	17.0	30.3	2,148	16.5	28.7	2	6.7	25.1	378	4.0	23.9	0.0
Total	47	100.0	100.0	12,993	100.0	100.0	30	100.0	100.0	9,478	100.0	100.0	100.0
					Home	Improve	ment Loans			,			
Low	0	0.0	4.2	0	0.0	2.1	0	0.0	4.3	0	0.0	2.0	22.6
Moderate	2	66.7	13.7	160	39.0	8.0	2	12.5	10.5	43	2.0	6.5	16.7
Middle	0	0.0	20.3	0	0.0	14.0	2	12.5	20.1	163	7.5	13.5	19.9
Upper	1	33.3	58.4	250	61.0	70.0	11	68.8	61.0	1,913	88.2	69.4	40.8
Unknown	0	0.0	3.4	0	0.0	5.8	1	6.3	4.2	51	2.4	8.5	0.0
Total	3	100.0	100.0	410	100.0	100.0	16	100.0	100.0	2,170	100.0	100.0	100.0
					Total H	ome Mor	tgage Loans	\$	-				
Low	9	9.6	4.6	1,324	5.3	2.4	7	6.5	5.2	1,393	4.6	2.6	22.6
Moderate	19	20.2	15.4	3,580	14.4	10.5	21	19.4	16.5	4,570	15.1	10.9	16.7
Middle	13	13.8	19.0	3,004	12.1	16.0	20	18.5	19.7	4,390	14.5	15.9	19.9
Upper	43	45.7	36.3	14,099	56.8	47.9	51	47.2	37.6	17,948	59.3	50.6	40.8
Unknown	10	10.6	24.7	2,804	11.3	23.1	9	8.3	21.0	1,973	6.5	19.9	0.0
Total	94	100.0	100.0	24,811	100.0	100.0	108	100.0	100.0	30,274	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

In 2020, the bank's level of lending to low-income borrowers (9.6%) was greater than the percentage of aggregate lending levels to such borrowers (4.6%) and less than the percentage of low-income families within the assessment area (22.6%). UB's lending to moderate-income borrowers (20.2%) was greater than both the percentage of aggregate lending levels (15.4%) and the percentage of moderate-income families (16.7%). The bank's performance during 2020 is considered excellent, and its performance during 2021 is similar.

Distrib	Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses												
		Asses	sment	Area: Cl	harlest	on-No	orth Cha	rlestor	ı, SC N	<b>ISA</b>			
				Bank	And A	ggreg	ate Loai	ıs By Y	(ear				Total
			20	20			2021						Total Businesses
	Bank Agg		Ban	k Agg		Bank		Agg	g Bank		Agg	%	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	·				By F	Reveni	1e						
\$1 Million or Less	109	44.9	38.9	4,046	21.8	28.5	90	47.4	45.2	17,663	60.7	32.5	93.0
Over \$1 Million	67	27.6		8,294	44.7		32	16.8		5,617	19.3		6.2
Revenue Unknown	67	27.6		6,199	33.4		68	35.8		5,798	19.9		0.9
Total	243	100.0		18,539	100.0		190	100.0		29,078	100.0		100.0
By Loan Size													
\$100,000 or Less	189	77.8	86.6	6,159	33.2	30.5	129	67.9	90.6	4,877	16.8	32.1	
\$100,001 - \$250,000	41	16.9	7.5	6,653	35.9	20.3	28	14.7	5.0	4,645	16.0	18.2	
\$250,001 - \$1 Million	13	5.3	5.9	5,727	30.9	49.2	33	17.4	4.3	19,556	67.3	49.7	
Total	243	100.0	100.0	18,539	100.0	100.0	190	100.0	100.0	29,078	100.0	100.0	
		]	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less	•			
\$100,000 or Less	101	92.7		2,468	61.0		57	63.3		2,193	12.4		
\$100,001 - \$250,000	7	6.4		1,178	29.1		11	12.2		1,917	10.9		
\$250,001 - \$1 Million	1	0.9		400	9.9		22	24.4		13,553	76.7		
Total	109	100.0		4,046	100.0		90	100.0		17,663	100.0		
ource: 2021 FFIEC Census Data 2021 Dun & Bradstreet Data													

2011-2015 U.S. Census Bureau: American Community Survey

Percentages may not total 100.0 percent due to rounding. Note:

D&B data from 2020, indicates that 92.5% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 27.6% involved loans for which revenues were unknown and 44.9% were to businesses with revenues of \$1 million or less. Additionally, 61.9% of the bank's loans where revenue was known (109 of 176 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 38.9% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 93% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 47.4% were to businesses with revenues of \$1 million or less, and 35.8% involved loans for which revenues were unknown. However, 73.8% of the bank's loans where revenue was known (90 of 122 loans) were to businesses with revenues of \$1 million or less. This level of lending exceeds the 2021 aggregate lending level of 45.2%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

## PPP Loans with no reported revenue

Charleston-North Charleston, SC MSA 2020										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	29	82.9%	930	41.8%						
\$100,001 - \$250,000	5	14.3%	796	35.7%						
\$250,001 - \$1 Million	1	2.9%	501	22.5%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	35	100.0%	2,227	100.0%						

During 2020, 77.8% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 86.6% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 82.9% had loan amounts of \$100,000 or less.

Charleston-North Charleston, SC MSA 2021										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	43	87.8%	1,034	48.7%						
\$100,001 - \$250,000	5	10.2%	721	33.9%						
\$250,001 - \$1 Million	1	2.0%	370	17.4%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	49	100.0%	2,125	100.0%						

During 2021, 67.9% of the small business loans reported were \$100,000 and less, and the aggregate reported 90.6% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 87.8% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

### **Community Development Lending:**

As previously discussed, opportunities for community development lending are reasonably available within the assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the assessment area. During the evaluation period, the bank originated or renewed two community development loans totaling \$290,790 within the assessment area, both of which were for the purpose of low-and-moderate income social services. This level of community development lending is considered adequate.

### **INVESTMENT TEST**

Overall, the bank has an excellent level of qualified community development investments and donations, which exhibit excellent responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the bank holds seven qualified investments totaling \$5.8 million that directly benefit the Charleston-North Charleston, SC MSA assessment area for the evaluation period. UB also has committed to fund \$5.4 million in investments within the assessment area.

During the evaluation period, the bank holds five affordable housing investments that support low- and moderate-income multifamily housing complexes, one investment that helps small business development, and one equity community needs investment. These investments demonstrate excellent responsiveness to the affordable housing, small business, and community needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$119,850. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the assessment area							
United Bank # \$							
Affordable Housing	4	1,000					
Community Service	32	88,850					
Economic	3	30,000					
Revitalize or Stabilize 0							
Total	39	119,850					

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

#### SERVICE TEST

Within the assessment area, UB's performance under the service test is considered good. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. This assessment area is new to the bank since the previous evaluation, and no branches have been closed. Business hours and services do not vary in a way that inconveniences the market, particularly low- and-moderate-income geographies and individuals. Also, UB has provided a relatively high level of services that include active participation in community development organizations during the review period.

### **Retail Services:**

Delivery systems are readily accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail, online banking, and mobile banking services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The bank operates eight full-service branch offices within the market, with none located in low-income census tracts and three (37.5%) branch offices located in moderate-income census tracts. The distribution of branches is excellent when considering 6.5% and 21% of the assessment area's households reside in low- and moderate-income areas, respectively according to 2015 census data. Branch services and business hours do not vary in a way that inconveniences the needs of the assessment area. No branch office has been closed in this market since the previous evaluation.

## **Community Development Services:**

The bank provides a relatively high level of community development services in the assessment area. Twenty-eight bank employees provided 561 hours of community development services during the evaluation period for 25 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, financial services, and financial education, which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area			
	#		
Affordable Housing	0		
Community Services	22		
Economic Development			
Revitalize or Stabilize			
Total	25		

### METROPOLITAN AREAS LIMITED REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COLUMBIA, SC ASSESSMENT AREA

A limited-scope review was conducted in the Columbia, SC assessment area. While the investment test performance was consistent with the statewide performance level, the lending and service test performances were below the statewide levels.

This assessment area consists of Lexington and Richland Counties. In 2021, the assessment area included 15 low-income, 40 moderate-income, 50 middle-income, 53 upper-income, and 5 unknown census tracts. According to the most current census data, the population of the assessment area is 671,742.

The bank operates two branch offices in the assessment area. One branch is located in a moderate-income tract, and one is in a middle-income tract. This assessment area contains .9% of the institution's branches and .5% of the deposits within the assessment area. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Columbia, SC Assessment Area							
	Tract Distribution # %		Percentage of Families by	Percentage of Families by			
Income Category*			Tract	Income Level			
Low Income	15	9.2	4.9	21.9			
Moderate Income	40	24.5	21.2	15.9			
Middle Income	50	30.7	33.8	19.3			
Upper Income	53	32.5	40.1	42.9			
Unknown	5	3.1	0.0				
Total	163	100.0	100.0	100.0			

<sup>\*</sup> NA – Tracts without household or family income as applicable

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Columbia, SC Assessment Area							
Loan Type 2020 2021 Total							
HMDA	19	23	42				
Small Business	71	50	121				
Total	90	73	163				

As a percentage by number and dollar, respectively, the Columbia, SC assessment area accounts for 0.8% and 0.9% of the bank's overall lending during the evaluation period and 12.8% and 15.4% of the bank's lending in South Carolina. In 2020, the bank ranked 105<sup>th</sup> out of 518 HMDA reporters with .05% of the area's total HMDA volume. UB ranked 109<sup>th</sup> in 2021 out of 559 reporters with .06% of the area's HMDA lending. In 2020, the bank ranked 25<sup>th</sup> out of 144 institutions reporting small business loans in the assessment area, and in 2021 it ranked 25<sup>th</sup> out of 134 reporters. The bank extended .5% of small business loans reported by the aggregate in the assessment area in 2020 and .3% in 2021.

While the bank made no community development loans, it held qualifying investments of \$6.7 million, and made donations of \$4,000. UB also had four qualified community development services during the evaluation period.

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE GREENVILLE-SPARTANBURG-ANDERSON, SC ASSESSMENT AREA

A limited-scope review was conducted in the Greenville-Spartanburg-Anderson, SC assessment area. Overall, the lending test performance was consistent with the bank's statewide performance level, and the investment performance level was below the statewide performance level. UB's service test performance level exceeded the statewide level.

This assessment area consists of Greenville and Spartanburg Counties. In 2021, the assessment area included 17 low-income, 42 moderate-income, 66 middle-income, and 55 upper-income census tracts. According to the most current census data, the population of the assessment area is 766,143.

The bank operates five branch offices in the assessment area. One branch is located in a moderate-income and four are in middle-income tracts. The assessment area contains 2.3% of the institution's branches and 1.6% of the deposits within the assessment area. One loan production office is also located in Greenville County. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Greenville-Spartanburg-Anderson, SC Assessment Area							
	Tract Distribution   Percentage of Families by   Percentage of Families by						
Income Category	# %		Tract	Income Level			
Low Income	17	9.4	5.4	21.3			
Moderate Income	42	23.3	16.9	16.3			
Middle Income	66	36.7	39.6	18.4			
Upper Income	55	30.6	38.1	44			
Total	180	100.0	100.0	100.0			

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Greenville-Spartanburg-Anderson, SC							
Assessment Area							
Loan Type 2020 2021 Total							
HMDA	43	103	146				
Small Business	169	177	346				
Total	212	280	492				

As a percentage by number and dollar, respectively, the Greenville-Spartanburg-Anderson, SC assessment area accounts for 2.3% and 2.5% of the bank's overall lending during the evaluation period and 38.2% and 40.3% of the bank's lending in its South Carolina assessment areas. In 2020, the bank ranked 106<sup>th</sup> out of 564 HMDA reporters with .09% of the area's total HMDA volume. UB ranked 85<sup>th</sup> in 2021 out of 619 reporters with .2% of the area's HMDA lending. In 2020, the bank ranked 25<sup>th</sup> out of 172 institutions reporting small business loans in the assessment area, and in 2021 it ranked 25<sup>th</sup> out of 153 reporters. The bank extended .8% of small business loans reported by the aggregate in the assessment area in 2020 and .8% in 2021.

Eight community development loans totaling \$24.9 million were originated that provided funds for affordable housing and social services to help low-and-moderate income residents within this limited scope assessment area. One of the community development loans was a PPP loan totaling \$1.2 million.

UB held qualified investments of \$1.7 million, with an additional \$600,000 committed but not yet funded. The bank also made donations equaling \$130,100 and had 27 community development services.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF SOUTH CAROLINA

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in Appendix C of this evaluation. Conclusions regarding performance, which did not impact the state of South Carolina's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	<b>Lending Test</b>	<b>Investment Test</b>	Service Test
Columbia, SC	Below	Consistent	Below
Greenville-Spartanburg-Anderson, SC	Consistent	Below	Exceeds

### **COMMONWEALTH OF VIRGINIA**

# CRA RATING FOR VIRGINIA8: Satisfactory

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>Outstanding</u>
The Service Test is rated: High Satisfactory

Major factors supporting the rating include:

• Lending activity reflects an adequate responsiveness to community credit needs given the bank's capacity within a highly competitive market.

- While performance varies by product, market area, and year, the geographic distribution performance is considered excellent overall.
- While performance varies by product, market area, and year, the borrower distribution performance is considered good overall.
- The bank exhibits an adequate record of serving the credit needs of low-income individuals and areas as well as very small businesses.
- The bank makes use of flexible lending practices in serving the credit needs of the assessment areas.
- UB made an adequate level of community development loans in Virginia that demonstrate an adequate responsiveness to local credit needs.
- The bank has an excellent level of qualified investments benefiting the statewide and regional area, including assessment areas within the commonwealth. Additionally, the bank makes significant use of innovative and/or complex investments. UB exhibits excellent responsiveness to credit and community development needs within the commonwealth.
- Delivery systems and branch locations are readily accessible to all segments of the assessment areas. Retail banking services do not vary in a way that inconveniences the bank's assessment areas, particularly low- and moderate-income areas and people. Branch closings have not adversely affected the accessibility of its delivery systems, particularly to low- and moderateincome neighborhoods.
- The bank is a leader in providing community development services within the assessment areas of Virginia.

### **SCOPE OF EXAMINATION**

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UB's reported HMDA and small business loans from calendar years 2020 and 2021 were used to evaluate lending performance for borrower and geographic distributions. As previously mentioned, small farm loans were not evaluated given the limited volume of lending. Community development loans made during this period, and qualified community development services provided during the review period, were considered. All qualified investments extended during the review period or outstanding as of the evaluation date, regardless of when made, were also considered. As previously stated, the Virginia assessment areas that were acquired from the Essex Bank merger were not considered in the lending test's geographic or borrower distributions tests.

<sup>8</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

When excluding activity in the Washington-Baltimore-Arlington, DC-VA-MD-WV CSA assessment area, the Virginia assessment areas account for 4.2%, 13.6%, and 8.4% of the institution's overall dollar volume of lending, branches, and deposits, respectively. The performance in the commonwealth was evaluated by applying the full scope interagency examination procedures to the Harrisonburg-Staunton, VA CSA which accounts for 32% of lending by dollar volume, 23.3% of branches, and 18.6% of deposits in the commonwealth. For the remaining assessment areas subject to limited scope review procedures, a determination was made as to whether performance was consistent with the assigned state rating.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COMMONWEALTH OF VIRGINIA

The institution operates 30 branch offices located throughout the Commonwealth of Virginia (excluding branches in the multistate assessment area) and all of its products and services are offered. None of the offices are located in low-income areas; however, three (10%) are located in moderate-income geographies. These 30 branch offices account for approximately \$2 billion of the bank's \$23.2 billion total deposit base.

According to ACS data from 2015, the bank's combined assessment areas within the Commonwealth of Virginia have a population of 1,684,280, including 411,916 families. The majority of families are middle- and upper-income (62.7%), while 19.7% are low-income and 17.6% are moderate-income. The percentage of families living below poverty level within the market is highest in the cities of Lynchburg (18.5%) and Richmond (19.3%), and the market's overall rate (8.7%) is slightly higher than the average rate for the entire state (8.2%). The owner-occupancy rate within the market (58.7%) is slightly lower than the rate for the Commonwealth of Virginia (59.2%). The 2020 median family incomes within the MSAs range from \$71,400 (Staunton, VA MSA) to \$87,000 (Charlottesville, VA MSA), while the median family income for nonmetropolitan areas of Virginia equals \$58,100 during 2020. The 2021 median family incomes within the MSAs range from \$66,700 (Harrisonburg, VA MSA) to \$90,900 (Charlottesville, VA MSA), while the median family income for nonmetropolitan areas of Virginia equals \$58,900 during 2021.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF VIRGINIA

The bank's Lending Test performance in the Commonwealth of Virginia's assessment areas' is considered high satisfactory. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of lending is considered good and the geographic distribution of lending is considered excellent. The bank originates an adequate level of community development loans.

The Investment Test performance is Outstanding. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs.

Under the Service Test, the bank's performance is considered High Satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or has adversely affected any particular individuals or areas. Further, the bank is a leader in providing community development services.

### **LENDING TEST**

Overall, the statewide lending test is rated high satisfactory. As previously mentioned, the rating of the Commonwealth of Virginia is based upon the performance within the Harrisonburg-Staunton, VA CSA assessment area. Lending activity is considered adequate and is measured primarily by proportion of lending in the bank's markets. The borrower distribution of loans is considered good, while the geographic distribution of loans is considered excellent. The provision of community development loans is considered adequate.

### **Lending Activity:**

The institution's HMDA and small business lending within the commonwealth, as measured by both number (4.6%) and dollar volume (4.2%) is less than the percentage of branch offices (13.6%) and the percentage of deposits (8.4%) in the commonwealth. As of June 30, 2022, the institution ranked 6<sup>th</sup> out of 43 financial institutions in deposit market share with 1.2% of the Commonwealth of Virginia's assessment areas' available FDIC insured deposits (credit union deposits are not included). When compared to 2020 aggregate data, the institution ranked 45<sup>th</sup> of 456 reporters of mortgage lending with a .6% market share and ranked 9<sup>th</sup> of 139 reporters of small business loans with a 4% market share. When compared to 2021 aggregate data, the institution ranked 76<sup>th</sup> of 712 reporters of mortgage lending with a .2% market share and ranked 22<sup>nd</sup> of 196 reporters of small business loans with a .6% market share. All market share rankings consider originated and purchased loans. Overall, lending activity is considered adequate.

### **Geographic and Borrower Distribution:**

Geographic distribution is considered excellent overall for each distribution, while borrower distribution is considered good overall for each distribution. When reaching overall conclusions, the state performance is reflective of the Harrisonburg-Staunton, VA CSA, as this was the only market fully reviewed. Additionally, regarding performance in the assessment area reviewed, HMDA loans and small business lending varied by year for largest product by dollar volume; however, small business loans generally carried more volume by dollar overall. As such, small business lending performance generally received the greatest weight when reaching the overall conclusion.

### **Community Development Loans:**

The bank originates an adequate level of loans that qualify as community development loans. During the evaluation period, UB funded or renewed seven community development loans totaling \$9.9 million in Virginia. The loans helped to address a variety of needs including job development, affordable housing, and services targeted to low- and moderate-income residents. The institution also originated two loans totaling \$2.2 million as a part of the PPP throughout the Commonwealth. Local lending opportunities are reasonably available when considering competition, bank size, economic conditions, and other area relevant factors. The institution faces no lending constraints relative to its size and business strategy.

### **INVESTMENT TEST**

The institution's level of qualified investments benefiting the Commonwealth of Virginia is rated outstanding. In addition to the previously mentioned VHDA bonds and VCDC funds that benefit the statewide and regional areas, the bank holds 73 allocations for its 120 investments totaling \$22.2 million that directly benefit its assessment areas and or the Commonwealth of Virginia. Additionally, 74 charitable donations totaling \$171,752 were made during the review period to organizations providing community development programs, affordable housing, and economic development throughout Virginia.

#### SERVICE TEST

The statewide rating for the institution under the service test is rated high satisfactory. Products and services offered within the Virginia market evaluated using the full-scope procedures are representative of those offered by the institution overall. In addition, services do not vary in a way that inconveniences the needs of its assessment areas. Delivery systems are readily accessible to all portions of the bank's market areas and to people of varying income levels.

The institution and its employees are leaders in the provision of community development services. Activities include participation in 59 organizations that provide either economic development, affordable housing, revitalization and/or stabilization, and other community services to low- and

moderate-income residents. More specifically, the bank provided services to organizations that are located throughout the bank's assessment areas within the Commonwealth of Virginia such as the Plains Area Day Care Center, Sportsmen for the Valley, City of Promise, Habitat for Humanity, and Big Brothers Big Sisters. The small percentage of the bank's total staff located in the Virginia assessment areas is also considered as an aspect of performance context, as is the pandemic's effect on staff to perform service activities.

Greater Charlottesville Habitat for Humanity: The bank has been an integral partner of the Charlottesville Habitat Southwood revitalization strategy. The redevelopment strategy helped to not displace the current residents living in the area, many who are low- and-moderate-income residents. Residents worked with Habitat staff and planning officials to develop a strategic plan for the redevelopment of this large property. Plans include nine distinct Villages, known as Southwood, that will create over 1,000 homes in mixed-income communities with multiple housing options from affordable housing rents to single-family homeownership. A majority of the donations and grants funding the project are tied to vertical construction, leaving the development cost of infrastructure for Charlottesville Habitat to raise. UB partnered with the Charlottesville Habitat in early 2020, and counted at the previous evaluation, by purchasing whole loans. The purchased loans helped to free up capital that the organization can reinvest in development costs related to new affordable housing. During this evaluation period in 2021, Habitat staff approached UB with another request to purchase whole loans. The purchase proceeds will be used to pay for infrastructure and site improvements needed for Charlottesville Habitat to begin construction on Southwood and allow existing families to realize homeownership or rent an affordable home. During January 2022, UB closed on the trade of 11 mortgages totaling \$1.4 million. Construction on the Southwood community is underway with the first Village to be completed by the end of 2023.

### METROPOLITAN AREAS FULL-SCOPE REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE HARRISONBURG-STAUNTON, VA CSA ASSESSMENT AREA

UB operates seven branch offices and seven ATMs within the Harrisonburg-Staunton, VA CSA assessment area, which includes the totality of the Harrisonburg, VA MSA and Staunton, VA MSA. All of Rockingham and Augusta Counties and the cities of Harrisonburg, Waynesboro, and Staunton are included in the assessment area. The complete composition of the assessment area is detailed in Appendix E. All of the bank's products and services are available in this market.

Twoot					DEMOGRAPHICS					
Tract Income	Bra	Branches		ATMS		MS Census Tracts		Total Businesses		
Levels	#	%	#	%	# %		%	%		
Low	0	0.0%	0	0.0%	2	3.7%	2.1%	2.9%		
Moderate	1	14.3%	1	14.3%	7	13.0%	13.0%	13.2%		
Middle	5	71.4%	5	71.4%	39	72.2%	76.0%	72.5%		
Upper	1	14.3%	1	14.3%	6	11.1%	8.9%	11.4%		
Unknown	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%		
Totals	7	100%	7	100%	54	100%	100%	100%		

According to the most current census data, the assessment area has a population of 248,569 and a median housing value of \$190,053. The owner-occupancy rate in the assessment area equals 58.6%, which is similar to the rate for the Commonwealth of Virginia (59.2%). The overall family poverty rate within the assessment area (9.2%) is slightly higher than that of the commonwealth (8.2%). Median family incomes for the MSAs that comprise the assessment area are detailed in the table below.

Median Family Income by MSA	2020	2021
Harrisonburg, VA MSA	\$71,900	\$66,700
Staunton-Waynesboro, VA MSA	\$71,400	\$71,200

The following table provides family and household demographic information for the assessment area, as well as the tract and owner-occupied housing unit distribution by tract income level. The table also provides D&B business data.

2021 Harrisonburg-Staunton, VA CSA AA Demographics								
Income Categories	Tract Dis	tribution	Families by T	ract Income		overty Level ilies by Tract	Families l	,
	#	%	#	%	#	%	#	%
Low	2	3.7	465	0.8	236	50.8	11,864	19.2
Moderate	7	13.0	7,254	11.7	1,302	17.9	11,668	18.9
Middle	39	72.2	48,117	77.8	3,909	8.1	14,019	22.7
Upper	6	11.1	5,977	9.7	262	4.4	24,262	39.3
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	54	100.0	61,813	100.0	5,709	9.2	61,813	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,449	197	0.3	8.0	1,753	71.6	499	20.4
Moderate	13,804	5,908	9.6	42.8	6,272	45.4	1,624	11.8
Middle	79,406	49,633	80.3	62.5	21,505	27.1	8,268	10.4
Upper	9,926	6,093	9.9	61.4	2,241	22.6	1,592	16.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	105,585	61,831	100.0	58.6	31,771	30.1	11,983	11.3
	Businesses by Tract & Revenue Size							
	Total Busines	sses by Tract	ses by Tract Less Than or = \$1 Million		Over \$1 Million		Revenue Not Reported	
	#	%	#	%	#	%	#	%
Low	294	2.9	260	2.8	30	4.1	4	4.4
Moderate	1,323	13.2	1,219	13.2	85	11.7	19	20.9
Middle	7,267	72.5	6,689	72.6	515	70.8	63	69.2
Upper	1,144	11.4	1,042	11.3	97	13.3	5	5.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	10,028	100.0	9,210	100.0	727	100.0	91	100.0
Perce	entage of Tota	al Businesses:		91.8		7.2		0.9
			Farms by Tract & Revenue Size					
	Total Farm	is by Tract	Less Than or	= \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1	0.1	1	0.1	0	0.0	0	0.0
Moderate	25	3.2	24	3.1	1	12.5	0	0.0
Middle	677	87.7	671	87.8	6	75.0	0	0.0
Upper	69	8.9	68	8.9	1	12.5	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	772	100.0	764	100.0	8	100.0	0	0.0
I	Percentage of	Total Farms:		99.0		1.0		0.0
Source: 2021 FFIFC Census Data								

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

As noted in the chart below, government, manufacturing, health services, manufacturing, and tourism employment opportunities provide a large portion of area employment for residents. In addition, James Madison University provides significant employment opportunities.

Harrisonburg-Staunton, VA CSA Employees by Industry							
Harrisonburg-Staun		2020 - Q2		_	2021 01	2021 02	2021 02
Government		12,097*	11.742*	12,038*	11.952*	12,122*	11,721*
	,	12,097	11,742	12,056	11,952	12,122	11,721
Private Sector		24.240	20.540	04.000	00.000	04.550	00.505
Private Sector Total, all industries	94,259	,	89,540	91,320	90,288	91,553	92,505
Agriculture, forestry, fishing and hunting	257*	384*	383*	322*	327*	422*	422*
Mining, quarrying, and oil and gas extraction	30*	31*	32*	31*	31*	31*	32*
Utilities	0*	0*	0*	0*	0*	0*	0*
Construction	6,613*	6,404*	6,536*	6,459*	6,377*	6,469*	6,449*
Manufacturing		18,029	18,335	18,376	18,270	17,904	17,938
Wholesale trade	,	1,403*	1,098*	1,122*	1,126*	1,123*	1,124*
Retail Trade	/	11,333	12,213	12,681	12,331	12,460	12,266
Transportation and warehousing	6,842*	6,435*	6,742*	7,040*	6,900*	6,835*	6,943*
Information	1,261	1,160	1,164	1,138	1,113	1,126	1,139
Finance and insurance	2,039	1,943	1,942	1,916	1,915	1,938	1,931
Real estate and rental and leasing	1,433	1,265	1,370	1,321	1,285	1,302	1,323
Professional and technical services	2,926	2,756	2,770	2,800	2,878	2,890	2,793
Management of companies and enterprises	962*	1,276	1,267	913*	961*	1,317	1,333
Administrative and waste services	3,141*	3,361	3,413	3,270*	2,866*	3,195	3,374
Educational services	2,331*	1,793*	1,621*	1,979*	1,987*	1,848*	1,715*
Health care and social assistance	13,142*	12,359*	12,685*	12,914*	12,964*	12,927*	13,029*
Arts, entertainment, and recreation	538	370	584	564	481	606	692
Accommodation and food services	12,303	7,097	9,813	10,168	10,239	10,406	10,965
Other services, except public administration	2,869	2,301	2,724	2,675	2,585	2,725	2,808
Public administration	0	0	0	0	0	0	0
Unclassified 179 183 225 232 241 256 261							
iource: Bureau of Labor Statistics(BLS), Quarterly Census of Employment and Wages							
Indicates that some or all of the data for this category was su	opressed fo	r confident	iality reason	15			

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Harrisonburg-Staunton, VA CSA Unemployment Rates						
Area	2020	2021				
Harrisonburg-Staunton, VA CSA	5.30%	3.37%				
Augusta County, VA	4.58%	3.06%				
Rockingham County, VA	4.68%	2.94%				
Harrisonburg city, VA	6.38%	4.04%				
Staunton city, VA	6.28%	3.81%				
Waynesboro city, VA	6.58%	4.13%				
Harrisonburg, VA MSA	5.31%	3.34%				
Staunton, VA MSA	5.28%	3.40%				
Virginia 6.20% 3.91%						
Source: Bureau of Labor Statistics (BLS), Loca	l Area Unemployme	ent Statistics				

Overall, unemployment rates across the assessment area have moved with the pandemic decreasing from 2020 to 2021. Further, the assessment area's unemployment rates are generally slightly lower than that of the Commonwealth of Virginia.

Harrisonburg	Harrisonburg-Staunton, VA CSA Median Family Income Change									
Area	2010 Median Family Income	2015 Median Family Income	Percent Change							
Harrisonburg-Staunton, VA CSA	\$62,584	\$60,599	-3.17%							
Augusta County, VA	\$65,888	\$61,913	-6.03%							
Rockingham County, VA	\$63,232	\$61,718	-2.39%							
Harrisonburg city, VA	\$58,290	\$55,774	-4.32%							
Staunton city, VA	\$62,987	\$61,097	-3.00%							
Waynesboro city, VA	\$51,818	\$55,540	7.18%							
Harrisonburg, VA MSA	\$62,155	\$60,539	-2.60%							
Staunton, VA MSA	\$63,137	\$60,603	-4.01%							
Virginia	\$80,053	\$78,390	-2.08%							

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

With the exception of the city of Waynesboro, as noted in the above chart, the CSA, MSAs, state, as well as the remaining counties within the assessment area denote a decrease in median family income amounts from 2010 to 2015. As depicted below, housing cost burden for the majority of the CSA low-and-moderate income renters and owners is equal to or exceeds 30 percent or more of household income within the assessment area. While housing cost burden in Rockingham County is high for low-and-moderate income renters, it is 30 percent or more of household income for low-income owners and below the threshold for moderate-income owners in the county.

Harris	onburg-Sta	unton, VA CSA	<b>Housing Co</b>	ost Burden					
	Cos	st Burden - Rent	ers	Cost Burden - Owners					
Area	Low Income	Moderate Income	All Renters	Low Income	Moderate Income	All Owners			
Harrisonburg-Staunton, VA CSA	77%	52%	42%	62%	33%	18%			
Augusta County, VA	68%	52%	35%	64%	38%	19%			
Rockingham County, VA	77%	42%	38%	56%	26%	16%			
Harrisonburg city, VA	80%	61%	49%	57%	36%	19%			
Staunton city, VA	76%	52%	44%	76%	35%	19%			
Waynesboro city, VA	80%	59%	44%	67%	32%	21%			
Harrisonburg, VA MSA	79%	51%	44%	57%	29%	17%			
Staunton, VA MSA	74%	54%	40%	66%	37%	20%			
Virginia	77%	56%	43%	65%	40%	21%			

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

A local community official was recently contacted to assist in evaluating UB's CRA performance. The contact indicated that the assessment area is diverse and includes both urban and rural areas and that housing and employment variables depend upon which part of the assessment area a resident resides. The county has a population of about 100,000 and the independent cities of Staunton and Waynesboro each have populations of about 20,000, respectively. He indicated that about five percent of the population is below the federal poverty level. Augusta County is in the Shenandoah Valley and includes parts of the Shenandoah National Park, the Blue Ridge Parkway, as well as the George Washington Forest, all of which contribute to making tourism a significant part of the local economy. Augusta County itself is rural in nature, with the independent municipalities of Staunton and Waynesboro being moderate-sized urban areas. The contact described how little has changed in the area overall from a job availability standpoint; the area is the second largest agricultural region in the state, adjacent to the largest agricultural region. While the area has seen some growth in population, he stated that the COVID-19 pandemic intensified existing economic problems in the area. For example, there are staffing shortages across all industries of employment due to the pandemic, particularly in the mental and behavioral health fields.

Affordable housing remains the biggest challenge; however, the rental market has increased in recent years, particularly in Waynesboro, which is adjacent to Nelson County, Virginia. Federal, state, and county funds are available for homelessness prevention and other affordable housing programs, but local landlords are not always willing to participate in such programs. Affordable housing construction is also very limited. To combat these existing problems, the Staunton County Planning Department recently released a grant to build rental housing for 24 new units. There is also a need for quality affordable housing stock, which remains limited. There is also a lack of skilled workers available for the job skill sets that are available. Some progress has been made in training local residents to step into these skilled jobs; however, some salaries/wages for certain jobs that require six years of higher education and training have a starting salary of only \$32,000 – the equivalent of an annual income at a local gas station.

The contact described VITA, which is a program they offer that they believe would be a logical fit for banks to explore ways to become more involved in helping to meet the needs of residents within the assessment area. Other potential opportunities for bank participation would be support for financial awareness training, either through financial support of a class, training, or through board memberships.

He stated their office does have a very good partnership with one local financial institution that has supported the agency's VITA program over the past five years. Another local financial institution is also highly visible and engaged in the community through their office. The contact stated that the agency hasn't had much of a relationship with the other banks that operate in the area. The assessment area does benefit from having James Madison University located in Harrisonburg, which provides the city and surrounding counites with job opportunities, health benefits, and contributes to spillover economics for the assessment area. The official did not mention any local bank participating in discriminatory acts.

UB holds a good deposit market share within the assessment area (6<sup>th</sup> of 18 banks operating within the assessment area) having 6.4% of all deposits from the June 30, 2022, FDIC deposit market share report when compared to the other banking institutions that operate within the assessment area. Overall, there is reasonable opportunity for community development loans and investments within the market area. Despite a competitive market, the bank faces no significant constraints in taking advantage of all available community development opportunities. UB serves the assessment area through its array of banking services and products; as noted above, all of the bank's services and products are offered in this assessment area, which includes community development loans, of which the bank originated three totaling \$4.8 million, as well as 18 qualified investments totaling \$4.8 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 64 customer's loan interest, which totaled 73 loans to the amount of \$361,224. Furthermore, during the pandemic from this assessment area, the bank waived 415 customer's ATM cash bank fees totaling \$830 and increased 11 customer's ATM withdrawal limits.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE HARRISONBURG-STAUNTON, VA CSA ASSESSMENT AREA:

The bank's Lending Test performance in the Harrisonburg-Staunton, VA CSA assessment area is considered good. Lending levels show adequate responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution of loans is excellent, and the bank originatesd an adequate level of community development loans.

The Investment Test performance is excellent. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs.

Under the Service Test, the bank's performance is considered good. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank is a leader at providing community development services.

### LENDING TEST

The institution's overall lending performance within this assessment area is considered good. This conclusion is based on the evaluation of the bank's lending activity, the geographic and borrower lending distribution, and the level of community development lending while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. The bank makes use of flexible lending practices in serving the credit needs of the assessment area. There were no gaps in lending, and the geographic distribution and dispersion of loans is good.

## **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by the number percentage (1.8%), is less than the percentage of branch offices (3.2%), but exceeds the percentage of deposits (1.6%) in the assessment area. On the other hand, the percentage of branch offices and deposits is greater than the dollar percentage (1.3%) in the assessment area. As of June 30, 2022, the bank ranked 6<sup>th</sup> out of 18 financial institutions in deposit market share having 6.4% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 40<sup>th</sup> of 340 reporters of mortgage lending with a .4% market share and ranked 14<sup>th</sup> of 82 reporters of small business loans with a 1.7% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is considered adequate.

# **Geographic Distribution:**

UB's geographic distribution performance is considered excellent for both HMDA and small business lending in the assessment area.

			12000				onburg-9		011, V	COA			1
					k And A	ggregate	Loans By Y	ear					
Geographic Income Level	Donk		202			A	Bank		20:			A ===	Owner Occupied Units %
income Level	Bank 		Agg	Bank		Agg	Bank 		Agg	<del></del>		Agg	Onits %
	#	#%	#%	\$(000)	\$%	\$%	# ase Loans	#%	#%	\$(000)	\$%	\$%	
1	0	0.0	0.8	0	0.0	0.5	ase Loans	4.2	1.1	113	1.6	0.9	0.
Low Moderate	10	47.6	12.	2,015	32.8	10.8	11	45.8	12.9	2,728	39.8	11.0	9.
Middle	9	42.9	74.1	3,267	53.2	72.3	7	29.2	73.2	2,039	29.7	72.0	80.
Upper	2	9.5	13.1	863	14.0	16.3	5	20.8	12.8	1,979	28.9	15.5	9.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	6,145	100.0	100.0	24	100.0	100.0	6,859	100.0	100.0	100
	<u> </u>			, ,		Refinance	e Loans			-,			
Low	0	0.0	0.5	0	0.0	0.6	0	0.0	0.5	0	0.0	0.3	0.
Moderate	10	32.3	9.1	2,449	42.9	8.2	1	5.9	10.3	181	7.8	9.3	9.
Middle	20	64.5	75.4	3,075	53.9	73.6	16	94.1	77.0	2,140	92.2	76.0	80.
Upper	1	3.2	15.0	186	3.3	17.6	0	0.0	12.3	0	0.0	14.4	9.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	31	100.0	100.0	5,710	100.0	100.0	17	100.0	100.0	2,321	100.0	100.0	100
					Home	Improve	ment Loans						
Low	0	0.0	0.8	0	0.0	1.6	0	0.0	0.4	0	0.0	0.2	0.
Moderate	0	0.0	8.8	0	0.0	8.5	0	0.0	7.5	0	0.0	6.1	9.
Middle	11	91.7	73.4	588	94.8	70.0	7	87.5	79.1	476	86.4	79.9	80.
Upper	1	8.3	17.0	32	5.2	19.9	1	12.5	13.0	75	13.6	13.9	9.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	620	100.0	100.0	8	100.0	100.0	551	100.0	100.0	100
					М	ultifamily	Loans						Multi-family
Low	0	0.0	9.1	0	0.0	1.2	0	0.0	2.9	0	0.0	0.3	Units %
Moderate	0	0.0	11.4	0	0.0	10.6	0	0.0	17.1	0	0.0	25.3	23.
Middle	0	0.0	77.3	0	0.0	88.1	0	0.0	71.4	0	0.0	59.0	57.
Upper	0	0.0	2.3	0	0.0	0.2	0	0.0	8.6	0	0.0	15.3	7.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100
					Total Ho	me Morte	age Loans						Owner Occupied
Low	0	0.0	0.6	0	0.0	0.6	4	1.9	0.7	113	1.1	0.6	<b>Units %</b>
Moderate	20	26.7	10.2	4,464	34.1	9.3	13	24.1	11.3	2,924	28.5	10.7	9.
Middle	47	62.7	75.0	7,248	55.3	73.8	34	63.0	75.5	5,174	50.4	73.7	80.
Upper	8	10.7	14.2	1,389	10.6	16.3	6	11.	1 12.5	2,054	20.0	15.0	9.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	2,034	0.0	0.0	0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	Ü.
HACE-OHK	U	0.0	0.0	U	0.0	0.0	U	0.0	0.0	U	0.0	0.0	

2011-2015 U.S. Census Bureau: American Community Survey

Percentages may not total 100.0 percent due to rounding.

In both years, refinance and home purchase loans were the primary product by number of loans for the bank, and home improvement loans were the third highest volume product. UB did not originate any multifamily loans during the review period. UB's refinance and home purchase lending performance in both 2020 and 2021 are considered excellent, while home improvement lending is considered very poor.

As reflected in the preceding table, the bank's lack of 2020 HMDA lending in low-income census tracts (0%) is lower than the aggregate lending level (.6%) and the percentage of owner-occupied housing units located in such tracts (.3%); however, demand is limited as reflected by the demographic proxy. Conversely, the bank's level of lending in moderate-income census tracts (26.7%) significantly exceeds both the level of aggregate lending in such tracts (10.2%) and the owner-occupied housing units located in moderate-income census tracts (9.6%). Overall, based on the low level of demand in low-income tracts, and the bank's lending in moderate-income tracts, performance during 2020 is considered excellent, and the performance during 2021 is substantially similar.

Di	istributio	on of 2	2020 aı	nd 2021 S	Small	Busine	ess Lend	ing By	Incor	ne Level	of Ge	ograp	hy	
			Asse	ssment A	Area: I	<b>Harris</b> o	nburg-9	Staunt	on, VA	CSA				
C 1	Bank And Aggregate Loans By Year													
Geographic			20	20					20	21			Total	
Income	Ban	k	Agg	Ban	k	Agg	Ban	Bank Agg Bank Agg			Agg	Businesses		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%	
Low	1	0.6	2.3	175	1.0	2.1	0	0.0	2.5	0	0.0	3.0	2.9	
Moderate	32	18.5	13.4	3,299	17.9	13.3	17	20.0	12.4	1,674	17.0	10.2	13.2	
Middle	122	70.5	71.7	13,672	74.4	72.8	58	68.2	73.7	7,999	81.3	76.7	72.5	
Upper	18	10.4	11.9	1,233	6.7	11.4	10	11.8	10.7	163	1.7	9.9	11.4	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.7	0	0.0	0.4	0	0.0	0.6	0	0.0	0.2		
Total	173	100.0	100.0	18,379	100.0	100.0	85	100.0	100.0	9,836	100.0	100.0	100.0	

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

During 2020, the bank's level of small business lending in low-income census tracts was less than aggregate reporters' lending levels (2.3%) and the percentage of businesses located in such tracts (3%). On the other hand, UB's level of lending in moderate-income census tracts (18.5%) substantially exceeded the aggregate lending level (13.4%) and the percentage of businesses located in such tracts (13%). Overall, the bank's small business lending performance during 2020 is considered excellent, and its performance during 2021 is substantially similar.

# Distribution by Borrower Income and Revenue Size of the Business:

The overall distribution by borrower income and business revenue within this assessment area is considered good for both HMDA and small business lending.

	Distribu	tion o					~ ~	_	•		Incom	e Lev	el
	Τ		Asse				onburg- Loans By Y		on, v	A CSA			l e
Borrower		2020							20:	21			Families by
Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Banl	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hom	ne Purch	ase Loans						I
Low	1	4.8	7.3	184	3.0	4.3	1	4.2	5.8	201	2.9	3.4	19.2
Moderate	4	19.0	25.9	778	12.7	20.0	5	20.8	21.7	945	13.8	16.6	18.9
Middle	4	19.0	22.6	988	16.1	22.7	5	20.8	22.4	1,278	18.6	21.3	22.7
Upper	12	57.1	28.6	4,195	68.3	37.0	12	50.0	30.5	4,221	61.5	39.0	39.3
Unknown	0	0.0	15.5	0	0.0	16.0	1	4.2	19.7	214	3.1	19.7	0.0
Total	21	100.0	100.0	6,145	100.0	100.0	24	100.0	100.0	6,859	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	5.5	0	0.0	3.0	2	11.8	5.8	215	9.3	3.5	19.2
Moderate	11	35.5	18.3	1,528	26.8	13.9	6	35.3	18.2	982	42.3	14.0	18.9
Middle	3	9.7	21.5	231	4.0	19.4	6	35.3	22.6	734	31.6	20.7	22.7
Upper	16	51.6	33.3	3,821	66.9	40.2	3	17.6	33.4	390	16.8	40.5	39.3
Unknown	1	3.2	21.4	130	2.3	23.6	0	0.0	19.9	0	0.0	21.4	0.0
Total	31	100.0	100.0	5,710	100.0	100.0	17	100.0	100.0	2,321	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	8.8	0	0.0	6.8	0	0.0	7.2	0	0.0	5.5	19.2
Moderate	2	16.7	17.3	105	16.9	13.3	2	25.0	20.9	69	12.5	15.5	18.9
Middle	5	41.7	24.9	193	31.1	25.2	1	12.5	27.7	225	40.8	26.0	22.7
Upper	5	41.7	47.0	322	51.9	52.7	4	50.0	40.7	237	43.0	45.7	39.3
Unknown	0	0.0	2.0	0	0.0	2.0	1	12.5	3.4	20	3.6	7.3	0.0
Total	12	100.0	100.0	620	100.0	100.0	8	100.0	100.0	551	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	5					
Low	1	1.3	6.4	184	1.4	3.6	3	5.6	6.0	416	4.1	3.5	19.2
Moderate	18	24.0	21.1	2,453	18.7	16.4	13	24.1	19.8	1,996	19.4	15.3	18.9
Middle	15	20.0	21.9	1,660	12.7	20.7	14	25.9	22.9	2,277	22.2	21.	22.7
Upper	40	53.3	31.8	8,674	66.2	38.8	22	40.7	32.6	5,342	52.0	39.9	39.3
Unknown	1	1.3	18.8	130	1.0	20.5	2	3.7	18.6	234	2.3	20.2	0.0
Total	75	100.0	100.0	13,10	1 100.0	100.0	54	100.0	100.0	10,265	100.0	100.0	100.0

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

In 2020, the bank's level of lending to low-income borrowers (1.3%) was significantly less than the percentage of aggregate lending levels to such borrowers (6.4%) and the percentage of low-income families within the assessment area (19.2%). UB's lending to moderate-income borrowers (24%) was greater than the percentage of aggregate lending levels (21.1%) and the percentage of moderate-income families (18.9%). Overall, the bank's performance during 2020 is considered good, and its performance during 2021 is substantially similar.

Distrib	oution of	f 2020	and 20	)21 Sma	ll Busi	ness L	ending l	By Rev	enue	Size of E	Busine	sses	
	Assessment Area: Harrisonburg-Staunton, VA CSA												
				Bank	And A	ggreg	ate Loai	ns By Y	(ear				Tatal
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Bank		Agg	Ban	ık	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
By Revenue													
\$1 Million or Less	21	12.1	40.5	1,431	7.8	28.8	22	25.9	54.0	883	9.0	34.7	91.8
Over \$1 Million	20	11.6		6,059	33.0		25	29.4		7,134	72.5		7.2
Revenue Unknown	132	76.3		10,889	59.2		38	44.7		1,819	18.5		0.9
Total	173	100.0		18,379	100.0		85	100.0		9,836	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	130	75.1	86.8	4,234	23.0	32.5	61	71.8	91.6	2,011	20.4	35.2	
\$100,001 - \$250,000	20	11.6	7.7	3,430	18.7	21.6	11	12.9	5.0	1,564	15.9	20.9	
\$250,001 - \$1 Million	23	13.3	5.5	10,715	58.3	45.8	13	15.3	3.4	6,261	63.7	43.9	
Total	173	100.0	100.0	18,379	100.0	100.0	85	100.0	100.0	9,836	100.0	100.0	
		I	By Loa	n Size a	nd Rev	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	17	81.0		549	38.4		20	90.9		599	67.8		
\$100,001 - \$250,000	3	14.3		465	32.5		2	9.1		284	32.2		
\$250,001 - \$1 Million	1	4.8		417	29.1		0	0.0		0	0.0		
Total	21	100.0		1,431	100.0		22	100.0		883	100.0		
Source: 2021 FFIEC C 2021 Dun & B													

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

D&B data from 2020, indicates that 91.8% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 76.3% involved loans for which revenues were unknown and 12.1% were to businesses with revenues of \$1 million or less. However, 51.2% of the bank's loans where revenue was known (21 of 41 loans) were to businesses with revenues of \$1 million or less. The percentage is greater than the 2020 aggregate lending level of 40.5% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 91.8% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 25.9% were to businesses with revenues of \$1 million or less, and 44.7% involved loans for which revenues were unknown. However, 46.8% of the bank's loans where revenue was known (22 of 47 loans) were to businesses with revenues of \$1 million or less. This level of lending is less than the 2021 aggregate lending level of 54%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

## PPP Loans with no reported revenue

Harrisonburg-S	Harrisonburg-Staunton, VA CSA 2020									
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	102	79.7%	3,083	28.9%						
\$100,001 - \$250,000	13	10.2%	2,117	19.8%						
\$250,001 - \$1 Million	13	10.2%	5,466	51.2%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	128	100.0%	10,666	100.0%						

During 2020, 75.1% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 86.8% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 79.7% had loan

Harrisonburg-S	Harrisonburg-Staunton, VA CSA 2021									
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	31	91.2%	871	59.9%						
\$100,001 - \$250,000	2	5.9%	316	21.7%						
\$250,001 - \$1 Million	1	2.9%	266	18.3%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	34	100.0%	1,453	100.0%						

During 2021, 71.8% of the small business loans reported were \$100,000 and less, and the aggregate reported 91.6% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 91.2% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

### **Community Development Lending:**

As previously discussed, opportunities for community development lending are reasonably available within the assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces no constraints in extending community development loans within the Harrisonburg-Staunton, VA CSA assessment area. During the evaluation period, two qualified community development loans were originated, totaling \$3.7 million within the assessment area, and provided funding for the purpose of revitalization/stabilization and job creation efforts. The bank also originated one loan totaling \$1.1 million as a part of the PPP. UB makes an adequate level of community development loans in this assessment area.

### **INVESTMENT TEST**

Overall, the bank has an excellent level of qualified community development investments and donations and exhibits excellent responsiveness to the credit and community needs in the assessment area. In addition to the previously described investments that benefit regional or statewide areas, the bank holds 18 qualified investments totaling \$4.8 million that directly benefit the Harrisonburg-Staunton, VA CSA assessment area for the evaluation period. UB also has committed to fund \$8.1 million in qualified investments within the assessment area. The investments include \$3 million in new investments.

During the evaluation period, the majority of the qualified investments made support affordable housing. These investments demonstrate excellent responsiveness to the affordable housing needs in the assessment area. The bank's prior-period investments also support affordable housing needs in the assessment area.

The bank made qualified investments in the form of donations, totaling \$39,950. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development, revitalize or stabilize low- and moderate-income geographies, and support affordable housing efforts, which are needed in the assessment area.

Qualified Investment Donations in the assessment area								
United Bank	#	\$						
Affordable Housing	1	250						
Community Service	17	28,000						
Economic	3	7,000						
Revitalize or Stabilize	4	4,700						
Total	25	39,950						

In addition, the bank makes significant use of innovative and/or complex investments to support community development initiatives. In particular within the assessment area, the bank provided financing to renovate a dilapidated commercial building located in a moderate-income census tract in the City of Harrisonburg. After the renovation, the bank bought the tax credits of the project to further support the projects' goal of revitalization and stabilization of the moderate-income census tract. The 18,000 square foot building is currently being leased to a local health care provider who is the primary medical provider for residents of the area.

### SERVICE TEST

Within the assessment area, UB's performance under the service test is rated high satisfactory. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low- and moderate-income areas. No new branch office activity has occurred since the previous evaluation, and the accessibility of its delivery systems, particularly to low-and-moderate-income geographies and/or individuals are not adversely affected. Branch services and business hours do not vary in a way that inconveniences the needs of the assessment area. Also, UB is a leader in providing services that include active participation in community development organizations.

#### **Retail Services:**

Delivery systems are readily accessible to all portions of the assessment area. ATMs are available and, through a network, provide customers with 24-hour nationwide access. Bank-by-mail, online banking, and mobile banking services are also offered by the institution. In addition, the institution provides customers with 24-hour telephone access to their accounts through an automated system.

The bank operates seven full-service branch offices within the market, none located in low-income census tracts and one (14.3%) branch office located in a moderate-income census tract. The distribution of branches is good when considering 2.1% and 13% of the assessment area's households reside in low-and moderate-income areas, respectively according to 2015 census data. Branch services and business hours do not vary in a way that inconveniences the needs of the assessment area. No branch office was opened or closed in this market since the previous evaluation.

## **Community Development Services:**

The bank is a leader in providing community development services in the assessment area. Thirty-three bank employees provided 1,090 hours of community development services during the evaluation period for 23 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, financial services, economic development, and financial education, which is responsive to the assessment area. During the evaluation period, bank employees served in various roles for the organizations, including board members, committee members, and trainers/presenters.

Community Development Services in the assessment area						
	#					
Affordable Housing	1					
Community Services	`19					
Economic Development	2					
Revitalize or Stabilize	1					
Total	23					

### METROPOLITAN AREAS LIMITED REVIEW

### DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE CHARLOTTESVILLE, VA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Charlottesville, VA assessment area was conducted. The bank's lending performance in the assessment area exceeds its statewide performance level, its investment test performance is below the statewide performance level, and its service test performance was consistent with the statewide performance level.

This assessment area consists of Albemarle and Greene Counties and the city of Charlottesville. In 2021, the assessment area included two low-income, ten moderate-income, 14 middle-income, 10 upper-income, and one unknown census tracts. According to the most current census data, the population of the assessment area is 167,130.

The bank operates three branch offices in the assessment area. One branch is located in a moderate-income tract, and two are in upper-income tracts. This assessment area contains 1.4% of the institution's branches and 1.3% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Charlottesville, VA Assessment Area										
	Tract Dis	tribution	Percentage of Families by	Percentage of Families by						
Income Category*	#	%	Tract	Income Level						
Low Income	2	5.4	3.1	20.1						
Moderate Income	10	27	17.5	16						
Middle Income	14	37.8	45.6	19.7						
Upper Income	10	27	33.7	44.2						
NA	1	2.7	0.1							
Total	37	100.0	100.0	100.0						

<sup>\*</sup> NA – Tracts without household or family income as applicable

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Charlottesville, VA Assessment Area									
Loan Type 2020 2021 Total									
HMDA	37	47	84						
Small Business	168	110	278						
Total	205	157	362						

As a percentage by number and dollar, respectively, the Charlottesville, VA assessment area accounts for 1.6% and 1.3% of the bank's overall lending during the evaluation period and 35.9% and 31.5% of its lending in the Virginia assessment areas. In 2020, the bank ranked 46<sup>th</sup> out of 364 HMDA reporters with .4% of the area's total HMDA volume. UB ranked 44<sup>th</sup> in 2021 out of 382 reporters with .5% of the area's HMDA lending. In 2020, the bank ranked ninth out of 120 institutions reporting small business loans in the assessment area, and in 2021 it ranked 12<sup>th</sup> out of 93 reporters. The bank extended 3.8% of small business loans reported by the aggregate in the assessment area in 2020 and 2.2% in 2021.

Three community development loans totaling approximately \$1.5 million were made. The loans included one PPP loan for \$1.2 million and two additional loans that helped low-and-moderate income families with social services within this limited scope assessment area.

Qualified investments equal \$1.9 million and the bank has committed, but not yet funded \$2 million. UB made qualified donations of \$55,375 and had 14 services during the review period.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE RICHMOND, VA ASSESSMENT AREA

A limited-scope review was conducted in the Richmond, VA assessment area. For this assessment area, the bank's lending performance was not rated due to the limited amount of lending data as a result of the timing of the Essex Bank merger (December 2021). The bank's investment and service performances in the assessment area were below the statewide performance levels.

This assessment area consists of Chesterfield, Goochland, Hanover, Henrico, King William, King and Queen, and Powhatan Counties, as well as the city of Richmond. In 2021, the assessment area included 28 low-income, 52 moderate-income, 83 middle-income, 75 upper-income, and two unknown census tracts. According to the most current census data, the population of the assessment area is 1,035,246.

The bank operates 12 branch offices in the assessment area. Five branches are located in middle-income tracts, and seven are in upper-income tracts. This assessment area contains 5.4% of the institution's branches and 3.5% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Richmond, VA Assessment Area						
	Tract Distribution		Percentage of Families by	Percentage of Families by		
Income Category*	#	%	Tract	Income Level		
Low Income	28	11.7	7.2	19.8		
Moderate Income	52	21.7	17.8	17.5		
Middle Income	83	34.6	38.1	20		
Upper Income	75	31.3	36.8	42.8		
NA	2	0.8	0.0			
Total	240	100.0	100.0	100.0		

<sup>\*</sup> NA – Tracts without household or family income as applicable

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Richmond, VA Assessment Area					
Loan Type	2020	2021	Total		
HMDA	N/A	87	87		
Small Business	N/A	14	14		
Total	N/A	101	101		

As a percentage by number and dollar, respectively, the Richmond, VA assessment area accounts for 0.5% and 1.1% of the bank's overall lending during the evaluation period and 10% and 26.8% of the bank's lending in the Virginia assessment areas. UB ranked  $98^{th}$  in 2021 out of 614 reporters with .1% of the area's HMDA lending. In 2021, the bank ranked  $53^{rd}$  out of 168 institutions reporting small business loans in the assessment area. The bank extended .05% of small business loans reported by the

aggregate in the assessment area in 2021. Two community development loans totaling \$5.9 million were made helping with the affordable housing needs within this limited scope assessment area. Qualified investments for this limited scope assessment area amount to \$869,756, and donations equal \$30,000. Additionally, the bank had seven qualified community development services.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LYNCHBURG, VA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Lynchburg, VA assessment area was conducted. For this assessment area, the bank's lending performance was not rated due to the limited amount of lending data as a result of the timing of the Essex Bank merger, and UB's service and investment performances in the assessment area were below the statewide performance levels.

This assessment area consists of Campbell County and the city of Lynchburg. In 2021, the assessment area included one low-income, 12 moderate-income, 14 middle-income, and four upper-income census tracts. According to the most current census data, the population of the assessment area is 133,170.

The bank operates two branch offices in the assessment area. One branch is located in a moderate-income tract, and one in an upper-income tract. This assessment area contains 0.9% of the institution's branches and 0.2% of the deposits. One LPO is located in this assessment area. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Lynchburg, VA Assessment Area					
	Tract Distribution		Percentage of Families by	Percentage of Families by	
Income Category*	#	%	Tract	Income Level	
Low Income	1	3.2	3.8	25	
Moderate Income	12	38.7	31.2	18.7	
Middle Income	14	45.2	49.8	20.5	
Upper Income	4	12.9	15.1	35.8	
NA	0	0	0.0		
Total	31	100.0	100.0	100.0	

<sup>\*</sup> NA – Tracts without household or family income as applicable

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Lynchburg, VA Assessment Area					
Loan Type 2020 2021 Total					
HMDA	N/A	1	1		
Small Business N/A 3 3					
Total	N/A	4	4		

As a percentage by number and dollar, respectively, the Lynchburg, VA assessment area accounts for .02% and .02% of the bank's overall lending during the evaluation period and 0.4% and 0.4% of the bank's lending in the Virginia assessment areas. In 2021, the bank ranked 59<sup>th</sup> out of 281 HMDA reporters with .02% of the area's total HMDA volume. In 2021, the bank ranked 25th out of 69 institutions reporting small business loans in the assessment area. The bank extended .1% of small business loans reported by the aggregate in the assessment area in 2021.

No community development loans or investments were made within this limited scope assessment area. UB made qualified donations of \$12,500 and had seven qualified services during the evaluation period.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE METROPOLITAN AREAS OF VIRGINIA

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in Appendix C of this evaluation. Conclusions regarding performance, which did not impact the Commonwealth of Virginia's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	<b>Lending Test</b>	<b>Investment Test</b>	Service Test
Charlottesville, VA	Exceeds	Below	Consistent
Richmond, VA	N/A*	Below	Below
Lynchburg, VA	N/A*	Below	Below

<sup>\*</sup> For this assessment area, the bank's lending performance was not rated due to the limited amount of lending data as a result of the timing of the Essex Bank merger.

## NONMETROPOLITAN STATEWIDE AREA LIMITED REVIEW

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE SHENANDOAH, VA NONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance was conducted in the Shenandoah, VA NonMSA assessment area. The bank's lending, investment, and service test performances in the assessment area were below the statewide performance levels.

This assessment area consists of Shenandoah County. In 2021, the assessment area included five middle-income and four upper-income census tracts. According to the most current census data, the population of the assessment area is 42,724.

The bank operates two branch offices in the assessment area. One branch is located in a middle-income tract and one branch is located in an upper-income tract. This assessment area contains 0.9% of the institution's branches and 0.3% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Shenandoah, VA NonMSA Assessment Area					
	Tract Dis	tribution	Percentage of Families by	Percentage of Families by	
Income Category	#	%	Tract	Income Level	
Low Income	0	0.0	0.0	14.6	
Moderate Income	0	0.0	0.0	17.5	
Middle Income	5	55.6	54.0	20.1	
Upper Income	4	44.4	46.0	47.8	
Total	9	100.0	100.0	100.0	

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Shenandoah, VA NonMSA Assessment Area					
Loan Type	2020	2021	Total		
HMDA	20	20	40		
Small Business	34	49	83		
Total	54	69	123		

As a percentage by number and dollar, respectively, the Shenandoah, VA NonMSA assessment area accounts for 0.6% and 0.2% of the bank's overall lending during the evaluation period and 12.8% and 5% of the bank's lending in Virginia. In 2020, the bank ranked 23<sup>rd</sup> out of 217 HMDA reporters with .8% of the area's total HMDA volume. UB ranked 27<sup>th</sup> in 2021 out of 213 reporters with .7% of the area's HMDA lending. In 2020, the bank ranked fifth out of 45 institutions reporting small business loans in the assessment area, and in 2021 it ranked fifth out of 43 reporters. The bank extended 5.2% of small business loans reported by the aggregate in the assessment area in 2020 and 6.5% in 2021.

UB made no community development loans during the period and held \$1 million in qualified investments. The bank made donations of \$2,950 and had five services during the period.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE LOUISA, VA NONMSA ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Louisa, VA NonMSA assessment area. For this assessment area, the bank's lending performance was not rated due to the limited amount of lending data as a result of the timing of the Essex Bank merger. The bank's service and investment performances in the assessment area were below the statewide performance levels.

This assessment area consists of Louisa County. In 2021, the assessment area included two middle-income and four upper-income census tracts. According to the most current census data, the population of the assessment area is 33,986.

The bank operates one branch office in the assessment area located in a middle-income tract. This assessment area contains 0.5% of the institution's branches and 0.5% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Louisa, VA NonMSA Assessment Area					
	Tract Distribution		Percentage of Families by	Percentage of Families by	
Income Category*	#	%	Tract	Income Level	
Low Income	0	0	0	11.7	
Moderate Income	0	0	0	13.8	
Middle Income	2	33.3	31.6	18.9	
Upper Income	4	66.7	68.4	55.6	
NA	0	0	0.0		
Total	6	100.0	100.0	100.0	

\* NA – Tracts without household or family income as applicable

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Louisa, VA NonMSA Assessment Area					
Loan Type 2020 2021 Total					
HMDA	N/A	8	8		
Small Business	N/A	10	10		
Total	N/A	18	18		

As a percentage by number and dollar, respectively, the Louisa, VA NonMSA assessment area accounts for 0.1% and 0.2% of the bank's overall lending during the evaluation period and 1.7% and 3.7% of the bank's lending in Virginia. In 2021, the bank ranked 46<sup>th</sup> out of 272 HMDA reporters with .2% of the area's total HMDA volume. In 2021, the bank ranked 15th out of 50 institutions reporting small business loans in the assessment area. The bank extended 1.2% of small business loans reported by the aggregate in the assessment area in 2021.

Qualified investments for this limited scope assessment area amount to \$816,409, and the bank made donations of \$1,927 during the period. Additionally, UB had one qualified service. No community development loans were made during the evaluation period.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE ESSEX, VA NONMSA ASSESSMENT AREA

A limited-scope review of the bank's CRA performance in the Essex, VA NonMSA assessment area was conducted. For this assessment area, the bank's lending performance was not rated due to the limited amount of lending data as a result of the timing of the Essex Bank merger. UB's investment and service performances in the assessment area were below the statewide performance levels.

This assessment area consists of Essex County. In 2021, the assessment area included two middle-income, and one upper-income census tracts. According to the most current census data, the population of the assessment area is 11,151.

The bank operates one branch office in the assessment area located in a middle-income tract. This assessment area contains 0.5% of the institution's branches and 0.6% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Essex, VA NonMSA Assessment Area					
	Tract Distribution		Percentage of Families by	Percentage of Families by	
Income Category*	#	%	Tract	Income Level	
Low Income	0	0	0	15.7	
Moderate Income	0	0	0	18.2	
Middle Income	2	66.7	66.6	22.6	
Upper Income	1	33.3	33.4	43.5	
NA	0	0	0.0		
Total	3	100.0	100.0	100.0	

\* NA – Tracts without household or family income as applicable

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Essex, VA NonMSA Assessment Area					
Loan Type 2020 2021 Total					
HMDA	N/A	1	1		
Small Business	N/A	1	1		
Total	N/A	2	2		

As a percentage by number and dollar, respectively, the Essex, VA NonMSA assessment area accounts for .01% and .02% of the bank's overall lending during the evaluation period and 0.2% and 0.4% of the bank's lending in the Virginia assessment areas. In 2021, the bank ranked 20<sup>th</sup> out of 121 HMDA reporters with .2% of the area's total HMDA volume. In 2021, the bank ranked 13<sup>th</sup> of 31 institutions reporting small business loans in the assessment area. The bank extended .3% of small business loans reported by the aggregate in the assessment area in 2021.

No community development loan or investments were made within this limited scope assessment area. Qualified donations equal \$15,300, and UB had one community development service.

## DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE NORTHUMBERLAND, VA NONMSA ASSESSMENT AREA

Examiners conducted a limited-scope review of the bank's CRA performance in the Northumberland, VA NonMSA assessment area. For this assessment area, the bank's lending performance was not rated due to the limited amount of lending data as a result of the timing of the Essex Bank merger (December 2021). UB's investment and service performances in the assessment area were below its performance levels at the statewide level.

This assessment area consists of Northumberland County. In 2021, the assessment area included one middle-income, two upper-income, and one unknown census tracts. According to the most current census data, the population of the assessment area is 12,304.

The bank operates two branch offices in the assessment area. One branch is located in a middle-income tract, and one in an upper-income tract. This assessment area contains 0.9% of the institution's branches and 0.3% of the deposits from the June 30, 2022, FDIC summary of deposits report. The following table provides information regarding the demographic characteristics of the assessment area, based on 2015 ACS data.

Assessment Area Demographics – Northumberland, VA NonMSA Assessment Area						
	Tract Distribution   Percentage of Families by   Percentage of Families by					
Income Category*	#	%	Tract	Income Level		
Low Income	0	0.0	0.0	16.6		
Moderate Income	0	0.0	0.0	13.8		
Middle Income	1	25	29.7	20.6		
Upper Income	2	50	70.3	49.0		
NA	1	25	0.0			
Total	4	100.0	100.0	100.0		

<sup>\*</sup> NA – Tracts without household or family income as applicable

The following table shows the bank's lending activity in the assessment area during the evaluation period.

Lending Activity in the Northumberland, VA NonMSA Assessment						
	Area	L				
Loan Type 2020 2021 Total						
HMDA	N/A	1	1			
Small Business	N/A	4	4			
Total	N/A	5	5			

As a percentage by number and dollar, respectively, the Northumberland, VA NonMSA assessment area accounts for .02% and .01% of the bank's overall lending during the evaluation period and 0.5% and 0.1% of the bank's lending in the Virginia assessment areas. In 2021, the bank ranked 26<sup>th</sup> out of 164 HMDA reporters with .1% of the area's total HMDA volume. In 2021, the bank ranked 11th out of 36 institutions reporting small business loans in the assessment area. The bank extended 1.1% of small business loans reported by the aggregate in the assessment area in 2021.

There were no community development loans or investments during the review period. The bank made donations of \$2,500 and had two qualified services during the period.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE NONMETROPOLITAN AREAS OF VIRGINIA

Facts and data reviewed for each assessment area, including performance and demographic information, can be found in Appendix C of this evaluation. Conclusions regarding performance, which did not impact the Commonwealth of Virginia's overall rating, are included in the following tables. For each test, the conclusion conveys whether performance in an assessment area was generally below, consistent with, or exceeded the institution's statewide ratings.

Assessment Area	<b>Lending Test</b>	<b>Investment Test</b>	Service Test
Shenandoah, VA NonMSA	Below	Below	Below
Louisa, VA NonMSA	N/A*	Below	Below
Essex, VA NonMSA	N/A*	Below	Below
Northumberland, VA NonMSA	N/A*	Below	Below

<sup>\*</sup>For this assessment area, the bank's lending performance was not rated due to the limited amount of lending data as a result of the timing of the Essex Bank merger.

## COMMONWEALTH OF PENNSYLVANIA

## CRA RATING FOR PENNSYLVANIA 9: Satisfactory

The Lending Test is rated: <u>High Satisfactory</u>
The Investment Test is rated: <u>Outstanding</u>
The Service Test is rated: <u>High Satisfactory</u>

Major factors supporting the rating include:

- Lending activity reflects good responsiveness to community credit needs given the bank's capacity within a highly competitive market.
- The geographic and borrower distribution performances are both considered good overall.
- The bank performs as a leader for its level of community development loans in response to local credit needs in Pennsylvania which demonstrate a good responsiveness to local credit needs.
- The bank makes use of flexible lending practices in serving the credit needs of the assessment area.
- UB has an excellent level of qualified investments benefiting the commonwealth. Additionally, the bank makes occasional use of innovative and/or complex investments. UB exhibits excellent responsiveness to credit and community development needs within Pennsylvania.
- Delivery systems and branch locations are readily accessible to all segments of the assessment area. Retail banking services do not vary in a way that inconveniences the bank's assessment area, particularly low- and moderate-income areas and people. Changes in branch locations have not adversely affected the accessibility of delivery systems, particularly to low-and-moderate-income areas or individuals.
- The bank is a leader in providing community development services within the assessment area.

#### **SCOPE OF EXAMINATION**

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Reported HMDA and small business loans from calendar years 2020 and 2021 were analyzed to determine the geographic and the borrower distribution of the bank's lending. Community development loans made since the previous evaluation period and qualified community development services provided during the review period were considered. All qualified investments extended during the review period or funded as of the evaluation date, regardless of when made, were also considered.

The bank has delineated one assessment area, a county within the Pittsburgh, PA MSA, in the Commonwealth of Pennsylvania. The complete composition of the assessment area is detailed in Appendix E. This assessment area accounts for 2.6%, 1.8%, and 2.1% of the institution's overall lending, branches, and deposit volume, respectively. Statewide ratings for Pennsylvania are based solely on the bank's performance in this assessment area.

<sup>&</sup>lt;sup>9</sup> For institutions with branches in two or more states in a multistate metropolitan area, this statewide evaluation is adjusted and does not reflect performance in the parts of those states contained within the multistate metropolitan area. Refer to the multistate metropolitan area rating and discussion for the rating and evaluation of the institution's performance in that area.

# DESCRIPTION OF INSTITUTION'S OPERATIONS IN THE COMMONWEALTH OF PENNSYLVANIA/ PITTSBURGH, PA ASSESSMENT AREA

The bank operates four branch offices and seven ATMs within the area, and all of its products and services are available.

Tract					DEMOGRAPHICS						
Income	Branche		A	TMS	Census	s Tracts	Households	Total Businesses			
Levels	#	%	#	%	#	%	%	%			
Low	0	0.0%	0	0.0%	2	5.6%	4.7%	5.6%			
Moderate	3	75.0%	5	71.4%	22	61.1%	62.7%	57.3%			
Middle	0	0.0%	0	0.0%	11	30.6%	28.9%	30.0%			
Upper	1	25.0%	2	28.6%	1	2.8%	3.7%	7.1%			
Unknown	0	0.0%	0	0.0%	0	0.0%	0.0%	0.0%			
Totals	4	100%	7	100%	36	100%	100%	100%			

The Pittsburgh, PA assessment area is located in southwestern Pennsylvania and is comprised entirely of Fayette County, Pennsylvania, which is a county that makes up the Pittsburgh, PA MSA. According to the 2015 census data, the assessment area has a population of 134,851 and a median housing value of \$88,860. The owner-occupancy rate in the assessment area equals 61.6%, which is substantially similar to the rate for the Commonwealth of Pennsylvania (61.4%) and the entire MSA (62.6%). The overall family poverty rate within the assessment area (14.2%) is higher than that of the state (9.3%) and the entirety of the MSA (8.5%). The Pittsburgh, PA MSA median family income during 2020 and 2021 equaled \$82,300 and \$84,200, respectively. The following table includes pertinent demographic data for the assessment area.

		2020 Pit	tsburgh, PA	AA Demog	raphics			
Income Categories	Tract Dis	stribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	-
	#	%	#	%	#	%	#	%
Low	2	5.6	1,313	3.8	334	25.4	11,400	33.0
Moderate	22	61.1	21,199	61.4	3,586	16.9	6,845	19.8
Middle	11	30.6	10,642	30.8	911	8.6	7,424	21.5
Upper	1	2.8	1,346	3.9	51	3.8	8,831	25.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	36	100.0	34,500	100.0	4,882	14.2	34,500	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,148	1,081	2.8	34.3	1,457	46.3	610	19.4
Moderate	38,734	23,516	60.7	60.7	10,348	26.7	4,870	12.6
Middle	18,841	12,454	32.2	66.1	3,156	16.8	3,231	17.1
Upper	2,155	1,678	4.3	77.9	307	14.2	170	7.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	62,878	38,729	100.0	61.6	15,268	24.3	8,881	14.1
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	246	5.5	216	5.3	26	8.0	4	3.6
Moderate	2,584	57.5	2,339	57.6	173	53.1	72	64.9
Middle	1,344	29.9	1,211	29.8	100	30.7	33	29.7
Upper	321	7.1	292	7.2	27	8.3	2	1.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,495	100.0	4,058	100.0	326	100.0	111	100.0
Perce	entage of Tota	al Businesses:		90.3		7.3		2.5
				Fa	rms by Tract	& Revenue S	ize	
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	55	50.9	54	52.4	1	25.0	0	0.0
Middle	52	48.1	48	46.6	3	75.0	1	100.0
Upper	1	0.9	1	1.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	108	100.0	103	100.0	4	100.0	1	100.0

2020 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

		2021 Pit	tsburgh, PA	AA Demog	raphics			
Income Categories	Tract Dis	stribution	Families by T	Tract Income		overty Level ilies by Tract		oy Family ome
	#	%	#	%	#	%	#	%
Low	2	5.6	1,313	3.8	334	25.4	11,400	33.0
Moderate	22	61.1	21,199	61.4	3,586	16.9	6,845	19.8
Middle	11	30.6	10,642	30.8	911	8.6	7,424	21.5
Upper	1	2.8	1,346	3.9	51	3.8	8,831	25.6
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	36	100.0	34,500	100.0	4,882	14.2	34,500	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	O	wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	3,148	1,081	2.8	34.3	1,457	46.3	610	19.4
Moderate	38,734	23,516	60.7	60.7	10,348	26.7	4,870	12.6
Middle	18,841	12,454	32.2	66.1	3,156	16.8	3,231	17.1
Upper	2,155	1,678	4.3	77.9	307	14.2	170	7.9
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	62,878	38,729	100.0	61.6	15,268	24.3	8,881	14.1
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	248	5.6	219	5.5	25	7.7	4	3.7
Moderate	2,538	57.3	2,296	57.5	171	52.6	71	65.1
Middle	1,326	30.0	1,190	29.8	104	32.0	32	29.4
Upper	314	7.1	287	7.2	25	7.7	2	1.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	4,426	100.0	3,992	100.0	325	100.0	109	100.0
Perce	entage of Tota	al Businesses:		90.2		7.3		2.5
				Fa	rms by Tract	& Revenue S	ize	
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	54	51.4	53	53.0	1	25.0	0	0.0
Middle	49	46.7	45	45.0	3	75.0	1	100.0
Upper	2	1.9	2	2.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	105	100.0	100	100.0	4	100.0	1	100.0
P	ercentage of	Total Farms:		95.2		3.8		1.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

As noted in the chart below, government, health care, retail trade, tourism, and manufacturing employment opportunities, in addition to the mining, oil and gas, and construction industries, provide a large portion of area employment for residents.

Pittsburg, PA Employees by Industry											
	2020 - Q1	2020 - Q2	2020 - Q3	2020 - Q4	2021 - Q1	2021 - Q2	2021 - Q3				
Government	6,009	5,649	5,422	5,796	5,745	5,751	5,420				
Private Sector											
Private Sector Total, all industries	32,553	28,360	30,725	30,944	30,029	31,184	31,374				
Agriculture, forestry, fishing and hunting	56	75	80	63	56	80	108				
Mining, quarrying, and oil and gas extraction	1,331	1,059	921	838	837	843	847				
Utilities	269	268	259	257	253	262	262				
Construction	1,294	1,191	1,425	1,334	1,217	1,389	1,434				
Manufacturing	3,542	3,273	3,446	3,452	3,449	3,491	3,404				
Wholesale trade	1,030	969	969	968	966	961	971				
Retail Trade	5,099	4,661	5,144	5,347	5,257	5,366	5,447				
Transportation and warehousing	1,941	1,482	1,527	1,806	1,693	1,723	1,545				
Information	383	331	358	329	339	365	365				
Finance and insurance	534	527	532	523	518	521	513				
Real estate and rental and leasing	425	353	401	375	374	403	453				
Professional and technical services	908	770	796	820	801	794	766				
Management of companies and enterprises	240	236	224	231	146	152	132				
Administrative and waste services	1,637	1,546	1,562	1,638	1,521	1,433	1,452				
Educational services	239	212	208	222	222	222	207				
Health care and social assistance	7,785	7,141	7,298	7,363	7,182	7,200	7,120				
Arts, entertainment, and recreation	564	368	614	479	408	604	706				
Accommodation and food services	4,150	3,052	3,962	3,868	3,735	4,252	4,495				
Other services, except public administration	1,126	843	1,000	1,029	1,055	1,122	1,148				
Public administration	0	0	0	0	0	0	C				
Unclassified 0 0 0 0 0 0 0 0											
Source: Bureau of Labor Statistics (BLS), Quarterly Cen	sus of Employm	ent and Wages									
Indicates that some or all of the data for this category was suppressed for confidentiality reasons											

Recent and historical unemployment rates since the previous evaluation are included in the following table.

Pittsburg, PA Unemployment Rates										
Area 2020 2021										
Fayette County	11.79%	8.74%								
Pittsburgh, PA MSA	9.21%	6.38%								
Pennsylvania 9.09% 6.35%										
Source: Bureau of Labor Statistics (BLS), Local Area Unemployment Statistics										

The unemployment rates in Fayette County, Pennsylvania, have been consistently higher than that of the Pittsburgh, PA MSA, and the Commonwealth of Pennsylvania since the previous evaluation. Additionally, as noted above, unemployment rates in all of the areas has declined between 2020 and 2021.

Pittsburg, PA Median Family Income Change											
Area 2010 Median Family Income 2015 Median Family Income Percent Char											
Fayette County	\$48,038	\$52,404	9.09%								
Pittsburgh, PA MSA	\$67,924	\$69,624	2.50%								
Pennsylvania	\$69,000	\$68,158	-1.22%								

Source: 2006 - 2010 U.S. Census Bureau American Community Survey

2011 - 2015 U.S. Census Bureau American Community Survey

Median Family Incomes have been inflation-adjusted and are expressed in 2015 dollars.

As noted in the above chart, Fayette County as well as the MSA have increased median family income amounts from 2010 to 2015, while the overall commonwealth's median family income has decreased. As depicted below, housing cost burden for both low-income renters and owners in Fayette County exceeds 30 percent or more of household income within the assessment area. While housing cost burden is lower than 30 percent of household income for county moderate-income renters and owners during the review period.

	Pittsburg, PA Housing Cost Burden												
	Cost Burden - Renters Cost Burden - Owners												
Area	Low Income	<b>Moderate Income</b>	All Renters	Low Income	<b>Moderate Income</b>	<b>Owners</b>							
Fayette County	61%	14%	39%	48%	16%	18%							
Pittsburgh, PA MSA	68%	30%	39%	58%	25%	17%							
Pennsylvania	73%	41%	43%	65%	34%	20%							

Cost Burden is housing cost that equals 30 percent or more of household income

Source: U.S. Department of Housing and Urban Development (HUD), 2014-2018 Comprehensive Housing Affordability Strategy

An economic development official was contacted during the evaluation to assist in evaluating the bank's CRA performance. The contact stated that small business activity within Fayette County was impacted by the COVID-19 pandemic and that the PPP helped retain approximately 15,600 jobs from the 1,388 PPP loans distributed to the county, of which 98% were loans of \$1 million or less. While the contact's office provides local residents and small businesses with strategy and consulting resources, the contact believes there is still a small business funding shortage within the county, and indicated that county residents looking for entry start-up small business financing often face monetary barriers due to a lack of community banks within the assessment area. While the contact believes the county has non-traditional lending resources, there is opportunity for traditional banking institutions to provide more small dollar lending to small businesses that would benefit the market area. The contact also believes that local financial institutions interact well with the community and was not aware of any instances of discriminatory practices.

UB holds a strong deposit market share within the assessment area (3<sup>rd</sup> of 10 banks operating within the assessment area) having 18.1% of all deposits from the June 30, 2022, FDIC deposit market share report when compared to the other nine banking institutions that operate within the one county assessment area. Overall, there is limited opportunity for qualified community development loans and investments within the market area. Considering the market and local economic conditions, UB faces some constraints in taking advantage of available community development opportunities. Nonetheless, UB serves the assessment area through its array of banking services and products; as noted above, all of the bank's services and products are offered in this assessment area, which include community development loans, originations of 40 totaling \$33.9 million, as well as qualified investments totaling \$6.7 million during the review period. In addition, during the COVID-19 emergency within this assessment area, the bank deferred 76 customer's loan interest, which totaled 141 loans to the amount of \$225,376. Furthermore, during the pandemic from this assessment area, the bank waived 755 customer's ATM cash bank fees totaling \$1,510 and increased 36 customer's ATM withdrawal limits. The bank also operates four branches and seven ATMs from its portfolio of 221 within the single county assessment area.

# CONCLUSIONS WITH RESPECT TO PERFORMANCE TESTS IN THE COMMONWEALTH OF PENNSYLVANIA/ PITTSBURGH, PA ASSESSMENT AREA

The bank's Lending Test performance in the Commonwealth of Pennsylvania is high satisfactory. Lending levels show good responsiveness to assessment area credit needs. Overall, the borrower distribution of loans among borrowers of different income levels and businesses of different sizes is good. The geographic distribution of loans is also good, and the bank is a leader in making community development loans. The bank makes use of flexible lending practices in serving the credit needs of the Commonwealth of Pennsylvania assessment area.

The Investment Test performance in the Commonwealth of Pennsylvania is outstanding. The bank's qualified investment securities and community development investment donations are excellent. The bank exhibits excellent responsiveness to credit and community development needs and makes occasional use of community development initiatives.

The service test performance in the Commonwealth of Pennsylvania is high satisfactory. The bank's delivery systems are readily accessible to all portions of the assessment area and do not vary in a way that inconveniences or adversely affects any particular individuals or areas. Further, the bank is a leader in providing community development services.

#### LENDING TEST

The lending test performance in the Pittsburgh, PA MSA assessment area is good. This conclusion is based on an evaluation of UB's lending activity, its geographic and its borrower distribution of lending, and its level of community development lending, while taking into account the bank's market strategy, area demographic data, and aggregate CRA small business and HMDA loan data. There were no gaps in lending.

## **Lending Activity:**

The HMDA and small business lending within the assessment area, as measured by the number of loans (2.6%) exceeds both the percentage of branch offices (1.8%) and the percentage of deposits (2.1%) in the assessment area. Alternatively, lending by dollar volume (1.5%), is less than both the percentage of deposits and branch offices. As of June 30, 2022, UB ranked 3<sup>rd</sup> out of 10 financial institutions in deposit market share having 18.1% of the assessment area's available FDIC insured deposits (credit union deposits are not included). According to 2021 aggregate data, the institution ranked 11<sup>th</sup> of 201 reporters of mortgage lending with a 2% market share and ranked 6<sup>th</sup> of 65 reporters of small business loans with a 7% market share. All market share rankings consider originated and purchased loans. As such, overall lending activity is good.

Note:

Percentages may not total 100.0 percent due to rounding.

# **Geographic Distribution:**

The geographic distribution of HMDA loans is considered excellent, while the geographic distribution for small business loans is good. Overall, the distribution is considered good when considering the relative performance and dollar volume of each lending product during the years analyzed.

	•						a: Pittsb		PA				1
					k And A	ggregate	Loans By Y	ear		24			
Geographic Income Level	D1		202				Bank		2021				Owner Occupied Units %
IIICOIIIe Level	Bank		Agg	Bank		Agg			Agg	Bank		Agg	Onits 76
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
						п	se Loans						<u> </u>
Low	6	22.2	3.3	235	8.5	2.1	3	10.0	3.2	101	3.2	1.9	
Moderate	15	55.6	58.6	1,524	55.1	53.8	23	76.7	60.5	2,298	72.8	55.9	6
Middle	4	14.8	31.7	612	22.1	35.2	2	6.7	30.2	416	13.2	32.9	3
Upper	2	7.4	6.4	396	14.3	9.0	2	6.7	6.1	342	10.8	9.3	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	27	100.0	100.0	2,767	100.0	100.0	30	100.0	100.0	3,157	100.0	100.0	10
Refinance Loans           ow         0         0.0         1.5         0         0.0         0.0         2.0         0         0.0         1.4         2.													
Low	0	0.0	1.5	0	0.0	0.8	0	0.0	2.0	0	0.0	1.4	
Moderate	19	65.5	52.9	2,379	55.0	47.8	18	75.0	55.8	2,293	68.4	51.3	6
Middle	6	20.7	36.1	1,048	24.2	38.4	5	20.8	35.1	859	25.6	38.4	3
Upper	4	13.8	9.6	897	20.7	12.9	1	4.2	7.1	200	6.0	8.9	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	4,324	100.0	100.0	24	100.0	100.0	3,352	100.0	100.0	10
Home Improvement Loans													
Low	0	0.0	2.8	0	0.0	2.2	1	33.3	4.6	25	16.2	4.3	
Moderate	7	87.5	57.7	263	81.4	56.5	1	33.3	53.0	67	43.5	53.6	6
Middle	1	12.5	33.5	60	18.6	33.4	0	0.0	36.9	0	0.0	36.2	3
Upper	0	0.0	6.0	0	0.0	7.9	1	33.3	5.5	62	40.3	5.9	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	323	100.0	100.0	3	100.0	100.0	154	100.0	100.0	10
				•	М	ultifamily	Loans						Multi-family
Low	0	0.0	16.7	0	0.0	8.1	0	0.0	5.6	0	0.0	5.6	Units %
Moderate	0	0.0	75.0	0	0.0	76.6	1	100.0	50.0	360	100.0	59.8	7
Middle	0	0.0	8.3	0	0.0	15.4	0	0.0	38.9	0	0.0	31.0	1
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	5.6	0	0.0	3.6	'
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0		
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	360	100.0	100.0	10
Total	U	0.0	100.0	1		11	<u>'</u>	100.0	100.0	300	100.0	100.0	Owner Occupied
	1				i otai Ho	me Mortg	age Loans						Units %
Low	7	9.7	2.5	296	3.7	1.6	4	5.9	2.7	126	1.6	1.8	
Moderate	46	63.9	55.6	4,501	56.2	51.1	48	70.6	57.7	5,449	68.9	53.7	- 6
Middle	11	15.3	34.1	1,720	21.5	36.7	9	13.2	32.9	1,565	19.8	35.5	3
Upper	8	11.	1 7.8	1,493	18.6	10.6	7	10.3	6.6	773	9.8	8.9	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	72	100.0	100.0	8,010	100.0	100.0	68	100.0	100.0	7,913	100.0	100.0	10

For the bank, refinance loans were the leading HMDA product by number followed by home purchase loans during 2020; however, during 2021 home purchase lending was the leading HMDA product by number followed by refinance loans. Home improvement lending was much smaller in volume than either refinance or home purchase lending, and multifamily lending was not a factor in the analysis due to limited lending within the assessment area. Considering both demographic and aggregate proxies for demand, the bank's performance for refinance, home purchase, and home improvement lending are each considered excellent in both years.

Overall, and as reflected in the preceding tables, UB's percentage of 2020 HMDA lending in low-income census tracts (9.7%) significantly exceeded both the aggregate lending level (2.5%) and the percentage of owner-occupied housing units located in such tracts (2.8%). Similarly, the bank's level of lending in moderate-income census tracts (63.9%) also exceeded both the level of aggregate lending in such tracts (55.6%) and the owner-occupied housing units located in moderate-income census tracts (60.7%). Overall, the bank's 2020 performance is considered excellent, and its performance in 2021 is substantially similar.

Di	istributio	on of 2	2020 aı				ess Lend a: Pittsb	0,		ne Leve	l of Ge	ograp	hy	
Geographic		Bank And Aggregate Loans By Year												
Income			20	20					20	21			Total Businesses	
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	ık	Agg		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%	
Low	43	15.0	6.0	6,153	22.0	8.8	18	11.8	5.2	2,893	17.9	8.3	5.6	
Moderate	167	58.4	58.0	13,004	46.5	51.9	85	55.9	56.1	7,578	46.8	50.8	57.3	
Middle	50	17.5	29.3	6,093	21.8	30.5	32	21.1	32.6	4,198	25.9	33.9	30.0	
Upper	26	9.1	6.1	2,733	9.8	8.5	17	11.2	5.4	1,535	9.5	6.9	7.1	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0	
Tract-Unk	0	0.0	0.6	0	0.0	0.2	0	0.0	0.7	0	0.0	0.1		
Total	286	100.0	100.0	27,983	100.0	100.0	152	100.0	100.0	16,204	100.0	100.0	100.0	

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

The bank's percentage of 2020 small business lending in low-income census tracts (15%) significantly exceeds both aggregate reporters' lending levels (6%) and the percentage of businesses located in such tracts (5.5%). UB's level of lending in moderate-income census tracts (58.4%) slightly exceeds aggregate lending (58%) and the percentage of businesses located in such tracts (57.5%). Overall, the bank's small business lending performance during 2020 is considered good, and its performance during 2021 is substantially similar.

## Distribution by Borrower Income and Revenue Size of the Business:

The overall distribution by borrower income and business revenue within this assessment area is considered good for both HMDA and small business lending.

	Distribu	tion o	f 2020				~ ~	_		orrower	Incom	e Lev	e1
							a: Pittsb		PA				T
				Ban	k And A	ggregate	Loans By Y	ear					
Borrower			2020 Agg				2021						Families by
Income Level	Bank	Bank		Bank		Agg	Bank	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	_				Hon	ne Purch	ase Loans			- I			T .
Low	5	18.5	16.6	370	13.4	10.	2	6.7	18.6	105	3.3	11.	33.0
Moderate	2	7.4	26.0	199	7.2	21.9	6	20.0	25.0	513	16.2	21.	19.8
Middle	6	22.2	24.1	758	27.4	25.8	5	16.7	19.3	579	18.3	21.4	21.5
Upper	4	14.8	18.9	893	32.3	29.4	7	23.3	18.7	1,428	45.2	28.5	25.6
Unknown	10	37.0	14.4	547	19.8	12.8	10	33.3	18.4	532	16.9	17.9	0.0
Total	27	100.0	100.0	2,767	100.0	100.0	30	100.0	100.0	3,157	100.0	100.0	100.0
Refinance Loans													
Low	4	13.8	11.2	243	5.6	5.7	4	16.7	11.0	213	6.4	6.0	33.0
Moderate	6	20.7	19.9	605	14.0	14.5	6	25.0	21.6	704	21.0	17.6	19.8
Middle	2	6.9	22.8	274	6.3	21.4	4	16.7	25.6	680	20.3	24.4	21.5
Upper	14	48.3	32.1	2,665	61.6	41.7	7	29.2	25.4	1,514	45.2	33.4	25.6
Unknown	3	10.3	14.1	537	12.4	16.8	3	12.5	16.4	241	7.2	18.7	0.0
Total	29	100.0	100.0	4,324	100.0	100.0	24	100.0	100.0	3,352	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	1	12.5	16.9	20	6.2	12.7	1	33.3	9.7	62	40.3	6.9	33.0
Moderate	2	25.0	23.4	55	17.0	17.3	2	66.7	30.4	92	59.7	24.6	19.8
Middle	4	50.0	26.6	214	66.3	27.1	0	0.0	31.8	0	0.0	31.7	21.5
Upper	0	0.0	31.5	0	0.0	42.0	0	0.0	26.7	0	0.0	36.1	25.6
Unknown	1	12.5	1.6	34	10.5	1.0	0	0.0	1.4	0	0.0	0.7	0.0
Total	8	100.0	100.0	323	100.0	100.0	3	100.0	100.0	154	100.0	100.0	100.0
					Total H	ome Mor	tgage Loans	;					
Low	11	15.3	13.7	683	8.5	8.0	9	13.4	14.2	580	7.7	8.5	33.0
Moderate	10	13.9	22.2	859	10.7	17.7	17	25.4	23.3	1,478	19.6	19.3	19.8
Middle	16	22.2	22.9	1,382	17.3	23.0	9	13.4	22.9	1,259	16.7	23.0	21.5
Upper	21	29.2	26.0	3,968	49.5	35.4	18	26.9	22.7	3,443	45.6	31.0	25.6
Unknown	14	19.4	15.2	1,11	3 14.0	15.9	14	20.9	16.9	793	10.5	18.	0.0
Total	72	100.0	100.0	8,010	100.0	100.0	67	100.0	100.0	7,553	100.0	100.0	100.0
C 2024 F	TIEC C	_											

Source: 2021 FFIEC Census Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

 $\label{lem:multifamily loans are not included in the borrower distribution analysis.$ 

In 2020, the bank's level of lending to low-income borrowers (15.3%) was greater than the percentage of aggregate lending levels to such borrowers (13.7%), but it was less than the percentage of low-income families within the assessment area (33%). UB's lending to moderate-income borrowers (13.9%) was lower than both the percentage of aggregate lending levels (22.2%) and the percentage of moderate-income families (19.8%). Overall, the bank's performance during 2020 is considered adequate.

In 2021, the bank's level of lending to low-income borrowers (13.4%) was similar to the percentage of aggregate lending levels to such borrowers (14.2%), but it was less than the percentage of low-income families within the assessment area (33%). UB's lending to moderate-income borrowers (25.4%) was greater than both the percentage of aggregate lending levels (23.3%) and the percentage of moderate-income families (19.8%). Overall, the bank's performance during 2020 is considered good.

Overall, the performance is considered good based upon the strength of relative performance and similar dollar volumes of lending during 2020 and 2021.

Distrib	Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses																	
				Assessm	ent A	rea: Pi	ttsburgh	, PA										
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear									
		2020							20	21			Total					
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses %					
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	70					
By Revenue																		
\$1 Million or Less	35	12.2	34.6	2,204	7.9	24.5	59	38.8	45.3	4,923	30.4	30.8	90.2					
Over \$1 Million	48	16.8		9,325	33.3		45	29.6		9,215	56.9		7.3					
Revenue Unknown	203	71.0		16,454	58.8		48	31.6		2,066	12.7		2.5					
Total	286	100.0		27,983	100.0		152	100.0		16,204	100.0		100.0					
	By Loan Size																	
\$100,000 or Less	198	69.2	84.7	6,431	23.0	31.1	103	67.8	89.1	3,852	23.8	35.6						
\$100,001 - \$250,000	64	22.4	10.1	10,540	37.7	27.0	35	23.0	6.9	6,356	39.2	24.4						
\$250,001 - \$1 Million	24	8.4	5.2	11,012	39.4	41.9	14	9.2	3.9	5,996	37.0	40.0						
Total	286	100.0	100.0	27,983	100.0	100.0	152	100.0	100.0	16,204	100.0	100.0						
,		]	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less									
\$100,000 or Less	31	88.6		1,274	57.8		44	74.6		1,796	36.5							
\$100,001 - \$250,000	3	8.6		500	22.7		12	20.3		2,071	42.1							
\$250,001 - \$1 Million	1	2.9		430	19.5		3	5.1		1,056	21.5							
Total	35	100.0		2,204	100.0		59	100.0		4,923	100.0							
Source: 2021 FFIEC C	ensus Dati	а																
2021 Dun & Bradstreet Data																		
2011-2015 U.S. Census Bureau: American Community Survey																		
Note: Percentages ma	iy not total	l 100.0 p	ercent d	ue to round	ing.			ů ů										

D&B data from 2020, indicates that 90.3% of all local businesses have revenues that do not exceed \$1 million per year. Of the total volume of small business loans considered in the evaluation, 71% involved loans for which revenues were unknown and 12.2% were to businesses with revenues of \$1 million or less. However, 42.2% of the bank's loans where revenue was known (35 of 83 loans) were to businesses with revenues of \$1 million or less. The percentage exceeds the 2020 aggregate lending level of 34.6% of reported loans being made to businesses with revenues of \$1 million or less.

D&B data from 2021, indicates that 90.2% of all local businesses have revenues that do not exceed \$1 million per year. Of the small business loans considered in the evaluation, 38.8% were to businesses with revenues of \$1 million or less, and 31.6% involved loans for which revenues were unknown. However, 56.7% of the bank's loans where revenue was known (59 of 104 loans) were to businesses with revenues of \$1 million or less. This level of lending is greater than the 2021 aggregate lending level of 45.3%.

UB's PPP loans included in the overall reported small business loans within this assessment area were also evaluated using loan size as a proxy for such loans where revenue was not known. The following table reflects this distribution.

PPP Loans with no reported revenue

Pittsburgh, PA 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	137	72.9%	3,818	24.2%							
\$100,001 - \$250,000	36	19.1%	5,723	36.3%							
\$250,001 - \$1 Million	15	8.0%	6,218	39.5%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	188	100.0%	15,759	100.0%							

During 2020, 69.2% of all small business loans reported by UB were in amounts of \$100,000 or less, and the aggregate reported 84.7% within the same loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 72.9% had loan amounts of \$100,000 or less.

Pittsbu	ırgh,	PA 2021		
By Loan Size	#	%	\$(000s)	%
\$100,000 or less	38	88.4%	1,047	59.5%
\$100,001 - \$250,000	5	11.6%	712	40.5%
\$250,001 - \$1 Million	0	0.0%	0	0.0%
Over \$1 Million	0	0.0%	0	0.0%
Total	43	100.0%	1,759	100.0%

During 2021, 67.8% of the small business loans reported were \$100,000 and less, and the aggregate reported 89.1% within that loan size category. Of the bank's PPP small business loans for which borrower revenue was not known, 88.4% had loan amounts of \$100,000 or less.

Overall, considering the significant volume of PPP lending, the limitations with both bank and aggregate data involving PPP lending in 2020 and 2021, and the bank's performance level when borrower revenue was known, UB's performance is considered good and indicates that it is helping to serve the needs of small businesses in the assessment area.

## **Community Development Lending:**

As previously discussed, opportunities for community development lending are limited within this assessment area. When considering the bank's capacity, market position, and business strategy, the bank faces some constraints in extending community development loans within the assessment area. During the evaluation period the bank performed as a leader in the level of community development loans within this market. UB originated 40 community development loans totaling \$33.9 million within the assessment area or region during the evaluation period. The loans provided funding for organizations whose primary purpose is the provision of services to low- and moderate-income individuals.

#### INVESTMENT TEST

The investment test performance in the commonwealth is rated outstanding. The investment test performance in the Pittsburgh, PA MSA assessment area is excellent. Overall, the bank has an excellent level of qualified community development investments and donations and exhibits excellent responsiveness to the credit and community needs in the assessment area. The 12 investments that directly benefit the Pittsburgh, PA assessment area totaled \$6.7 million for the evaluation period. UB has also committed to fund \$4.7 million of qualified investments within this assessment area. While the assessment area is included in the Pittsburgh, PA MSA, it only contains one county that is on the southern tip of the MSA, and this performance context was taken into consideration when assessing the rating based on peer comparisons.

During the evaluation period, the bank holds housing investments that support low- and moderate-income affordable housing needs, as well as economic development and community needs.

The bank made qualified investments in the form of donations, totaling \$28,375. The majority of donations focused on community services targeted toward low- and moderate-income individuals. Those donations helped local organizations provide essential goods and services to low- and moderate-income people, most of which helped promote child development, offer family services, and support education. The bank also made donations to organizations that promote economic development which are needed in the assessment area.

Qualified Investment Donations in the assessment area										
United Bank # \$										
Affordable Housing	0	0								
Community Service	26	27,675								
Economic	2	700								
Revitalize or Stabilize	0	0								
Total	28	28,375								

In addition, the bank makes occasional use of innovative and/or complex investments to support community development initiatives.

#### **SERVICE TEST**

UB's performance under the service test within the commonwealth is high satisfactory. The service test performance in the Pittsburgh, PA MSA assessment area is high satisfactory. Systems for delivering retail banking services are readily accessible to all portions of the assessment area, including low and moderate-income areas. Business hours and services do not vary in a way that inconveniences the market, particularly to low-and-moderate-income census tracts and/or individuals. No branch changes have occurred since the previous evaluation and has not adversely affected the accessibility of its delivery systems, particularly to low-and-moderate-income geographies and/or individuals. The bank was a leader in providing qualified community development services. The small percentage of the bank's total staff located in the Pennsylvania assessment area is also considered as an aspect of performance context, as was the pandemic's effect on staff to perform service activities. Examples include Fay-Penn Economic Development Council, Republic Food Enterprise, Fayette County Community Action Agency, and Uniontown Downtown Business District Authority.

#### **Retail Services:**

Delivery systems and branch locations are readily accessible to geographies and individuals of different income levels within the assessment area. Alternative delivery systems are available through 24-hour ATM access, online and mobile banking, bank-by-mail, and bank-by-phone services that are offered by the institution.

The bank operates four full-service branch offices within the market, none located in low-income census tracts and three (75%) branch offices located in moderate-income census tracts. The distribution of branches is excellent when considering that 4.7% and 62.7% of the assessment area's households reside in low- and moderate-income areas, respectively according to the 2015 census. Business hours and services do not vary in a way that inconveniences the needs of the assessment area. No branches have been opened or closed since the previous evaluation.

## **Community Development Services:**

The bank was a leader at providing community development services in the assessment area. Twenty-three bank employees provided 313 hours of community development services during the evaluation period for 17 different organizations. The bank's community development service activities mainly focus on nonprofit organizations that provide essential services to low- and moderate-income individuals, such as social services, health care, food, financial services, economic development, and financial education, which is responsive to the assessment area.

Community Development Services in the assessment area						
	#					
Affordable Housing	0					
Community Services	`12					
Economic Development	4					
Revitalize or Stabilize	1					
Total	17					

# CRA APPENDIX A SCOPE OF EXAMINATION TABLE

LIST OF ASSESSMENT AREAS, TYPE OF EXAMINAT	ΓΙΟΝ, AND BRANC	HES VISITED
Assessment Area	Type of Examination	Branches Visited*
Washington-Baltimore-Arlington, DC-VA-MD-WV CSA	Full-Scope	None
Wheeling, WV-OH MSA	Full-Scope	None
Charleston-Huntington-Ashland, WV CSA	Full-Scope	None
Morgantown, WV MSA	Full-Scope	None
Parkersburg-Vienna, WV	Limited-Scope	None
Beckley, WV MSA	Limited-Scope	None
Braxton, WV NonMSA	Limited-Scope	None
Myrtle Beach-Conway, SC-NC CSA	Limited-Scope	None
Weirton-Steubenville, WV MSA	Limited-Scope	None
Harrisonburg-Staunton-Waynesboro, VA CSA	Full-Scope	None
Charlottesville, VA	Limited-Scope	None
Shenandoah, VA NonMSA	Limited-Scope	None
Charlotte-Concord-Gastonia, NC-SC	Full-Scope	None
Columbus, NC NonMSA	Limited-Scope	None
Dare-Pasquotank County, NC NonMSA	Limited-Scope	None
Fayetteville-Sanford-Lumberton, NC	Full-Scope	None
Goldsboro, NC MSA	Limited-Scope	None
Greenville-Kinston-Washington, NC CSA	Full-Scope	None
Hickory-Lenoir-Morgantown, NC	Limited-Scope	None
Martin County, NC NonMSA	Limited-Scope	None
New Bern-Morehead City, NC CSA	Limited-Scope	None
Raleigh-Durham-Cary, NC	Full-Scope	None
Rocky Mount-Wilson-Roanoke Rapids, NC	Limited-Scope	None
Rutherford County, NC NonMSA	Limited-Scope	None
Wilmington, NC MSA	Full-Scope	None
Charleston-North Charleston, SC MSA	Full-Scope	None
Columbia, SC	Limited-Scope	None
Greenville-Spartanburg-Anderson, SC	Limited-Scope	None
Essex, VA NonMSA	Limited-Scope	None
Louisa, VA NonMSA	Limited-Scope	None
Lynchburg, VA	Limited-Scope	None
Northumberland, VA NonMSA	Limited-Scope	None
Richmond, VA	Limited-Scope	None
Pittsburgh, PA	Full-Scope	None

<sup>\*</sup>No branches were visited due to constraints as a result of COVID-19.

# CRA APPENDIX B SUMMARY OF STATE AND MULTISTATE RATINGS

State or Multistate Metropolitan Area Name	Lending Test Rating	Investment Test Rating	Service Test Rating	Overall Rating
Washington- Baltimore-Arlington, DC-VA-MD-WV CSA	High Satisfactory	Outstanding	Outstanding	Outstanding
Wheeling, WV-OH MSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Charlotte-Concord- Gastonia, NC-SC	High Satisfactory	Low Satisfactory	High Satisfactory	Satisfactory
Myrtle Beach- Conway, SC-NC CSA	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of West Virginia	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
State of North Carolina	High Satisfactory	High Satisfactory	High Satisfactory	Satisfactory
State of South Carolina	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Commonwealth of Virginia	High Satisfactory	Outstanding	High Satisfactory	Satisfactory
Commonwealth of Pennsylvania	High Satisfactory	Outstanding	High Satisfactory	Satisfactory

## **CRA APPENDIX C**

# 2020 Demographic Tables for Full-Scope Review Assessment Areas and Lending Tables for Limited-Scope Review Assessment Areas

		2021 Beck	dey, WV MS	A AA Demo	graphics			
Income Categories	Tract Dis		Families by		as % of Fami	overty Level		ome
_	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0		0.0	6,790	20.7
Moderate	3	10.3	2,829	8.6		24.5	5,967	18.1
Middle	23	79.3	26,565	80.8	3,725	14.0	6,812	20.7
Upper	3	10.3	3,483	10.6	221	6.3	13,308	40.5
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	29	100.0	32,877	100.0	4,640	14.1	32,877	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	4,666	2,889	7.9	61.9	1,121	24.0	656	14.1
Middle	47,093	29,558	81.3	62.8	10,019	21.3	7,516	16.0
Upper	5,781	3,901	10.7	67.5	1,455	25.2	425	7.4
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	57,540	36,348	100.0	63.2	12,595	21.9	8,597	14.9
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	167	4.8	142	4.6	17	5.6	8	11.6
Middle	2,937	85.3	2,621	85.3	257	85.1	59	85.5
Upper	341	9.9	311	10.1	28	9.3	2	2.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,445	100.0	3,074	100.0	302	100.0	69	100.0
Perco	entage of Tota	al Businesses:		89.2		8.8		2.0
				Fa	rms by Tract	& Revenue Si	ize	
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
	60	93.8	59	93.7	0	0.0	1	100.0
Middle	00				l		<b> </b>	
Middle Upper	4	6.3	4	6.3	0	0.0	0	0.0
			4 0	6.3 0.0		0.0	0	0.0
Upper	4	6.3			0			

Source: 2021 FFIEC Census Data

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	Distribu	tion o	f 2020	and 202	1 Hom	ie Moi	rtgage Lo	ending	g By Bo	orrower	Incom	e Lev	el el
				Asses	smen	t Area:	Beckley	, WV	MSA				
				Ban	k And A	ggregate	Loans By Y	'ear					
Borrower			2020			-	_		20:				Families by
Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
			ı		Hon	ne Purch	ase Loans			1			1
Low	3	10.3	6.2	204	4.6	2.9	1	6.7	7.6	112	3.8	4.0	20.7
Moderate	9	31.0	18.8	804	18.0	12.5	2	13.3	17.9	215	7.3	12.2	18.1
Middle	4	13.8	24.5	567	12.7	20.2	2	13.3	24.1	260	8.8	20.9	20.7
Upper	11	37.9	41.6	2,618	58.7	56.5	7	46.7	41.1	2,124	71.9	54.7	40.5
Unknown	2	6.9	8.9	269	6.0	7.9	3	20.0	9.3	244	8.3	8.2	0.0
Total	29	100.0	100.0	4,462	100.0	100.0	15	100.0	100.0	2,955	100.0	100.0	100.0
Refinance Loans													
Low	0	0.0	3.6	0	0.0	1.6	1	3.8	3.5	69	1.6	1.7	20.7
Moderate	7	18.9	11.5	5 552	9.3	7.1	4	15.4	13.1	362	8.3	8.8	18.1
Middle	3	8.1	17.8	253	4.3	13.3	2	7.7	17.4	240	5.5	13.7	20.7
Upper	25	67.6	50.0	4,845	82.0	58.8	18	69.2	50.2	3,616	83.2	58.1	40.5
Unknown	2	5.4	17.1	260	4.4	19.2	1	3.8	15.8	57	1.3	17.7	0.0
Total	37	100.0	100.0	5,910	100.0	100.0	26	100.0	100.0	4,344	100.0	100.0	100.0
	,				Home	Improve	ment Loans						
Low	0	0.0	6.0	0	0.0	2.3	0	0.0	1.8	0	0.0	0.7	20.7
Moderate	1	25.0	21.4	20	8.9	9.4	0	0.0	16.2	0	0.0	18.0	18.1
Middle	2	50.0	23.8	174	77.7	27.9	0	0.0	32.4	0	0.0	23.4	20.7
Upper	1	25.0	45.2	30	13.4	58.5	3	75.0	47.7	117	60.9	56.5	40.5
Unknown	0	0.0	3.6	0	0.0	1.8	1	25.0	1.8	75	39.1	1.4	0.0
Total	4	100.0	100.0	224	100.0	100.0	4	100.0	100.0	192	100.0	100.0	100.0
			•		Total H	ome Mor	tgage Loans	5					
Low	3	3.8	4.9	204	1.9	2.2	3	6.1	5.6	196	2.5	2.9	20.7
Moderate	18	22.8	15.0	1,449	13.2	9.6	7	14.3	15.3	672	8.7	10.7	18.1
Middle	11	13.9	20.9	1,048	9.6	16.6	4	8.2	21.2	500	6.5	17.6	20.7
Upper	41	51.9	44.0	7,636	69.8	56.3	30	61.2	45.2	5,949	77.3	56.0	40.5
Unknown	6	7.6	15.2	607	5.5	15.3	5	10.2	12.7	376	4.9	12.8	0.0
Total	79	100.0	100.0	10,944	100.0	100.0	49	100.0	100.0	7,693	100.0	100.0	100.0
													1

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Beckley, WV MSA													
				Bank	And A	ggreg	ate Loar	ns By Y	<b>Year</b>				m . 1
			20	20					20	21			Total Businesses
	Bank		Agg	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, 0
By Revenue													
\$1 Million or Less	19	9.5	30.7	1,443	7.6	26.6	30	30.0	47.2	3,831	31.8	39.8	89.2
Over \$1 Million	23	11.6		5,409	28.3		22	22.0		5,909	49.1		8.8
Revenue Unknown	157	78.9		12,235	64.1		48	48.0		2,304	19.1		2.0
Total	199	100.0		19,087	100.0		100	100.0		12,044	100.0		100.0
	By Loan Size												
\$100,000 or Less	153	76.9	82.4	5,242	27.5	27.6	66	66.0	86.1	2,351	19.5	27.8	
\$100,001 - \$250,000	27	13.6	11.0	4,569	23.9	24.5	20	20.0	8.3	3,683	30.6	23.1	
\$250,001 - \$1 Million	19	9.5	6.6	9,276	48.6	47.9	14	14.0	5.7	6,010	49.9	49.1	
Total	199	100.0	100.0	19,087	100.0	100.0	100	100.0	100.0	12,044	100.0	100.0	
			By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	17	89.5		691	47.9		20	66.7		898	23.4		
\$100,001 - \$250,000	0	0.0		0	0.0		5	16.7		877	22.9		
\$250,001 - \$1 Million	2	10.5		752	52.1		5	16.7		2,056	53.7		
Total	19	100.0		1,443	100.0		30	100.0		3,831	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

				Pani	L And A	aroasto	Loane By V	oor					
			202		K Allu Aç	eggregate Loans By Year 2021							
Geographic Income Level	Bank		Agg	Bank	1	Agg	Bank	1	Agg	Bank	(	Agg	Owner Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		, ,		4(000)			se Loans	70	70	4(000)	470	¥ //0	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Moderate	2	6.9	5.5	182	4.1	3.8	2	13.3	5.6	153	5.2	4.2	7.5
Middle	24	82.8	76.3	3,922	87.9	72.3	9	60.0	76.0	1,468	49.7	71.5	81.
Upper	3	10.3	18.3	358	8.0	23.9	4	26.7	18.4	1,334	45.1	24.3	10.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	29	100.0	100.0	4,462	100.0	100.0	15	100.0	100.0	2,955	100.0	100.0	100
	!				ı	Refinance	Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	2.7	3.4	69	1.2		0	0.0	3.5	0	0.0	2.3	7.9
Middle	30	81.1	75.1	4,557	77.1	71.0	17	65.4	79.4	2,227	51.3	75.9	81.
Upper	6	16.2	21.5	1,284	21.7	27.0	9	34.6	17.1	2,117	48.7	21.8	10.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	5,910	100.0	100.0	26	100.0	100.0	4,344	100.0	100.0	100.
		ļ			Home	Improver	nent Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	1.2	0	0.0	0.6	0	0.0	4.5	0	0.0	3.6	7.9
Middle	4	100.0	91.7	224	100.0	89.1	4	100.0	81.1	192	100.0	73.7	81.
Upper	0	0.0	7.1	0	0.0	10.3	0	0.0	14.4	0	0.0	22.7	10.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	224	100.0	100.0	4	100.0	100.0	192	100.0	100.0	100.
				,	М	ultifamily	Loans						Multi-family
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	Units % 0.0
Moderate	0	0.0	9.1	0	0.0	16.8	0	0.0	14.3	0	0.0	9.6	4.9
Middle	0	0.0	81.8		0.0		0	0.0	71.4	0	0.0	88.5	80.8
Upper	0	0.0	9.1	0	0.0	9.3	0	0.0	14.3	0	0.0	1.9	14.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.
		0.0	.00.0				age Loans	0.0	.00.0		0.0	100.0	Owner Occupied
	<del></del> ,	ı			-		<del></del>				-		Units %
Low	0	0.0	0.0	0	0.0		0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	3.8	4.5	251	2.3	3.1	2	4.1	4.5	153	2.0	3.5	7.9
Middle	66	83.5	76.1	8,978	82.0	71.8	34	69.4	77.7	4,089	53.2	73.8	81.
Upper	10	12.7	19.4	1,715	15.7	25.0	13	26.5	17.8	3,451	44.9	22.6	10.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

2011-2015 U.S. Census Bureau: American Community Survey

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
				Asses	sment	Area:	Beckley	, WV I	MSA						
C	Bank And Aggregate Loans By Year Geographic 2020														
1 0 1	2020   2021														
Income Level	Bank   Agg   Bank   Agg   Bank   Agg   Bank   Agg								Businesses %						
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	<b>%</b> 0		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Moderate	10	5.0	4.5	363	1.9	4.8	4	4.0	3.6	95	0.8	5.6	4.8		
Middle	165	82.9	79.5	15,747	82.5	79.2	83	83.0	80.7	10,105	83.9	78.7	85.3		
Upper	24	12.1	15.1	2,977	15.6	15.6	13	13.0	14.1	1,844	15.3	15.5	9.9		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	1.0	0	0.0	0.4	0	0.0	1.6	0	0.0	0.2			
Total	199	100.0	100.0	19,087	100.0	100.0	100	100.0	100.0	12,044	100.0	100.0	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

# PPP Loans with no Revenue reported

Beckl	Beckley, WV MSA 2020										
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	118	80.8%	3,845	32.6%							
\$100,001 - \$250,000	19	13.0%	3,077	26.1%							
\$250,001 - \$1 Million	9	6.2%	4,869	41.3%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	146	100.0%	11,791	100.0%							

Beckley, WV MSA 2021										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	37	88.1%	860	49.3%						
\$100,001 - \$250,000	5	11.9%	883	50.7%						
\$250,001 - \$1 Million	0	0.0%	0	0.0%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	42	100.0%	1,743	100.0%						

	:	MSA AA De	emographics						
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	,	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	8,241	20.4	
Moderate	6	13.3	4,474	11.1	1,023	22.9	6,397	15.8	
Middle	28	62.2	25,110	62.1	3,625	14.4	8,184	20.3	
Upper	11	24.4	10,827	26.8	1,051	9.7	17,589	43.5	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	45	100.0	40,411	100.0	5,699	14.1	40,411	100.0	
	Housing			Hous	sing Type by	Tract			
	Units by	O	wner-occupie	d	Rei	ntal	Vac	cant	
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	9,047	4,802	10.5	53.1	2,101	23.2	2,144	23.7	
Middle	47,212	28,838	63.1	61.1	9,107	19.3	9,267	19.6	
Upper	18,307	12,058	26.4	65.9	4,089	22.3	2,160	11.8	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	74,566	45,698	100.0	61.3	15,297	20.5	13,571	18.2	
	"				nesses by Tra	ct & Revenue	Size		
	Total Businesses by Tract		Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	480	9.6	426	9.6	44	9.5	10	9.0	
Middle	2,843	56.8	2,510	56.7	260	56.3	73	65.8	
Upper	1,680	33.6	1,494	33.7	158	34.2	28	25.2	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	5,003	100.0	4,430	100.0	462	100.0	111	100.0	
Perce	entage of Tota	ıl Businesses:		88.5		9.2		2.2	
				Fa	rms by Tract	& Revenue S	ize		
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	13	7.8	12	7.2	1	100.0	0	0.0	
Middle	135	80.8	135	81.3	0	0.0	0	0.0	
Upper	19	11.4	19	11.4	0	0.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	167	100.0	166	100.0	1	100.0	0	0.0	
I	Percentage of	Total Farms:		99.4		0.6		0.0	
Source: 2021 FFIEC Census D	1-4-			•					

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	Distribu	tion o	f 2020				~ ~	_			Incom	e Lev	el
							raxton, V		nMS/	4			T
			2020	Ban	k And A	ggregate	Loans By Y	ear	20:	24			
Borrower Income Level	Bank	,	Agg	Bank	,	Agg	Bank	,	Agg	Bank	,	Agg	Families by Family Income %
				1			#						anny moonie 70
	#	#%	#%	\$(000)	\$% Hom	\$%	# ase Loans	#%	#%	\$(000)	\$%	\$%	
Low	2	12.5	5.1	78	4.4	1.9	3	20.0	5.4	141	10.6	2.4	20.4
Moderate	3	18.8	17.0	272	15.5	10.0	3	20.0	16.8	183	13.8	10.1	15.8
Middle	5	31.3	22.1	612	34.8	18.0	1	6.7	23.9	102	7.7	19.8	20.3
Upper	5	31.3	47.7	779	44.3	61.9	7	46.7	42.4	848	63.8	55.5	43.5
Unknown	1	6.3	8.0	16	0.9	8.2	1	6.7	11.5	55	4.1	12.3	0.0
Total	16		100.0	1,757	100.0	100.0	15		100.0	1,329	100.0	100.0	100.0
Total	10	100.0	100.0	1,737		Refinanc	L	100.0	100.0	1,329	100.0	100.0	100.0
Low	0	0.0	3.3	0	0.0	1.2	1	4.3	3.0	103	2.8	1.2	20.4
Moderate	4	16.0	7.8	232	6.2	4.4	3	13.0	9.3	319	8.5	5.0	15.8
Middle	4	16.0	17.3	539	14.4	12.8	1	4.3	16.9	101	2.7	12.	20.3
Upper	16	64.0	55.8	2,811	75.1	63.0	17	73.9	54.5	2,980	79.8	62.6	43.5
Unknown	1	4.0	15.8	162	4.3	18.7	1	4.3	16.3	232	6.2	19.	0.0
Total	25	100.0	100.0	3,744	100.0	100.0	23	100.0	100.0	3,735	100.0	100.0	100.0
10.0.1		100.0	100.0	0,7 11			ment Loans		100.0	0,700	100.0	100.0	100.0
Low	0	0.0	2.3	0	0.0	1.2	0	0.0	5.8	0	0.0	3.6	20.4
Moderate	0	0.0	10.9	0	0.0	6.9	1	16.7	10.9	30	9.2	6.7	15.8
Middle	2	50.0	20.0	44	16.1	18.0	1	16.7	18.2	28	8.6	13.4	20.3
Upper	1	25.0	63.4	200	73.0	71.7	4	66.7	61.3	267	82.2	72.9	43.5
Unknown	1	25.0	3.4	30	10.9	2.1	0	0.0	3.6	0	0.0	3.4	0.0
Total	4	100.0	100.0	274	100.0	100.0	6	100.0	100.0	325	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	5					l
Low	3	5.9	4.0	173	2.8	1.5	5	10.0	4.3	306	5.3	1.8	20.4
Moderate	8	15.7	11.8	659	10.6	6.8	7	14.0	12.6	532	9.2	7.4	15.8
Middle	11	21.6	19.2	1,195	i 19.1	15.	4	8.0	20.0	261	4.5	15.5	20.3
Upper	25	49.0	52.1	3,867	61.9	62.1	32	64.0	49.0	4,428	76.2	59.4	43.5
Unknown	4	7.8	12.9	352	5.6	14.4	2	4.0	14.1	287	4.9	15.8	0.0
Total	51	100.0	100.0	6,246	100.0	100.0	50	100.0	100.0	5,814	100.0	100.0	100.0
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2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Braxton, WV NonMSA													
				Bank	And A	ggreg	ate Loar	ns By Y	(ear				T . 1
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	70
	,				By F	Revenu	ıe		·				
\$1 Million or Less	14	9.3	30.1	1,306	10.6	20.4	29	25.4	43.1	2,707	33.1	29.8	88.5
Over \$1 Million	9	6.0		2,070	16.7		13	11.4		2,903	35.5		9.2
Revenue Unknown	127	84.7		8,998	72.7		72	63.2		2,559	31.3		2.2
Total	150	100.0		12,374	100.0		114	100.0		8,169	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	121	80.7	85.2	3,553	28.7	27.5	94	82.5	89.8	2,869	35.1	33.3	
\$100,001 - \$250,000	16	10.7	8.1	2,735	22.1	19.7	12	10.5	5.8	1,798	22.0	19.5	
\$250,001 - \$1 Million	13	8.7	6.7	6,086	49.2	52.7	8	7.0	4.3	3,502	42.9	47.3	
Total	150	100.0	100.0	12,374	100.0	100.0	114	100.0	100.0	8,169	100.0	100.0	
		]	By Loa	n Size a	nd Rev	venue	\$1 Mill	ion or	Less				
\$100,000 or Less	12	85.7		526	40.3		22	75.9		863	31.9		
\$100,001 - \$250,000	0	0.0		0	0.0		4	13.8		603	22.3		
\$250,001 - \$1 Million	2	14.3		780	59.7		3	10.3		1,241	45.8		
Total	14	100.0		1,306	100.0		29	100.0		2,707	100.0		

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2011-2015 U.S. Census Bureau: American Community Survey

	istributio					_	raxton, V	_	-				r J
				Ban	k And Ag	ggregate	Loans By Y	ear					
Geographic			202	20					20:	21			Owner Occupied
Income Level	Bank	Ĭ.	Agg	Bank		Agg	Bank	Ĭ.	Agg	Bank	(	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
			-		Hon	ne Purch	ase Loans						T
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	12.5	7.8	276	15.7	4.6	4	26.7	7.9	245	18.4	4.8	10.
Middle	8	50.0	51.3	664	37.8	47.0	8	53.3	50.3	873	65.7	46.0	63.
Upper	6	37.5	40.8	817	46.5	48.4	3	20.0	41.8	211	15.9	49.2	26.
Unknown	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	1,757	100.0	100.0	15	100.0	100.0	1,329	100.0	100.0	100.
	,				F	Refinanc	Loans						T
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Moderate	5	20.0	4.5	313	8.4	2.7	4	17.4	4.8	300	8.0	2.9	10.
Middle	15	60.0	50.1	1,799	48.1	43.4	12	52.2	49.9	1,510	40.4	42.9	63.
Upper	5	20.0	45.4	1,632	43.6	53.8	7	30.4	45.3	1,925	51.5	54.2	26.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	25	100.0	100.0	3,744	100.0	100.0	23	100.0	100.0	3,735	100.0	100.0	100.
		•	-	· ·	Home	Improve	ment Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	25.0	5.7	25	9.1	4.4	2	33.3	5.1	58	17.8	3.4	10.
Middle	2	50.0	46.9	219	79.9	42.3	2	33.3	42.3	120	36.9	39.2	63.
Upper	1	25.0	47.4	30	10.9	53.3	2	33.3	52.6	147	45.2	57.4	26.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	274	100.0	100.0	6	100.0	100.0	325	100.0	100.0	100.
	•			•	M	ultifamily	Loans						Multi-family
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	Units %
Moderate	0	0.0	20.0	0	0.0	2.7	0	0.0	0.0	0	0.0	0.0	13
Middle	0	0.0	30.0	0	0.0		1	100.0	78.6	498	100.0	58.3	47.6
Upper	0	0.0	50.0	0	0.0	72.3	0	0.0		0	0.0	41.7	39.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0,0
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	498	100.0	100.0	100.
Total		0.0	100.0				<u>'</u>	100.0	100.0	430	100.0	100.0	Owner Occupied
	1	Т					gage Loans			-			Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	9	17.6	6.2	636	10.2	3.7	11	21.6	6.3	696	11.0	3.8	10.
Middle	27	52.9	50.0	2,981	47.7	44.4	28	54.9	50.3	3,333	52.8	44.3	63.
Upper	15	29.4	43.7	2,629	42.1	51.9	12	23.5	43.4	2,283	36.2	51.9	26.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	51	100.0	100.0	6,246	100.0	100.0	51	100.0	100.0	6,312	100.0	100.0	100.

2011-2015 U.S. Census Bureau: American Community Survey

D	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography												
				Assessn	nent A	rea: B	raxton, V	VV No	nMSA	<b>L</b>			
C 1-i-				Bank	And A	ggreg	ate Loar	ns By Y	<b>Year</b>				Total
Geographic			20	20					20	21			
Income Level	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	ık	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	29	19.3	12.5	867	7.0	6.9	27	23.7	10.1	1,418	17.4	8.6	9.6
Middle	88	58.7	53.1	8,371	67.6	55.3	64	56.1	55.3	4,382	53.6	53.1	56.8
Upper	33	22.0	33.8	3,136	25.3	37.5	23	20.2	32.9	2,369	29.0	38.1	33.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.3	0	0.0	1.7	0	0.0	0.2	
Total	150	100.0	100.0	12,374	100.0	100.0	114	100.0	100.0	8,169	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

# PPP Loans with no Revenue reported

Beckley, WV MSA 2020										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	118	80.8%	3,845	32.6%						
\$100,001 - \$250,000	19	13.0%	3,077	26.1%						
\$250,001 - \$1 Million	9	6.2%	4,869	41.3%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	146	100.0%	11,791	100.0%						

Beckley, WV MSA 2021										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	37	88.1%	860	49.3%						
\$100,001 - \$250,000	5	11.9%	883	50.7%						
\$250,001 - \$1 Million	0	0.0%	0	0.0%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	42	100.0%	1,743	100.0%						

					ographics						
Income Categories	Tract Dis	tribution	Families by T	Tract Income	Families < Po	overty Level ilies by Tract	Families l	•			
	#	%	#	%	#	%	#	%			
Low	2	5.4	1,164	3.1	239	20.5	7,603	20.1			
Moderate	10	27.0	6,631	17.5	990	14.9	6,054	16.0			
Middle	14	37.8	17,226	45.6	981	5.7	7,434	19.7			
Upper	10	27.0	12,736	33.7	596	4.7	16,700	44.2			
Unknown	1	2.7	34	0.1	34	100.0	0	0.0			
Total AA	37	100.0	37,791	100.0	2,840	7.5	37,791	100.0			
	Housing			Hous	sing Type by	Tract					
	Units by	O	wner-occupie	d	Rei	ntal	Vac	ant			
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit			
Low	3,975	1,365	3.5	34.3	2,217	55.8	393	9.9			
Moderate	16,106	5,786	15.0	35.9	8,019	49.8	2,301	14.3			
Middle	29,747	18,070	46.9	60.7	8,645	29.1	3,032	10.2			
Upper	21,490	13,293	34.5	61.9	6,269	29.2	1,928	9.0			
Unknown	52	14	0.0	26.9	38	73.1	0	0.0			
Total AA	71,370	38,528	100.0	54.0	25,188	35.3	7,654	10.7			
				Busi	nesses by Tract & Revenue Size						
	Total Businesses by Tra	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported			
	#	%	#	%	#	%	#	%			
Low	400	4.0	359	3.9	39	5.4	2	2.4			
Moderate	1,518	15.2	1,369	14.9	131	18.3	18	21.4			
Middle	3,933	39.4	3,660	39.9	249	34.7	24	28.6			
Upper	4,092	41.0	3,762	41.0	291	40.6	39	46.4			
Unknown	35	0.4	27	0.3	7	1.0	1	1.2			
Total AA	9,978	100.0	9,177	100.0	717	100.0	84	100.0			
Perc	entage of Tota	l Businesses:		92.0		7.2		0.8			
				Fa	rms by Tract	& Revenue Si	ze				
	Total Farm	s by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported			
	#	%	#	%	#	%	#	%			
Low	2	0.8	2	0.8	0	0.0	0	0.0			
Moderate	36	15.0	35	14.7	1	100.0	0	0.0			
Middle	132	55.0	132	55.5	0	0.0	0	0.0			
Upper	70	29.2	69	29.0	0	0.0	1	100.0			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	Total AA 240 100.0				1	100.0	1	100.0			
	Percentage of	Total Farms:		99.2		0.4		0.4			

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level												
				Asses	sment	Area:	Charlot	tesville	e, VA				
				Ban	k And A	ggregate	Loans By Y	ear					
Borrower			2020			-			20:			_	Families by
Income Level	Banl	(	Agg	Bank	(	Agg	Banl	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	1				Hon		ase Loans						
Low	0	0.0	4.4	0	0.0	2.0	3	17.6	4.6	615	10.5	2.4	20.1
Moderate	6	60.0	16.5	1,239	54.8	11.	7	41.2	16.9	1,905	32.6	11.1	16.0
Middle	2	20.0	20.7	708	31.3	17.8	2	11.8	19.4	582	10.0	16.7	19.7
Upper	2	20.0	47.2	316	14.0	56.4	4	23.5	42.9	2,269	38.9	52.9	44.2
Unknown	0	0.0	11.2	2 0	0.0	12.3	1	5.9	16.2	469	8.0	16.4	0.0
Total	10	100.0	100.0	2,263	100.0	100.0	17	100.0	100.0	5,840	100.0	100.0	100.0
					ı	Refinanc	e Loans						
Low	1	6.7	3.9	73	2.5	1.9	4	23.5	6.0	401	11.9	3.1	20.1
Moderate	3	20.0	13.3	539	18.6	9.1	5	29.4	15.9	988	29.3	10.7	16.0
Middle	1	6.7	19.0	121	4.2	15.8	2	11.8	18.9	443	13.1	15.6	19.7
Upper	10	66.7	45.6	2,164	74.7	53.4	5	29.4	41.0	1,130	33.5	50.4	44.2
Unknown	0	0.0	18.2	0	0.0	19.7	1	5.9	18.3	413	12.2	20.2	0.0
Total	15	100.0	100.0	2,897	100.0	100.0	17	100.0	100.0	3,375	100.0	100.0	100.0
	•	,			Home	Improve	ment Loans	,	,				
Low	1	8.3	7.3	43	4.6	4.9	1	12.5	7.0	78	6.5	4.4	20.1
Moderate	2	16.7	12.5	80	8.6	9.3	0	0.0	13.7	0	0.0	9.0	16.0
Middle	3	25.0	20.4	116	12.5	16.5	2	25.0	20.8	321	26.6	17.8	19.7
Upper	6	50.0	58.5	688	74.2	65.1	3	37.5	55.6	455	37.7	65.1	44.2
Unknown	0	0.0	1.4	0	0.0	4.2	2	25.0	2.9	354	29.3	3.7	0.0
Total	12	100.0	100.0	927	100.0	100.0	8	100.0	100.0	1,208	100.0	100.0	100.0
					Total H	ome Mor	tgage Loans	;					
Low	2	5.4	4.1	116	1.9	2.0	8	17.0	5.5	1,094	9.9	2.8	20.1
Moderate	11	29.7	14.2	1,858	30.5	9.9	13	27.7	16.1	2,925	26.4	11.0	16.0
Middle	6	16.2	19.5	945	15.5	16.4	7	14.9	19.1	1,387	12.5	16.0	19.7
Upper	18	48.6	46.3	3,168	52.0	54.4	15	31.9	42.6	4,430	40.0	52.1	44.2
Unknown	0	0.0	15.9	0	0.0	17.3	4	8.5	16.7	1,236	11.2	18.2	0.0
Total	37	100.0	100.0	6,087	100.0	100.0	47	100.0	100.0	11,072	100.0	100.0	100.0
	-												1

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Charlottesville, VA													
				Bank	And A	ggreg	ate Loai	ıs By Y	(ear				Total
			20	20					20	21			Businesses
	Ban	k	Agg	Ban	k	Agg	Bank		Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	,,
By Revenue													
\$1 Million or Less	12	7.1	47.2	4,339	20.0	31.2	29	26.4	53.1	6,072	48.8	36.0	92.0
Over \$1 Million	12	7.1		3,503	16.2		12	10.9		2,524	20.3		7.2
Revenue Unknown	144	85.7		13,832	63.8		69	62.7		3,852	30.9		0.8
Total	168	100.0		21,674	100.0		110	100.0		12,448	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	121	72.0	87.0	3,592	16.6	32.4	86	78.2	92.5	2,641	21.2	37.9	
\$100,001 - \$250,000	18	10.7	7.6	2,803	12.9	21.2	12	10.9	4.5	2,286	18.4	20.7	
\$250,001 - \$1 Million	29	17.3	5.4	15,279	70.5	46.3	12	10.9	2.9	7,521	60.4	41.4	
Total	168	100.0	100.0	21,674	100.0	100.0	110	100.0	100.0	12,448	100.0	100.0	
		]	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	6	50.0		190	4.4		18	62.1		727	12.0		
\$100,001 - \$250,000	0	0.0		0	0.0		4	13.8		762	12.5		
\$250,001 - \$1 Million	6	50.0		4,149	95.6		7	24.1		4,583	75.5		
Total	12	100.0		4,339	100.0		29	100.0		6,072	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

# PPP Loans with no Revenue reported

Charlottesville, VA 2020										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	110	76.4%	3,188	23.0%						
\$100,001 - \$250,000	18	12.5%	2,803	20.3%						
\$250,001 - \$1 Million	16	11.1%	7,841	56.7%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	144	100.0%	13,832	100.0%						

Charlottesville, VA 2021										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	62	93.9%	1,563	45.0%						
\$100,001 - \$250,000	2	3.0%	398	11.5%						
\$250,001 - \$1 Million	2	3.0%	1,509	43.5%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	66	100.0%	3,470	100.0%						

	istributio					_	Charlott	_	•				. ,
				Ban	k And A	ggregate	Loans By Y	ear					
Geographic			202	20					20:	21			Owner Occupied
Income Level	Bank	(	Agg	Bank	[	Agg	Bank	[	Agg	Bank	[	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hon	ne Purch	ase Loans						
Low	0	0.0	4.5	0	0.0	3.8	3	17.6	5.1	874	15.0	4.4	3.
Moderate	3	30.0	12.5	799	35.3	9.0	9	52.9	14.2	2,279	39.0	10.0	15.
Middle	4	40.0	44.5	721	31.9	42.6	4	23.5	42.3	1,689	28.9	41.	46.
Upper	3	30.0	38.5	743	32.8	44.5	1	5.9	38.4	998	17.1	44.5	34.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	2,263	100.0	100.0	17	100.0	100.0	5,840	100.0	100.0	100
	·				F	Refinanc	e Loans						
Low	1	6.7	3.3	311	10.7	2.7	0	0.0	3.3	0	0.0	2.7	3.
Moderate	1	6.7	11.0	) 158	5.5	8.3	7	41.2	11.6	1,052	31.2	8.2	15.
Middle	6	40.0	44.6	1,128	38.9	43.1	7	41.2	46.1	1,824	54.0	43.6	46.9
Upper	7	46.7	41.1	1,300	44.9	45.9	3	17.6	39.1	499	14.8	45.4	34.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	15	100.0	100.0	2,897	100.0	100.0	17	100.0	100.0	3,375	100.0	100.0	100.
	•	-		•	Home	Improve	ment Loans	-		-	-		
Low	1	8.3	2.4	43	4.6	1.9	2	25.0	3.8	382	31.6	5.6	3.5
Moderate	2	16.7	9.0	41	4.4	6.1	0	0.0	12.0	0	0.0	9.2	15.
Middle	2	16.7	39.8	160	17.3	34.8	4	50.0	45.0	541	44.8	43.4	46.9
Upper	7	58.3	48.8	683	73.7	57.2	2	25.0	39.2	285	23.6	41.8	34.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	927	100.0	100.0	8	100.0	100.0	1,208	100.0	100.0	100.
	•				М	ultifamily	Loans						Multi-family
Low	0	0.0	20.0	0	0.0	16.	0	0.0	13.0	0	0.0	3.0	Units %
Moderate	0	0.0	40.0	0	0.0	43.2	0	0.0	30.4	0	0.0	38.0	40.3
Middle	0	0.0	6.7	0	0.0		0	0.0	39.1	0	0.0	46.6	25.
Upper	0	0.0	26.7	0	0.0	8.6	0	0.0	17.4	0	0.0	12.4	25.0
Unknown	0	0.0	6.7	0	0.0	30.9	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.
Total	<u></u>	0.0	100.0				l l	0.0	100.0	U	0.0	100.0	Owner Occupied
	, ,				Total Ho	me Morte	gage Loans						Units %
Low	2	5.4	3.7	354	5.8	3.6	6	12.8	4.0	1,320	11.9	3.5	3.9
Moderate	6	16.2	11.7	998	16.4	9.9	16	34.0	12.6	3,331	30.1	10.2	15.
Middle	12	32.4	44.3	2,009	33.0	41.3	17	36.2	44.7	4,127	37.3	42.7	46.
Upper	17	45.9	40.3	2,726	44.8	44.0	8	17.0	38.8	2,294	20.7	43.6	34.
Unknown	0	0.0	0.0	0	0.0	1.2	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	37	100.0	100.0	6,087	100.0	100.0	47	100.0	100.0	11,072	100.0	100.0	100.

2011-2015 U.S. Census Bureau: American Community Survey

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
				Assess	sment	Area:	Charlott	esville	, VA					
. 1:				Bank	And A	ggreg	ate Loai	ns By Y	Year				Total	
Geographic			20	20					20	21				
Income	Ban	ık	Agg	Ban	ık	Agg	Ban	$\mathbf{k}$	Agg	Ban	k	Agg	Businesses %	
Level	#	# #% #% \$(000) \$% \$% # #% \$(000) \$% \$%												
Low	2	1.2	5.2	36	0.2	5.3	6	5.5	5.3	1,292	10.4	7.3	4.0	
Moderate	28	16.7	14.6	3,658	16.9	14.7	19	17.3	15.5	1,693	13.6	15.9	15.2	
Middle	67	39.9	38.0	6,249	28.8	34.9	41	37.3	38.0	2,517	20.2	30.8	39.4	
Upper	71	42.3	41.5	11,731	54.1	44.6	44	40.0	40.6	6,946	55.8	45.9	41.0	
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4	
Tract-Unk	0	0.0	0.7	0	0.0	0.5	0	0.0	0.6	0	0.0	0.2		
Total	168	100.0	100.0	21,674	100.0	100.0	110	100.0	100.0	12,448	100.0	100.0	100.0	

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

		2021 Co	olumbia, SC	AA Demog	raphics			
Income Categories	Tract Dis	stribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	
	#	%	#	%	#	%	#	%
Low	15	9.2	7,844	4.9	3,261	41.6	35,248	21.9
Moderate	40	24.5	34,032	21.2	6,660	19.6	25,535	15.9
Middle	50	30.7	54,414	33.8	5,388	9.9	31,056	19.3
Upper	53	32.5	64,500	40.1	3,185	4.9	68,955	42.9
Unknown	5	3.1	4	0.0	0	0.0	0	0.0
Total AA	163	100.0	160,794	100.0	18,494	11.5	160,794	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	19,022	4,299	2.6	22.6	11,859	62.3	2,864	15.1
Moderate	68,451	31,445	19.1	45.9	27,761	40.6	9,245	13.5
Middle	93,021	56,266	34.2	60.5	27,294	29.3	9,461	10.2
Upper	102,346	72,437	44.0	70.8	20,333	19.9	9,576	9.4
Unknown	277	4	0.0	1.4	8	2.9	265	95.7
Total AA	283,117	164,451	100.0	58.1	87,255	30.8	31,411	11.1
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	2,709	8.9	2,374	8.4	290	14.6	45	16.2
Moderate	6,128	20.1	5,613	19.9	474	23.9	41	14.7
Middle	9,735	31.9	8,947	31.7	690	34.7	98	35.3
Upper	11,805	38.7	11,204	39.7	515	25.9	86	30.9
Unknown	142	0.5	116	0.4	18	0.9	8	2.9
Total AA	30,519	100.0	28,254	100.0	1,987	100.0	278	100.0
Pero	entage of Tota	al Businesses:		92.6		6.5		0.9
				Fa	rms by Tract	& Revenue S	ize	
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	6	1.8	6	1.9	0	0.0	0	0.0
Moderate	64	19.3	61	19.1	3	25.0	0	0.0
Middle	142	42.9	135	42.3	7	58.3	0	0.0
Upper	118	35.6	116	36.4	2	16.7	0	0.0
Unknown	1	0.3	1	0.3	0	0.0	0	0.0
Total AA	331	100.0	319	100.0	12	100.0	0	0.0
	Percentage of	Total Farms:		96.4		3.6		0.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	Distribu	tion o	f 2020				~ ~	_		orrower	Incom	e Lev	el
	1						ea: Colui		SC				T
			2020	Ban	k And A	ggregate	Loans By Y	ear	20:	21			
Borrower Income Level	Bank	7	Agg	Bank	,	Agg	Bank	7	Agg	Bank	(	Agg	Families by Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	,
	#	# 70	# 70	\$(000)	-		ase Loans	# 70	# 70	\$(000)	<b>\$</b> 70	<b>\$</b> 70	
Low	1	8.3	8.9	130	4.1	4.8	0	0.0	6.7	0	0.0	3.6	21.9
Moderate	3	25.0	25.7	466	14.6	18.8	4	33.3	21.7	846	36.9	15.7	15.9
Middle	0	0.0	22.6	0	0.0	21.7	1	8.3	21.7	204	8.9	20.2	19.3
Upper	7	58.3	31.7	2,478	77.5	43.6	4	33.3	32.2	784	34.2	42.8	42.9
Unknown	1	8.3	11.2	2,176	3.9	11.	3	25.0	17.7	460	20.1	17.7	0.0
Total	12	100.0	100.0	3,199	100.0	100.0	12	100.0	100.0	2,294	100.0	100.0	100.0
1000	<u> </u>	100.0	100.0	0,100		Refinanc		100.0	100.0	2,201	100.0	100.0	100.0
Low	1	14.3	3.0	88	5.3	1.5	0	0.0	4.5	0	0.0	2.5	21.9
Moderate	2	28.6	11.5	253	15.3	7.3	1	12.5	13.5	120	10.1	9.0	15.9
Middle	1	14.3	16.3	147	8.9	13.	2	25.0	17.9	76	6.4	14.8	19.3
Upper	3	42.9	38.7	1,164	70.5	46.9	5	62.5	35.0	991	83.5	42.9	42.9
Unknown	0	0.0	30.4	0	0.0	31.3	0	0.0	29.2	0	0.0	30.9	0.0
Total	7	100.0	100.0	1,652	100.0	100.0	8	100.0	100.0	1,187	100.0	100.0	100.0
					Home	Improve	ment Loans						1
Low	0	0.0	8.2	0	0.0	5.0	0	0.0	4.4	0	0.0	2.9	21.9
Moderate	0	0.0	14.8	0	0.0	12.0	0	0.0	13.5	0	0.0	8.9	15.9
Middle	0	0.0	22.9	0	0.0	20.6	2	66.7	21.7	100	30.8	17.6	19.3
Upper	0	0.0	50.9	0	0.0	58.8	1	33.3	58.1	225	69.2	68.1	42.9
Unknown	0	0.0	3.2	0	0.0	3.6	0	0.0	2.4	0	0.0	2.5	0.0
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	325	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	3					
Low	2	10.5	5.6	218	4.5	2.9	0	0.0	5.4	0	0.0	3.0	21.9
Moderate	5	26.3	17.3	719	14.8	12.2	5	21.7	17.0	966	25.4	12.2	15.9
Middle	1	5.3	18.6	147	3.0	16.6	5	21.7	19.5	380	10.0	17.4	19.3
Upper	10	52.6	35.1	3,642	75.1	44.8	10	43.5	34.5	2,000	52.5	43.2	42.9
Unknown	1	5.3	23.5	125	2.6	23.4	3	13.0	23.6	460	12.1	24.1	0.0
Total	19	100.0	100.0	4,851	100.0	100.0	23	100.0	100.0	3,806	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses														
Assessment Area: Columbia, SC  Bank And Aggregate Loans By Year														
				Bank	And A	ggreg	ate Loai	ns By Y	(ear				T-1-1	
_			20	20					20	21			Total Businesses	
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Bank		Agg	%	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, ,	
					By F	Reveni	1e							
\$1 Million or Less 32 45.1 39.8 1,671 26.2 28.3 15 30.0 47.7 2,729 36.2 33.0														
Over \$1 Million         21         29.6         3,060         48.0         7         14.0         535         7.1														
Revenue Unknown         18         25.4         1,639         25.7         28         56.0         4,268         56.7													0.9	
Total	71	100.0		6,370	100.0		50	100.0		7,532	100.0		100.0	
					By L	oan Si	ze						•	
\$100,000 or Less	49	69.0	87.8	1,704	26.8	33.0	31	62.0	91.9	1,057	14.0	35.8		
\$100,001 - \$250,000	17	23.9	7.0	2,634	41.4	19.9	9	18.0	4.4	1,374	18.2	17.9		
\$250,001 - \$1 Million	5	7.0	5.2	2,032	31.9	47.1	10	20.0	3.7	5,101	67.7	46.4		
Total	71	100.0	100.0	6,370	100.0	100.0	50	100.0	100.0	7,532	100.0	100.0		
,		l	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less					
\$100,000 or Less	27	84.4		667	39.9		8	53.3		286	10.5			
\$100,001 - \$250,000	4	12.5		694	41.5		3	20.0		494	18.1			
\$250,001 - \$1 Million	1	3.1		310	18.6		4	26.7		1,949	71.4			
Total	32	100.0		1,671	100.0		15	100.0		2,729	100.0			

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

Columbia, SC 2020												
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	12	75.0%	460	32.3%								
\$100,001 - \$250,000	2	12.5%	259	18.2%								
\$250,001 - \$1 Million	2	12.5%	707	49.6%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	16	100.0%	1,426	100.0%								

Columbia, SC 2021												
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	16	80.0%	417	25.9%								
\$100,001 - \$250,000	3	15.0%	428	26.6%								
\$250,001 - \$1 Million	1	5.0%	765	47.5%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	20	100.0%	1,610	100.0%								

							Loans By Y	nbia, S					
Caamanhia			202		K Alla A	Jgi egate	Loans by 1		20:	21			Owner Occurried
Geographic Income Level	Bank		Agg	Bank	[	Agg	Bank	(	Agg	Bank	(	Agg	Owner Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	ļ!	,,		*(****)			se Loans	,.		7(000)	47.5	***	
Low	0	0.0	1.6	0	0.0	0.9	0	0.0	2.0	0	0.0	1.2	2.
Moderate	1	8.3	13.7	99	3.1	9.3	3	25.0	12.9	548	23.9	8.7	19
Middle	2	16.7	29.4	294	9.2	24.6	2	16.7	30.8	286	12.5	25.9	34.:
Upper	9	75.0	55.2	2,806	87.7	65.1	7	58.3	54.2	1,460	63.6	64.1	44.
Unknown	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	3,199	100.0	100.0	12	100.0	100.0	2,294	100.0	100.0	100
	,				i	Refinance	Loans						
Low	0	0.0	0.7	0	0.0	0.4	1	12.5	1.1	61	5.1	0.6	2.
Moderate	1	14.3	7.6	109	6.6	4.9	1	12.5	9.3	160	13.5	6.3	19
Middle	2	28.6	24.7	188	11.4	19.4	3	37.5	28.3	352	29.7	22.9	34.
Upper	4	57.1	67.0	1,355	82.0	75.2	3	37.5	61.3	614	51.7	70.1	44.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	1,652	100.0	100.0	8	100.0	100.0	1,187	100.0	100.0	100
		•			Home	Improver	nent Loans						
Low	0	0.0	1.0	0	0.0	0.4	0	0.0	1.2	0	0.0	0.9	2.
Moderate	0	0.0	9.8	0	0.0	6.9	0	0.0	8.4	0	0.0	6.3	19
Middle	0	0.0	26.6	0	0.0	22.9	2	66.7	27.4	100	30.8	23.2	34.
Upper	0	0.0	62.7	0	0.0	69.7	1	33.3	62.9	225	69.2	69.6	44.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	3	100.0	100.0	325	100.0	100.0	100.
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	27.7	0	0.0	29.3	1	50.0	19.3	205	1.6	5.5	17
Moderate	0	0.0	12.8	0	0.0	21.0	0	0.0	22.8	0	0.0	15.5	35.
Middle	1	100.0	34.0	2,210	100.0	34.2	0	0.0	28.1	0	0.0	23.0	25.
Upper	0	0.0	25.5	0	0.0	15.4	1	50.0	29.8	12,992	98.4	56.0	21
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	2,210	100.0	100.0	2	100.0	100.0	13,197	100.0	100.0	100
	•			· · · · · · · · · · · · · · · · · · ·	Total Ho	me Mortg	age Loans						Owner Occupied
Low	0	0.0	1.2	0	0.0	1.2	2	8.0	1.5	266	1.6	1.	Units %
Moderate	2	10.0	10.4	208	2.9	7.2	4	16.0	11.0		4.2	7.8	19
Middle	5	25.0	27.0	2,692	38.1	22.1	7	28.0	29.4	738	4.3	24.4	34.:
Upper	13	65.0	61.3	4,161	58.9	69.4	12	48.0	58.1	15,291	89.9	66.7	44.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	7,061	100.0	100.0	25	100.0	100.0	17,003	100.0	100.0	100

2011-2015 U.S. Census Bureau: American Community Survey

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Columbia, SC  Bank And Aggregate Loans By Year														
Geographic	2020 2021												Total	
Income	Ban	ık	Agg	Ban	ık	Agg	Ban	Bank		Agg Ban		Agg	Businesses	
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000) \$%		\$%	%	
Low	3	4.2	7.0	167	2.6	10.2	7	14.0	6.3	435	5.8	9.2	8.9	
Moderate	25	35.2	18.0	2,184	34.3	22.5	11	22.0	18.1	1,503	20.0	22.5	20.1	
Middle	23	32.4	30.6	2,676	42.0	32.4	23	46.0	31.5	4,318	57.3	32.0	31.9	
Upper	20	28.2	43.6	1,343	21.1	34.1	9	18.0	43.2	1,276	16.9	35.5	38.7	
Unknown	0	0.0	0.2	0	0.0	0.3	0	0.0	0.3	0	0.0	0.7	0.5	
Tract-Unk	0	0.0	0.6	0	0.0	0.5	0	0.0	0.6	0	0.0	0.1		
Total	71	100.0	100.0	6,370	100.0	100.0	50	100.0	100.0	7,532	100.0	100.0	100.0	

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	2	021 Columb	us, NC Non	MSA AA De	emographics	6				
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	•		
	#	%	#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	13,238	24.4		
Moderate	10	24.4	13,035	24.1	3,457	26.5	10,046	18.6		
Middle	29	70.7	39,136	72.3	6,748	17.2	10,526	19.4		
Upper	2	4.9	1,979	3.7	194	9.8	20,340	37.6		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	41	100.0	54,150	100.0	10,399	19.2	54,150	100.0		
	Housing			Hous	sing Type by	Tract				
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	0	0	0.0	0.0	0	0.0	0	0.0		
Moderate	23,147	12,767	22.6	55.2	7,282	31.5	3,098	13.4		
Middle	69,347	41,595	73.6	60.0	17,196	24.8	10,556	15.2		
Upper	3,805	2,139	3.8	56.2	654	17.2	1,012	26.6		
Unknown	0	0	0.0	0.0	0	0.0	0	0.0		
Total AA	96,299	56,501	100.0	58.7	25,132	26.1	14,666	15.2		
				Busi	nesses by Tra	ct & Revenue	e Size			
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue Not Reported			
	#	%	#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0		
Moderate	1,447	22.0	1,341	22.0	77	20.8	29	21.3		
Middle	4,945	75.0	4,557	74.9	284	76.5	104	76.5		
Upper	200	3.0	187	3.1	10	2.7	3	2.2		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	6,592	100.0	6,085	100.0	371	100.0	136	100.0		
Perc	entage of Tota	al Businesses:		92.3		5.6		2.1		
				Fa	rms by Tract	& Revenue S	ize			
	Total Farm	s by Tract	Million	Revenue No	ot Reported					
	#	%	#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0		
Moderate	243	25.3	232	25.3	10	24.4	1	50.0		
Middle	699	72.8	669	73.0	29	70.7	1	50.0		
Upper	18	1.9	16	1.7	2	4.9	0	0.0		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	960	100.0	917	100.0	41	100.0	2	100.0		
	Percentage of	Total Farms:		95.5		4.3		0.2		
Source: 2021 FFIEC Census I	>-1-									

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu	tion o						_	-		Incom	ne Lev	el
			1				lumbus		onMS	SA			П
			2020	Ban	k And A	ggregate	Loans By Y	ear	20:	21			
Borrower Income Level	Banl	<b>(</b>	Agg	Banl	(	Agg	Bank	(	Agg	Banl	(	Agg	Families by Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	,
	#	# 70	#70	\$(000)			ase Loans	# 70	# 70	\$(000)	<b>\$</b> 70	<b>\$</b> 70	
Low	0	0.0	3.1	0	0.0	1.6	0	0.0	3.4	0	0.0	1.7	24.4
Moderate	0	0.0	20.0	0	0.0	13.3	0	0.0	19.3	0	0.0	13.3	18.6
Middle	0	0.0	26.4	0	0.0	23.0	2	40.0	25.2	244	31.4	21.7	
Upper	0	0.0	38.4	0	0.0	49.5	2	40.0	38.3	382	49.2	48.0	37.6
Unknown	0	0.0	12.0	0	0.0	12.7	1	20.0	13.7	150	19.3	15.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	5	100.0	100.0	776	100.0	100.0	100.0
						Refinanc	e Loans						II.
Low	0	0.0	1.8	0	0.0	0.7	0	0.0	2.6	0	0.0	1.3	24.4
Moderate	0	0.0	6.7	0	0.0	3.9	0	0.0	9.5	0	0.0	6.1	18.6
Middle	0	0.0	14.9	0	0.0	11.3	2	33.3	17.4	180	21.8	14.2	19.4
Upper	4	80.0	46.5	779	86.0	49.6	4	66.7	47.0	645	78.2	52.7	37.6
Unknown	1	20.0	30.1	127	14.0	34.5	0	0.0	23.4	0	0.0	25.6	0.0
Total	5	100.0	100.0	906	100.0	100.0	6	100.0	100.0	825	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	6.3	0	0.0	2.8	0	0.0	2.6	0	0.0	1.6	24.4
Moderate	1	33.3	14.3	50	22.4	10.9	0	0.0	6.9	0	0.0	4.9	18.6
Middle	1	33.3	23.0	153	68.6	23.5	0	0.0	20.7	0	0.0	12.2	19.4
Upper	0	0.0	51.6	0	0.0	58.3	4	100.0	67.2	282	100.0	77.8	37.6
Unknown	1	33.3	4.8	20	9.0	4.5	0	0.0	2.6	0	0.0	3.6	0.0
Total	3	100.0	100.0	223	100.0	100.0	4	100.0	100.0	282	100.0	100.0	100.0
			ı		Total H	ome Mor	tgage Loans	\$				1	
Low	0	0.0	2.7	0	0.0	1.2	0	0.0	3.0	0	0.0	1.5	24.4
Moderate	1	12.5	13.1	50	4.4	8.5	0	0.0	13.8	0	0.0	9.7	18.6
Middle	1	12.5	19.7	153	13.6	16.6	5	27.8	20.8	477	20.4	17.8	19.4
Upper	4	50.0	41.8	779	69.0	48.9	12	66.7	43.6	1,709	73.2	50.6	37.6
Unknown	2	25.0	22.6	147	13.0	24.8	1	5.6	18.8	150	6.4	20.4	0.0
Total	8	100.0	100.0	1,129	100.0	100.0	18	100.0	100.0	2,336	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses														
Assessment Area: Columbus, NC NonMSA														
				Bank	And A	ggreg	ate Loar	ns By Y	(ear				T. 4.1	
			20	20					20	21			Total Businesses	
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Bank		Agg	%	
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	70	
	,				By F	Revenu	ıe	,						
\$1 Million or Less 59 60.8 41.8 3,018 42.7 33.2 24 24.2 48.9 1,314 20.0 34.4														
Over \$1 Million         18         18.6         2,876         40.7         13         13.1         2,866         43.6														
Revenue Unknown         20         20.6         1,173         16.6         62         62.6         2,399         36.5												2.1		
Total	97	100.0		7,067	100.0		99	100.0		6,579	100.0		100.0	
					By L	oan Si	ize							
\$100,000 or Less	82	84.5	89.5	2,347	33.2	39.5	85	85.9	92.8	2,606	39.6	43.1		
\$100,001 - \$250,000	9	9.3	6.8	1,526	21.6	21.5	11	11.1	4.7	1,935	29.4	19.5		
\$250,001 - \$1 Million	6	6.2	3.8	3,194	45.2	38.9	3	3.0	2.6	2,038	31.0	37.3		
Total	97	100.0	100.0	7,067	100.0	100.0	99	100.0	100.0	6,579	100.0	100.0		
			By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				•	
\$100,000 or Less	55	93.2		1,088	36.1		23	95.8		761	57.9			
\$100,001 - \$250,000	1	1.7		213	7.1		0	0.0		0	0.0			
\$250,001 - \$1 Million	3	5.1		1,717	56.9		1	4.2		553	42.1			
Total	59	100.0		3,018	100.0		24	100.0		1,314	100.0			

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

Columbus, NC NonMSA 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	7	77.8%	149	35.6%							
\$100,001 - \$250,000	2	22.2%	269	64.4%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	9	100.0%	418	100.0%							

Columbus, NC NonMSA 2021											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	45	93.8%	1,116	76.2%							
\$100,001 - \$250,000	3	6.3%	349	23.8%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	48	100.0%	1,465	100.0%							

				Ban	k Δnd Δα	nareaste	Loans By Y	ear					
Caamamhia			202		K Alla A	ggregate	Loans by 1		20:	21			Owner Occurried
Geographic Income Level	Bank	(	Agg	Bank	[	Agg	Bank	(	Agg	Bank	(	Agg	Owner Occupied Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		" 70	/ 0	Ψ(000)			se Loans	11 70	<i>11 70</i>	Ψ(σσσ)	<b>¥</b> 70	<b>\$</b> 70	
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Moderate	0	0.0	19.4	0	0.0	16.6	1	20.0	21.5	150	19.3	19.0	22.
Middle	0	0.0	75.9	0	0.0	77.5	3	60.0	74.2	501	64.6	75.8	73.
Upper	0	0.0	4.7	0	0.0	5.9	1	20.0	4.3	125	16.1	5.2	3.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	5	100.0	100.0	776	100.0	100.0	100.
	!	ļ		·	F	Refinance	Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Moderate	1	20.0	20.2	85	9.4	18.6	1	16.7	19.7	308	37.3	18.	22.
Middle	3	60.0	74.2	689	76.0	74.8	4	66.7	75.1	314	38.1	75.7	73.
Upper	1	20.0	5.6	132	14.6	6.6	1	16.7	5.2	203	24.6	6.3	3.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	906	100.0	100.0	6	100.0	100.0	825	100.0	100.0	100
	•			······································	Home	Improver	nent Loans						1
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Moderate	0	0.0	20.6	0	0.0	18.2	3	75.0	20.7	232	82.3	21.0	22.
Middle	3	100.0	76.2	223	100.0	77.9	1	25.0	74.1	50	17.7	71.6	73.
Upper	0	0.0	3.2	0	0.0	4.0	0	0.0	5.2	0	0.0	7.4	3.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	223	100.0	100.0	4	100.0	100.0	282	100.0	100.0	100
					М	ultifamily	Loans						Multi-family
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	Units %
Moderate	0	0.0	50.0	0	0.0	16.5	0	0.0	33.3	0	0.0	5.5	29.
Middle	0	0.0	50.0	0	0.0		0	0.0	50.0	0	0.0	90.6	69.
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	16.7	0	0.0	3.9	0.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100
	!	<u> </u>		<u> </u>		me Morto	age Loans						Owner Occupied
Low	0	0.0	0.0	0	0.0		0	0.0	0.0	0	0.0	0.0	Units %
Low Moderate	1	12.5	20.2	85	7.5	0.0 17.8	5	27.8	20.7	690	29.5	18.5	0. 22.
Middle	6	75.0	74.6	912	80.8	75.9	ە 11	61.1	74.5			75.7	73.
Upper	b 1	75.0 12.5	5.2	132	80.8	6.3	2	11.	1 4.8	1,318 328	56.4 14.0	5.8	3.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Hact-Olik	U 0	0.0	0.0	U	0.0	0.0	0	0.0	0.0	U	0.0	0.0	

2011-2015 U.S. Census Bureau: American Community Survey

Di	stributio	on of 2	2020 aı	nd 2021 S	Small	Busine	ess Lend	ing By	y Incor	ne Level	l of Ge	ograp	hy
			A	Assessm	ent Ar	ea: Co	lumbus,	NC N	onMS	A			
				Bank	And A	Aggreg	ate Loai	ıs By Y	Year				T-4-1
Geographic			20	20					20	21			Total
Income	Ban	ık	Agg	Ban	ık	Agg	Ban	ık	Agg	Ban	ık	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	15	15.5	21.8	747	10.6	18.4	21	21.2	22.7	2,354	35.8	20.4	22.0
Middle	76	78.4	73.9	5,136	72.7	77.7	71	71.7	72.7	3,973	60.4	76.0	75.0
Upper	6	6.2	3.3	1,184	16.8	3.3	7	7.1	3.6	252	3.8	3.4	3.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.0	0	0.0	0.6	0	0.0	1.0	0	0.0	0.2	
Total	97	100.0	100.0	7,067	100.0	100.0	99	100.0	100.0	6,579	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	2021 Dar	e-Pasquotai	nk County, N	NC NonMSA	A AA Demog	graphics		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	•
	#	%	#	%	#	%	#	%
Low	1	4.8	637	3.2	307	48.2	2,843	14.2
Moderate	1	4.8	293	1.5	80	27.3	2,769	13.8
Middle	5	23.8	4,705	23.5	751	16.0	3,958	19.8
Upper	12	57.1	14,392	71.9	976	6.8	10,457	52.2
Unknown	2	9.5	0	0.0	0	0.0	0	0.0
Total AA	21	100.0	20,027	100.0	2,114	10.6	20,027	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	1,322	183	1.0	13.8	985	74.5	154	11.6
Moderate	939	242	1.3	25.8	471	50.2	226	24.1
Middle	7,589	4,250	22.1	56.0	2,274	30.0	1,065	14.0
Upper	40,878	14,544	75.7	35.6	6,468	15.8	19,866	48.6
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	50,728	19,219	100.0	37.9	10,198	20.1	21,311	42.0
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	109	2.3	99	2.3	10	3.5	0	0.0
Moderate	181	3.9	170	3.9	8	2.8	3	6.3
Middle	712	15.3	651	15.0	56	19.8	5	10.4
Upper	3,661	78.5	3,412	78.7	209	73.9	40	83.3
Unknown	2	0.0	2	0.0	0	0.0	0	0.0
Total AA	4,665	100.0	4,334	100.0	283	100.0	48	100.0
Per	centage of Tota	al Businesses:		92.9		6.1		1.0
				Fa	rms by Tract	& Revenue Si	ze	
	Total Farm	is by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	0	0.0	0	0.0	0	0.0	0	0.0
Middle	22	26.2	22	26.5	0	0.0	0	0.0
Upper	62	73.8	61	73.5	1	100.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	84	100.0	83	100.0	1	100.0	0	0.0
	1							

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu							_	_			e Lev	el
		A	ssessn	nent Are	a: Dar	e-Paso	luotank	Count	y, NC	NonMS.	A		
				Ban	k And A	ggregate	Loans By Y	'ear					
Borrower	<u> </u>		2020						20:				Families by
Income Level	Banl		Agg	Bank		Agg	Banl		Agg	Bank		Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
							ase Loans						Т
Low	0	0.0	0.6	0	0.0	0.2	0	0.0	0.4	0	0.0	0.2	14.2
Moderate	0	0.0	5.3	0	0.0	2.7	0	0.0	4.5	0	0.0	2.1	13.8
Middle	1	25.0	13.7	249	32.3	9.1	0	0.0	12.0	0	0.0	7.2	19.8
Upper	3	75.0	67.6	522	67.7	76.9	6	75.0	65.0	2,981	91.3	72.3	52.2
Unknown	0	0.0	12.7	0	0.0	11.0	2	25.0	18.2	284	8.7	18.3	0.0
Total	4	100.0	100.0	771	100.0	100.0	8	100.0	100.0	3,265	100.0	100.0	100.0
			ı		ı	Refinanc	e Loans						
Low	0	0.0	0.7	0	0.0	0.3	0	0.0	1.2	0	0.0	0.6	14.2
Moderate	0	0.0	3.4	0	0.0	1.9	0	0.0	5.4	0	0.0	3.1	13.8
Middle	0	0.0	10.3	0	0.0	7.2	0	0.0	13.1	0	0.0	9.2	19.8
Upper	0	0.0	61.9	0	0.0	67.7	4	100.0	59.8	867	100.0	67.9	52.2
Unknown	0	0.0	23.7	0	0.0	22.9	0	0.0	20.4	0	0.0	19.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	867	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	1.7	0	0.0	0.8	0	0.0	0.5	0	0.0	0.2	14.2
Moderate	0	0.0	6.8	0	0.0	3.1	0	0.0	5.7	0	0.0	4.2	13.8
Middle	1	50.0	11.9	40	30.3	7.6	0	0.0	10.0	0	0.0	6.0	19.8
Upper	1	50.0	76.8	92	69.7	86.0	5	100.0	81.8	740	100.0	88.1	52.2
Unknown	0	0.0	2.8	0	0.0	2.5	0	0.0	1.9	0	0.0	1.4	0.0
Total	2	100.0	100.0	132	100.0	100.0	5	100.0	100.0	740	100.0	100.0	100.0
					Total H	ome Mor	tgage Loans	5					
Low	0	0.0	0.8	0	0.0	0.3	0	0.0	0.8	0	0.0	0.4	14.2
Moderate	0	0.0	4.5	0	0.0	2.3	0	0.0	5.0	0	0.0	2.5	13.8
Middle	2	33.3	11.8	289	32.0	8.1	0	0.0	12.5	0	0.0	8.0	19.8
Upper	4	66.7	63.8	614	68.0	71.7	16	88.9	62.9	4,633	94.2	70.5	52.2
Unknown	0	0.0	19.2	0	0.0	17.6	2	11.	1 18.9	284	5.8	18.6	0.0
Total	6	100.0	100.0	903	100.0	100.0	18	100.0	100.0	4,917	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

2021 Dun & Bradstreet Data

Note:

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
	1	Assess	ment A	Area: Da	re-Pas	quota	nk Cour	ty, NO	Non	MSA			
				Bank	And A	ggreg	ate Loar	ns By Y	(ear				T-1-1
			20	20					20	21			Total Businesses
	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					By F	Reveni	1e	•					
\$1 Million or Less	28	31.8	42.5	735	12.3	32.4	25	38.5	49.6	3,221	47.6	38.7	92.9
Over \$1 Million	24	27.3		3,481	58.1		9	13.8		1,921	28.4		6.1
Revenue Unknown	36	40.9		1,778	29.7		31	47.7		1,620	24.0		1.0
Total	88	100.0		5,994	100.0		65	100.0		6,762	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	69	78.4	86.5	1,697	28.3	33.1	49	75.4	90.2	1,640	24.3	31.0	
\$100,001 - \$250,000	15	17.0	8.5	2,358	39.3	22.7	8	12.3	5.1	1,394	20.6	18.9	
\$250,001 - \$1 Million	4	4.5	5.0	1,939	32.3	44.3	8	12.3	4.7	3,728	55.1	50.2	
Total	88	100.0	100.0	5,994	100.0	100.0	65	100.0	100.0	6,762	100.0	100.0	
		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	26	92.9		402	54.7		17	68.0		650	20.2		
\$100,001 - \$250,000	2	7.1		333	45.3		3	12.0		528	16.4		
\$250,001 - \$1 Million	0	0.0		0	0.0		5	20.0		2,043	63.4		
Total	28	100.0		735	100.0		25	100.0		3,221	100.0		
Source: 2021 FFIEC C	ensus Dat	a											

## PPP Loans with no Revenue reported

Dare-Pasquotank County, NC NonMSA 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	18	90.0%	473	61.7%							
\$100,001 - \$250,000	2	10.0%	293	38.3%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	20	100.0%	766	100.0%							

Dare-Pasquotank County, NC NonMSA 2021											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	28	96.6%	784	77.9%							
\$100,001 - \$250,000	1	3.4%	223	22.1%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	29	100.0%	1,007	100.0%							

Geographic Income Level								Count					
				Banl	k And Ag	ggregate	Loans By Y	ear	,				
Income Level			202	20					202	21			Owner Occupied
	Bank		Agg	Bank		Agg	Bank	(	Agg	Bank	(	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
			-		Hon	ne Purcha	ase Loans						T
Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.6	0	0.0	0.3	1.
Moderate	0	0.0	0.6	0	0.0	0.3	0	0.0	0.5	0	0.0	0.3	1.
Middle	0	0.0	12.7	0	0.0	8.6	1	12.5	13.2	45	1.4	8.0	22.
Upper	4	100.0	86.3	771	100.0	90.8	7	87.5	85.7	3,220	98.6	91.4	75.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	4	100.0	100.0	771	100.0	100.0	8	100.0	100.0	3,265	100.0	100.0	100.
					F	Refinance	Loans						1
Low	0	0.0	0.1	0	0.0	0.1	0	0.0	0.1	0	0.0	0.0	1.
Moderate	0	0.0	0.2	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	1.
Middle	0	0.0	10.2	0	0.0	7.8	0	0.0	11.7	0	0.0	8.7	22.
Upper	0	0.0	89.5	0	0.0	91.9	4	100.0	87.9	867	100.0	91.	75.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	867	100.0	100.0	100.
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	1.
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.5	0	0.0	0.6	1.
Middle	0	0.0	14.7	0	0.0	10.8	1	20.0	8.6	125	16.9	7.3	22.
Upper	2	100.0	85.3	132	100.0	89.2	4	80.0	90.9	615	83.1	92.1	75.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	132	100.0	100.0	5	100.0	100.0	740	100.0	100.0	100.
,					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	12.5	0	0.0	9.2	0	0.0	0.0	0	0.0	0.0	4.9
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	22.2	0	0.0	5.2	5.7
Middle	0	0.0	25.0	0	0.0	10.9	0	0.0	22.2	0	0.0	1.5	5.9
Upper	0	0.0	62.5	0	0.0	79.9	1	100.0	55.6	2,700	100.0	93.3	83.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	1	100.0	100.0	2,700	100.0	100.0	100.0
		5.5					gage Loans		.00.0	2,. 50			Owner Occupied
Low	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	Units %
Moderate	0	0.0	0.3	0	0.0	0.2	0	0.0	0.3	0	0.0	0.2	1.
Middle	0	0.0	11.6		0.0	8.3	2	10.5		170	2.2	8.3	22.
Upper	6	100.0	87.8	903	100.0	91.3	17	89.5	87.0	7,447	97.8	91.2	75.7
Unknown	0	0.0	0.0	903	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total		100.0	100.0	903	100.0	100.0	19	100.0			100.0		100.
Source: 2021 FFIE	6 EC Census		100.0	903	100.0	100.0	19	100.0	100.0	7,617	100.0	100.0	100

2011-2015 U.S. Census Bureau: American Community Survey

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
		As	sessm	ent Area	a: Dare	e-Pasq	uotank (	County	y, NC I	NonMS	A				
				Bank	And A	ggreg	gate Loai	ıs By Y	Year				T. (.1		
Geographic			20	20					20	21			Total		
Income	Ban	ık	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Businesses		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%		
Low	0	0.0	1.4	0	0.0	2.2	0	0.0	1.5	0	0.0	1.9	2.3		
Moderate	1	1.1	2.9	81	1.4	3.8	2	3.1	2.3	90	1.3	2.7	3.9		
Middle	6	6.8	12.3	565	9.4	13.4	6	9.2	13.5	605	8.9	14.2	15.3		
Upper	81	92.0	81.7	5,348	89.2	79.4	57	87.7	80.5	6,067	89.7	80.8	78.5		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	1.6	0	0.0	1.2	0	0.0	2.2	0	0.0	0.3			
Total	88	100.0	100.0	5,994	100.0	100.0	65	100.0	100.0	6,762	100.0	100.0	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

		2021 Essex	. VA NonM	SA AA Dem	ographics				
Income Categories	Tract Dis	stribution	Families by T	Tract Income		overty Level ilies by Tract	Families l		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	427	15.7	
Moderate	0	0.0	0	0.0	0	0.0	494	18.2	
Middle	2	66.7	1,809	66.6	170	9.4	614	22.6	
Upper	1	33.3	907	33.4	86	9.5	1,181	43.5	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	3	100.0	2,716	100.0	256	9.4	2,716	100.0	
	Housing			Hous	sing Type by	Tract			
	Units by	O	wner-occupie	d	Rei	ntal	Vacant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0.0	0	0.0	0	0.0	
Middle	4,028	1,971	61.8	48.9	935	23.2	1,122	27.9	
Upper	1,749	1,218	38.2	69.6	208	11.9	323	18.5	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	5,777	3,189	100.0	55.2	1,143	19.8	1,445	25.0	
				Busi	nesses by Tra	ct & Revenue	Size		
	Total Busines	sses by Tract Less Than or = \$1 Million Over \$1 Million Revenue No			ot Reported				
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	341	74.9	313	73.6	26	92.9	2	100.0	
Upper	114	25.1	112	26.4	2	7.1	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	455	100.0	425	100.0	28	100.0	2	100.0	
Per	centage of Tota	al Businesses:		93.4		6.2		0.4	
				Fa	rms by Tract	& Revenue Si	ize		
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	18	46.2	16	45.7	2	50.0	0	0.0	
Upper	21	53.8	19	54.3	2	50.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	39	100.0	35	100.0	4	100.0	0	0.0	
	Percentage of	Total Farms:		89.7		10.3		0.0	
Source: 2021 FFIEC Census	Da ta								

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Distribution		<u> </u>	, ,	•	ncome Level		
	Asses			onMSA			
						Families by	
-						Family Income %	
#	#%		, , , ,	\$%	\$%	,	
		Home Pu	rchase Loans				
0	0.0	1.4	0	0.0	0.6	15.7	
0	0.0	14.7	0	0.0	9.3	18.2	
0	0.0	26.6	0	0.0	22.9	22.6	
1	100.0	36.0	644	100.0	46.2	43.5	
0	0.0	21.3	0	0.0	21.0	0.0	
1	100.0	100.0	644	100.0	100.0	100.0	
		Refina	nce Loans				
0	0.0	2.0	0	0.0	1.1	15.7	
0	0.0	11.6	0	0.0	8.4	18.2	
0	0.0	16.2	0	0.0	11.3	22.6	
0	0.0	46.4	0	0.0	52.2	43.5	
0	0.0	23.8	0	0.0	27.0	0.0	
0	0.0	100.0	0	0.0	100.0	100.0	
		Home Impr	ovement Loans				
0	0.0	5.3	0	0.0	0.9	15.7	
0	0.0	10.5	0	0.0	3.3	18.2	
0	0.0	15.8	0	0.0	15.9	22.6	
0	0.0	63.2	0	0.0	72.9	43.5	
0	0.0	5.3	0	0.0	7.1	0.0	
0	0.0	100.0	0	0.0	100.0	100.0	
		Total Home	Mortgage Loan	6			
0	0.0	2.1	0	0.0	1.0	15.7	
0	0.0	12.5	0	0.0	8.6	18.2	
0	0.0	21.0	0	0.0	17.2	22.6	
1	100.0	42.7	644	100.0	49.7	43.5	
0	0.0	21.8	0	0.0	23.6	0.0	
1	100.0	100.0	644	100.0	100.0	100.0	
	#  0 0 0 1 1 0 0 0 0 0 0 0 0 0 0 0 0 0 0	Bank	Assessment Area:   Bank And Age	Bank   Agg   Ba   #   #   #   #   #   #   #   #   #	Bank And Aggregate Loans   Bank	Bank   Agg   Bank   Agg   Same   Agg   Same   Sa	

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2021 Small Business Lending By Revenue Size of Businesses												
	As	sessment A	rea: Essex.	VA NonMS	A							
		Ва	nk And Agg	gregate Loa	ns		Total					
	Bank Agg Bank Agg				Agg	Businesses						
	#	#%	#%	\$(000)	\$%	\$%	%					
By Revenue												
\$1 Million or Less	1	100.0	51.6	50	100.0	42.4	93.4					
Over \$1 Million	0	0.0		0	0.0		6.2					
Revenue Unknown	0	0.0		0	0.0		0.4					
Total	1	100.0		50	100.0		100.0					
		В	y Loan Size	:								
\$100,000 or Less	1	100.0	91.3	50	100.0	33.4						
\$100,001 - \$250,000	0	0.0	4.5	0	0.0	18.2						
\$250,001 - \$1 Million	0	0.0	4.2	0	0.0	48.4						
Total	1	100.0	100.0	50	100.0	100.0						
	By Loa	an Size and	Revenues \$	1 Million o	r Less							
\$100,000 or Less	1	100.0		50	100.0							
\$100,001 - \$250,000	0	0.0		0	0.0							
\$250,001 - \$1 Million	0	0.0		0	0.0							
Total	1	100.0		50	100.0							

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

Essex. VA NonMSA 2021											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	0	0.0%	0	0.0%							
\$100,001 - \$250,000	0	0.0%	0	0.0%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	0	0.0%	0	0.0%							

D	istribution o			Lending By Ir Essex. VA No		of Geograp	ny
Coorambia			Bank And Agg	regate Loans			Ozumou Osaunio d
Geographic — Income Level —	Bank		Agg	Ban	k	Agg	Owner Occupied Units %
income Level	#	#%	#%	\$(000)	<b>\$%</b>	\$%	Onits 76
-		,	Home Puro	chase Loans			
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	71.3	0	0.0	72.6	61.8
Upper	1	100.0	28.3	644	100.0	26.9	38.2
Unknown	0	0.0	0.3	0	0.0	0.5	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	644	100.0	100.0	100.0
!			Refinan	ce Loans			
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	68.9	0	0.0	71.1	61.8
Upper	0	0.0	30.8	0	0.0	28.6	38.2
Unknown	0	0.0	0.3	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
	- 1			vement Loans			
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	78.9	0	0.0	59.9	61.8
Upper	0	0.0	21.1	0	0.0	40.1	38.2
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total	· ·	0.0			0.0	100.0	Multi-family
			Multifami				Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	100.0
Upper	0	0.0	0.0	0	0.0	0.0	0.0
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
		-	Гotal Home Mo	ortgage Loans			Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	70.0	0	0.0	71.5	61.8
Upper	1	100.0	29.7	644	100.0	28.1	38.2
Unknown	0	0.0	0.3	0	0.0	0.4	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	644	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

I	Distribution of 2021 Small Business Lending By Income Level of Geography												
	Assessment Area: Essex. VA NonMSA												
Geographic		Bank And Aggregate Loans											
Income	Ва	Bank Agg Bank Agg											
Level	# #% #% \$(000) \$% \$%												
Low	0	0.0	0.0	0	0.0	0.0	0.0						
Moderate	0	0.0	0.0	0	0.0	0.0	0.0						
Middle	0	0.0	80.1	0	0.0	90.0	74.9						
Upper	1	100.0	17.9	50	100.0	9.7	25.1						
Unknown	0	0.0	0.0	0	0.0	0.0	0.0						
Tract-Unk	0	0.0	1.9	0	0.0	0.3							
Total	1	100.0	100.0	50	100.0	100.0	100.0						

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	2021 Gr	eenville-Spa	artanburg-A	nderson, SC	AA Demog	raphics		
Income Categories	Tract Dis	stribution	Families by T	Γract Income		overty Level ilies by Tract	Families l Inco	•
	#	%	#	%	#	%	#	%
Low	17	9.4	10,651	5.4	4,464	41.9	42,022	21.3
Moderate	42	23.3	33,393	16.9	7,905	23.7	32,036	16.3
Middle	66	36.7	78,003	39.6	8,722	11.2	36,314	18.4
Upper	55	30.6	75,027	38.1	3,472	4.6	86,702	44.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	180	100.0	197,074	100.0	24,563	12.5	197,074	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	)wner-occupie	ed.	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	20,477	6,281	3.2	30.7	10,927	53.4	3,269	16.0
Moderate	63,265	28,207	14.5	44.6	26,424	41.8	8,634	13.6
Middle	125,996	78,673	40.6	62.4	34,711	27.5	12,612	10.0
Upper	113,562	80,838	41.7	71.2	23,693	20.9	9,031	8.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	323,300	193,999	100.0	60.0	95,755	29.6	33,546	10.4
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1,939	5.4	1,710	5.3	213	7.4	16	4.6
Moderate	5,962	16.7	5,305	16.3	618	21.6	39	11.3
Middle	12,489	34.9	11,464	35.2	917	32.1	108	31.2
Upper	15,377	43.0	14,081	43.2	1,113	38.9	183	52.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	35,767	100.0	32,560	100.0	2,861	100.0	346	100.0
Pe	rcentage of Tota	al Businesses:		91.0		8.0		1.0
				Fa	rms by Tract			
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	5	1.4	5	1.4	0	0.0	0	0.0
Moderate	41	11.6	39	11.3	2	33.3	0	0.0
Middle	188	53.3	185	53.5	2	33.3	1	100.0
Upper	119	33.7	117	33.8	2	33.3	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	353	100.0	346	100.0	6	100.0	1	100.0
	Percentage of	Total Farms:		98.0		1.7		0.3

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu							_				e Lev	el .
	Т	A	ssessi				e-Sparta Loans By Y		-Anae	rson, SC	-		
Borrower			2020		K Alla Aş	gg. oguto	2021						Families by
Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
				-	Hom	ne Purch	ase Loans			<u> </u>			
Low	0	0.0	6.1	0	0.0	3.5	7	17.1	5.8	1,223	12.4	3.4	21.3
Moderate	2	12.5	23.4	378	14.8	17.6	17	41.5	21.9	3,258	32.9	16.6	16.3
Middle	2	12.5	24.5	328	12.8	22.5	6	14.6	22.1	1,378	13.9	20.4	18.4
Upper	6	37.5	35.6	1,053	41.2	46.5	11	26.8	33.3	4,036	40.8	43.3	44.0
Unknown	6	37.5	10.4	794	31.1	9.9	0	0.0	16.9	0	0.0	16.4	0.0
Total	16	100.0	100.0	2,553	100.0	100.0	41	100.0	100.0	9,895	100.0	100.0	100.0
Refinance Loans													
Low	1	5.3	4.1	98	2.5	2.0	4	9.3	5.8	287	4.2	3.1	21.3
Moderate	3	15.8	13.1	447	11.6	8.7	10	23.3	16.1	1,470	21.8	11.3	16.3
Middle	1	5.3	18.9	132	3.4	15.4	11	25.6	20.7	1,296	19.2	17.5	18.4
Upper	8	42.1	44.1	2,186	56.7	54.0	15	34.9	37.3	3,036	44.9	47.4	44.0
Unknown	6	31.6	19.8	992	25.7	19.9	3	7.0	20.2	666	9.9	20.7	0.0
Total	19	100.0	100.0	3,855	100.0	100.0	43	100.0	100.0	6,755	100.0	100.0	100.0
					Home	Improve	ment Loans						_
Low	0	0.0	5.4	0	0.0	3.2	1	8.3	6.2	35	2.9	3.2	21.3
Moderate	0	0.0	12.9	0	0.0	9.5	1	8.3	14.5	100	8.2	10.0	16.3
Middle	1	20.0	19.8	50	19.2	16.0	3	25.0	20.0	207	17.0	14.2	18.4
Upper	3	60.0	56.6	175	67.0	64.4	7	58.3	55.3	878	72.0	68.0	44.0
Unknown	1	20.0	5.3	36	13.8	6.9	0	0.0	4.1	0	0.0	4.6	0.0
Total	5	100.0	100.0	261	100.0	100.0	12	100.0	100.0	1,220	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	3					_
Low	1	2.3	4.9	98	1.4	2.7	13	12.6	5.8	1,575	8.6	3.2	21.3
Moderate	5	11.6	17.2	825	11.7	12.6	29	28.2	18.4	4,921	26.8	13.8	16.3
Middle	5	11.6	20.9	640	9.1	18.4	21	20.4	21.1	2,981	16.2	18.8	18.4
Upper	19	44.2	40.3	3,639	51.8	50.3	37	35.9	36.3	8,220	44.8	45.8	44.0
Unknown	13	30.2	16.7	1,822	25.9	16.0	3	2.9	18.4	666	3.6	18.4	0.0
Total	43	100.0	100.0	7,024	100.0	100.0	103	100.0	100.0	18,363	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
		Asses	sment	Area: G	reenvi	lle-Sp	artanbur	g-And	lerson	, SC			
				Bank	And A	ggreg	ate Loar	ıs By Y	<b>Year</b>				m . 1
			20	20			2021						Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, 0
By Revenue													
\$1 Million or Less	64	37.9	40.1	6,138	33.4	28.0	67	37.9	47.0	8,877	42.8	32.1	91.0
Over \$1 Million	44	26.0		6,457	35.2		48	27.1		7,785	37.6		8.0
Revenue Unknown	61	36.1		5,772	31.4		62	35.0		4,056	19.6		1.0
Total	169	100.0		18,367	100.0		177	100.0		20,718	100.0		100.0
By Loan Size													,
\$100,000 or Less	119	70.4	85.2	4,022	21.9	28.2	124	70.1	90.1	4,607	22.2	30.3	
\$100,001 - \$250,000	33	19.5	8.0	5,523	30.1	19.6	32	18.1	5.1	5,343	25.8	17.9	
\$250,001 - \$1 Million	17	10.1	6.8	8,822	48.0	52.2	21	11.9	4.7	10,768	52.0	51.9	
Total	169	100.0	100.0	18,367	100.0	100.0	177	100.0	100.0	20,718	100.0	100.0	
			By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	53	82.8		1,622	26.4		44	65.7		1,827	20.6		
\$100,001 - \$250,000	5	7.8		832	13.6		12	17.9		1,892	21.3		
\$250,001 - \$1 Million	6	9.4		3,684	60.0		11	16.4		5,158	58.1		
Total	64	100.0		6,138	100.0		67	100.0		8,877	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

## PPP Loans with no Revenue reported

Greenville-Spartanburg-Anderson, SC 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	41	73.2%	1,252	24.2%							
\$100,001 - \$250,000	9	16.1%	1,405	27.2%							
\$250,001 - \$1 Million	6	10.7%	2,513	48.6%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	56	100.0%	5,170	100.0%							

Greenville-Spartanburg-Anderson, SC 2021											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	48	90.6%	1,260	60.1%							
\$100,001 - \$250,000	5	9.4%	838	39.9%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	53	100.0%	2,098	100.0%							

	istributio					_	e-Sparta	_	•			8	r)
				Ban	k And A	ggregate	Loans By Y	ear					
Geographic			202	20				2021				Owner Occupied	
Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	1 1			1	Hon	ne Purch	ase Loans			1			T
Low	1	6.3	2.5	159	6.2	2.3	4	9.8	2.9	1,048	10.6	2.4	3.2
Moderate	4	25.0	10.7	500	19.6	8.0	7	17.1	11.7	1,287	13.0	9.0	14.5
Middle	9	56.3	41.4	1,336	52.3	37.5	18	43.9	39.9	3,934	39.8	36.4	40.6
Upper	2	12.5	45.4	558	21.9	52.2	12	29.3	45.5	3,626	36.6	52.2	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	16	100.0	100.0	2,553	100.0	100.0	41	100.0	100.0	9,895	100.0	100.0	100.0
					ı	Refinanc	e Loans						T
Low	1	5.3	1.9	150	3.9	1.9	2	4.7	2.1	300	4.4	1.9	3.2
Moderate	3	15.8	7.0	430	11.2	4.9	7	16.3	8.0	877	13.0	5.7	14.5
Middle	2	10.5	35.3	285	7.4	30.4	13	30.2	37.5	1,430	21.2	32.7	40.6
Upper	13	68.4	55.8	2,990	77.6	62.7	21	48.8	52.4	4,148	61.4	59.7	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	3,855	100.0	100.0	43	100.0	100.0	6,755	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	2.6	0	0.0	2.6	0	0.0	2.3	0	0.0	2.8	3.2
Moderate	0	0.0	9.2	0	0.0	8.1	0	0.0	8.9	0	0.0	6.7	14.5
Middle	3	60.0	35.6	136	52.1	31.5	3	25.0	35.0	98	8.0	28.9	40.6
Upper	2	40.0	52.7	125	47.9	57.8	9	75.0	53.8	1,122	92.0	61.6	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	261	100.0	100.0	12	100.0	100.0	1,220	100.0	100.0	100.0
					М	ultifamily	Loans						Multi-family
Low	0	0.0	26.2	0	0.0	26.7	0	0.0	13.9	0	0.0	12.0	Units % 7.5
Moderate	0	0.0	27.2	0	0.0	17.6	4	80.0	35.2	24,014	70.0	24.9	23.3
Middle	1	100.0	28.2	744	100.0		0	0.0	28.7	0	0.0	27.4	
Upper	0	0.0	18.4	0	0.0		1	20.0	22.2	10,294	30.0	35.7	33.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	744	100.0	100.0	5	100.0	100.0	34,308	100.0	100.0	100.0
10141	<u> </u>	100.0	100.0				gage Loans	100.0	100.0	04,000	100.0	100.0	Owner Occupied
	1 1	1				· ·							Units %
Low	2	4.5	2.3	309	4.0	3.0	6	5.6	2.5	1,348	2.6	2.6	3.2
Moderate	7	15.9	8.9	930	12.0	6.8	18	16.7	9.8	26,178	49.7	8.2	14.5
Middle	16	36.4	38.1	2,651	34.1	33.8	39	36.1	38.4	5,885	11.2	34.1	40.6
Upper	19	43.2	50.8	3,878	49.9	56.4	45	41.7	49.3	19,260	36.6	55.0	41.7
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	44	100.0	100.0	7,768	100.0	100.0	108	100.0	100.0	52,671	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Di	istributio	on of 2	2020 aı	nd 2021 S	Small	Busine	ess Lend	ing By	/ Incor	ne Level	of Ge	ograp	hy
		A	ssessr	nent Are	a: Gre	envill	e-Sparta	nburg	-Ande	rson, SC	-		
				Bank	And A	ggreg	gate Loai	ıs By Y	Year				T-4-1
Geographic			20	20				Total					
Income Level	Ban	ık	Agg	Ban	ık	Agg	Ban	Bank Agg Bank		Agg	Businesses		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	3	1.8	5.0	348	1.9	6.3	3	1.7	4.9	1,375	6.6	5.9	5.4
Moderate	29	17.2	14.7	4,322	23.5	17.8	21	11.9	14.4	2,881	13.9	17.3	16.7
Middle	77	45.6	33.5	9,587	52.2	30.2	95	53.7	34.6	11,212	54.1	30.9	34.9
Upper	60	35.5	46.1	4,110	22.4	45.3	58	32.8	45.3	5,250	25.3	45.8	43.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.6	0	0.0	0.4	0	0.0	0.8	0	0.0	0.1	
Total	169	100.0	100.0	18,367	100.0	100.0	177	100.0	100.0	20,718	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	2021 Louisa, VA NonMSA AA Demographics									
Income Categories	Tract Dis	stribution	Families by T	Tract Income		overty Level ilies by Tract		,		
	#	%	#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	1,084	11.7		
Moderate	0	0.0	0	0.0	0	0.0	1,282	13.8		
Middle	2	33.3	2,933	31.6	279	9.5	1,748	18.9		
Upper	4	66.7	6,338	68.4	253	4.0	5,157	55.6		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	6	100.0	9,271	100.0	532	5.7	9,271	100.0		
	Housing			Hous	sing Type by	Tract				
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit		
Low	0	0	0.0	0.0	0	0.0	0	0.0		
Moderate	0	0	0.0	0.0	0	0.0	0	0.0		
Middle	4,926	3,152	30.9	64.0	1,146	23.3	628	12.7		
Upper	11,766	7,052	69.1	59.9	1,479	12.6	3,235	27.5		
Unknown	0	0	0.0	0.0	0	0.0	0	0.0		
Total AA	16,692	10,204	100.0	61.1	2,625	15.7	3,863	23.1		
				Busi	nesses by Tra	ct & Revenue	Size			
	Total Busine	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported		
	#	%	#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0		
Moderate	0	0.0	0	0.0	0	0.0	0	0.0		
Middle	501	35.8	465	35.2	30	46.2	6	40.0		
Upper	899	64.2	855	64.8	35	53.8	9	60.0		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	1,400	100.0	1,320	100.0	65	100.0	15	100.0		
Perc	entage of Tota	al Businesses:		94.3		4.6		1.1		
				Fa	rms by Tract	& Revenue S	ize			
	Total Farn	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported		
	#	%	#	%	#	%	#	%		
Low	0	0.0	0	0.0	0	0.0	0	0.0		
Moderate	0	0.0	0	0.0	0	0.0	0	0.0		
Middle	30	32.3	29	32.2	1	50.0	0	0.0		
Upper	63	67.7	61	67.8	1	50.0	1	100.0		
Unknown	0	0.0	0	0.0	0	0.0	0	0.0		
Total AA	93	100.0	90	100.0	2	100.0	1	100.0		
	Percentage of	Total Farms:		96.8		2.2		1.1		
Source: 2021 FFIEC Census I	2-1-									

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	Distribution of 2021 Home Mortgage Lending By Borrower Income Level								
		Asses	sment Area:		NonMSA				
Borrower		_	Bank And Aggregate Loans				Families by		
Income Level	Ba		Agg	Ba		Agg	Family Income %		
<u> </u>	#	#%	#%	\$(000)	\$%	\$%			
Home Purchase Loans									
Low	0	0.0	0.9	0	0.0	0.3	11.7		
Moderate	0	0.0	9.6	0	0.0	5.8	13.8		
Middle	0	0.0	20.6	0	0.0	15.5	18.9		
Upper	5	83.3	51.5	4,465	89.4	61.2	55.6		
Unknown	1	16.7	17.6	528	10.6	17.2	0.0		
Total	6	100.0	100.0	4,993	100.0	100.0	100.0		
				nce Loans					
Low	0	0.0	2.5	0	0.0	1.1	11.7		
Moderate	0	0.0	8.4	0	0.0	5.1	13.8		
Middle	0	0.0	16.6	0	0.0	12.6	18.9		
Upper	0	0.0	49.6	0	0.0	56.4	55.6		
Unknown	0	0.0	22.9	0	0.0	24.7	0.0		
Total	0	0.0	100.0	0	0.0	100.0	100.0		
·			Home Impre	ovement Loans					
Low	0	0.0	1.3	0	0.0	0.3	11.7		
Moderate	0	0.0	3.9	0	0.0	2.9	13.8		
Middle	0	0.0	17.1	0	0.0	10.1	18.9		
Upper	0	0.0	73.7	0	0.0	82.4	55.6		
Unknown	0	0.0	3.9	0	0.0	4.3	0.0		
Total	0	0.0	100.0	0	0.0	100.0	100.0		
			Total Home	Mortgage Loans	s				
Low	0	0.0	1.8	0	0.0	0.7	11.7		
Moderate	0	0.0	8.8	0	0.0	5.4	13.8		
Middle	0	0.0	18.3	0	0.0	14.0	18.9		
Upper	6	85.7	51.1	4,615	89.7	59.0	55.6		
Unknown	1	14.3	20.1	528	10.3	20.9	0.0		
Total	7	100.0	100.0	5,143	100.0	100.0	100.0		
<u> </u>									

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distributi	Distribution of 2021 Small Business Lending By Revenue Size of Businesses										
Assessment Area: Louisa, VA NonMSA											
		Ва	nk And Agg	gregate Loa	ns		Total				
	Ban	nk	Agg	Ba	nk	Agg	Businesses				
	#	#%	#%	\$(000)	<b>\$</b> %	<b>\$%</b>	%				
	By Revenue										
\$1 Million or Less	3	30.0	57.9	176	18.4	37.8	94.3				
Over \$1 Million	2	20.0		465	48.6		4.6				
Revenue Unknown	5	50.0		315	32.9		1.1				
Total	10	100.0		956	100.0		100.0				
		В	y Loan Size								
\$100,000 or Less	7	70.0	95.9	282	29.5	49.4					
\$100,001 - \$250,000	2	20.0	2.0	384	40.2	12.6					
\$250,001 - \$1 Million	1	10.0	2.1	290	30.3	38.0					
Total	10	100.0	100.0	956	100.0	100.0					
	By Loa	an Size and	Revenues \$	1 Million o	r Less						
\$100,000 or Less	3	100.0		176	100.0						
\$100,001 - \$250,000	0	0.0		0	0.0						
\$250,001 - \$1 Million	0	0.0		0	0.0						
Total	3	100.0		176	100.0						
Courses 2021 FFIFC Consus F	• •			-							

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2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

Louisa, VA NonMSA 2021									
By Loan Size	#	%	\$(000s)	%					
\$100,000 or less	4	80.0%	106	33.7%					
\$100,001 - \$250,000	1	20.0%	209	66.3%					
\$250,001 - \$1 Million	0	0.0%	0	0.0%					
Over \$1 Million	0	0.0%	0	0.0%					
Total	5	100.0%	315	100.0%					

D.	istribution o			Louisa, VA N	ncome Level IonMSA	or Geograp.	шу
C 1			Bank And Agg				0
Geographic —	Banl	ς .	Agg	Ba	nk	Agg	Owner Occupied
Income Level —	#	#%	#%	\$(000)	\$%	\$%	Units %
'			Home Pur	chase Loans	•		
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	28.0	0	0.0	22.0	30.9
Upper	6	100.0	72.0	4,993	100.0	78.0	69.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	4,993	100.0	100.0	100.0
<u>'</u>		ļ.	Refina	nce Loans	<u>.</u>		II.
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	27.5	0	0.0	22.0	30.9
Upper	0	0.0	72.5	0	0.0	78.0	69.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
	- 1			ovement Loans			
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	17.1	0	0.0	14.5	30.9
Upper	0	0.0	82.9	0	0.0	85.5	69.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
	<b>I</b>		Multifam	ily I oans			Multi-family
T	0	0.0	0.0	<del>-</del>	0.0	0.0	Units %
Low	0			0	0.0	0.0	0.0
Moderate	0	0.0	0.0 100.0	0	0.0	100.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	100.0
Upper Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
10141	0				0.0	100.0	Owner Occupied
			Total Home M	ortgage Loans			Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	27.4	0	0.0	22.2	30.9
Upper	7	100.0	72.6	5,143	100.0	77.8	69.1
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	5,143	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

I	Distribution of 2021 Small Business Lending By Income Level of Geography									
Assessment Area: Louisa, VA NonMSA										
Geographic		Bank And Aggregate Loans								
Income	Ba	nk	Agg	Ва	nk	Agg	Businesses			
Level	#	#%	#%	\$(000)	\$%	<b>\$</b> %	<b>%</b>			
Low	0	0.0	0.0	0	0.0	0.0	0.0			
Moderate	0	0.0	0.0	0	0.0	0.0	0.0			
Middle	0	0.0	36.1	0	0.0	43.9	35.8			
Upper	10	100.0	62.6	956	100.0	55.8	64.2			
Unknown	0	0.0	0.0	0	0.0	0.0	0.0			
Tract-Unk	0	0.0	1.4	0	0.0	0.3				
Total	10	100.0	100.0	956	100.0	100.0	100.0			

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2011-2015 U.S. Census Bureau: American Community Survey

		2021 Lyı	nchburg, VA	AA Demog	graphics			
Income Categories	Tract Dis	stribution	Families by	Tract Income		overty Level ilies by Tract		by Family ome
	#	%	#	%	#	%	#	%
Low	1	3.2	1,214	3.8	499	41.1	7,933	25.0
Moderate	12	38.7	9,917	31.2	1,935	19.5	5,931	18.7
Middle	14	45.2	15,804	49.8	1,942	12.3	6,514	20.5
Upper	4	12.9	4,802	15.1	253	5.3	11,359	35.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
T otal AA	31	100.0	31,737	100.0	4,629	14.6	31,737	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	)wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,393	1,046	3.4	43.7	946	39.5	401	16.8
Moderate	20,165	7,910	25.5	39.2	9,474	47.0	2,781	13.8
Middle	27,203	16,939	54.6	62.3	6,854	25.2	3,410	12.5
Upper	7,591	5,135	16.5	67.6	2,015	26.5	441	5.8
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
T otal AA	57,352	31,030	100.0	54.1	19,289	33.6	7,033	12.3
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Businesses b		Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	147	2.7	125	2.5	20	4.5	2	4.7
Moderate	1,951	35.8	1,766	35.6	173	38.6	12	27.9
Middle	2,554	46.9	2,318	46.7	213	47.5	23	53.5
Upper	799	14.7	751	15.1	42	9.4	6	14.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	5,451	100.0	4,960	100.0	448	100.0	43	100.0
Per	centage of Tota	al Businesses:		91.0		8.2		0.8
				Fa	rms by Tract	& Revenue S	ize	
	Total Farm	is by Tract	Less Than o	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	1	1.1	1	1.1	0	0.0	0	0.0
Moderate	13	14.8	13	14.8	0	0.0	0	0.0
Middle	65	73.9	65	73.9	0	0.0	0	0.0
Upper	9	10.2	9	10.2	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	88	100.0	88	100.0	0	0.0	0	0.0
	Percentage of	Total Farms:		100.0		0.0		0.0

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2011-2015 U.S. Census Bureau: American Community Survey

	Distribution		~ `	ge Lending B	•	ncome Level			
		As	sessment Are	ea: Lynchbur	g, VA				
Borrower –			Bank And Ag	gregate Loans			Families by		
Income Level	Ва		Agg	Ва	nk	Agg	Family Income %		
	#	#%	#%	\$(000)	\$%	\$%	/·		
Home Purchase Loans									
Low	0	0.0	12.2	0	0.0	7.6	25.0		
Moderate	0	0.0	25.4	0	0.0	21.6	18.7		
Middle	0	0.0	20.9	0	0.0	22.6	20.5		
Upper	0	0.0	25.4	0	0.0	31.9	35.8		
Unknown	0	0.0	16.1	0	0.0	16.2	0.0		
Total	0	0.0	100.0	0	0.0	100.0	100.0		
	•		Refina	nce Loans					
Low	0	0.0	8.0	0	0.0	4.9	25.0		
Moderate	0	0.0	20.4	0	0.0	16.4	18.7		
Middle	0	0.0	21.8	0	0.0	19.8	20.5		
Upper	1	100.0	29.3	200	100.0	36.6	35.8		
Unknown	0	0.0	20.4	0	0.0	22.3	0.0		
Total	1	100.0	100.0	200	100.0	100.0	100.0		
			Home Impr	ovement Loans	•				
Low	0	0.0	6.6	0	0.0	4.0	25.0		
Moderate	0	0.0	26.4	0	0.0	24.5	18.7		
Middle	0	0.0	23.1	0	0.0	17.0	20.5		
Upper	0	0.0	39.7	0	0.0	50.9	35.8		
Unknown	0	0.0	4.1	0	0.0	3.6	0.0		
Total	0	0.0	100.0	0	0.0	100.0	100.0		
			Total Home	Mortgage Loan	5				
Low	0	0.0	10.1	0	0.0	6.3	25.0		
Moderate	0	0.0	22.8	0	0.0	19.1	18.7		
Middle	0	0.0	21.1	0	0.0	21.0	20.5		
Upper	1	100.0	28.0	200	100.0	34.5	35.8		
Unknown	0	0.0	18.1	0	0.0	19.1	0.0		
Total	1	100.0	100.0	200	100.0	100.0	100.0		

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribut	Distribution of 2021 Small Business Lending By Revenue Size of Businesses									
Assessment Area: Lynchburg, VA										
		Ва	nk And Agg	gregate Loa	ns		Total			
	Ba	nk	Agg	Ba	nk	Agg	Businesses			
	#	# <b>%</b>	#%	\$(000)	\$%	\$%	%			
	By Revenue									
\$1 Million or Less	1	33.3	48.9	10	2.4	30.8	91.0			
Over \$1 Million	2	66.7		400	97.6		8.2			
Revenue Unknown	0	0.0		0	0.0		0.8			
Total	3	100.0		410	100.0		100.0			
	,	В	y Loan Size	•						
\$100,000 or Less	2	66.7	91.2	53	12.9	30.3				
\$100,001 - \$250,000	0	0.0	4.5	0	0.0	17.5				
\$250,001 - \$1 Million	1	33.3	4.3	357	87.1	52.1				
Total	3	100.0	100.0	410	100.0	100.0				
	By Lo	an Size and	Revenues \$	1 Million o	r Less					
\$100,000 or Less	1	100.0		10	100.0					
\$100,001 - \$250,000	0	0.0		0	0.0					
\$250,001 - \$1 Million	0	0.0		0	0.0					
Total	1	100.0		10	100.0					
Carrage 2021 FFIFC Carrage										

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2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

Lynchburg, VA 2021								
	#	%	\$(000s)	%				
\$100,000 or less	0	0.0%	0	0.0%				
\$100,001 - \$250,000	0	0.0%	0	0.0%				
\$250,001 - \$1 Million	0	0.0%	0	0.0%				
Over \$1 Million	0	0.0%	0	0.0%				
Total	0	0.0%	0	0.0%				

	1541124410110		essment Area		ncome Level 3, VA	or ocograp	··· <i>y</i>
Geographic —			Bank And Agg	regate Loans			Owner Occupied
Income Level	Bank	ς .	Agg	Baı	Bank		Units %
Income Level	#	#%	#º/o	\$(000)	\$%	\$%	Office 76
•		•	Home Puro	chase Loans	<u>.</u>		
Low	0	0.0	3.5	0	0.0	1.8	3.4
Moderate	0	0.0	35.1	0	0.0	29.5	25.5
Middle	0	0.0	45.7	0	0.0	47.7	54.6
Upper	0	0.0	15.7	0	0.0	21.0	16.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
•	-		Refinan	ice Loans			
Low	0	0.0	1.4	0	0.0	0.8	3.4
Moderate	0	0.0	26.9	0	0.0	22.0	25.5
Middle	1	100.0	51.6	200	100.0	50.8	54.6
Upper	0	0.0	20.1	0	0.0	26.4	16.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	200	100.0	100.0	100.0
'	•		Home Impro	vement Loans	•		
Low	0	0.0	4.1	0	0.0	4.8	3.4
Moderate	0	0.0	26.4	0	0.0	25.1	25.5
Middle	0	0.0	43.0	0	0.0	36.8	54.6
Upper	0	0.0	26.4	0	0.0	33.2	16.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
· '	·!		Multifami	lv Loans	<u>!</u> .		Multi-family
Low	0	0.0	2.9	0	0.0	0.9	<u>Units %</u> 5.0
Moderate	0	0.0	37.1	0	0.0	10.3	50.7
Middle	0	0.0	48.6	0	0.0	85.8	31.9
Upper	0	0.0	11.4	0	0.0	3.0	12.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total			Total Home Mo		0.0	100.0	Owner Occupied
,							Units %
Low	0	0.0	2.5	0	0.0	1.3	3.4
Moderate	0	0.0	30.8	0	0.0	24.3	25.5
Middle	1	100.0	48.4	200	100.0	52.6	54.6
Upper	0	0.0	18.3	0	0.0	21.7	16.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total  Source: 2021 FFIE	1	100.0	100.0	200	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

1	Distribution o	of 2021 Small	Business Le	nding By Inc	ome Level of	Geography	
		Asse	ssment Area	: Lynchburg,	VA		
Geographic		В	ank And Ag	gregate Loan	S		Total
Income	Ва	nk	Agg	Ва	nk	Agg	Businesses
Level	#	#%	#%	\$(000)	<b>\$</b> %	\$%	<b>%</b>
Low	0	0.0	2.3	0	0.0	7.1	2.7
Moderate	0	0.0	33.5	0	0.0	29.3	35.8
Middle	3	100.0	47.3	410	100.0	51.2	46.9
Upper	0	0.0	16.2	0	0.0	12.3	14.7
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.7	0	0.0	0.2	
Total	3	100.0	100.0	410	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Income Categories								
Theomic Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level lies by Tract	Families l	oy Family ome
Ŭ	#	%	#	%	#	%	#	%
Low	2	2.9	1,159	2.2	546	47.1	10,018	18.8
Moderate	7	10.3	6,759	12.7	1,139	16.9	9,140	17.2
Middle	29	42.6	25,005	47.0	3,005	12.0	9,794	18.4
Upper	26	38.2	20,308	38.2	1,504	7.4	24,279	45.6
Unknown	4	5.9	0	0.0	0	0.0	0	0.0
Total AA	68	100.0	53,231	100.0	6,194	11.6	53,231	100.0
	Housing			Hous	sing Type by	Γract		
	Units by	C	)wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	2,960	670	1.3	22.6	1,565	52.9	725	24.5
Moderate	12,251	5,345	10.1	43.6	4,547	37.1	2,359	19.3
Middle	48,045	25,267	47.6	52.6	13,185	27.4	9,593	20.0
Upper	43,615	21,769	41.0	49.9	6,721	15.4	15,125	34.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	106,871	53,051	100.0	49.6	26,018	24.3	27,802	26.0
					nesses by Tra	ct & Revenue	Size	
	Total Businesses by Tract		Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	413	4.7	378	4.7	26	5.0	9	7.6
Moderate	1,110	12.8	1,004	12.5	88	16.9	18	15.3
Middle	3,789	43.6	3,515	43.6	221	42.4	53	44.9
Upper	3,384	38.9	3,160	39.2	186	35.7	38	32.2
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	8,696	100.0	8,057	100.0	521	100.0	118	100.0
Perce	entage of Tota	l Businesses:		92.7		6.0		1.4
				Fa	rms by Tract	& Revenue Si	ize	
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	3	1.2	3	1.3	0	0.0	0	0.0
Moderate	42	17.1	41	17.7	1	7.7	0	0.0
Middle	138	56.1	129	55.6	8	61.5	1	100.0
Upper	63	25.6	59	25.4	4	30.8	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	246	100.0	232	100.0	13	100.0	1	100.0
P	ercentage of	Total Farms:		94.3		5.3		0.4

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu	tion o									Incom	e Lev	el
	T		Asses				ern-More		City, N	IC CSA			
			2020	Ban	k And A	ggregate	Loans By Y	ear	20:	24			
Borrower Income Level	Banl	•		Bank	,	Agg	Bank	,		21 Bank	,	Agg	Families by Family Income %
income Level			Agg			Agg			Agg			Agg	r anning income 76
	#	#%	#%	\$(000)	\$%	\$%	# ase Loans	#%	#%	\$(000)	\$%	\$%	
1	1 4	4.0	0.5	400			ase Loans	4.0	0.0	450	4.0	4.0	40.0
Low Moderate	1 1	4.8	3.5 12.4	130 50	0.8	7.3	2	4.2 8.3	2.9	150 281	1.9 3.6	1.3 6.7	18.8 17.2
Middle	2	9.5	19.2	481	8.1	14.2	3	12.5	18.6	548	6.9	13.7	18.4
Upper	17	81.0		5,288	88.9	66.8	13	54.2	53.1	4,928	62.5	64.0	45.6
Unknown	0	0.0	10.4	0,200	0.0	10.5	5	20.8	13.7	1,982	25.1	14.2	0.0
Total	21	100.0		5,949	100.0	100.0	24	100.0	100.0	7,889	100.0	100.0	100.0
Total		100.0	100.0	0,040		Refinanc		100.0	100.0	7,000	100.0	100.0	100.0
Low	2	15.4	1.7	122	3.7	0.7	0	0.0	2.4	0	0.0	1.2	18.8
Moderate	3	23.1	6.6	350	10.7	3.8	1	20.0	7.9	74	6.4	4.7	17.2
Middle	1	7.7	12.0	129	3.9	8.7	1	20.0	15.3	50	4.3	11.4	18.4
Upper	4	30.8	48.1	1,81	1 55.3	55.4	2	40.0	46.6	880	76.5	55.3	45.6
Unknown	3	23.1	31.6	863	26.4	31.4	1	20.0	27.8	147	12.8	27.4	0.0
Total	13	100.0	100.0	3,275	100.0	100.0	5	100.0	100.0	1,15	1 100.0	100.0	100.0
	•				Home	Improve	ment Loans						
Low	0	0.0	3.4	0	0.0	1.6	0	0.0	2.8	0	0.0	1.4	18.8
Moderate	0	0.0	13.4	0	0.0	8.4	0	0.0	5.3	0	0.0	2.6	17.2
Middle	0	0.0	18.2	0	0.0	12.6	3	33.3	15.2	287	36.3	10.0	18.4
Upper	1	100.0	60.6	40	100.0	71.8	5	55.6	75.2	435	55.1	83.5	45.6
Unknown	0	0.0	4.5	0	0.0	5.5	1	11.	1 1.5	68	8.6	2.5	0.0
Total	1	100.0	100.0	40	100.0	100.0	9	100.0	100.0	790	100.0	100.0	100.0
					Total H	ome Mor	tgage Loans	3					
Low	3	7.7	2.5	252	2.7	1.2	1	2.4	2.6	150	1.5	1.2	18.8
Moderate	4	10.3	9.4	400	4.2	5.5	4	9.5	9.5	430	4.3	5.7	17.2
Middle	3	7.7	15.4	610	6.4	11.4	8	19.0	16.9	910	9.1	12.6	18.4
Upper	26	66.7	51.2	7,349	77.6	60.9	22	52.4	50.9	6,298	63.1	60.5	45.6
Unknown	3	7.7	21.4	863	9.1	21.0	7	16.7	20.1	2,197	22.0	20.1	0.0
Total	39	100.0	100.0	9,474	100.0	100.0	42	100.0	100.0	9,985	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
		Asse	essmer	nt Area: 1	New B	Bern-M	lorehead	l City,	NC CS	SA			
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear				T-1-1
			20	20			2021						Total Businesses
	Ban	k	Agg	Ban	k	Agg	Bank		Agg	agg Bank		Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, -
					By F	Revenu	1e						
\$1 Million or Less	47	52.2	41.9	2,467	35.0	31.5	25	41.0	55.5	3,436	50.1	41.4	92.7
Over \$1 Million	17	18.9		2,569	36.5		7	11.5		1,342	19.6		6.0
Revenue Unknown	26	28.9		2,009	28.5		29	47.5		2,082	30.3		1.4
Total	90	100.0		7,045	100.0		61	100.0		6,860	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	72	80.0	87.2	2,112	30.0	35.6	47	77.0	91.5	1,193	17.4	36.6	
\$100,001 - \$250,000	11	12.2	8.1	1,810	25.7	23.4	4	6.6	4.7	792	11.5	18.1	
\$250,001 - \$1 Million	7	7.8	4.7	3,123	44.3	41.0	10	16.4	3.8	4,875	71.1	45.3	
Total	90	100.0	100.0	7,045	100.0	100.0	61	100.0	100.0	6,860	100.0	100.0	
		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	44	93.6		1,036	42.0		19	76.0		479	13.9		
\$100,001 - \$250,000	1	2.1		191	7.7		2	8.0		487	14.2		
\$250,001 - \$1 Million	2	4.3		1,240	50.3		4	16.0		2,470	71.9		
Total	47	100.0		2,467	100.0		25	100.0		3,436	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

New Bern-	Morehead	City, NC CS	A 2020	
By Loan Size	#	%	\$(000s)	%
\$100,000 or less	12	75.0%	399	27.3%
\$100,001 - \$250,000	2	12.5%	335	23.0%
\$250,001 - \$1 Million	2	12.5%	725	49.7%
Over \$1 Million	0	0.0%	0	0.0%
Total	16	100.0%	1,459	100.0%

New Bern-More	New Bern-Morehead City, NC CSA 2021										
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	23	95.8%	554	66.8%							
\$100,001 - \$250,000	0	0.0%	0	0.0%							
\$250,001 - \$1 Million	1	4.2%	275	33.2%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	24	100.0%	829	100.0%							

				Ban	k And Ad	ggregate	Loans By Y	ear					
Caamanhia			202		K Alla A	2021						Owner Occurried	
Geographic Income Level	Bank		Agg	Bank		Agg	Bank	(	Agg	Bank		Agg	Owner Occupied Units %
ŀ	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
			,•	*(****)			ase Loans	,.		*(****)	***	474	
Low	1	4.8	1.4	130	2.2	1.2	1	4.2	1.5	437	5.5	1.5	1
Moderate	2	9.5	6.4	250	4.2	5.9	3	12.5	7.0	501	6.4	6.2	10
Middle	12	57.1	37.4	3,629	61.0	29.9	9	37.5	41.5	2,952	37.4	34.0	47.
Upper	6	28.6	54.8	1,940	32.6	62.9	11	45.8	50.0	3,999	50.7	58.3	41
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	21	100.0	100.0	5,949	100.0	100.0	24	100.0	100.0	7,889	100.0	100.0	100
		ļ			F	Refinance	Loans					Į.	
Low	1	7.7	0.8	180	5.5	0.9	0	0.0	0.8	0	0.0	0.9	1
Moderate	2	15.4	4.7	274	8.4	4.1	0	0.0	5.9	0	0.0	5.7	10
Middle	6	46.2	32.3	915	27.9	27.7	3	60.0	34.9	271	23.5	28.6	47.
Upper	4	30.8	62.1	1,906	58.2	67.3	2	40.0	58.3	880	76.5	64.9	41
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	13	100.0	100.0	3,275	100.0	100.0	5	100.0	100.0	1,15	1 100.0	100.0	100
•					Home	Improver	ment Loans						
Low	0	0.0	2.1	0	0.0	0.7	0	0.0	1.9	0	0.0	3.7	1
Moderate	0	0.0	5.5	0	0.0	6.2	1	11.	1 7.4	25	3.2	7.3	10
Middle	0	0.0	41.4	0	0.0	35.0	2	22.2	29.7	88	11.	1 23.4	47.
Upper	1	100.0	51.0	40	100.0	58.1	6	66.7	61.0	677	85.7	65.6	41
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	40	100.0	100.0	9	100.0	100.0	790	100.0	100.0	100
	•				М	ultifamily	Loans						Multi-family
Low	0	0.0	12.5	0	0.0	1.0	0	0.0	13.0	0	0.0	1.1	<b>Units %</b> 9.
Moderate	0	0.0	12.5	0	0.0	3.6	1	50.0	13.0	125	20.8	6.5	7.
Middle	0	0.0	50.0	0	0.0		0	0.0	39.1	0	0.0	18.4	42.
Upper	0	0.0	25.0	0	0.0	60.2	1	50.0	34.8	475	79.2	74.1	40.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	2	100.0	100.0	600	100.0	100.0	100
						l l	age Loans	- 1					Owner Occupied
1	اء		4.0				ار	0.0	4.0	407	4.4	4.0	Units %
Low	2	5.1	1.2		3.3		1	2.3	1.3	437	4.1	1.3	1
Moderate Middle	20	10.3	5.6	524	5.5	5.0	5	11.4	6.5	651	6.2	6.0	10
Middle		51.3	35.3 58.0	4,619	48.8	29.2	17	38.6	37.7	3,441	32.5	30.9	47.
Upper	13	33.3		4,021	42.4	64.7	21	47.7	54.5	6,056	57.2	61.8	41.
Unknown Troot Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	

2011-2015 U.S. Census Bureau: American Community Survey

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography												
			Asses	sment A	rea: N	ew Be	rn-More	head (	City, N	C CSA			
				Bank	And A	ggreg	gate Loai	ıs By Y	(ear				Total
Geographic			20	20					20	21			
Income	Ban	$\mathbf{k}$	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	10	11.1	4.1	1,247	17.7	5.1	4	6.6	3.7	695	10.1	4.3	4.7
Moderate	12	13.3	11.7	1,400	19.9	12.8	9	14.8	11.4	328	4.8	10.6	12.8
Middle	38	42.2	41.8	1,769	25.1	43.0	23	37.7	42.1	3,941	57.4	41.3	43.6
Upper	30	33.3	40.9	2,629	37.3	37.6	25	41.0	41.9	1,896	27.6	43.7	38.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.5	0	0.0	1.5	0	0.0	0.9	0	0.0	0.1	
Total	90	100.0	100.0	7,045	100.0	100.0	61	100.0	100.0	6,860	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	2021	Northumbe	erland, VA N	IonMSA AA	Demograp	hics			
Income Categories	Tract Dis	stribution	Families by T	Tract Income		overty Level ilies by Tract	Families l		
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	668	16.6	
Moderate	0	0.0	0	0.0	0	0.0	556	13.8	
Middle	1	25.0	1,193	29.7	142	11.9	828	20.6	
Upper	2	50.0	2,827	70.3	232	8.2	1,968	49.0	
Unknown	1	25.0	0	0.0	0	0.0	0	0.0	
Total AA	4	100.0	4,020	100.0	374	9.3	4,020	100.0	
	Housing			Hous	sing Type by	Tract			
	Units by	C	wner-occupie	d	Rei	ntal	Vacant		
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit	
Low	0	0	0.0	0.0	0	0.0	0	0.0	
Moderate	0	0	0.0	0.0	0	0.0	0	0.0	
Middle	2,511	1,434	29.2	57.1	298	11.9	779	31.0	
Upper	6,585	3,472	70.8	52.7	657	10.0	2,456	37.3	
Unknown	0	0	0.0	0.0	0	0.0	0	0.0	
Total AA	9,096	4,906	100.0	53.9	955	10.5	3,235	35.6	
				Busi	nesses by Tra	ct & Revenue	Size		
	Total Businesses		Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	184	31.1	164	29.8	18	48.6	2	50.0	
Upper	408	68.9	387	70.2	19	51.4	2	50.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	592	100.0	551	100.0	37	100.0	4	100.0	
Per	centage of Tota	al Businesses:		93.1		6.3		0.7	
				Fa	rms by Tract	& Revenue Si	ize		
	Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%	
Low	0	0.0	0	0.0	0	0.0	0	0.0	
Moderate	0	0.0	0	0.0	0	0.0	0	0.0	
Middle	8	19.5	8	20.0	0	0.0	0	0.0	
Upper	33	80.5	32	80.0	1	100.0	0	0.0	
Unknown	0	0.0	0	0.0	0	0.0	0	0.0	
Total AA	41	100.0	40	100.0	1	100.0	0	0.0	
	Percentage of	Total Farms:		97.6		2.4		0.0	
Source: 2021 FFIEC Census		1 Otal Farms:		97.6		2.4		0.	

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

# 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0.0 0.0 0.0 0.0	Agg #%	umberland, V regate Loans  Ban \$(000)  chase Loans  0 0 0		Agg \$%	Families by Family Income %
# 0 0 0 0	0.0	Agg #% Home Puro 3.6 12.5 11.6	\$(000) chase Loans	\$%	\$%	Family Income %
# 0 0 0 0	#% 0.0 0.0 0.0 0.0 0.0	#% Home Purc 3.6 12.5 11.6	\$(000) chase Loans 0 0	\$%	\$%	Family Income %
0 0 0 0	0.0 0.0 0.0 0.0	3.6 12.5 11.6	chase Loans 0 0	0.0	1.0	-
0 0 0	0.0 0.0 0.0	3.6 12.5 11.6	0			
0 0 0	0.0 0.0 0.0	12.5 11.6	0			
0 0	0.0	11.6		0.0		16.6
0	0.0		0	0.0	6.2	13.8
0		58.4	U	0.0	7.4	20.6
-	0.0		0	0.0	70.5	49.0
0	0.0	14.0	0	0.0	14.9	0.0
	0.0	100.0	0	0.0	100.0	100.0
		Refinan	ice Loans			
0	0.0	3.2	0	0.0	2.0	16.6
0	0.0	5.8	0	0.0	3.5	13.8
0	0.0	15.0	0	0.0	11.3	20.6
0	0.0	59.0	0	0.0	65.9	49.0
0	0.0	17.1	0	0.0	17.3	0.0
0	0.0	100.0	0	0.0	100.0	100.0
,		Home Improv	vement Loans			
0	0.0	5.6	0	0.0	1.9	16.6
0	0.0	11.1	0	0.0	10.9	13.8
0	0.0	16.7	0	0.0	20.2	20.6
0	0.0	66.7	0	0.0	67.0	49.0
0	0.0	0.0	0	0.0	0.0	0.0
0	0.0	100.0	0	0.0	100.0	100.0
-	·	Total Home M	Aortgage Loans	-		
0	0.0	3.3	0	0.0	1.4	16.6
0	0.0	9.3	0	0.0	5.1	13.8
0	0.0	13.2	0	0.0	9.1	20.6
1	100.0	58.7	50	100.0	68.3	49.0
0	0.0	15.6	0	0.0	16.1	0.0
1	100.0	100.0	50	100.0	100.0	100.0
	0 0 0 0 0 0 0 0 0 0 0 0 0 0	0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 0 0.0 1 100.0	0         0.0         100.0           Refinant           0         0.0         3.2           0         0.0         5.8           0         0.0         15.0           0         0.0         59.0           0         0.0         59.0           0         0.0         17.1           0         0.0         100.0           Home Improvement Impro	O   O.0   100.0   O	No.   No.   No.   No.   No.   No.	New York   New York

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distributi	on of 2021 S	Small Busin	ess Lending	g By Revenu	ie Size of Bi	usinesses					
	Assessm	ent Area: N	lorthumber	land, VA N	onMSA						
		Ba	nk And Agg	gregate Loa	ns		Total				
	Ba	nk	Agg	Ba	nk	Agg	Businesses				
	#	#%	#%	\$(000)	<b>\$</b> %	<b>\$%</b>	%				
		Ī	By Revenue								
\$1 Million or Less	2	50.0	48.8	55	33.7	33.9	93.1				
Over \$1 Million	1	25.0		78	47.9		6.3				
Revenue Unknown	1	25.0		30	18.4		0.7				
Total	4	100.0		163	100.0		100.0				
By Loan Size											
\$100,000 or Less	4	100.0	93.4	163	100.0	44.1					
\$100,001 - \$250,000	0	0.0	4.7	0	0.0	21.3					
\$250,001 - \$1 Million	0	0.0	1.9	0	0.0	34.6					
Total	4	100.0	100.0	163	100.0	100.0					
	By Loa	an Size and	Revenues \$	1 Million o	r Less						
\$100,000 or Less	2	100.0		55	100.0						
\$100,001 - \$250,000	0	0.0		0	0.0						
\$250,001 - \$1 Million	0	0.0		0	0.0						
Total	2	100.0		55	100.0						
Courses 2021 FFIFC Courses D	-1-										

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

#### PPP Loans with no Revenue reported

Northumberland, VA NonMSA 21										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	0	0.0%	0	0.0%						
\$100,001 - \$250,000	0	0.0%	0	0.0%						
\$250,001 - \$1 Million	0	0.0%	0	0.0%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	0	0.0%	0	0.0%						

		Assessmen			VA NonMSA	of Geograp A	ny
Geographic			Bank And Ag	gregate Loans			Owner Occupied
	Ва	nk	Agg	Ва	nk	Agg	-
Income Level	#	#%	#%	\$(000)	\$%	\$%	Units %
			Home Pu	rchase Loans			
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	22.0	0	0.0	17.2	29.2
Upper	0	0.0	78.0	0	0.0	82.8	70.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
-			Refina	nce Loans			ı
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	22.9	0	0.0	20.9	29.2
Upper	0	0.0	77.1	0	0.0	79.1	70.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
			Home Impre	ovement Loans			
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	33.3	0	0.0	39.8	29.2
Upper	0	0.0	66.7	0	0.0	60.2	70.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	100.0
			Multifam	ily Loans			Multi-family
Low	0	0.0	0.0	0	0.0	0.0	<b>Units %</b> 0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	17.5
Upper	0	0.0	100.0	0	0.0	100.0	82.5
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	100.0
Total	0	0.0			0.0	100.0	Owner Occupied
			Total Home M				Units %
Low	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	22.6	50	100.0	19.1	29.2
Upper	0	0.0	77.4	0	0.0	80.9	70.8
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	1 FIEC Census Da	100.0	100.0	50	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

1	Distribution of 2021 Small Business Lending By Income Level of Geography													
	Assessment Area: Northumberland, VA NonMSA													
Geographic		В	ank And Ag	gregate Loan	s		Total							
Income	Ba	nk	Agg	Ва	nk	Agg	Businesses							
Level	#	\$%	%											
Low	0	0.0	0.0	0	0.0	0.0	0.0							
Moderate	0	0.0	0.0	0	0.0	0.0	0.0							
Middle	2	50.0	31.9	55	33.7	28.9	31.1							
Upper	2	50.0	67.3	108	66.3	69.5	68.9							
Unknown	0	0.0	0.0	0	0.0	0.0	0.0							
Tract-Unk	0	0.0	0.8	0	0.0	1.6								
Total	4	100.0	100.0	163	100.0	100.0	100.0							

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Middle		2021 Rock	y Mount-Wi	ilson-Roano	ke Rapids, I	NC AA Demo	ographics		
Low	Income Categories	Tract Dis	Tract Distribution Families by Tract Income as % of Families by Tract  # % # % # %						
Middle		#	%	#	%	#	%	#	%
Middle	Low	2	3.9	571	1.0	347	60.8	13,127	22.1
Upper	Moderate	11	21.6	11,215	18.9	3,888	34.7	9,840	16.6
Unknown	Middle	27	52.9	31,031	52.4	4,497	14.5	11,608	19.6
Total AA   Si   1000   59,267   1000   10,005   16.9   59,267   100.0	Upper	11	21.6	16,450	27.8	1,273	7.7	24,692	41.7
Housing Units by Tract	Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Units by Tract   2	Total AA	51	100.0	59,267	100.0	10,005	16.9	59,267	100.0
Tract		Housing			Hous	sing Type by	Tract		
Low		Units by	C	)wner-occupie	d	Rei	ntal	Vac	ant
Moderate         21,073         7,828         14.1         37.1         9,365         44.4         3,880         18.48           Middle         55,864         30,307         54.7         54.3         18,524         33.2         7,033         12.66           Upper         24,352         17,058         30.8         70.0         5,649         23.2         1,645         6.8           Unknown         0         0         0.0         0		Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Middle	Low	1,476	238	0.4	16.1	771	52.2	467	31.6
Upper	Moderate	21,073	7,828	14.1	37.1	9,365	44.4	3,880	18.4
Unknown	Middle	55,864	30,307	54.7	54.3	18,524	33.2	7,033	12.6
Total AA   102,765   55,431   100.0   53.9   34,309   33.4   13,025   12.75	Upper	24,352	17,058	30.8	70.0	5,649	23.2	1,645	6.8
Total Businesses by Tract   Total Businesses   Total Business	Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total Businesses by Tract   Less Than or = \$1 Million   Over \$1 Million   Revenue Not Reported	Total AA	102,765	55,431	100.0	53.9	34,309	33.4	13,025	12.7
Less Than or = \$1 Million   Over \$1 Million   Revenue Not Reported					Busi	nesses by Tra	ct & Revenue	Size	
Low   189   2.3   172   2.3   15   2.3   2   2.0		Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
Moderate         1,242         15.1         1,107         14.8         124         19.2         11         10.9           Middle         4,640         56.5         4,219         56.5         368         56.9         53         52.5           Upper         2,146         26.1         1,971         26.4         140         21.6         35         34.7           Unknown         0         0.0         0         0.0         0         0.0         0         0.0           Total AA         8,217         100.0         7,469         100.0         647         100.0         101         100.0           Percentage of Total Businesses:         90.9         7.9         7.9         1.2           Farms by Tract & Revenue Size           Less Than or = \$1 Million         Over \$1 Million         Revenue Not Reported           Low         0         0.0         0         0.0         0         0.0           Moderate         19         5.3         17         5.1         2         7.4         0         0.0           Middle         250         69.3         231         69.2         19         70.4         0		#	%	#	%	#	%	#	%
Middle         4,640         56.5         4,219         56.5         368         56.9         53         52.5           Upper         2,146         26.1         1,971         26.4         140         21.6         35         34.7           Unknown         0         0.0         0         0.0         0	Low	189	2.3	172	2.3	15	2.3	2	2.0
Upper	Moderate	1,242	15.1	1,107	14.8	124	19.2	11	10.9
Unknown	Middle	4,640	56.5	4,219	56.5	368	56.9	53	52.5
Total AA   8,217   100.0   7,469   100.0   647   100.0   101   100.0	Upper	2,146	26.1	1,971	26.4	140	21.6	35	34.7
Percentage of Total Businesses:   90.9   7.9   1.2	Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total Farms by Tract   Less Than or = \$1 Million   Over \$1 Million   Revenue Not Reported	Total AA	8,217	100.0	7,469	100.0	647	100.0	101	100.0
Total Farms by Tract   Less Than or = \$1 Million   Over \$1 Million   Revenue Not Reported	Pero	entage of Tota	al Businesses:		90.9		7.9		1.2
Less Than or = \$1 Million   Over \$1 Million   Revenue Not Reported					Fa	rms by Tract			
Low         0         0.0         0         0.0         0         0.0         0         0.0           Moderate         19         5.3         17         5.1         2         7.4         0         0.0           Middle         250         69.3         231         69.2         19         70.4         0         0.0           Upper         92         25.5         86         25.7         6         22.2         0         0.0           Unknown         0         0.0         0         0.0         0         0.0         0         0.0           Total AA         361         100.0         334         100.0         27         100.0         0         0.0		Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
Moderate         19         5.3         17         5.1         2         7.4         0         0.0           Middle         250         69.3         231         69.2         19         70.4         0         0.0           Upper         92         25.5         86         25.7         6         22.2         0         0.0           Unknown         0         0.0         0         0.0         0         0.0         0         0.0           Total AA         361         100.0         334         100.0         27         100.0         0         0.0		#	%	#	%	#	%	#	%
Middle         250         69.3         231         69.2         19         70.4         0         0.0           Upper         92         25.5         86         25.7         6         22.2         0         0.0           Unknown         0         0.0         0         0.0         0         0.0         0         0.0           Total AA         361         100.0         334         100.0         27         100.0         0         0.0	Low	0	0.0	0	0.0	0	0.0	0	0.0
Upper         92         25.5         86         25.7         6         22.2         0         0.0           Unknown         0         0.0         0         0.0         0         0.0         0         0.0           Total AA         361         100.0         334         100.0         27         100.0         0         0.0	Moderate	19	5.3	17	5.1	2	7.4	0	0.0
Unknown         0         0.0         0         0.0         0         0.0         0         0.0           Total AA         361         100.0         334         100.0         27         100.0         0         0.0	Middle	250	69.3	231	69.2	19	70.4	0	0.0
Total AA 361 100.0 334 100.0 27 100.0 0 0.0	Upper	92	25.5	86	25.7	6	22.2	0	0.0
	Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Percentage of Total Farms: 925 75	Total AA	361	100.0	334	100.0	27	100.0	0	0.0
7.5 0.0		Percentage of	Total Farms:		92.5		7.5		0.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Rocky Mount-Wilson-Roanoke Rapids, NC													
	T	Ass	essme						noke l	Rapids, I	NC		T	
			2022	Ban	k And A	ggregate	Loans By Y	ear		04				
Borrower Income Level	Bank		2020	Bank		A	Dani		20:	21 Bank		A	Families by Family Income %	
IIICOIIIe Level	Bank		Agg			Agg	Bank	#%	Agg #%	\$(000)	\$%	Agg \$%	Failing income /6	
	#	#%	#%	\$(000)	\$%	\$%	#							
_	<u> </u>						ase Loans			_1				
Low	0	0.0	2.6	0	0.0	1.4	0	0.0	4.1	0	0.0	2.2	22.1	
Moderate	5	41.7	19.2	643	39.3	14.3	3	30.0	20.1	268	18.1	14.7	16.6	
Middle	2	16.7	26.6	526	32.1	24.7	0	0.0	26.0	0	0.0	24.5	19.6	
Upper	4	33.3	39.6	425	25.9	47.6	2	20.0	34.4	507	34.3	42.4	41.7	
Unknown	1	8.3	12.0	44	2.7	12.0	5	50.0	15.5	705	47.6	16.	0.0	
Total	12	100.0	100.0	1,638	100.0		10	100.0	100.0	1,480	100.0	100.0	100.0	
_	1 .					Refinanc			_1					
Low	1	16.7	1.9	42	8.5	0.9	0	0.0	3.9	0	0.0	2.1	22.1	
Moderate	1	16.7	8.7	80	16.2	5.6	0	0.0	12.1	0	0.0	8.6	16.6	
Middle	1	16.7	15.9	61	12.3	12.7	1	100.0	20.7	125	100.0	17.7	19.6	
Upper	3	50.0	44.3	312	63.0	49.0	0	0.0	41.3	0	0.0	47.6	41.7	
Unknown	0	0.0	29.2	0	0.0	31.8	0	0.0	21.9	0	0.0	24.0	0.0	
Total	6	100.0	100.0	495	100.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0	
	1						ment Loans							
Low	0	0.0	1.8	0	0.0	1.0	0	0.0	6.0	0	0.0	3.3	22.1	
Moderate	0	0.0	12.0	0	0.0	8.9	1	25.0	10.8	50	11.		16.6	
Middle	0	0.0	20.5	0	0.0	14.4	0	0.0	22.4	0	0.0	17.0	19.6	
Upper	0	0.0	58.4	0	0.0	69.5	2	50.0	54.8	350	77.8	60.5	41.7	
Unknown	0	0.0	7.2	0	0.0	6.2	1	25.0	6.0	50	11.	1 11.	0.0	
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	450	100.0	100.0	100.0	
	1						tgage Loans							
Low	1	5.3	2.3	42	1.9	1.2	0	0.0	3.9	0	0.0	2.2	22.1	
Moderate	6	31.6	13.3	723	33.5	9.8	4	23.5	15.3	318	14.3	11.1	16.6	
Middle	3	15.8	20.2	587	27.2	18.3	3	17.6	22.9	291	13.1	21.2	19.6	
Upper	8	42.1	41.8	764	35.4	47.8	4	23.5	39.2	857	38.6	45.1	41.7	
Unknown	1	5.3	22.5	44	2.0	23.0	6	35.3	18.6	755	34.0	19.9	0.0	
Total	19	100.0	100.0	2,160	100.0	100.0	17	100.0	100.0	2,221	100.0	100.0	100.0	

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Rocky Mount-Wilson-Roanoke Rapids, NC													
				Bank	And A	ggreg	ate Loar	ns By Y	<b>Year</b>				T 1
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, 0
					By F	Reveni	1e	•					
\$1 Million or Less	33	28.0	33.4	1,031	9.0	19.9	14	15.9	43.5	2,301	19.4	28.2	90.9
Over \$1 Million	60	50.8		8,952	78.1		50	56.8		8,300	69.9		7.9
Revenue Unknown         25         21.2         1,481         12.9         24         27.3         1,272         10.7													
Total	118	100.0		11,464	100.0		88	100.0		11,873	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	95	80.5	82.2	3,976	34.7	27.1	62	70.5	89.4	3,041	25.6	31.0	
\$100,001 - \$250,000	13	11.0	10.5	1,994	17.4	24.0	17	19.3	6.1	2,726	23.0	20.9	
\$250,001 - \$1 Million	10	8.5	7.3	5,494	47.9	48.9	9	10.2	4.6	6,106	51.4	48.1	
Total	118	100.0	100.0	11,464	100.0	100.0	88	100.0	100.0	11,873	100.0	100.0	
		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	32	97.0		831	80.6		7	50.0		131	5.7		
<b>\$100,001 - \$250,000</b> 1 3.0 200 19.4 5 35.7 870 37.8													
\$250,001 - \$1 Million	0	0.0		0	0.0		2	14.3		1,300	56.5		
Total	33	100.0		1,031	100.0		14	100.0		2,301	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

Rocky Mount-Wilson-Roanoke Rapids, NC 2020												
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	9	81.8%	276	26.6%								
\$100,001 - \$250,000	1	9.1%	106	10.2%								
\$250,001 - \$1 Million	1	9.1%	657	63.2%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	11	100.0%	1,039	100.0%								

Rocky Mount-Wilson-Roanoke Rapids, NC 2021												
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	17	89.5%	440	61.0%								
\$100,001 - \$250,000	2	10.5%	281	39.0%								
\$250,001 - \$1 Million	0	0.0%	0	0.0%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	19	100.0%	721	100.0%								

				Ban	k And A	gregate	Loans By Y	ear					
Geographic			202				,		20:	21			Owner Occupied
Income Level	Bank	(	Agg	Bank	í .	Agg	Bank	(	Agg	Bank	1	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	-	•			Hon	ne Purcha	se Loans						
Low	0	0.0	0.2	0	0.0	0.1	0	0.0	0.6	0	0.0	0.3	0.4
Moderate	0	0.0	2.3	0	0.0	1.3	1	10.0	7.7	64	4.3	5.1	14.
Middle	7	58.3	55.3	785	47.9	50.7	7	70.0	55.8	909	61.4	53.0	54.7
Upper	5	41.7	42.2	853	52.1	47.9	2	20.0	35.9	507	34.3	41.6	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	12	100.0	100.0	1,638	100.0	100.0	10	100.0	100.0	1,480	100.0	100.0	100.0
					ı	Refinance	Loans						
Low	0	0.0	0.1	0	0.0	0.0	0	0.0	0.1	0	0.0	0.1	0.4
Moderate	0	0.0	1.6	0	0.0	0.9	1	100.0	5.6	125	100.0	3.8	14.
Middle	1	16.7	44.8	42	8.5	39.9	0	0.0	49.9	0	0.0	46.6	54.7
Upper	5	83.3	53.4	453	91.5	59.2	0	0.0	44.4	0	0.0	49.5	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	495	100.0	100.0	1	100.0	100.0	125	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.4
Moderate	0	0.0	3.0	0	0.0	1.6	1	25.0	11.2	2 50	11.	1 8.6	14.
Middle	0	0.0	49.4	0	0.0	51.9	1	25.0	52.0	50	11.	1 50.7	54.7
Upper	0	0.0	47.6	0	0.0	46.5	2	50.0	36.8	350	77.8	40.7	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	4	100.0	100.0	450	100.0	100.0	100.0
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	11.5	0	0.0	20.2	0	0.0	0.0	0	0.0	0.0	1.2
Moderate	1	100.0	26.9	500	100.0	19.9	0	0.0	40.5	0	0.0	31.3	29.4
Middle	0	0.0	50.0	0	0.0	28.0	1	33.3	45.9	485	35.3	35.9	58.4
Upper	0	0.0	11.5	0	0.0	32.0	2	66.7	13.5	888	64.7	32.8	10.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	500	100.0	100.0	3	100.0	100.0	1,373	100.0	100.0	100.0
					Total Ho	me Mortg	jage Loans						Owner Occupied Units %
Low	0	0.0	0.2	0	0.0	1.0	0	0.0	0.4	0	0.0	0.2	0.4
Moderate	1	5.0	2.4	500	18.8	2.1	3	15.0	7.0	239	6.6	5.4	14.
Middle	8	40.0	50.2	827	31.1	45.0	9	45.0	52.3	1,444	40.2	49.5	54.7
Upper	11	55.0	47.1	1,333	50.1	51.9	8	40.0	40.3	1,91	1 53.2	44.9	30.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	2,660	100.0	100.0	20	100.0	100.0	3,594	100.0	100.0	100.0

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Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography															
Assessment Area: Rocky Mount-Wilson-Roanoke Rapids, NC															
	Bank And Aggregate Loans By Year														
Geographic			20	20					20	21			Total		
Income	Ban	ık	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	ık	Agg	Businesses		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%		
Low	2	1.7	1.9	203	1.8	1.9	8	9.1	1.5	2,950	24.8	2.1	2.3		
Moderate	38	32.2	10.6	3,340	29.1	15.5	40	45.5	15.4	3,678	31.0	19.5	15.1		
Middle	54	45.8	52.8	5,182	45.2	46.8	27	30.7	53.8	2,852	24.0	47.2	56.5		
Upper	24	20.3	32.8	2,739	23.9	34.3	13	14.8	28.1	2,393	20.2	30.6	26.1		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	1.8	0	0.0	1.5	0	0.0	1.1	0	0.0	0.5			
Total	118	100.0	100.0	11,464	100.0	100.0	88	100.0	100.0	11.873	100.0	100.0	100.0		

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	2021	Rutherford	County, NC	NonMSA A	A Demogra <sub>l</sub>	phics							
	Tract Dis	tribution	Families by T	Tract Income	Families < Po	overty Level	Families l	y Family					
Income Categories	Tract Dis	tiibution	ranimes by 1	ract miconie	as % of Fam	ilies by Tract	Inco	ome					
	#	%	#	%	#	%	#	%					
Low	0	0.0	0	0.0	0	0.0	3,970	21.7					
Moderate	3	23.1	4,092	22.3	968	23.7	3,937	21.5					
Middle	9	69.2	13,419	73.2	1,641	12.2	4,010	21.9					
Upper	1	7.7	823	4.5	62	7.5	6,417	35.0					
Unknown	0	0.0	0	0.0	0	0.0	0	0.0					
Total AA	13	100.0	18,334	100.0	2,671	14.6	18,334	100.0					
	Housing			Hous	sing Type by	Tract							
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant					
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit					
Low	0	0	0.0	0.0	0	0.0	0	0.0					
Moderate	6,918	3,188	16.9	46.1	2,394	34.6	1,336	19.3					
Middle	23,520	14,711	78.0	62.5	4,898	20.8	3,911	16.6					
Upper	3,422	971	5.1	28.4	264	7.7	2,187	63.9					
Unknown	0	0	0.0	0.0	0	0.0	0	0.0					
Total AA	33,860	18,870	100.0	55.7	7,556	22.3	7,434	22.0					
				Busi	nesses by Tra	ct & Revenue	Size						
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported					
	#	%	#	%	#	%	#	%					
Low	0	0.0	0	0.0	0	0.0	0	0.0					
Moderate	551	24.8	488	23.8	60	40.0	3	11.5					
Middle	1,475	66.3	1,372	66.9	85	56.7	18	69.2					
Upper	200	9.0	190	9.3	5	3.3	5	19.2					
Unknown	0	0.0	0	0.0	0	0.0	0	0.0					
Total AA	2,226	100.0	2,050	100.0	150	100.0	26	100.0					
Perc	entage of Tota	al Businesses:		92.1		6.7		1.2					
				Fa	rms by Tract								
	Total Farm	is by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported					
	#	%	#	%	% # % # %								
Low	0	0.0	0	0.0	0	0.0	0	0.0					
Moderate	4	4.4	4	4.4	0	0.0	0	0.0					
Middle	79	87.8	79	87.8	0	0.0	0	0.0					
Upper	7	7.8	7	7.8	0	0.0	0	0.0					
Unknown	0	0.0	0	0.0	0	0.0	0	0.0					
Total AA	90	100.0	90	100.0	0	0.0	0	0.0					
]	Percentage of	Total Farms:		100.0		0.0		0.0					
Source: 2021 FFIEC Census I	2-1-												

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	Distribu	tion o						_	_		Incom	e Lev	el
	1		Asse				ford Cou	-	IC No	nMSA			
			2022	Ban	k And A	ggregate	Loans By Y	ear					
Borrower Income Level	DI		2020	DI	_	•	I		20:		_	•	Families by
income Level	Banl		Agg	Bank		Agg	Bank		Agg	Bank		Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	<del>                                     </del>			_			ase Loans						
Low	0	0.0	3.5	0	0.0	1.5	0	0.0	3.4	0	0.0	1.5	21.7
Moderate	0	0.0	16.0	0	0.0	9.3	1	8.3	17.2	115	5.9	10.	21.5
Middle	1	14.3	21.4	126	18.6	16.7	2	16.7	20.2	223	11.5		21.9
Upper	3	42.9	50.3	181	26.8	64.0	4	33.3	47.0	742	38.1	60.9	35.0
Unknown	3	42.9	8.7	369	54.6	8.5	5	41.7	12.1	865	44.5	11.6	0.0
Total	7	100.0	100.0	676	100.0	100.0	. 12	100.0	100.0	1,945	100.0	100.0	100.0
	1	Refinance Loans											
Low	0	0.0	2.9	0	0.0	1.1	0	0.0	3.9	0	0.0	2.2	21.7
Moderate	0	0.0	10.7	0	0.0	6.2	0	0.0	12.0	0	0.0	8.3	21.5
Middle	1	50.0	18.6	155	43.7	14.3	2	40.0	19.5	253	38.8	15.9	21.9
Upper	1	50.0	50.9	200	56.3	58.9	3	60.0	47.5	399	61.2	55.3	35.0
Unknown	0	0.0	16.8	0	0.0	19.4	0	0.0	17.0	0	0.0	18.3	0.0
Total	2	100.0	100.0	355	100.0	100.0	5	100.0	100.0	652	100.0	100.0	100.0
	1				Home	Improve	ment Loans			· · · · · · · · · · · · · · · · · · ·			
Low	0	0.0	4.1	0	0.0	1.8	0	0.0	2.1	0	0.0	0.8	21.7
Moderate	0	0.0	14.9	0	0.0	10.8	0	0.0	12.4	0	0.0	8.2	21.5
Middle	1	33.3	28.4	50	14.6	26.9	0	0.0	18.6	0	0.0	10.4	21.9
Upper	2	66.7	51.4	293	85.4	58.3	4	100.0	64.9	301	100.0	73.0	35.0
Unknown	0	0.0	1.4	0	0.0	2.2	0	0.0	2.1	0	0.0	7.5	0.0
Total	3	100.0	100.0	343	100.0	100.0	4	100.0	100.0	301	100.0	100.0	100.0
					Total He	ome Mor	tgage Loans	3					
Low	0	0.0	3.5	0	0.0	1.4	0	0.0	3.7	0	0.0	1.8	21.7
Moderate	0	0.0	13.3	0	0.0	7.9	1	4.0	14.2	115	3.1	9.2	21.5
Middle	4	23.5	20.4	361	18.4	15.8	4	16.0	19.8	476	13.0	15.8	21.9
Upper	10	58.8	50.0	1,233	62.8	61.	15	60.0	48.6	2,196	60.1	58.9	35.0
Unknown	3	17.6	12.9	369	18.8	13.8	5	20.0	13.8	865	23.7	14.3	0.0
Total	17	100.0	100.0	1,963	100.0	100.0	25	100.0	100.0	3,652	100.0	100.0	100.0
													•

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Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
		Ass	essme	nt Area:	Ruthe	rford	County,	NC N	onMS.	A			
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear				m . 1
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	70
		,		-	By F	Reveni	ıe	,	,				
\$1 Million or Less	35	47.9	39.2	2,912	40.0	31.9	25	55.6	58.6	2,663	62.8	44.1	92.1
Over \$1 Million	22	30.1		3,685	50.6		10	22.2		1,129	26.6		6.7
Revenue Unknown	16	21.9		692	9.5		10	22.2		450	10.6		1.2
Total	73	100.0		7,289	100.0		45	100.0		4,242	100.0		100.0
					By L	oan Si	ize						
\$100,000 or Less	50	68.5	87.8	1,808	24.8	33.4	32	71.1	91.9	1,266	29.8	37.4	
\$100,001 - \$250,000	16	21.9	8.0	2,519	34.6	24.7	9	20.0	5.4	1,573	37.1	25.8	
\$250,001 - \$1 Million	7	9.6	4.2	2,962	40.6	41.9	4	8.9	2.7	1,403	33.1	36.8	
Total	73	100.0	100.0	7,289	100.0	100.0	45	100.0	100.0	4,242	100.0	100.0	
		I	By Loa	n Size a	nd Rev	venue	s \$1 Mill	ion or	Less		-		
\$100,000 or Less	25	71.4		960	33.0		17	68.0		737	27.7		
\$100,001 - \$250,000	7	20.0		982	33.7		5	20.0		803	30.2		
\$250,001 - \$1 Million	3	8.6		970	33.3		3	12.0		1,123	42.2		
Total	35	100.0		2,912	100.0		25	100.0		2,663	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

## PPP Loans with no Revenue reported

Rutherford County, NC NonMSA 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	10	90.9%	220	55.7%							
\$100,001 - \$250,000	1	9.1%	175	44.3%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	11	100.0%	395	100.0%							

Rutherford County, NC NonMSA 2021											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	7	100.0%	173	100.0%							
\$100,001 - \$250,000	0	0.0%	0	0.0%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	7	100.0%	173	100.0%							

				Ban	k And A	gregate	Loans By Y	ear					
Geographic			202			]	,		20:	21			Owner Occupied
Income Level	Bank	(	Agg	Bank		Agg	Bank	(	Agg	Bank	1	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
					Hon	ne Purcha	ase Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	4	57.1	12.9	336	49.7	7.8	7	58.3	18.4	930	47.8	12.5	16.
Middle	3	42.9	63.9	340	50.3	55.8	4	33.3	61.6	709	36.5	55.3	78.0
Upper	0	0.0	23.2	0	0.0	36.3	1	8.3	20.0	306	15.7	32.3	5.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	7	100.0	100.0	676	100.0	100.0	12	100.0	100.0	1,945	100.0	100.0	100.
	•			•	ı	Refinance	Loans	-			•		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	50.0	9.5	155	43.7	6.2	2	40.0	13.1	318	48.8	9.6	16.
Middle	1	50.0	69.6	200	56.3	63.5	3	60.0	73.1	334	51.2	69.3	78.0
Upper	0	0.0	20.9	0	0.0	30.4	0	0.0	13.8	0	0.0	21.0	5.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	355	100.0	100.0	5	100.0	100.0	652	100.0	100.0	100.
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	33.3	13.5	100	29.2	10.6	1	25.0	15.5	32	10.6	10.9	16.
Middle	1	33.3	70.3	50	14.6	64.9	3	75.0	69.1	269	89.4	61.4	78.0
Upper	1	33.3	16.2	193	56.3	24.6	0	0.0	15.5	0	0.0	27.8	5.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	3	100.0	100.0	343	100.0	100.0	4	100.0	100.0	301	100.0	100.0	100.
					М	ultifamily	Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	4	57.1	33.3	943	26.4	8.1	39.4
Middle	2	100.0	100.0	596	100.0	100.0	3	42.9	66.7	2,630	73.6	91.9	49.8
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	10.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	596	100.0	100.0	7	100.0	100.0	3,573	100.0	100.0	100.
					Total Ho	me Mortg	jage Loans						Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	7	36.8	11.6	792	30.9	7.3	15	46.9	15.7	2,402	33.2	11.	16.
Middle	11	57.9	67.4	1,574	61.5	60.1	15	46.9	68.0	4,117	57.0	62.5	78.0
Upper	1	5.3	21.1	193	7.5	32.6	2	6.3	16.3	706	9.8	26.5	5.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	19	100.0	100.0	2,559	100.0	100.0	32	100.0	100.0	7,225	100.0	100.0	100.

2011-2015 U.S. Census Bureau: American Community Survey

Di	stributio	on of 2					ess Lend ford Cou	0 3			l of Ge	ograp	ohy
				Bank	And A	Aggreg	ate Loar	ns By Y	Year				T. 1.1
Geographic			20	20					20	21			Total
Income	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	ık	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	27	37.0	25.4	3,095	42.5	36.3	15	33.3	22.0	956	22.5	27.5	24.8
Middle	30	41.1	64.1	2,864	39.3	55.6	26	57.8	67.4	2,743	64.7	65.6	66.3
Upper	16	21.9	8.6	1,330	18.2	6.7	4	8.9	8.2	543	12.8	6.5	9.0
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.9	0	0.0	1.3	0	0.0	2.3	0	0.0	0.4	
Total	73	100.0	100.0	7,289	100.0	100.0	45	100.0	100.0	4,242	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

		2021 Golds	boro, NC M	SA AA Den	nographics			
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	,
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	7,207	22.8
Moderate	10	38.5	9,467	30.0	2,607	27.5	5,648	17.9
Middle	13	50.0	17,873	56.6	2,404	13.5	6,136	19.4
Upper	3	11.5	4,260	13.5	254	6.0	12,609	39.9
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	26	100.0	31,600	100.0	5,265	16.7	31,600	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	O	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	18,483	7,606	26.7	41.2	8,146	44.1	2,731	14.8
Middle	28,582	15,947	56.0	55.8	9,939	34.8	2,696	9.4
Upper	6,076	4,926	17.3	81.1	966	15.9	184	3.0
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	53,141	28,479	100.0	53.6	19,051	35.8	5,611	10.6
				Busi	nesses by Tra	ct & Revenue	Size	
	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,409	35.4	1,264	34.7	126	45.8	19	33.9
Middle	2,102	52.9	1,943	53.3	128	46.5	31	55.4
Upper	465	11.7	438	12.0	21	7.6	6	10.7
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	3,976	100.0	3,645	100.0	275	100.0	56	100.0
Pero	centage of Tota	al Businesses:		91.7		6.9		1.4
				Fa	rms by Tract			
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	29	14.9	27	14.9	2	16.7	0	0.0
Middle	137	70.6	129	71.3	7	58.3	1	100.0
Upper	28	14.4	25	13.8	3	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	194	100.0	181	100.0	12	100.0	1	100.0
	Percentage of	Total Farms:		93.3		6.2		0.5
Source: 2021 FFIEC Census	Da ta							

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	Distribu	tion o	f 2020	and 202	1 Hon	ie Moi	rtgage L	ending	g By Bo	orrower	Incom	ie Lev	el
				Assess	ment.	Area:	Goldsbo	ro, NO	MSA				
				Ban	k And A	ggregate	Loans By Y	'ear					
Borrower			2020						20:			1	Families by
Income Level	Banl	k	Agg	Bank	(	Agg	Banl	K	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$(000) \$% \$% # #% \$(000) \$% \$%								
		1	1		Hon	ne Purch	ase Loans						II.
Low	0	0.0	2.3	0	0.0	1.1	0	0.0	1.6		0.0	0.8	22.8
Moderate	2	100.0	16.9	90	100.0	12.	2	66.7	11.5	305	57.2	7.6	
Middle	0	0.0	30.0	0	0.0	28.0	0	0.0	26.4	0	0.0	23.7	19.4
Upper	0	0.0	39.5	0	0.0	47.7	1	33.3	46.8	228	42.8	54.4	39.9
Unknown	0	0.0	11.3	0	0.0	11.	0	0.0	13.7	0	0.0	13.6	0.0
Total	2	100.0	100.0	90	100.0	100.0	3	100.0	100.0	533	100.0	100.0	100.0
			,		ı	Refinanc	e Loans						
Low	0	0.0	1.6	0	0.0	0.7	0	0.0	1.6	0	0.0	0.7	22.8
Moderate	0	0.0	6.2	0	0.0	3.9	0	0.0	5.5	0	0.0	3.7	17.9
Middle	0	0.0	10.8	0	0.0	7.9	0	0.0	13.5	0	0.0	10.5	19.4
Upper	1	100.0	33.4	86	100.0	34.2	4	100.0	41.7	369	100.0	43.1	39.9
Unknown	0	0.0	47.9	0	0.0	53.3	0	0.0	37.6	0	0.0	42.0	0.0
Total	1	100.0	100.0	86	100.0	100.0	4	100.0	100.0	369	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	1.2	0	0.0	0.6	0	0.0	0.0	0	0.0	0.0	22.8
Moderate	1	100.0	17.3	30	100.0	13.8	0	0.0	7.5	0	0.0	5.7	17.9
Middle	0	0.0	17.3	0	0.0	11.0	0	0.0	16.0	0	0.0	16.3	19.4
Upper	0	0.0	59.3	0	0.0	69.3	1	100.0	76.4	25	100.0	78.0	39.9
Unknown	0	0.0	4.9	0	0.0	5.3	0	0.0	0.0	0	0.0	0.0	0.0
Total	1	100.0	100.0	30	100.0	100.0	1	100.0	100.0	25	100.0	100.0	100.0
					Total H	ome Mor	tgage Loans	5					
Low	0	0.0	1.8	0	0.0	0.9	0	0.0	1.5	0	0.0	0.7	22.8
Moderate	3	60.0	11.3	120	43.3	8.0	3	33.3	8.4	445	41.7	5.8	17.9
Middle	0	0.0	19.7	0	0.0	18.0	0	0.0	19.6	0	0.0	17.6	19.4
Upper	2	40.0	35.9	157	56.7	40.4	6	66.7	45.4	622	58.3	49.5	39.9
Unknown	0	0.0	31.3	0	0.0	32.7	0	0.0	25.0	0	0.0	26.4	0.0
Total	5	100.0	100.0	277	100.0	100.0	9	100.0	100.0	1,067	100.0	100.0	100.0
	-												

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

2021 Dun & Bradstreet Data

Note:

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses															
	Assessment Area: Goldsboro, NC MSA														
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear				T ( )		
			20	20					20	21			Total Businesses		
	Ban	k	Agg	Ban	k	Agg	Ban	Bank		Ban	k	Agg	%		
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, ,		
By Revenue															
\$1 Million or Less 10 66.7 35.5 195 43.0 29.6 5 20.8 47.5 73 13.4 37.1 91.7															
Over \$1 Million	2	13.3		228	50.2		1	4.2		150	27.6		6.9		
Revenue Unknown	3	20.0		31	6.8		18	75.0		320	58.9		1.4		
Total	15	100.0		454	100.0		24	100.0		543	100.0		100.0		
					By L	oan Si	ze								
\$100,000 or Less	14	93.3	86.2	274	60.4	32.3	23	95.8	91.2	393	72.4	35.8			
\$100,001 - \$250,000	1	6.7	8.4	180	39.6	22.5	1	4.2	5.5	150	27.6	21.1			
\$250,001 - \$1 Million	0	0.0	5.4	0	0.0	45.2	0	0.0	3.3	0	0.0	43.1			
Total	15	100.0	100.0	454	100.0	100.0	24	100.0	100.0	543	100.0	100.0			
		1	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				"		
\$100,000 or Less	10	100.0		195	100.0		5	100.0		73	100.0				
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0				
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0				
Total	10	100.0		195	100.0		5	100.0		73	100.0				
Source: 2021 FFIEC C	ensus Data	а													

# PPP Loans with no Revenue reported

Goldsboro, NC MSA 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	1	100.0%	5	100.0%							
\$100,001 - \$250,000	0	0.0%	0	0.0%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	1	100.0%	5	100.0%							

Goldsboro, NC MSA 2021											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	18	100.0%	320	100.0%							
\$100,001 - \$250,000	0	0.0%	0	0.0%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	18	100.0%	320	100.0%							

	istributio		ui			·	Goldsbo	_	•			556.4	r J
				Ban	k And A	ggregate	Loans By Y	ear					
Geographic			202	20					20:	21			Owner Occupied
Income Level	Bank	1	Agg	Bank		Agg	Bank	1	Agg	Bank	1	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	,				Hon	ne Purch	ase Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	100.0	20.4	90	100.0	14.3	1	33.3	21.4	228	42.8	15.9	26.
Middle	0	0.0	52.4	0	0.0	53.1	1	33.3	56.5	120	22.5	57.3	56.
Upper	0	0.0	27.2	0	0.0	32.6	1	33.3	22.2	185	34.7	26.8	17.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	2	100.0	100.0	90	100.0	100.0	3	100.0	100.0	533	100.0	100.0	100.
	,				F	Refinanc	e Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Moderate	0	0.0	15.7	0	0.0	11.4	3	75.0	16.7	252	68.3	12.3	26.
Middle	1	100.0	57.3	86	100.0	56.8	1	25.0	55.7	117	31.7	54.8	56.0
Upper	0	0.0	27.0	0	0.0	31.8	0	0.0	27.6	0	0.0	32.9	17.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	86	100.0	100.0	4	100.0	100.0	369	100.0	100.0	100.
Home Improvement Loans													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	24.7	0	0.0	22.4	0	0.0	25.5	0	0.0	28.6	26.7
Middle	1	100.0	61.7	30	100.0	64.6	1	100.0	50.9	25	100.0	50.4	56.0
Upper	0	0.0	13.6	0	0.0	13.0	0	0.0	23.6	0	0.0	20.9	17.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	30	100.0	100.0	1	100.0	100.0	25	100.0	100.0	100.
					М	ultifamily	Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	58.3	0	0.0	12.6	0	0.0	12.5	0	0.0	2.1	41.
Middle	0	0.0	33.3	0	0.0	86.2	0	0.0	75.0	0	0.0	96.5	58.2
Upper	0	0.0	8.3	0	0.0	1.2	0	0.0	12.5		0.0	1.3	0.8
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0		0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.
	ļ						gage Loans						Owner Occupied
Law	1 1	0.0						0.0	0.0		0.0	0.0	Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	60.0	18.8	161	58.1	13.2	4	44.4	19.2		45.0	14.3	26.
Middle	2	40.0	54.6	116	41.9		4	44.4	55.8	402	37.7	56.5	56.
Upper	0	0.0	26.6	0	0.0	30.0	1	11.		185	17.3	29.2	17.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
<b>Total</b> Source: 2021 FF	5	100.0	100.0	277	100.0	100.0	9	100.0	100.0	1,067	100.0	100.0	100.

2011-2015 U.S. Census Bureau: American Community Survey

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
				Assessi	ment A	Area: (	Goldsbor	ro, NC	MSA						
C 1-i-				Bank	And A	ggreg	ate Loar	ns By Y	(ear				Total		
Geographic			20	20					20	21			Businesses		
Income Level	Ban	Bank Agg Bank Agg Bank Agg Bank Ag													
Level	#	# #% #% \$(000) \$% \$% # #% \$(000) \$% \$%													
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Moderate	5	33.3	33.9	236	52.0	36.0	10	41.7	30.9	262	48.3	30.7	35.4		
Middle	10	66.7	51.8	218	48.0	54.5	13	54.2	54.6	260	47.9	54.1	52.9		
Upper	0	0.0	13.6	0	0.0	8.7	1	4.2	13.8	21	3.9	15.1	11.7		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	0.7	0	0.0	0.8	0	0.0	0.7	0	0.0	0.1			
Total	15	100.0	100.0	454	100.0	100.0	24	100.0	100.0	543	100.0	100.0	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	2021 ]	Hickory-Ler	oir-Morgan	town, NC A	A Demogra	phics		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	7,300	18.1
Moderate	5	16.1	4,351	10.8	1,242	28.5	7,195	17.8
Middle	18	58.1	25,082	62.1	2,779	11.1	8,229	20.4
Upper	8	25.8	10,971	27.2	686	6.3	17,680	43.8
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	31	100.0	40,404	100.0	4,707	11.6	40,404	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	9,190	3,477	8.5	37.8	4,208	45.8	1,505	16.4
Middle	40,853	26,155	64.2	64.0	9,819	24.0	4,879	11.9
Upper	17,777	11,097	27.2	62.4	3,885	21.9	2,795	15.7
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	67,820	40,729	100.0	60.1	17,912	26.4	9,179	13.5
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1,366	19.8	1,140	18.5	215	31.5	11	14.3
Middle	3,274	47.3	2,943	47.8	295	43.2	36	46.8
Upper	2,275	32.9	2,072	33.7	173	25.3	30	39.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	6,915	100.0	6,155	100.0	683	100.0	77	100.0
Perc	entage of Tota	al Businesses:		89.0		9.9		1.1
				Fa	rms by Tract			
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	2	2.1	2	2.2	0	0.0	0	0.0
Middle	69	73.4	66	73.3	3	75.0	0	0.0
Upper	23	24.5	22	24.4	1	25.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	94	100.0	90	100.0	4	100.0	0	0.0
]	Percentage of	Total Farms:		95.7		4.3		0.0
Source: 2021 FFIEC Census I	2-4-							

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu	tion o						-			Incom	e Lev	el
	T		Asse	ssment A			-		gantov	n, NC			
			2020	Ban	k And A	ggregate	Loans By Y	'ear	20	04			
Borrower Income Level	Banl	,		Bank	,	Λαα	Banl			Bank	,	Λαα	Families by Family Income %
Income Level			Agg			Agg			Agg			Agg	anny income 76
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
							ase Loans						
Low	0	0.0	5.8	0	0.0	2.7	0	0.0	4.8	0	0.0	2.4	18.1
Moderate	1	7.1	20.1	139	7.9	13.0	1	8.3	19.7	152	5.9	12.5	17.8
Middle	0	0.0	23.1	0	0.0	18.7	0	0.0	20.7	0	0.0	16.4	20.4
Upper	1	7.1	39.7	249	14.1	55.0	3	25.0	40.6	705	27.3	55.4	43.8
Unknown	12	85.7	11.3	1,377	78.0	10.7	8	66.7	14.3	1,729	66.9	13.4	0.0
Total	14	100.0	100.0	1,765	100.0	100.0	12	100.0	100.0	2,586	100.0	100.0	100.0
			ı		I	Refinanc	e Loans						
Low	0	0.0	3.6	0	0.0	1.7	0	0.0	4.4	0	0.0	2.1	18.1
Moderate	0	0.0	11.0	) 0	0.0	6.4	2	28.6	15.0	288	25.3	9.5	17.8
Middle	2	33.3	17.5	206	27.4	13.0	1	14.3	19.1	127	11.2	14.5	20.4
Upper	1	16.7	46.3	96	12.8	56.4	1	14.3	44.2	250	21.9	55.7	43.8
Unknown	3	50.0	21.5	449	59.8	22.5	3	42.9	17.3	474	41.6	18.2	0.0
Total	6	100.0	100.0	751	100.0	100.0	7	100.0	100.0	1,139	100.0	100.0	100.0
	,				Home	Improve	ment Loans	·					
Low	0	0.0	4.5	0	0.0	2.7	0	0.0	3.2	0	0.0	1.9	18.1
Moderate	0	0.0	11.2	2 0	0.0	7.1	1	20.0	12.5	60	11.7	' 10.2	17.8
Middle	0	0.0	21.9	0	0.0	15.7	0	0.0	19.0	0	0.0	14.8	20.4
Upper	3	60.0	58.7	430	79.0	71.7	3	60.0	63.8	305	59.2	68.6	43.8
Unknown	2	40.0	3.7	114	21.0	2.8	1	20.0	1.4	150	29.1	4.4	0.0
Total	5	100.0	100.0	544	100.0	100.0	5	100.0	100.0	515	100.0	100.0	100.0
	•	·			Total H	ome Mor	tgage Loans	5	l.		!		
Low	0	0.0	4.5	0	0.0	2.1	0	0.0	4.6	0	0.0	2.2	18.1
Moderate	2	6.5	14.4	189	5.0	9.2	4	12.9	16.5	500	10.2	10.7	17.8
Middle	3	9.7	19.6	306	8.0	15.3	2	6.5	19.5	157	3.2	15.2	20.4
Upper	9	29.0	43.7	1,382	36.2	55.5	13	41.9	43.9	1,876	38.4	56.0	43.8
Unknown	17	54.8	17.9	1,940	50.8	17.9	12	38.7	15.5	2,353	48.2	15.8	0.0
Total	31	100.0	100.0	3,817	100.0	100.0	31	100.0	100.0	4,886	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

2021 Dun & Bradstreet Data

Note:

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses															
Assessment Area: Hickory-Lenoir-Morgantown, NC															
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear						
			20	20			2021						Total Businesses		
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	%				
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%			
					By F	Reveni	1e								
\$1 Million or Less	59	55.1	36.5	5,277	46.9	22.9	33	34.4	48.6	4,773	41.2	25.8	89.0		
Over \$1 Million	33	30.8		4,599	40.9		24	25.0		3,962	34.2		9.9		
Revenue Unknown	15	14.0		1,366	12.2		39	40.6		2,850	24.6		1.1		
Total															
					By L	oan Si	ze						<u> </u>		
\$100,000 or Less 73 68.2 83.0 2,792 24.8 25.1 65 67.7 88.9 2,578 22.3 28.4															
\$100,001 - \$250,000	22	20.6	9.1	3,448	30.7	21.0	17	17.7	6.0	2,639	22.8	20.1			
\$250,001 - \$1 Million	12	11.2	7.9	5,002	44.5	54.0	14	14.6	5.1	6,368	55.0	51.5			
Total	107	100.0	100.0	11,242	100.0	100.0	96	100.0	100.0	11,585	100.0	100.0			
		I	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less						
\$100,000 or Less	44	74.6		1,416	26.8		25	75.8		1,136	23.8				
\$100,001 - \$250,000	10	16.9		1,576	29.9		3	9.1		482	10.1				
\$250,001 - \$1 Million	5	8.5		2,285	43.3		5	15.2		3,155	66.1				
Total	59	100.0		5,277	100.0		33	100.0		4,773	100.0				
Source: 2021 FFIEC C	Census Dat	a													

# PPP Loans with no Revenue reported

Hickory-Lenoir-Morgantown, NC 2020											
By Loan Size	#	%	\$(000s)	%							
\$100,000 or less	10	83.3%	357	51.6%							
\$100,001 - \$250,000	2	16.7%	335	48.4%							
\$250,001 - \$1 Million	0	0.0%	0	0.0%							
Over \$1 Million	0	0.0%	0	0.0%							
Total	12	100.0%	692	100.0%							

Hickory-Lenoin	Hickory-Lenoir-Morgantown, NC 2021											
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	25	83.3%	717	47.5%								
\$100,001 - \$250,000	5	16.7%	794	52.5%								
\$250,001 - \$1 Million	0	0.0%	0	0.0%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	30	100.0%	1,511	100.0%								

				Ban	k And Ad	ggregate	y-Lenoir <sub>Loans</sub> By Y						
Geographic			202			,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,			20:	21			Owner Occupied
Income Level	Bank	1	Agg	Bank	(	Agg	Bank		Agg	Bank	(	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		J.			Hon	ne Purcha	se Loans						1
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	7.1	7.2	33	1.9	4.5	3	25.0	10.1	454	17.6	6.4	8.5
Middle	6	42.9	57.4	644	36.5	47.2	4	33.3	55.8	616	23.8	47.9	64.2
Upper	7	50.0	35.4	1,088	61.6	48.3	5	41.7	34.1	1,516	58.6	45.7	27.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	1,765	100.0	100.0	12	100.0	100.0	2,586	100.0	100.0	100.0
					F	Refinance	Loans		,		,		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	4.7	0	0.0	2.9	2	28.6	5.2	104	9.1	3.2	8.5
Middle	4	66.7	53.0	552	73.5	44.2	2	28.6	57.4	251	22.0	47.4	64.2
Upper	2	33.3	42.3	199	26.5	52.9	3	42.9	37.4	784	68.8	49.4	27.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	751	100.0	100.0	7	100.0	100.0	1,139	100.0	100.0	100.0
					Home	Improver	nent Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.0	0	0.0	4.4	0	0.0	5.0	0	0.0	2.7	8.5
Middle	1	20.0	55.0	47	8.6	41.0	2	40.0	49.1	90	17.5	36.9	64.2
Upper	4	80.0	40.1	497	91.4	54.6	3	60.0	45.9	425	82.5	60.4	27.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	5	100.0	100.0	544	100.0	100.0	5	100.0	100.0	515	100.0	100.0	100.0
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	100.0	33.3	187	100.0	6.2	0	0.0	29.0	0	0.0	4.4	28.0
Middle	0	0.0	46.7	0	0.0	53.3	1	33.3	41.9	551	20.9	87.2	47.
Upper	0	0.0	20.0	0	0.0	40.5	2	66.7	29.0	2,081	79.1	8.3	24.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	187	100.0	100.0	3	100.0	100.0	2,632	100.0	100.0	100.0
					Total Ho	me Mortg	age Loans						Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	3	9.4	5.8	280	7.0	3.7	5	14.7	7.3	558	7.4	4.7	8.5
Middle	12	37.5	55.1	1,343	33.5	45.9	14	41.2	56.3	1,863	24.8	49.7	64.2
Upper	17	53.1	39.1	2,381	59.5	50.4	15	44.1	36.4	5,097	67.8	45.7	27.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	32	100.0	100.0	4,004	100.0	100.0	34	100.0	100.0	7,518	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

D <sub>1</sub>	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography														
			Asses	ssment A	rea: H	lickor	y-Lenoir	-Morg	antow	n, NC					
	Bank And Aggregate Loans By Year														
Geographic			20	20					20	21			Total		
Income Level	Ban	ık	Agg	Ban	ık	Agg	Ban	ık	Agg	Ban	k	Agg	Businesses		
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%		
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Moderate	20	18.7	21.2	1,360	12.1	28.7	18	18.8	18.9	1,551	13.4	31.5	19.8		
Middle	42	39.3	41.8	4,509	40.1	35.4	46	47.9	45.4	6,377	55.0	33.7	47.3		
Upper	45	42.1	36.1	5,373	47.8	35.3	32	33.3	34.2	3,657	31.6	34.6	32.9		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0.0	0.9	0	0.0	0.7	0	0.0	1.5	0	0.0	0.3			
Total	107	100.0	100.0	11,242	100.0	100.0	96	100.0	100.0	11,585	100.0	100.0	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Innome Categories         Tract Distribution         families by Technology         page 30 modes		202	1 Martin Co	unty, NC No	onMSA AA	Demograph	ics		
Low         0         0         0         0         0         0         0         1,16         2,11         1,16         1,16         2,11         1,16         1,10         <	Income Categories	Tract Dis	stribution	Families by T	Tract Income				
Moderate         1		#	%	#	%	#	%	#	%
Middle	Low	0	0.0	0	0.0	0	0.0	1,400	22.9
Upper         1         1         1         1         1         1         1         2         1         2         4         4         4         0 </td <td>Moderate</td> <td>1</td> <td>16.7</td> <td>711</td> <td>11.6</td> <td>117</td> <td>16.5</td> <td>1,123</td> <td>18.4</td>	Moderate	1	16.7	711	11.6	117	16.5	1,123	18.4
Unknown         0	Middle	4	66.7	4,229	69.2	657	15.5	1,114	18.2
Total AA         Housing Units by Tract           Foreign   Housing Units by Tract           For	Upper	1	16.7	1,167	19.1	227	19.5	2,470	40.4
Housing Units by Trace   T	Unknown	0	0.0	0	0.0	0	0.0	0	0.0
No.	Total AA	6	100.0	6,107	100.0	1,001	16.4	6,107	100.0
Low         π         π         % by tract         % by unit         π         % by unit         π         % by unit           Low         0		Housing			Hous	sing Type by	Tract		
No		Units by	C	wner-occupie	d	Rei	ntal	Vac	cant
Moderate         1,399         776         12.3         55.5         260         18.6         363         25.9           Middle         8,206         4,348         68.7         53.0         2,248         27.4         1,610         19.6           Upper         1,999         1,209         19.0         60.6         432         21.7         353         17.7           Unknown         0		Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Middle	Low	0	0	0.0	0.0	0	0.0	0	0.0
Upper         1,990         1,205         19,00         66,60         432         21,7         333         17.7           Unknown         0	Moderate	1,399	776	12.3	55.5	260	18.6	363	25.9
Unknown         0	Middle	8,206	4,348	68.7	53.0	2,248	27.4	1,610	19.6
Total AA   11,595   6,329   100.0   54.6   2,940   25.4   2,326   20.1	Upper	1,990	1,205	19.0	60.6	432	21.7	353	17.7
Total Businesse by Tract   Less Than or \$1 Million   Nover \$1 Milli	Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Position	Total AA	11,595	6,329	100.0	54.6	2,940	25.4	2,326	20.1
Less Than or = \$1 Million   Over \$1 Million   Over \$1 Million   Over \$1 Million   Revenue Not Reported					Busi	nesses by Tra	ct & Revenue	Size	
Low         0         0.0         0         0.0		Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
Moderate         40         5.4         35         5.2         0         0.0         5         29.4           Middle         592         80.1         540         80.0         41         87.2         11         64.7           Upper         107         14.5         100         14.8         6         12.8         1         59           Unknown         0         0.0         0         0         0         0         0         0         0         0           Percutage of Total AA         739         100.0         675         100.0         47         100.0         17         100.0           Percutage of Total Businesses:         91.3         6.4         100.0         2.3           Total Farms by Tract         Less Than or = \$1 Million         Over \$1 Million         Revenue Not Reported           Low         0         0         0         0         0         0         0         0           Low         0         0         0         0         0         0         0         0         0         0           Moderate         2         19.0         19         19.2         1         16.7		#	%	#	%	#	%	#	%
Middle         592         80.1         540         80.0         41         87.2         11         64.7           Upper         107         14.5         100         14.8         6         12.8         1         5.9           Unknown         0         0.0         0         0         0         0         0.0         0	Low	0	0.0	0	0.0	0	0.0	0	0.0
Upper         107         14.5         100         14.8         6         12.8         1         5.9           Unknown         0         0.0         0         0.0         0         0         0.0         0.0           Total AA         739         100.0         675         100.0         47         100.0         17         100.0           Percentage of Total Businesses:         Farms by Tract Revenue Size           Total Farms by Tract         Revenue Note Reported           #         %         #         %         #         %         #         %           Low         0         0         0         0         0         0         0         0         0         0           Moderate         20         19.0         19         19.2         1         16.7         0         0         0           Middle         6         57.1         58         58.6         2         33.3         0         0         0           Upper         25         23.8         22         22.2         3         50.0         0         0         0           Unknown         0         0	Moderate	40	5.4	35	5.2	0	0.0	5	29.4
Unknown         0         0.0         0	Middle	592	80.1	540	80.0	41	87.2	11	64.7
Total AA   739   100.0   675   100.0   47   100.0   17   100.0	Upper	107	14.5	100	14.8	6	12.8	1	5.9
Percentage of Total Businesses:   91.3   6.4   2.3	Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total Farms by Tract   Less Than or = \$1 Million   Over \$1 Million   Over \$1 Million   Revenue Nover Reported	Total AA	739	100.0	675	100.0	47	100.0	17	100.0
Total Farms by Tract   Less Than or = \$1 Million   Over \$1 Million   Over \$1 Million   Revenue Note Reported	Perc	entage of Tota	al Businesses:		91.3		6.4		2.3
Less Than or = \$1 Million   Over \$1 Million   Revenue Not Reported					Fa	rms by Tract			
Low         0         0.0         0         0.0         0         0.0         0         0         0.0           Moderate         20         19.0         19         19.2         1         16.7         0         0.0           Middle         60         57.1         58         58.6         2         33.3         0         0.0           Upper         25         23.8         22         22.2         3         50.0         0         0.0           Unknown         0         0.0         0         0         0         0         0         0.0           Total AA         105         100.0         99         100.0         6         100.0         0         0.0		Total Farm	ns by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
Moderate         20         19.0         19         19.2         1         16.7         0         0.0           Middle         60         57.1         58         58.6         2         33.3         0         0.0           Upper         25         23.8         22         22.2         3         50.0         0         0.0           Unknown         0         0.0         0         0         0         0         0         0           Total AA         105         100.0         99         100.0         6         100.0         0         0.0		#	%	#	%	#	%	#	%
Middle         60         57.1         58         58.6         2         33.3         0         0.0           Upper         25         23.8         22         22.2         3         50.0         0         0.0           Unknown         0         0.0         0         0         0         0         0         0           Total AA         105         100.0         99         100.0         6         100.0         0         0.0	Low	0	0.0	0	0.0	0	0.0	0	0.0
Upper         25         23.8         22         22.2         3         50.0         0         0.0           Unknown         0         0.0         0         0.0         0	Moderate	20	19.0	19	19.2	1	16.7	0	0.0
Unknown         0         0.0         0         0.0         0         0.0         0         0.0           Total AA         105         100.0         99         100.0         6         100.0         0         0.0	Middle	60	57.1	58	58.6	2	33.3	0	0.0
Total AA 105 100.0 99 100.0 6 100.0 0 0.0	Upper	25	23.8	22	22.2	3	50.0	0	0.0
	Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Percentage of Total Farms: 94.3 5.7 0.0	Total AA	105	100.0	99	100.0	6	100.0	0	0.0
		Percentage of	Total Farms:		94.3		5.7		0.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu	tion o	f 2020	and 202	1 Hom	ie Moi	rtgage L	ending	By Bo	orrower	Incom	ie Lev	el
			As	sessmen	t Area	: Mar	tin Coun	ty, NC	NonN	<b>ASA</b>			
				Ban	k And A	ggregate	Loans By Y	'ear					
Borrower			2020						20:				Families by
Income Level	Banl	k	Agg	Bank	(	Agg	Ban	k	Agg	Bank	(	Agg	Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		1			Hon	ne Purch	ase Loans			1			ı
Low	0	0.0	6.0	0	0.0	3.4	0	0.0	6.7	0	0.0	4.4	22.9
Moderate	0	0.0	23.8	0	0.0	18.3	0	0.0	20.6	0	0.0	16.3	18.4
Middle	0	0.0	36.4	0	0.0	36.4	0	0.0	24.9	0	0.0	21.7	18.2
Upper	0	0.0	28.5	0	0.0	35.9	0	0.0	33.5	0	0.0	42.5	40.4
Unknown	0	0.0	5.3	0	0.0	6.1	0	0.0	14.4	0	0.0	15.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					ı	Refinanc	e Loans						
Low	0	0.0	1.3	0	0.0	0.8	0	0.0	3.0	0	0.0	2.0	22.9
Moderate	0	0.0	10.5	0	0.0	7.7	0	0.0	13.0	0	0.0	8.7	18.4
Middle	0	0.0	21.6	0	0.0	19.5	0	0.0	12.4	0	0.0	11.8	18.2
Upper	0	0.0	51.6	0	0.0	54.5	0	0.0	52.7	0	0.0	57.4	40.4
Unknown	0	0.0	15.0	0	0.0	17.4	0	0.0	18.9	0	0.0	20.2	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
	•				Home	Improve	ment Loans	3					
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	22.9
Moderate	0	0.0	26.7	0	0.0	15.	0	0.0	0.0	0	0.0	0.0	18.4
Middle	0	0.0	46.7	0	0.0	37.9	0	0.0	25.0	0	0.0	20.2	18.2
Upper	0	0.0	26.7	0	0.0	47.0	0	0.0	75.0	0	0.0	79.8	40.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Total H	ome Mor	tgage Loan:	S					
Low	0	0.0	3.7	0	0.0	2.1	0	0.0	4.6	0	0.0	3.3	22.9
Moderate	0	0.0	17.0	0	0.0	12.2	0	0.0	16.1	0	0.0	12.9	18.4
Middle	0	0.0	28.0	0	0.0	26.8	0	0.0	19.4	0	0.0	17.8	18.2
Upper	0	0.0	39.7	0	0.0	45.5	0	0.0	42.9	0	0.0	48.8	40.4
Unknown	0	0.0	11.6	0	0.0	13.4	0	0.0	17.0	0	0.0	17.3	0.0
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
	•												

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses														
Assessment Area: Martin County, NC NonMSA														
				Bank	And A	ggreg	ate Loai	ns By Y	(ear				T . 1	
			20	20					20	21			Total Businesses	
	Ban	ık	Agg	Ban	Bank Agg Bank Agg Bank Agg									
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%	
	•				By F	Reveni	1e							
\$1 Million or Less	3	42.9	47.9	95	21.3	40.5	2	50.0	54.1	117	26.7	47.6	91.3	
Over \$1 Million	3	42.9		174	39.0		1	25.0		300	68.5		6.4	
Revenue Unknown	1	14.3		177	39.7		1	25.0		21	4.8		2.3	
Total	7	100.0		446	100.0		4	100.0		438	100.0		100.0	
					By L	oan Si	ze							
\$100,000 or Less	6	85.7	81.3	269	60.3	32.1	3	75.0	91.8	138	31.5	44.5		
\$100,001 - \$250,000	1	14.3	12.8	177	39.7	27.7	0	0.0	4.9	0	0.0	19.8		
\$250,001 - \$1 Million	0	0.0	5.9	0	0.0	40.1	1	25.0	3.3	300	68.5	35.7		
Total	7	100.0	100.0	446	100.0	100.0	4	100.0	100.0	438	100.0	100.0		
		1	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less					
\$100,000 or Less	3	100.0		95	100.0		2	100.0		117	100.0			
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0			
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0			
Total	3	100.0		95	100.0		2	100.0		117	100.0			

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

### PPP Loans with no Revenue reported

Martin County, NC NonMSA 2020												
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	0	0.0%	0	0.0%								
\$100,001 - \$250,000	0	0.0%	0	0.0%								
\$250,001 - \$1 Million	0	0.0%	0	0.0%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	0	0.0%	0	0.0%								

Martin Cou	Martin County, NC NonMSA 21											
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	1	100.0%	21	100.0%								
\$100,001 - \$250,000	0	0.0%	0	0.0%								
\$250,001 - \$1 Million	0	0.0%	0	0.0%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	1	100.0%	21	100.0%								

				sessmen Ban			Loans By Y	•					
Geographic			202						20:	21			Owner Occupied
Income Level	Bank	(	Agg	Bank		Agg	Bank	(	Agg	Bank	ĭ	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	!	J.			Hon	ne Purcha	se Loans						1
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	9.9	0	0.0	9.8	0	0.0	12.4	0	0.0	11.1	12.
Middle	0	0.0	72.8	0	0.0	73.1	0	0.0	73.7	0	0.0	77.3	68.7
Upper	0	0.0	17.2	0	0.0	17.1	0	0.0	13.9	0	0.0	11.0	19.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.
					ı	Refinance	Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	7.8	0	0.0	6.7	0	0.0	7.1	0	0.0	6.6	12.
Middle	0	0.0	77.8	0	0.0	79.7	0	0.0	69.8	0	0.0	71.6	68.7
Upper	0	0.0	14.4	0	0.0	13.5	0	0.0	22.5	0	0.0	21.0	19.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.6	0	0.0	0.9	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.
				-	Home	Improver	ment Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	13.3	0	0.0	18.0	0	0.0	8.3	0	0.0	5.4	12.
Middle	0	0.0	66.7	0	0.0	35.6	0	0.0	75.0	0	0.0	84.9	68.7
Upper	0	0.0	20.0	0	0.0	46.4	0	0.0	16.7	0	0.0	9.7	19.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	96.
Upper	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	3.6
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	100.
					Total Ho	me Morto	jage Loans			•			Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	Units %
Moderate	0	0.0	9.0	0	0.0	7.9	0	0.0	10.1	0	0.0	9.3	12.
Middle	0	0.0	75.5	0	0.0	76.3	0	0.0	71.0	0	0.0	74.4	68.7
Upper	0	0.0	15.5		0.0	15.8	0	0.0	18.7	0	0.0	15.9	19.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.2	0	0.0	0.3	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.

2011-2015 U.S. Census Bureau: American Community Survey

D <sub>1</sub>	ıstrıbutı	on of 2	2020 aı	nd 2021 S	Small	Busine	ess Lend	ıng By	y Incor	ne Level	of Ge	eograp	hy
	Assessment Area: Martin County, NC NonMSA												
	Bank And Aggregate Loans By Year												
Geographic			20	20					20	21			Total
Income	Ban	ık	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	Businesses
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.6	0	0.0	2.0	0	0.0	5.9	0	0.0	5.1	5.4
Middle	6	85.7	75.6	386	86.5	80.0	4	100.0	75.8	438	100.0	79.7	80.1
Upper	1	14.3	16.4	60	13.5	17.2	0	0.0	17.9	0	0.0	15.1	14.5
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	1.4	0	0.0	0.7	0	0.0	0.5	0	0.0	0.1	
Total	7	100.0	100.0	446	100.0	100.0	4	100.0	100.0	438	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	20	021 Parkers	burg-Vienna	, WV AA Do	emographic	S		
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	•
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	4,781	20.5
Moderate	5	19.2	2,099	9.0	524	25.0	3,997	17.1
Middle	15	57.7	15,993	68.6	2,196	13.7	4,732	20.3
Upper	6	23.1	5,233	22.4	329	6.3	9,815	42.1
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	26	100.0	23,325	100.0	3,049	13.1	23,325	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	wner-occupie	d	Rei	ntal	Vac	cant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	0	0	0.0	0.0	0	0.0	0	0.0
Moderate	4,461	2,186	8.5	49.0	1,561	35.0	714	16.0
Middle	27,667	17,374	67.4	62.8	7,446	26.9	2,847	10.3
Upper	8,137	6,231	24.2	76.6	1,394	17.1	512	6.3
Unknown	0	0	0.0	0.0	0	0.0	0	0.0
Total AA	40,265	25,791	100.0	64.1	10,401	25.8	4,073	10.1
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	300	10.7	264	10.4	36	14.6	0	0.0
Middle	1,991	71.0	1,799	70.9	176	71.5	16	69.6
Upper	514	18.3	473	18.7	34	13.8	7	30.4
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	2,805	100.0	2,536	100.0	246	100.0	23	100.0
Perc	entage of Tota	l Businesses:		90.4		8.8		0.8
				Fa	rms by Tract			
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	0	0.0	0	0.0	0	0.0	0	0.0
Moderate	1	2.3	1	2.3	0	0.0	0	0.0
Middle	36	83.7	36	83.7	0	0.0	0	0.0
Upper	6	14.0	6	14.0	0	0.0	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	43	100.0	43	100.0	0	0.0	0	0.0
	Percentage of Total Farms					0.0		0.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu	tion o						_			Incom	e Lev	el
	Τ		A	Assessm					nna, N	/ <b>V</b>			
_			2020	Вап	K And Aç	ggregate	Loans By Y	ear	20:	21			
Borrower Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Families by Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	-
	π	# /0	# /0	Φ(000)			ase Loans	# /0	# /0	φ(000)	Ψ /0	Ψ /0	
Low	2	8.7	12.8	287	5.9	7.4	4	12.9	10.4	272	4.5	5.9	20.5
Moderate	1	4.3	22.1	145	3.0	16.2	6	19.4	21.8	584	9.6	16.2	17.1
Middle	6	26.1	24.1	712	14.8	22.0	2	6.5	23.0	296	4.9	21.6	20.3
Upper	8	34.8	34.1	2,422	50.2	47.3	12	38.7	34.1	3,484	57.3	46.1	42.1
Unknown	6	26.1	6.9	1,260	26.1	7.1	7	22.6	10.6	1,447	23.8	10.2	0.0
Total	23	100.0	100.0	4,826	100.0	100.0	31	100.0	100.0	6,083	100.0	100.0	100.0
	!			<u> </u>	F	Refinanc	e Loans			· ·			
Low	1	2.3	4.8	45	0.5	1.9	3	8.6	5.4	182	3.1	3.0	20.5
Moderate	4	9.1	13.7	281	3.1	8.6	4	11.4	14.0	362	6.3	9.0	17.1
Middle	8	18.2	18.1	1,132	12.6	13.7	5	14.3	19.7	757	13.1	16.2	20.3
Upper	24	54.5	45.8	6,359	70.6	56.0	19	54.3	44.0	3,622	62.6	53.1	42.1
Unknown	7	15.9	17.6	1,185	13.2	19.9	4	11.4	16.9	859	14.9	18.7	0.0
Total	44	100.0	100.0	9,002	100.0	100.0	35	100.0	100.0	5,782	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	12.0	0	0.0	8.8	1	9.1	7.4	68	9.5	4.3	20.5
Moderate	1	10.0	13.9	45	6.4	11.4	2	18.2	17.8	160	22.4	15.2	17.1
Middle	4	40.0	22.2	204	28.8	19.0	1	9.1	24.4	100	14.0	25.0	20.3
Upper	5	50.0	50.9	459	64.8	58.6	7	63.6	48.9	387	54.1	54.8	42.1
Unknown	0	0.0	0.9	0	0.0	2.2	0	0.0	1.5	0	0.0	0.7	0.0
Total	10	100.0	100.0	708	100.0	100.0	11	100.0	100.0	715	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	3					
Low	4	4.5	8.9	403	2.6	4.6	8	9.8	8.0	522	3.9	4.6	20.5
Moderate	7	7.9	17.3	511	3.3	12.	13	15.9	17.9	1,220	9.2	12.9	17.1
Middle	19	21.3	20.5	2,095	13.4	17.4	10	12.2	21.2	1,391	10.5	18.9	20.3
Upper	43	48.3	39.9	10,079	64.4	51.5	40	48.8	39.4	7,793	58.9	49.7	42.1
Unknown	16	18.0	13.3	2,561	16.4	14.5	11	13.4	13.5	2,306	17.4	13.9	0.0
Total	89	100.0	100.0	15,649	100.0	100.0	82	100.0	100.0	13,232	100.0	100.0	100.0

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Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Parkersburg-Vienna, WV													
				Bank	And A	ggreg	ate Loar	ıs By Y	(ear				T 1
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Bank		Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	,0
					By F	Reveni	1e						
\$1 Million or Less	9	3.0	21.5	1,291	3.7	11.5	23	8.9	36.5	1,438	5.5	19.6	90.4
Over \$1 Million	110	36.4		14,867	42.3		135	52.3		19,927	76.8		8.8
Revenue Unknown	183	60.6		18,992	54.0		100	38.8		4,577	17.6		0.8
Total	302	100.0		35,150	100.0		258	100.0		25,942	100.0		100.0
					By L	oan Si	ze			-			
\$100,000 or Less	214	70.9	82.4	7,013	20.0	27.1	194	75.2	86.6	7,148	27.6	33.2	
\$100,001 - \$250,000	52	17.2	10.8	9,047	25.7	24.1	39	15.1	8.8	6,099	23.5	25.9	
\$250,001 - \$1 Million	36	11.9	6.8	19,090	54.3	48.8	25	9.7	4.6	12,695	48.9	40.9	
Total	302	100.0	100.0	35,150	100.0	100.0	258	100.0	100.0	25,942	100.0	100.0	
By Loan Size and Revenues \$1 Million or Less													
\$100,000 or Less	7	77.8		199	15.4		17	73.9		699	48.6		
\$100,001 - \$250,000	0	0.0		0	0.0		6	26.1		739	51.4		
\$250,001 - \$1 Million	2	22.2		1,092	84.6		0	0.0		0	0.0		
Total	9	100.0		1,291	100.0		23	100.0		1,438	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

## PPP Loans with no Revenue reported

Parkersburg-Vienna, WV 2020										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	131	74.4%	3,788	20.9%						
\$100,001 - \$250,000	27	15.3%	4,550	25.1%						
\$250,001 - \$1 Million	18	10.2%	9,790	54.0%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	176	100.0%	18,128	100.0%						

Parkersburg-Vienna, WV 2021										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	77	89.5%	1,996	63.3%						
\$100,001 - \$250,000	9	10.5%	1,155	36.7%						
\$250,001 - \$1 Million	0	0.0%	0	0.0%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	86	100.0%	3,151	100.0%						

				Ban	k And Ad	agregate	Loans By Y	ear					
Geographic			202			, 5. 0 5 4.10			20:	21			Owner Occupied
Income Level	Bank	1	Agg	Bank	1	Agg	Bank		Agg	Bank	(	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
		·			Hon	ne Purcha	ase Loans						I
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	6.5	0	0.0	3.7	0	0.0	7.7	0	0.0	5.3	8.5
Middle	11	47.8	64.8	1,751	36.3	62.8	21	67.7	66.7	4,233	69.6	65.6	67.4
Upper	12	52.2	28.7	3,075	63.7	33.5	10	32.3	25.6	1,850	30.4	29.1	24.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	23	100.0	100.0	4,826	100.0	100.0	31	100.0	100.0	6,083	100.0	100.0	100.0
					ı	Refinance	Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	2.3	3.8	30	0.3	1.9	1	2.9	3.3	82	1.4	1.7	8.5
Middle	31	70.5	63.1	5,306	58.9	61.1	19	54.3	64.6	2,371	41.0	64.1	67.4
Upper	12	27.3	33.1	3,666	40.7	37.0	15	42.9	32.1	3,329	57.6	34.2	24.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	44	100.0	100.0	9,002	100.0	100.0	35	100.0	100.0	5,782	100.0	100.0	100.0
					Home	Improver	ment Loans						
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	5.6	0	0.0	3.1	0	0.0	2.2	0	0.0	2.1	8.5
Middle	6	60.0	59.3	236	33.3	61.7	8	72.7	64.4	513	71.7	68.0	67.4
Upper	4	40.0	35.2	472	66.7	35.2	3	27.3	33.3	202	28.3	29.9	24.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	10	100.0	100.0	708	100.0	100.0	11	100.0	100.0	715	100.0	100.0	100.0
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	10.5	0	0.0	11.5	0	0.0	20.0	0	0.0	18.2	16.3
Middle	0	0.0	68.4	0	0.0	48.5	0	0.0	80.0	0	0.0	81.8	73.3
Upper	0	0.0	21.1	0	0.0	40.0	0	0.0	0.0	0	0.0	0.0	10.4
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
					Total Ho	me Mortg	jage Loans						Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	2	2.2	5.6	70	0.4	3.7	1	1.2	5.5	82	0.6	4.0	8.5
Middle	56	62.9	63.8	7,968	50.9	60.8	53	64.6	65.8	7,769	58.7	65.6	67.4
Upper	31	34.8	30.6	7,611	48.6	35.5	28	34.1	28.7	5,381	40.7	30.5	24.2
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	89	100.0	100.0	15,649	100.0	100.0	82	100.0	100.0	13,232	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Di	Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography												
	Assessment Area: Parkersburg-Vienna, WV												
Caaamambia		Bank And Aggregate Loans By Year											
Geographic			20	20					20	21			Total Businesses
Income	Ban	Bank Agg Bank Agg Bank Agg											
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	42	13.9	11.6	6,786	19.3	15.1	31	12.0	8.8	4,711	18.2	11.9	10.7
Middle	231	76.5	66.2	26,422	75.2	69.6	212	82.2	65.5	20,151	77.7	65.2	71.0
Upper	29	9.6	21.9	1,942	5.5	15.1	15	5.8	25.5	1,080	4.2	22.9	18.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.3	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	
Total	302	100.0	100.0	35,150	100.0	100.0	258	100.0	100.0	25,942	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

		2021 Ric	chmond, VA	AA Demog	raphics			
Income Categories	Tract Dis	tribution	Families by T	Tract Income		overty Level ilies by Tract	Families l	
	#	%	#	%	#	%	#	%
Low	28	11.7	18,081	7.2	6,298	34.8	49,947	19.8
Moderate	52	21.7	45,106	17.8	6,094	13.5	44,227	17.5
Middle	83	34.6	96,444	38.1	6,134	6.4	50,439	20.0
Upper	75	31.3	93,152	36.8	2,112	2.3	108,197	42.8
Unknown	2	0.8	27	0.0	9	33.3	0	0.0
Total AA	240	100.0	252,810	100.0	20,647	8.2	252,810	100.0
	Housing			Hous	sing Type by	Tract		
	Units by	C	)wner-occupie	d	Rental		Vac	ant
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit
Low	38,627	10,616	4.1	27.5	22,802	59.0	5,209	13.5
Moderate	90,873	40,192	15.6	44.2	40,825	44.9	9,856	10.8
Middle	155,707	102,926	40.0	66.1	41,748	26.8	11,033	7.1
Upper	142,055	103,644	40.3	73.0	29,773	21.0	8,638	6.1
Unknown	474	51	0.0	10.8	304	64.1	119	25.1
Total AA	427,736	257,429	100.0	60.2	135,452	31.7	34,855	8.1
				Busi	nesses by Tra	ct & Revenue	Size	
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	3,317	5.8	2,983	5.7	313	8.1	21	4.9
Moderate	11,286	19.9	10,226	19.5	932	24.1	128	29.8
Middle	19,527	34.4	18,163	34.6	1,256	32.5	108	25.1
Upper	22,531	39.7	21,023	40.0	1,337	34.6	171	39.8
Unknown	152	0.3	126	0.2	24	0.6	2	0.5
Total AA	56,813	100.0	52,521	100.0	3,862	100.0	430	100.0
Perc	entage of Tota	al Businesses:		92.4		6.8		0.8
				Fa	rms by Tract			
	Total Farm	is by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported
	#	%	#	%	#	%	#	%
Low	11	1.9	11	1.9	0	0.0	0	0.0
Moderate	76	13.1	76	13.5	0	0.0	0	0.0
Middle	256	44.1	250	44.2	5	33.3	1	100.0
Upper	238	41.0	228	40.4	10	66.7	0	0.0
Unknown	0	0.0	0	0.0	0	0.0	0	0.0
Total AA	581	100.0	565	100.0	15	100.0	1	100.0
	Percentage of Total Farms					2.6		0.2
Source: 2021 FFIEC Census	Data							

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distributio	on of 2021 Ho	~ ~	~ .		ncome Level	
			essment Area Bank And Aggr		l, VA		
Borrower —	Bar		Agg	Bai	nk	Agg	Families by
Income Level	#	#%	#%	\$(000)	\$%	\$%	Family Income %
		,		hase Loans	477	¥ // v	
Low	0	0.0	7.0	0	0.0	4.0	19.8
Moderate	5	12.8	21.9	1,252	6.5	16.2	17.5
Middle	6	15.4	21.6	2,056	10.6	20.3	20.0
Upper	26	66.7	32.4	15,325	79.1	41.6	42.8
Unknown	2	5.1	17.0	736	3.8	18.0	0.0
Total	39	100.0	100.0	19,369	100.0	100.0	100.0
,	ļ.	!	Refinan	ce Loans	,		
Low	1	7.1	6.6	211	2.2	3.9	19.8
Moderate	0	0.0	17.7	0	0.0	13.1	17.5
Middle	1	7.1	20.1	335	3.4	18.0	20.0
Upper	12	85.7	35.3	9,205	94.4	43.6	42.8
Unknown	0	0.0	20.3	0	0.0	21.5	0.0
Total	14	100.0	100.0	9,751	100.0	100.0	100.0
	•	•	Home Improv	vement Loans			•
Low	0	0.0	5.7	0	0.0	3.4	19.8
Moderate	0	0.0	14.4	0	0.0	10.7	17.5
Middle	5	25.0	23.9	439	20.1	18.7	20.0
Upper	15	75.0	52.0	1,749	79.9	62.0	42.8
Unknown	0	0.0	4.1	0	0.0	5.2	0.0
Total	20	100.0	100.0	2,188	100.0	100.0	100.0
		•	Total Home M	lortgage Loans	3		
Low	1	1.3	6.7	211	0.7	3.9	19.8
Moderate	5	6.3	19.0	1,252	3.9	14.3	17.5
Middle	12	15.0	20.7	2,830	8.8	18.9	20.0
Upper	60	75.0	34.8	27,096	84.3	43.0	42.8
Unknown	2	2.5	18.7	736	2.3	19.9	0.0
Total	80	100.0	100.0	32,125	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribut	Distribution of 2021 Small Business Lending By Revenue Size of Businesses											
	Assessment Area: Richmond, VA											
		Ва	nk And Agg	gregate Loa	ns		Total					
	Ba	nk	Agg	Ba	nk	Agg	Businesses					
	#	#%	#%	\$(000)	\$%	\$%	%					
		I	By Revenue									
\$1 Million or Less	2	14.3	49.5	679	25.3	29.7	92.4					
Over \$1 Million	3	21.4		623	23.2		6.8					
Revenue Unknown	9	64.3		1,378	51.4		0.8					
Total	14	100.0		2,680	100.0		100.0					
	-	В	y Loan Size	;								
\$100,000 or Less	6	42.9	91.7	101	3.8	33.7						
\$100,001 - \$250,000	5	35.7	4.5	903	33.7	18.7						
\$250,001 - \$1 Million	3	21.4	3.7	1,676	62.5	47.6						
Total	14	100.0	100.0	2,680	100.0	100.0						
	By Lo	an Size and	Revenues \$	1 Million o	r Less							
\$100,000 or Less	0	0.0		0	0.0							
\$100,001 - \$250,000	0	0.0		0	0.0							
\$250,001 - \$1 Million	2	100.0		679	100.0							
Total	2	100.0		679	100.0							
Courses 2021 FFIFC Course F	\											

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

## PPP Loans with no Revenue reported

Richmond, VA 2021										
By Loan Size	#	%	\$(000s)	%						
\$100,000 or less	6	100.0%	101	100.0%						
\$100,001 - \$250,000	0	0.0%	0	0.0%						
\$250,001 - \$1 Million	0	0.0%	0	0.0%						
Over \$1 Million	0	0.0%	0	0.0%						
Total	6	100.0%	101	100.0%						

D	eistribution (			Lending By I ea: Richmond	ncome Level I, VA	of Geograp	hy
Geographic —			Bank And Agg	gregate Loans			Owner Occupied
Income Level	Ban	ık	Agg	Ba	nk	Agg	Units %
Income Level	#	#%	#%	\$(000)	\$%	\$%	Units %
-	·		Home Pur	chase Loans			
Low	0	0.0	5.2	0	0.0	3.8	4.1
Moderate	3	7.7	16.2	801	4.1	12.6	15.6
Middle	9	23.1	37.5	3,214	16.6	33.1	40.0
Upper	27	69.2	41.1	15,354	79.3	50.5	40.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	39	100.0	100.0	19,369	100.0	100.0	100.0
<u>'</u>		Į.	Refina	nce Loans	<u>!</u>		ı
Low	0	0.0	2.9	0	0.0	2.0	4.1
Moderate	0	0.0	11.7	0	0.0	8.5	15.6
Middle	4	28.6	37.3	1,505	15.4	32.3	40.0
Upper	10	71.4	48.1	8,246	84.6	57.1	40.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	14	100.0	100.0	9,751	100.0	100.0	100.0
				ovement Loans			
Low	1	5.0	2.7	25	1.1	2.3	4.1
Moderate	0	0.0	10.4	0	0.0	8.1	15.6
Middle	7	35.0	34.1	589	26.9	29.0	40.0
Upper	12	60.0	52.8	1,574	71.9	60.3	40.3
Unknown	0	0.0	0.0	0	0.0	0.2	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0.0
Total	20	100.0	100.0	2,188	100.0	100.0	100.0
Total	20	100.0			100.0	100.0	Multi-family
			Multifam	<del>-</del>			Units %
Low	0	0.0	24.8	0	0.0	20.7	17.3
Moderate	2	33.3	35.9	5,400	61.2	27.7	28.1
Middle	1	16.7	24.1	735	8.3	31.6	
Upper	3	50.0	14.5	2,687	30.5	19.7	25.6
Unknown	0	0.0	0.7	0	0.0	0.2	0.5
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	6	100.0	100.0	8,822	100.0	100.0	100.0
		,	Total Home M	ortgage Loans			Owner Occupied Units %
Low	2	2.3	3.7	102	0.2	3.4	4.1
Moderate	5	5.8	13.4	6,201	15.1	11.0	15.6
Middle	24	27.9	37.3	6,317	15.4	32.5	40.0
Upper	55	64.0	45.6	28,327	69.2	53.0	40.3
Unknown	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	
Total	86	100.0	100.0	40,947	100.0	100.0	100.0
Source: 2021 FFIE							1

2011-2015 U.S. Census Bureau: American Community Survey

Distribution of 2021 Small Business Lending By Income Level of Geography													
Assessment Area: Richmond, VA													
Geographic			Total										
Income	Ba	nk	Agg	Ва	nk	Agg	Businesses						
Level	#												
Low	0	0.0	5.0	0	0.0	6.2	5.8						
Moderate	5	35.7	18.3	1,421	53.0	20.4	19.9						
Middle	2	14.3	33.9	505	18.8	31.6	34.4						
Upper	7	50.0	42.2	754	28.1	40.9	39.7						
Unknown	0	0.0	0.2	0	0.0	0.8	0.3						
Tract-Unk	0	0.0	0.6	0	0.0	0.1							
Total	14	100.0	100.0	2,680	100.0	100.0	100.0						

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	202	21 Shenand	oah, VA No	nMSA AA E	Demographic	es					
Income Categories	Tract Dis	Tract Distribution     Families by Tract Income					Families l	•			
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	1,719	14.6			
Moderate	0	0.0	0	0.0	0	0.0	2,060	17.5			
Middle	5	55.6	6,347	54.0	587	9.2	2,362	20.1			
Upper	4	44.4	5,411	46.0	307	5. <i>7</i>	5,617	47.8			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	9	100.0	11,758	100.0	894	7.6	11,758	100.0			
	Housing			Hous	sing Type by	Γract					
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant			
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit			
Low	0	0	0.0	0.0	0	0.0	0	0.0			
Moderate	0	0	0.0	0.0	0	0.0	0	0.0			
Middle	11,484	6,670	53.7	58.1	2,272	19.8	2,542	22.1			
Upper	9,542	5,747	46.3	60.2	2,407	25.2	14.5				
Unknown	0	0	0.0	0.0	0	0.0	0	0.0			
Total AA	21,026	12,417	100.0	59.1	4,679	22.3	3,930	18.7			
				Busi	nesses by Tra	ct & Revenue	Size				
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported			
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	0	0.0			
Moderate	0	0.0	0	0.0	0	0.0	0	0.0			
Middle	1,171	53.9	1,108	54.0	46	50.0	17	60.7			
Upper	1,002	46.1	945	46.0	46	50.0	11	39.3			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	2,173	100.0	2,053	100.0	92	100.0	28	100.0			
Perc	entage of Tota	ıl Businesses:		94.5		4.2		1.3			
				Fa	rms by Tract						
	Total Farm	s by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported			
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0 0.0					
Moderate	0	0.0	0	0.0	0	0.0	0	0.0			
Middle	118	64.8	118	65.2	0	0.0	0	0.0			
Upper	64	35.2	63	34.8	1	1 100.0 0					
Unknown	0	0.0	0	0.0	0	0 0.0 0					
Total AA	182	100.0	181	100.0	1	100.0	0	0.0			
Percentage of Total Farms: 99.5 0.5											

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

Bank And Aggregate Loans By Year		Distribution of 2020 and 2021 Home Mortgage Lending By Borrower Income Level Assessment Area: Shenandoah, VA NonMSA													
Borrower   Income Level   Bank		T		A						NonM	ISA			•	
Note   Part   Part				0000	Ban	k And A	ggregate	Loans By Y	'ear		24				
# #% #% \$(000) \$% \$% # #% \$(000) \$% \$% \$%   # #% #% \$% \$(000) \$% \$% \$%   # #% #% \$% \$(000) \$% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% \$% \$%   # #% #% #% #% \$% \$%   # #% #% #% #% \$% \$%   # #% #% #% #% \$% \$%   # #% #% #% #% #% #% #% #% #% #% #% #% #		Dowl			Danil		A	Dowl					A	Families by	
Home Purchase Loans	IIICOIIIe Level													railing income /6	
Low		#	#%	#%	\$(000)				#%	#%	\$(000)	\$%	\$%		
Moderate         1         100.0         14.6         260         100.0         10.9         0         0.0         14.5         0         0.0         10.9           Middle         0         0.0         21.5         0         0.0         19.7         2         66.7         19.4         410         70.7         17.8           Upper         0         0.0         41.8         0         0.0         47.5         1         33.3         39.0         170         29.3         45.6           Unknown         0         0.0         20.4         0         0.0         20.8         0         0.0         25.4         0         0.0         24.9           Total         1         10.0         260         100.0         100.0         3         100.0         100.0         580         100.0         100.0           Refinance Loans           Low         1         12.5         2.6         99         12.1         1.         1         20.0         27.7         35         7.2         1.4           Moderate         3         37.5         45.1         367         44.8         50.2         2         40.0         4	_	T .						1			_				
Middle         0         0.0         21.5         0         0.0         19.7         2         66.7         19.4         410         70.7         17.8           Upper         0         0.0         41.8         0         0.0         47.5         1         33.3         39.0         170         29.3         45.6           Unknown         0         0.0         20.4         0         0.0         20.8         0         0.0         25.4         0         0.0         24.9           Total         1         100.0         100.0         260         100.0         100.0         3         100.0         100.0         580         100.0         100.0           Refinance Loans           Low         1         12.5         2.6         99         12.1         1.         1         20.0         2.7         35         7.2         1.4           Moderate         3         37.5         10.4         329         40.1         6.8         1         20.0         11.5         13.5         27.8         8.0           Upper         3         37.5         45.1         367         44.8         50.2         2         40.0		0			-									14.6	
Upper		1			-									17.5	
Unknown		1						2						20.1	
Total		+												47.8	
Noderate		0												0.0	
Low	Total	1	100.0	100.0	260				100.0	100.0	580	100.0	100.0	100.0	
Moderate         3         37.5         10.4         329         40.1         6.8         1         20.0         11.5         135         27.8         8.0           Middle         1         12.5         14.8         25         3.0         12.4         0         0.0         18.2         0         0.0         15.6           Upper         3         37.5         45.1         367         44.8         50.2         2         40.0         44.4         285         58.8         50.6           Unknown         0         0.0         27.2         0         0.0         29.9         1         20.0         23.2         30         6.2         24.4           Total         8         100.0         100.0         820         100.0         100.0         5         100.0         100.0         485         100.0         100.0           Home Improvement Loans           Low         1         12.5         2.6         21         4.2         0.7         0         0.0         1.2         0         0.0         1.1           Moderate         1         12.5         2.6         21         4.2         0.7         0         0.0 <td></td> <td></td> <td></td> <td>ı</td> <td></td> <td></td> <td></td> <td>e Loans</td> <td>1</td> <td></td> <td></td> <td></td> <td>1</td> <td>T</td>				ı				e Loans	1				1	T	
Middle	Low	1	12.5	2.6	99	12.1	1.	1	20.0	2.7	35	7.2	1.4	14.6	
Upper         3         37.5         45.1         367         44.8         50.2         2         40.0         44.4         285         58.8         50.6           Unknown         0         0.0         27.2         0         0.0         29.9         1         20.0         23.2         30         6.2         24.4           Total         8         100.0         100.0         820         100.0         100.0         5         100.0         100.0         485         100.0         100.0           Home Improvement Loans           Low         1         12.5         2.6         21         4.2         0.7         0         0.0         1.2         0         0.0         1.1           Moderate         1         12.5         14.3         20         4.0         9.8         0         0.0         10.7         0         0.0         9.7           Middle         0         0.0         18.2         0         0.0         13.7         0         0.0         16.7         0         0.0         8.7           Upper         6         75.0         62.3         460         91.8         71.8         7         87.5	Moderate	3	37.5	10.4	329	40.1	6.8	1	20.0	11.5	135	27.8	8.0	17.5	
Unknown         0         0.0         27.2         0         0.0         29.9         1         20.0         23.2         30         6.2         24.4           Total         8         100.0         100.0         820         100.0         100.0         5         100.0         100.0         485         100.0         100.0           Home Improvement Loans           Low         1         12.5         2.6         21         4.2         0.7         0         0.0         1.2         0         0.0         1.1           Moderate         1         12.5         14.3         20         4.0         9.8         0         0.0         10.7         0         0.0         9.7           Middle         0         0.0         18.2         0         0.0         13.7         0         0.0         16.7         0         0.0         8.7           Upper         6         75.0         62.3         460         91.8         71.8         7         87.5         70.2         570         97.4         80.3           Unknown         0         0.0         2.6         0         0.0         4.0         1         12.5         <	Middle	1	12.5	14.8	25	3.0	12.0	0	0.0	18.2	0	0.0	15.6	20.1	
Total   8   100.0   100.0   820   100.0   100.0   5   100.0   100.0   485   100.0   100.0     Home Improvement Loans	Upper	3	37.5	45.1	367	44.8	50.2	2	40.0	44.4	285	58.8	50.6	47.8	
Home Improvement Loans	Unknown	0	0.0	27.2	0	0.0	29.9	1	20.0	23.2	30	6.2	24.4	0.0	
Low         1         12.5         2.6         21         4.2         0.7         0         0.0         1.2         0         0.0         1.1           Moderate         1         12.5         14.3         20         4.0         9.8         0         0.0         10.7         0         0.0         9.7           Middle         0         0.0         18.2         0         0.0         13.7         0         0.0         16.7         0         0.0         8.7           Upper         6         75.0         62.3         460         91.8         71.6         7         87.5         70.2         570         97.4         80.3           Unknown         0         0.0         2.6         0         0.0         4.0         1         12.5         1.2         15         2.6         0.2           Total         8         100.0         100.0         501         100.0         100.0         8         100.0         100.0         585         100.0         100.0           Total Home Mortgage Loans           Low         2         10.0         2.2         120         7.2         1.1         1         5.0	Total	8	100.0	100.0	820	100.0	100.0	5	100.0	100.0	485	100.0	100.0	100.0	
Moderate         1         12.5         14.3         20         4.0         9.8         0         0.0         10.7         0         0.0         9.7           Middle         0         0.0         18.2         0         0.0         13.7         0         0.0         16.7         0         0.0         8.7           Upper         6         75.0         62.3         460         91.8         71.8         7         87.5         70.2         570         97.4         80.3           Unknown         0         0.0         2.6         0         0.0         4.0         1         12.5         1.2         15         2.6         0.2           Total         8         100.0         100.0         501         100.0         100.0         8         100.0         100.0         585         100.0         100.0           Total Home Mortgage Loans           Low         2         10.0         2.2         12         7.2         1.         1         5.0         2.2         35         1.9         1.           Moderate         6         30.0         12.         634         37.8         8.6         2         10.0						Home	Improve	ment Loans	,					_	
Middle         0         0.0         18.2         0         0.0         13.7         0         0.0         16.7         0         0.0         8.7           Upper         6         75.0         62.3         460         91.8         71.8         7         87.5         70.2         570         97.4         80.3           Unknown         0         0.0         2.6         0         0.0         4.0         1         12.5         1.2         15         2.6         0.2           Total         8         100.0         100.0         501         100.0         100.0         8         100.0         100.0         585         100.0         100.0           Total Home Mortgage Loans           Low         2         10.0         2.2         120         7.2         1.1         1         5.0         2.2         35         1.9         1.1           Moderate         6         30.0         12.         634         37.8         8.6         2         10.0         12.7         150         8.3         9.4           Middle         2         10.0         17.5         75         4.5         15.3         4         20.0	Low	1	12.5	2.6	21	4.2	0.7	0	0.0	1.2	0	0.0	1.1	14.6	
Upper         6         75.0         62.3         460         91.8         71.8         7         87.5         70.2         570         97.4         80.3           Unknown         0         0.0         2.6         0         0.0         4.0         1         12.5         1.2         15         2.6         0.2           Total         8         100.0         100.0         501         100.0         100.0         8         100.0         100.0         585         100.0         100.0           Total Home Mortgage Loans           Low         2         10.0         2.2         120         7.2         1.1         1         5.0         2.2         35         1.9         1.1           Moderate         6         30.0         12.         634         37.8         8.6         2         10.0         12.7         150         8.3         9.4           Middle         2         10.0         17.5         75         4.5         15.3         4         20.0         18.9         509         28.1         16.6	Moderate	1	12.5	14.3	20	4.0	9.8	0	0.0	10.7	0	0.0	9.7	17.5	
Unknown 0 0.0 2.6 0 0.0 4.0 1 12.5 1.2 15 2.6 0.2  Total 8 100.0 100.0 501 100.0 100.0 8 100.0 100.0 585 100.0 100.0   Total Home Mortgage Loans  Low 2 10.0 2.2 120 7.2 1. 1 5.0 2.2 35 1.9 1.1  Moderate 6 30.0 12. 634 37.8 8.6 2 10.0 12.7 150 8.3 9.4  Middle 2 10.0 17.5 75 4.5 15.3 4 20.0 18.9 509 28.1 16.6	Middle	0	0.0	18.2	0	0.0	13.7	0	0.0	16.7	0	0.0	8.7	20.1	
Total         8         100.0         100.0         501         100.0         100.0         8         100.0         100.0         585         100.0         100.0           Total Home Mortgage Loans           Low         2         10.0         2.2         120         7.2         1.1         1         5.0         2.2         35         1.9         1.1           Moderate         6         30.0         12.         634         37.8         8.6         2         10.0         12.7         150         8.3         9.4           Middle         2         10.0         17.5         75         4.5         15.3         4         20.0         18.9         509         28.1         16.6	Upper	6	75.0	62.3	460	91.8	71.8	7	87.5	70.2	570	97.4	80.3	47.8	
Total Home Mortgage Loans   Low   2   10.0   2.2   120   7.2   1.1   1   5.0   2.2   35   1.9   1.1	Unknown	0	0.0	2.6	0	0.0	4.0	1	12.5	1.2	15	2.6	0.2	0.0	
Low         2         10.0         2.2         120         7.2         1.         1         5.0         2.2         35         1.9         1.           Moderate         6         30.0         12.         634         37.8         8.6         2         10.0         12.7         150         8.3         9.4           Middle         2         10.0         17.5         75         4.5         15.3         4         20.0         18.9         509         28.1         16.6	Total	8	100.0	100.0	501	100.0	100.0	8	100.0	100.0	585	100.0	100.0	100.0	
Moderate         6         30.0         12.1         634         37.8         8.6         2         10.0         12.7         150         8.3         9.4           Middle         2         10.0         17.5         75         4.5         15.3         4         20.0         18.9         509         28.1         16.6						Total H	ome Mor	tgage Loans	s						
Middle 2 10.0 17.5 75 4.5 15.3 4 20.0 18.9 509 28.1 16.6	Low	2	10.0	2.2	120	7.2	1.	1	5.0	2.2	35	1.9	1.1	14.6	
	Moderate	6	30.0	12.1	634	37.8	8.6	2	10.0	12.7	150	8.3	9.4	17.5	
Upper         10         50.0         43.8         847         50.5         48.7         11         55.0         42.8         1,075         59.3         48.4	Middle	2	10.0	17.5	75	4.5	15.3	4	20.0	18.9	509	28.1	16.6	20.1	
	Upper	10	50.0	43.8	847	50.5	48.7	11	55.0	42.8	1,075	59.3	48.4	47.8	
Unknown         0         0.0         24.4         0         0.0         26.2         2         10.0         23.5         45         2.5         24.4	Unknown	0	0.0	24.4	0	0.0	26.2	2	10.0	23.5	45	2.5	24.4	0.0	
Total 20 100.0 100.0 1,676 100.0 100.0 20 100.0 100.0 1,814 100.0 100.0	Total	20	100.0	100.0	1,676	100.0	100.0	20	100.0	100.0	1,814	100.0	100.0	100.0	

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Shenandoah, VA NonMSA													
				Bank	And A	ggreg	gate Loar	ıs By Y	<b>Year</b>				m . 1
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	ık	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	, 0
				•	By F	Reveni	ue	,					
\$1 Million or Less	3	8.8	33.7	165	8.4	21.7	18	36.7	60.3	1,109	50.1	57.0	94.5
Over \$1 Million	3	8.8		735	37.5		4	8.2		178	8.0		4.2
Revenue Unknown	28	82.4		1,058	54.0		27	55.1		927	41.9		1.3
Total	34	100.0		1,958	100.0		49	100.0		2,214	100.0		100.0
					By L	oan Si	ize						
\$100,000 or Less	30	88.2	92.5	989	50.5	40.7	46	93.9	94.9	1,311	59.2	44.2	
\$100,001 - \$250,000	3	8.8	4.3	406	20.7	19.4	2	4.1	3.0	444	20.1	18.2	
\$250,001 - \$1 Million	1	2.9	3.2	563	28.8	39.9	1	2.0	2.1	459	20.7	37.6	
Total	34	100.0	100.0	1,958	100.0	100.0	49	100.0	100.0	2,214	100.0	100.0	
		]	By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	3	100.0		165	100.0		16	88.9		450	40.6		
\$100,001 - \$250,000	0	0.0		0	0.0		1	5.6		200	18.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		1	5.6		459	41.4		
Total	3	100.0		165	100.0		18	100.0		1,109	100.0		

# 2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

Percentages may not total 100.0 percent due to rounding. Note:

Source: 2021 FFIEC Census Data

### PPP Loans with no Revenue reported

Shenandoah, VA NonMSA 2020												
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	24	92.3%	766	75.0%								
\$100,001 - \$250,000	2	7.7%	256	25.0%								
\$250,001 - \$1 Million	0	0.0%	0	0.0%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	26	100.0%	1,022	100.0%								

Shenandoah, VA NonMSA 2021												
By Loan Size	#	%	\$(000s)	%								
\$100,000 or less	25	96.2%	583	70.5%								
\$100,001 - \$250,000	1	3.8%	244	29.5%								
\$250,001 - \$1 Million	0	0.0%	0	0.0%								
Over \$1 Million	0	0.0%	0	0.0%								
Total	26	100.0%	827	100.0%								

			Α	ssessme	nt Are	a: She	nandoal	h, VA	NonM	[SA			
					k And A	gregate	Loans By Y	ear					
Geographic			202						20:				Owner Occupied
Income Level	Bank	(	Agg	Bank	Ĭ	Agg	Bank	(	Agg	Bank	(	Agg	Units %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	1 1			ı			ase Loans						T
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	1	100.0	50.0	260	100.0	49.3	3	100.0	46.7	580	100.0	45.5	53.7
Upper	0	0.0	50.0	0	0.0	50.7	0	0.0	53.3	0	0.0	54.5	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	1	100.0	100.0	260	100.0	100.0	3	100.0	100.0	580	100.0	100.0	100.0
	<del>                                     </del>			ı		Refinance							<u> </u>
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	3	37.5	52.2	175	21.3	51.4	3	60.0	49.3	355	73.2	48.3	53.7
Upper	5	62.5	47.8	645	78.7	48.6	2	40.0	50.7	130	26.8	51.7	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	820	100.0	100.0	5	100.0	100.0	485	100.0	100.0	100.0
				1	Home	Improve	ment Loans						Ī
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	5	62.5	51.9	311	62.1	38.9	2	25.0	52.4	100	17.1	53.2	53.7
Upper	3	37.5	48.1	190	37.9	61.	6	75.0	47.6	485	82.9	46.8	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	8	100.0	100.0	501	100.0	100.0	8	100.0	100.0	585	100.0	100.0	100.0
					M	ultifamily	Loans						Multi-family Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	0	0.0	0.0	0	0.0	0.0	0	0.0	100.0	0	0.0	100.0	49.9
Upper	0	0.0	100.0	0	0.0	100.0	0	0.0	0.0	0	0.0	0.0	50.
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	0	0.0	100.0	100.0
	!!				Total Ho	me Morto	gage Loans						Owner Occupied Units %
Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Middle	11	55.0	50.9	816	48.7	49.9	11	55.0	48.3	1,177	64.9	47.7	53.7
Upper	9	45.0	49.1	860	51.3	50.1	9	45.0	51.7	637	35.1	52.3	46.3
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Total	20	100.0	100.0	1,676	100.0	100.0	20	100.0	100.0	1,814	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Distribution of 2020 and 2021 Small Business Lending By Income Level of Geography													hy		
	Assessment Area: Shenandoah, VA NonMSA														
C 1-i-	Bank And Aggregate Loans By Year														
Geographic			20	20					20	21			Total Businesses		
Income	Ban	Bank Agg Bank Agg Bank Agg													
Level	#														
Low	0	0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0 0.0													
Moderate	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Middle	22	64.7	52.6	1,657	84.6	59.4	25	51.0	49.6	1,461	66.0	58.8	53.9		
Upper	12	35.3	46.8	301	15.4	40.1	24	49.0	49.6	753	34.0	40.9	46.1		
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0		
Tract-Unk	0	0 0.0 0.6 0 0.0 0.5 0 0.0 0.8 0 0.0													
Total	34	100.0	100.0	1,958	100.0	100.0	49	100.0	100.0	2,214	100.0	100.0	100.0		

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

	20	21 Weirton	Steubenville	e, WV AA D	emographic	's					
Income Categories	Tract Dis	tribution	Families by	Tract Income		overty Level ilies by Tract	Families l				
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	2,600	17.8			
Moderate	1	7.1	796	5.4	110	13.8	2,752	18.8			
Middle	11	78.6	11,524	78.7	1,295	11.2	3,150	21.5			
Upper	2	14.3	2,314	15.8	167	7.2	6,132	41.9			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	14	100.0	14,634	100.0	1,572	10.7	14,634	100.0			
	Housing			Hous	sing Type by	Tract					
	Units by	C	wner-occupie	d	Rei	ntal	Vac	ant			
	Tract	#	% by tract	% by unit	#	% by unit	#	% by unit			
Low	0	0	0.0	0.0	0	0.0	0	0.0			
Moderate	1,325	818	4.9	61.7	316	23.8	191	14.4			
Middle	20,482	13,072	77.7	63.8	5,321	26.0	2,089	10.2			
Upper	3,565	2,929	17.4	82.2	468	13.1	168	4.7			
Unknown	0	0	0.0	0.0	0	0.0	0	0.0			
Total AA	25,372	16,819	100.0	66.3	6,105	24.1	2,448	9.6			
				Busi	nesses by Tra	ct & Revenue	Size				
	Total Busines	sses by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported			
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	0	0.0			
Moderate	62	3.9	49	3.4	12	9.8	1	3.4			
Middle	1,398	87.2	1,264	87.1	107	87.0	27	93.1			
Upper	143	8.9	138	9.5	4	3.3	1	3.4			
Unknown	0	0.0	0	0.0	0	0.0	0	0.0			
Total AA	1,603	100.0	1,451	100.0	123	100.0	29	100.0			
Perc	centage of Tota	al Businesses:		90.5		7.7		1.8			
				Fa	rms by Tract						
	Total Farm	is by Tract	Less Than or	r = \$1 Million	Over \$1	Million	Revenue No	ot Reported			
	#	%	#	%	#	%	#	%			
Low	0	0.0	0	0.0	0	0.0	0	0.0			
Moderate	0	0.0	0	0.0	0	0.0	0	0.0			
Middle	12	85.7	12	85.7	0	0.0	0	0.0			
Upper	2	14.3	2	14.3	0	0.0	0	0.0			
Unknown	0	0.0	0	0.0	0	0.0	0.0				
Total AA	14	100.0	14	100.0	0	0.0	0	0.0			
	Percentage of	Total Farms:		100.0		0.0		0.0			
Source: 2021 FFIEC Census	D - 1 -										

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Note: Percentages may not total 100.0 percent due to rounding.

	Distribu	tion o									Incom	e Lev	el
			A	ssessme					ville, V	VV			
B			2020	Бап	k And Aç	ggregate	Loans By Y	ear	20:	21			Familian bu
Borrower Income Level	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Bank	(	Agg	Families by Family Income %
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	
	i I			-	Hom	ne Purch	ase Loans			<u> </u>			
Low	1	16.7	8.4	55	10.3	4.6	0	0.0	6.9	0	0.0	3.8	17.8
Moderate	2	33.3	25.4	144	27.1	20.1	2	28.6	25.9	223	38.4	19.3	18.8
Middle	0	0.0	26.0	0	0.0	26.4	0	0.0	22.7	0	0.0	22.4	21.5
Upper	2	33.3	28.0	303	57.0	36.7	2	28.6	31.5	145	25.0	40.4	41.9
Unknown	1	16.7	12.2	30	5.6	12.2	3	42.9	13.0	213	36.7	14.2	0.0
Total	6	100.0	100.0	532	100.0	100.0	7	100.0	100.0	581	100.0	100.0	100.0
		,			F	Refinanc	e Loans		,				
Low	1	16.7	5.6	56	12.8	3.1	2	50.0	5.0	131	49.8	2.9	17.8
Moderate	1	16.7	13.2	68	15.6	9.3	1	25.0	13.7	75	28.5	9.6	18.8
Middle	1	16.7	22.5	53	12.1	18.8	0	0.0	22.7	0	0.0	19.0	21.5
Upper	3	50.0	42.9	260	59.5	50.8	0	0.0	44.5	0	0.0	53.4	41.9
Unknown	0	0.0	15.8	0	0.0	18.0	1	25.0	14.0	57	21.7	15.	0.0
Total	6	100.0	100.0	437	100.0	100.0	4	100.0	100.0	263	100.0	100.0	100.0
					Home	Improve	ment Loans						
Low	0	0.0	8.0	0	0.0	6.2	0	0.0	7.2	0	0.0	6.1	17.8
Moderate	0	0.0	14.0	0	0.0	11.	1 1	50.0	13.3	50	41.7	9.6	18.8
Middle	0	0.0	28.7	0	0.0	22.8	1	50.0	25.3	70	58.3	21.3	21.5
Upper	2	100.0	48.7	33	100.0	57.7	0	0.0	54.2	0	0.0	63.0	41.9
Unknown	0	0.0	0.7	0	0.0	2.2	0	0.0	0.0	0	0.0	0.0	0.0
Total	2	100.0	100.0	33	100.0	100.0	2	100.0	100.0	120	100.0	100.0	100.0
					Total Ho	ome Mor	tgage Loans	3					
Low	2	14.3	7.0	11	1 11.	1 4.0	2	15.4	6.2	131	13.6	3.5	17.8
Moderate	3	21.4	18.4	212	21.2	14.3	4	30.8	19.4	348	36.1	14.5	18.8
Middle	1	7.1	23.8	53	5.3	22.2	1	7.7	22.6	70	7.3	20.5	21.5
Upper	7	50.0	35.5	596	59.5	43.3	2	15.4	38.5	145	15.0	47.0	41.9
Unknown	1	7.1	15.2	30	3.0	16.	4	30.8	13.3	270	28.0	14.5	0.0
Total	14	100.0	100.0	1,002	100.0	100.0	13	100.0	100.0	964	100.0	100.0	100.0

2011-2015 U.S. Census Bureau: American Community Survey

Note: Percentages may not total 100.0 percent due to rounding.

Multifamily loans are not included in the borrower distribution analysis.

Note:

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey Percentages may not total 100.0 percent due to rounding.

Distribution of 2020 and 2021 Small Business Lending By Revenue Size of Businesses													
Assessment Area: Weirton-Steubenville, WV													
				Bank	And A	ggreg	ate Loar	ns By Y	(ear				m . 1
			20	20					20	21			Total Businesses
	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	Ban	k	Agg	%
	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	70
By Revenue													
\$1 Million or Less	1	2.2	33.6	10	0.4	25.3	2	8.0	50.0	33	2.9	24.0	90.5
Over \$1 Million	0	0.0		0	0.0		1	4.0		30	2.6		7.7
Revenue Unknown	45	97.8		2,355	99.6		22	88.0		1,078	94.5		1.8
Total	46	100.0		2,365	100.0		25	100.0		1,141	100.0		100.0
					By L	oan Si	ze						
\$100,000 or Less	42	91.3	86.3	1,188	50.2	30.7	24	96.0	89.8	640	56.1	28.9	
\$100,001 - \$250,000	2	4.3	8.1	430	18.2	23.2	0	0.0	5.1	0	0.0	16.2	
\$250,001 - \$1 Million	2	4.3	5.6	747	31.6	46.1	1	4.0	5.1	501	43.9	54.9	
Total	46	100.0	100.0	2,365	100.0	100.0	25	100.0	100.0	1,141	100.0	100.0	
			By Loa	n Size a	nd Re	venue	s \$1 Mill	ion or	Less				
\$100,000 or Less	1	100.0		10	100.0		2	100.0		33	100.0		
\$100,001 - \$250,000	0	0.0		0	0.0		0	0.0		0	0.0		
\$250,001 - \$1 Million	0	0.0		0	0.0		0	0.0		0	0.0		
Total	1	100.0		10	100.0		2	100.0		33	100.0		

## PPP Loans with no Revenue reported

Weirton-S	teubenville,	WV-OH MS	A 2020	
By Loan Size	#	%	\$(000s)	%
\$100,000 or less	41	91.1%	1,178	50.0%
\$100,001 - \$250,000	2	4.4%	430	18.3%
\$250,001 - \$1 Million	2	4.4%	747	31.7%
Over \$1 Million	0	0.0%	0	0.0%
Total	45	100.0%	2,355	100.0%

Weirton-Steubenville, WV 2021								
By Loan Size	#	%	\$(000s)	%				
\$100,000 or less	21	95.5%	577	53.5%				
\$100,001 - \$250,000	0	0.0%	0	0.0%				
\$250,001 - \$1 Million	1	4.5%	501	46.5%				
Over \$1 Million	0	0.0%	0	0.0%				
Total	22	100.0%	1,078	100.0%				

Part	T			A	Assessme					viiie, V	V V			
Part   Part	-			201		k And A	ggregate	Loans By Y	ear	20	21			
		Rank	(			,	Δαα	Bank	7			7	Δαα	Owner Occupied Units %
Note   Note														23332 /2
Low         0         0.0         0.4         0         0.0         0.2         0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         0.0         6.3           Middle         8         8.33         70.7         4.45         69         13.0         3.2         0         0.0         72.6         58.1         100.0         73.9           Unknown         0         0.0         15.4         0         0.0         10.0         0.0 <th></th> <th>#</th> <th># /0</th> <th># /0</th> <th>\$(000)</th> <th></th> <th></th> <th></th> <th># /0</th> <th># /0</th> <th>\$(000)</th> <th>Ψ /0</th> <th>Ψ /0</th> <th></th>		#	# /0	# /0	\$(000)				# /0	# /0	\$(000)	Ψ /0	Ψ /0	
Moderate	Low	0	0.0	0.4	0			1	0.0	0.0	0	0.0	0.0	0.
Middle		1												4.
Upper         0         0.0         15.4         0         0.0         17.7         0         0.0         16.5         0         0.0         19.8           Unknown         0         0.0         0.0         0         0.0		5							- 1					77.
Unknown	Upper			15.4		0.0		0					19.8	17
Total	• • • • • • • • • • • • • • • • • • • •	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Note	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Low	Total	6	100.0	100.0	532	100.0	100.0	7	100.0	100.0	581	100.0	100.0	100
Moderate						F	Refinanc	e Loans						
Middle	Low	0	0.0	0.4	0	0.0	0.3	0	0.0	0.0	0	0.0	0.0	0.
Upper	Moderate	1	16.7	3.7	53	12.1	3.1	1	25.0	4.0	69	26.2	4.1	4.
Unknown         0         0.0         0.0         0 <t< td=""><td>Middle</td><td>4</td><td>66.7</td><td>77.4</td><td>289</td><td>66.1</td><td>75.6</td><td>2</td><td>50.0</td><td>71.7</td><td>119</td><td>45.2</td><td>71.5</td><td>77.</td></t<>	Middle	4	66.7	77.4	289	66.1	75.6	2	50.0	71.7	119	45.2	71.5	77.
Tract-Unk         0	Upper	1	16.7	18.4	95	21.7	21.	1	25.0	24.2	75	28.5	24.5	17
Total	Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Low	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Low	Total	6	100.0	100.0	437	100.0	100.0	4	100.0	100.0	263	100.0	100.0	100
Moderate         0         0.0         5.3         0         0.0         5.3         0         0.0         3.6         0         0.0         1.7           Middle         2         100.0         77.3         33         100.0         74.0         1         50.0         71.         70         58.3         63.1           Upper         0         0.0         17.3         0         0.0         20.7         1         50.0         25.3         50         41.7         35.2           Unknown         0         0.0 <td>•</td> <td></td> <td></td> <td></td> <td>!</td> <td>Home</td> <td>Improve</td> <td>ment Loans</td> <td></td> <td></td> <td>!</td> <td></td> <td></td> <td>•</td>	•				!	Home	Improve	ment Loans			!			•
Middle	Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Upper	Moderate	0	0.0	5.3	0	0.0	5.3	0	0.0	3.6	0	0.0	1.7	4.5
Unknown	Middle	2	100.0	77.3	33	100.0	74.0	1	50.0	71.1	70	58.3	63.1	77.
Tract-Unk	Upper	0	0.0	17.3	0	0.0	20.7	1	50.0	25.3	50	41.7	35.2	17
Total   2   100.0   100.0   33   100.0   100.0   2   100.0   100.0   120   100.0   100.0	Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.
Multi-family   Low	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	
Low	Total	2	100.0	100.0	33	100.0	100.0	2	100.0	100.0	120	100.0	100.0	100
Low         0         0.0						М	ultifamily	Loans						,
Moderate         0         0.0         25.0         0         0.0         33.4         0         0.0         0.0         0.0         0.0         91.9           Middle         0         0.0         62.5         0         0.0         61.2         0         0.0         80.0         0         0.0         91.9           Upper         0         0.0         12.5         0         0.0         5.4         0         0.0         20.0         0         0.0         81.4           Unknown         0         0.0	Low	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.10 O.10
Middle         0         0.0         62.5         0         0.0         61.2         0         0.0         80.0         0         0.0         91.5           Upper         0         0.0         12.5         0         0.0         5.4         0         0.0         20.0         0         0.0         8.1           Unknown         0         0.0								0				0.0	0.0	1
Upper         0         0.0         12.5         0         0.0         5.4         0         0.0         20.0         0         0.0         8.1           Unknown         0         0.0	Middle	0						0						92.
Unknown         0         0.0 </td <td></td> <td>6.</td>														6.
Tract-Unk         0         0.0		0						0						0.
Description	Tract-Unk	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0		0.0	0.0	
Low		0	0.0		0	0.0	100.0	0	0.0			0.0	100.0	100
Low         0         0.0         0.5         0         0.0         0.3         0         0.0					<u> </u>	Total Ho	me Morte	nage Loans						Owner Occupied
Moderate         2         14.3         4.5         122         12.2         4.2         1         7.7         5.4         69         7.2         5.1           Middle         11         78.6         78.3         78.3         76.8         10         76.9         74.4         770         79.9         72.9           Upper         1         7.1         16.6         95         9.5         18.7         2         15.4         20.2         125         13.0         22.1           Unknown         0         0.0         0.0         0.0         0.0         0.0         0.0         0.0	, 1		2.5		1				2.5	0.0		2.5	0.5	
Middle         11         78.6         78.3         78.5         78.3         76.8         10         76.9         74.4         770         79.9         72.9           Upper         1         7.1         16.6         95         9.5         18.7         2         15.4         20.2         125         13.0         22.1           Unknown         0         0.0         0.0         0.0         0.0         0.0         0.0         0.0								0						0.
Upper         1         7.1         16.6         95         9.5         18.7         2         15.4         20.2         125         13.0         22.1           Unknown         0         0.0<								1						4.
Unknown 0 0.0 0.0 0 0.0 0.0 0 0.0 0.0 0.0 0.0		11												77.
	• •	1												17
Tract-Unk 0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0														0.
Total 14 100.0 100.0 1,002 100.0 100.0 13 100.0 100.0 964 100.0 100.0														100

2011-2015 U.S. Census Bureau: American Community Survey

Di	istributio	on of 2	2020 aı	nd 2021	Small	Busin	ess Lend	ing By	y Incor	ne Level	of Ge	ograp	hy
			A	ssessme	nt Are	a: We	irton-Ste	ubenv	ille, W	/V			
				Bank	And A	ggreg	ate Loai	ns By Y	Year				T- (-1
Geographic			20	20					20	21			Total
Income	Ban	ank Agg Bank Agg Bank Agg Bank Agg					Agg	Businesses					
Level	#	#%	#%	\$(000)	\$%	\$%	#	#%	#%	\$(000)	\$%	\$%	%
Low	0	0.0	1.6	0	0.0	2.3	0	0.0	0.0	0	0.0	0.0	0.0
Moderate	1	2.2	11.8	84	3.6	14.4	0	0.0	4.8	0	0.0	4.5	3.9
Middle	42	91.3	73.4	2,204	93.2	74.0	24	96.0	84.4	1,119	98.1	91.1	87.2
Upper	3	6.5	13.0	77	3.3	9.2	1	4.0	10.7	22	1.9	4.4	8.9
Unknown	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0	0.0	0.0	0.0
Tract-Unk	0	0.0	0.2	0	0.0	0.1	0	0.0	0.2	0	0.0	0.0	
Total	46	100.0	100.0	2,365	100.0	100.0	25	100.0	100.0	1,141	100.0	100.0	100.0

2021 Dun & Bradstreet Data

2011-2015 U.S. Census Bureau: American Community Survey

#### CRA APPENDIX D LOAN, BRANCH, AND DEPOSIT VOLUME BY ASSESSMENT AREA

The following table includes the distribution of branch offices, along with loan and deposit volume, in each assessment area evaluated during the review period. Branch information is current as of the evaluation date, and loan volume includes all reported HMDA, small business, and small farm loans considered in the evaluation. Deposit volume includes all bank deposits and is current as of June 30, 2022.

	HMDA/CRA Loan Volume					nches	Deposit Volume		
Assessment Area	#	%	\$ 000s	%	#	%	\$ 000s	%	
	Mult	i-State M	SAs						
Myrtle Beach-Conway, SC-NC CSA	1,615	7.3%	\$270,556	6.7%	12	5.4%	\$940,090	4%	
Washington-Baltimore-Arlington, DC-VA-MD-WV CSA	8,620	39.2%	\$2,039,067	50.7%	76	34.4%	\$11,329,074	48.7%	
Wheeling, WV-OH MSA	368	1.7%	\$48,219	1.2%	6	2.7%	\$520,156	2.2%	
Charlotte-Concord-Gastonia, NC-SC	815	3.7%	\$158,476	3.9%	7	3.2%	\$534,710	2.3%	
Multi-State Subtotal	11,418	51.9%	\$2,516,318	62.6%	101	45.7%	\$13,324,030	57.3%	
West Virginia Assessment Areas									
Charleston-Huntington-Ashland, WV CSA	2,002	9.1 %	\$292,080	7.3%	14	6.3%	\$1,981,154	8.5%	
Morgantown, WV MSA	1,106	5%	\$166,919	4.2%	6	2.7%	\$1,215,804	5.2%	
Parkersburg-Vienna, WV	731	3.3%	\$89,973	2.2%	4	1.8%	\$738,802	3.2%	
Beckley, WV MSA	428	1.9%	\$49,810	1.2%	6	2.7%	\$493,567	2.1%	
Braxton, WV NonMSA	368	1.7%	\$33,433	0.8%	5	2.3%	\$380,031	1.6%	
Weirton-Steubenville, WV	98	0.5%	\$5,472	0.1%	2	0.9%	\$144,500	0.6%	
West Virginia Subtotal	4,733	21.5%	\$637,687	15.8%	37	16.7%	\$4,953,858	21.3%	
N	orth Caroli	na Assess	ment Areas						
Columbus, NC NonMSA	246	1.1%	\$18,467	0.5%	5	2.3%	\$233,738	1%	
Dare-Pasquotank County, NC NonMSA	178	0.8%	\$21,276	0.5%	3	1.4%	\$109,124	0.5%	
Fayetteville-Sanford-Lumberton, NC	301	1.4%	\$48,338	1.2%	4	1.8%	\$165,535	0.7%	
Goldsboro, NC MSA	53	0.2%	\$2,341	0.1%	2	0.9%	\$55,790	0.2%	
Greenville-Kinston-Washington, NC CSA	526	2.4%	\$53,738	1.3%	7	3.2%	\$339,846	1.5%	
Hickory-Lenoir-Morgantown, NC	273	1.2%	\$34,598	0.9%	1	0.5%	\$62,076	0.3%	
Martin County, NC NonMSA	11	0.05%	\$884	0.02%	0	0%	\$0	0%	
New Bern-Morehead City, NC CSA	237	1.1%	\$34,124	0.8%	3	1.4%	\$154,855	0.7%	
Raleigh-Durham-Cary, NC	383	1.7%	\$75,468	1.9%	2	0.9%	\$95,701	0.4%	
Rocky Mount-Wilson-Roanoke Rapids, NC	255	1.2%	\$29,966	0.7%	3	1.4%	\$150,789	0.6%	
Rutherford County, NC NonMSA	172	0.8%	\$21,631	0.5%	1	0.5%	\$99,996	0.4%	
Wilmington, NC MSA	330	1.5%	\$54,534	1.4%	3	1.4%	\$57,105	0.2%	
North Carolina Subtotal	2,965	13.5%	\$395,365	9.8%	34	15.4%	\$1,524,555	6.6%	
Se	outh Caroli	na Assess	ment Areas						
Charleston-North Charleston, SC MSA	640	2.9%	\$109,270	2.7%	8	3.6%	\$519,950	2.2%	
Columbia, SC	168	0.8%	\$38,060	0.9%	2	0.9%	\$125,369	0.5%	
Greenville-Spartanburg-Anderson, SC	500	2.3%	\$99,641	2.5%	5	2.3%	\$371,845	1.6%	
South Carolina Subtotal	1,308	5.9%	\$246,971	6.1%	15	6.8%	\$1,017,164	4.3%	

	Virginia Assessment Areas								
Charlottesville, VA	362	1.6%	\$51,281	1.3%	3	1.4%	\$301,517	1.3%	
Harrisonburg-Staunton, VA CSA	389	1.8%	\$52,057	1.3%	7	3.2%	\$362,120	1.6%	
Shenandoah, VA NonMSA	129	0.6%	\$8,203	0.2%	2	0.9%	\$79,157	0.3%	
Louisa, Va NonMSA *	17	0.1%	\$6,099	0.2%	1	0.5%	\$126,231	0.5%	
Essex, VA NonMSA*	2	0.01%	\$694	0.02%	1	0.5%	\$148,292	0.6%	
Lynchburg, VA*	4	0.02%	\$610	0.02%	2	0.9%	\$46,057	0.2%	
Northumberland, VA NonMSA*	5	0.02%	\$213	0.01%	2	0.9%	\$66,232	0.3%	
Richmond, VA*	101	0.5%	\$43,677	1.1%	12	5.4%	\$818,349	3.5%	
Virginia Subtotal	1,009	4.6%	\$162,834	4.2%	30	13.6%	\$1,947,955	8.4%	
Pennsylvania Assessment Area									
Pittsburgh, PA	581	2.6%	\$60,185	1.5 %	4	1.8%	\$479,155	2.1%	
Total	22,014	100%	\$4,019,360	100%	221	100%	\$23,246,717	100%	

<sup>\*</sup> Added from the December 2021 acquisition of Essex Bank

# CRA APPENDIX E ASSESSMENT AREA COMPOSITION

Multi-St	tate Assessment Areas	State	County/City	Census Tracts	
		DC	District of Columbia	All	
			Anne Arundel		
			Baltimore		
		MD	Baltimore City	All	
		WID	Howard	All	
Washington-Baltimore-Arlington, DC-VA-MD-WV CSA			Montgomery		
>			Prince George's		
M-O			Alexandria City		
[W-			Arlington		
-VA	Washington-Baltimore-		Clarke		
DC	Arlington, DC-VA-MD-		Fairfax		
on,	WV MSA		Fairfax City		
ingt		VA	Falls Church City	All	
-Arl			Fredericksburg City		
ore.			Loudoun		
ltim			Manassas City		
-Ba			Manassas Park City		
gton			Prince William		
hing			Spotsylvania		
Was			Stafford		
			Warren		
	Hagerstown-Martinsburg,	MD	Washington	All	
	MD-WV MSA	WV	Berkeley	All	
	Winchester, VA-WV MSA	37.4	Frederick	All	
	winchester, vA-w v MSA	VA	Anne Arundel Baltimore Baltimore City Howard Montgomery Prince George's Alexandria City Arlington Clarke Fairfax Fairfax City Falls Church City Fredericksburg City Loudoun Manassas City Manassas Park City Prince William Spotsylvania Stafford Warren Washington Berkeley Frederick Winchester City Brunswick Georgetown Horry Lincoln Gaston Mecklenburg Iredell York Belmont Ohio	All	
		Hamiltonia Annie Arundel Baltimore Baltimore City Howard Montgomery Prince George's  Alexandria City Arlington Clarke Fairfax Fairfax City Falls Church City Fredericksburg City Loudoun Manassas City Manassas Park City Prince William Spotsylvania Stafford Warren  MD Washington  WV Berkeley VA Frederick Winchester City  NC Brunswick Georgetown Horry Lincoln Gaston Mecklenburg Iredell SC York OH Belmont Ohio	All		
Myrtle Beach-0	Conway, SC-NC CSA	SC	Georgetown	All	
		SC	Horry	All	
			Lincoln	All	
		NC	Gaston	All	
Charlotte-Conce	cord-Gastonia, NC-SC	INC	Mecklenburg	All	
	Charlotte-Concord-Gastonia, NC-SC		Iredell	All	
		SC	York	All	
		ОН	Belmont	All	
Wheeling, WV	-OH MSA	11717	Ohio	All	
		VV V	Marshall	All	

Virgin	ia Assessment Areas	State	County/City	Census Tracts
			Chesterfield	All
			Goochland	All
		374	Hanover	All
Richmond, VA			Henrico	All
Kiciiiiolia, VA		VA	King William	All
			King and Queen	All
		VA VA VA VA VA VA	Powhatan	All
			Richmond City	All
الم ما	Hamisanhuna VA MCA	37.4	Harrisonburg City	All
ourg , V	Trainsoliouig, VA WISA	VA	Rockingham	All
Harrisonburg- Staunton, VA CSA	Staunton, VA MSA	VA	Augusta	All
farri taur			Waynesboro City	All
Ξ S			Staunton City	All
Lynchburg, VA		37.4	Lynchburg City	All
Lynchburg, VA	l	VA	Campbell	All
			Charlottesville City	All
Charlottesville,	VA	VA	Greene	All
			Albemarle	All
Essex, VA Non	MSA	VA	Essex	All
Louisa, VA No	nMSA	VA	Louisa	All
Northumberlan	d, VA NonMSA	VA	Northumberland	All
Shenandoah, V	A NonMSA	VA	Shenandoah	All

West Vir	ginia Assessment Areas	State	County/City	Census Tracts
			Boone	All
ton-	Charleston, WV MSA	33/37	Kanawha	All
Charleston-Huntington- Ashland, WV CSA	Charleston, W V WISA	W V	Jackson	All
			Lincoln	All
on-l			Wayne	All
rlest	Huntington-Ashland, WV0KY-OH MSA	WV	Cabell	All
Charl	W VOICE OFF WISH		Putnam	All
	WV NonMSA	WV	Logan	All
	VIVI N.C.A	WV Kanawha Jackson Lincoln Wayne WV Cabell Putnam	All	
Morgantown, V	W V MSA	W V Preston		All
Parkersburg-V	ienna, WV	WV	Wood	All
D1-1 W/V/			Fayette	All
Beckley, WV	WISA	WV	Raleigh	All
			Webster	All
			Lewis	All
			Nicholas	All
Braxton, WV N	NonMSA	WV	Gilmer	All
			Harrison	All
			Braxton	All
			Ritchie	All
Weirton-Steub	enville WV	WV	Hancock	
	enville, w v have branches in OH)			All
	•		Brooke	All
		ОН	Jefferson	All

North Carolina Assessment Areas	State	County/City	Census Tracts
		Pitt	All
Greenville-Kinston-Washington, NC CSA	NC	Lenoir	All
		Beaufort	All
		Durham	All
Raleigh-Durham-Cary, NC	NC	Wake	All
		Johnston	All
Fayetteville-Sanford-Lumberton, NC	NC	Cumberland	All
rayettevine-Samord-Lumberton, NC	NC	Robeson	All
Wilmington, NC MSA	NC	New Hanover	All
winnington, NC WSA	NC	Pender	All
		Carteret	All
New Bern-Morehead City, NC CSA	NC	Craven	All
	NC	Pamlico	All
	Pitt NC Lenoir Beaufort  Durham NC Wake Johnston  Cumberland Robeson  NC New Hanover Pender  Carteret Craven	Jones	All
Hickory-Lenoir-Morgantown, NC	NC	Catawba	All
	NC	Wilson	All
Rocky Mount-Wilson-Roanoke-Rapids, NC	NC	Nash	All
	NC	Edgecombe	All
		Duplin	All
Calumbua NC NauMCA	NC	Columbus	All
Columbus, NC NonMSA	NC	Bladen	All
		Lenoir Beaufort  Durham  Wake Johnston  Cumberland Robeson  New Hanover Pender  Carteret  Craven Pamlico Jones  Catawba  Wilson  Nash Edgecombe Duplin Columbus Bladen Sampson  Martin  Rutherford Pasquotank Dare	All
Martin County, NC NonMSA	NC	Martin	All
Rutherford County, NC NonMSA	NC	Rutherford	All
Dans Barranda Causta NCNa MCA	NC	Pasquotank	All
Dare-Pasquotank County, NC NonMSA	NC	Dare	All
Goldsboro, NC MSA	NC	Wayne	All

South Carolina Assessment Areas	State	County/City	Census Tracts
		Charleston	All
Charleston-North Charleston, SC MSA	SC	Berkeley	All
		Dorchester	All
Crosmyilla Smartanhyura Andarsan SC	SC	Greenville	All
Greenville-Spartanburg-Anderson SC	SC	Spartanburg	All
Columbia SC	SC	Lexington	All
Columbia, SC	SC	Richland	All

Pennsylvania Assessment Area	State	County/City	Census Tracts
Pittsburgh, PA	PA	Fayette	All

# CRA APPENDIX F BRANCH OPENINGS AND CLOSINGS AND ACQUISTION

Excluding the Essex Bank merger activity, the bank opened four branch offices, while closing 15 branch offices since the previous evaluation as outlined below.

Non Merger Branch Openings and Closures								
Assessment Area	Date	Address	City	State	Туре	2021 Income Level		
Charleston-Huntington-Ashland, WV CSA	3/4/2021	550 Emily Dr	Clarksburg	WV	Closed	Upper		
	8/5/2021	1079 Charleston Town Center	Charleston	WV	Closed	Middle		
Charlotte-Concord-Gastonia, NC-SC	1/21/2021	799 West Hwy 27	Lincolnton	NC	Closed	Moderate		
	1/28/2021	202 North Main St	Heath Spring	SC	Closed	Moderate		
Hickory-Lenoir-Morgantown, NC	1/26/2021	9584 North Hwy 10 West	Vale	NC	Closed	Middle		
Martin County, NC NonMSA	2/18/2021	1067 Brentway Blvd	Williamston	NC	Closed	Middle		
Rutherford County, NC NonMSA	10/13/2021	103 Arcade St	Lake Lure	NC	Closed	Upper		
Washington-Baltimore-Arlington, DC-MD- VA-WV CSA	11/6/2020	10830 Balls Ford Rd	Manassas	VA	Closed	Middle		
	11/9/2020	8323 Sudley Rd	Manassas	VA	Opened	Moderate		
	5/21/2021	1100 Connecticut Ave, NW	Washington	DC	Opened	Moderate		
	1/12/2021	6500 Williamsburg Blvd	Arlington	VA	Closed	Upper		
	1/28/2021	16268 Frederick Rd	Gaithersburg	MD	Closed	Middle		
	3/11/2021	907 North Quincy St	Arlington	VA	Closed	Upper		
	5/27/2021	1776 K Street, NW	Washington	DC	Closed	Moderate		
	9/30/2021	250 M Street SE	Washington	DC	Opened	Middle		
	10/21/2021	2030 Old Bridge Rd	Woodbridge	VA	Closed	Middle		
	5/19/2022	7315 Wisconsin Ave	Bethesda	MD	Closed	Upper		
	10/3/2022	6206 Annapolis Rd	Hyattsville	MD	Opened	Moderate		
Wheeling, WV-OH MSA	11/19/2020	1269 Warwood Ave	Wheeling	WV	Closed	Middle		
Wheeling, WV-OH MSA	11/19/2020	1269 Warwood Ave	Wheeling	WV	Closed			

The following table details the 22 branch locations UB opened after the December 2021 acquisition with Essex Bank. As previously stated, UB did not maintain two of the Essex Bank branch locations upon acquisition; neither of which were located in low- or-moderate-income census tracts.

	Acquired Branches from the Essex Banl	k Merger		
Assessment Area	Address	City	State	2021 Income level
Essex, VA NonMSA	1325 Tappahannock Blvd.	Tappahannock	VA	Middle
Louisa, VA NonMSA	217 East Main Street	Louisa	VA	Middle
Lynchburg, VA	3638 Old Forest Road	Lynchburg	VA	Moderate
	21437 Timberlake Road	Lynchburg	VA	Upper
Northumberland, VA NonMSA	14598 Northumberland Hwy.	Burgess	VA	Upper
	654 Northumberland Hwy.	Callao	VA	Middle
Richmond, VA	2730 Buford Road	Richmond	VA	Upper
	9954 Mayland Drive, Suite 2100	Henrico	VA	Upper
	2320 Anderson Highway	Powhatan	VA	Upper
	1949 Sandy Hook Road	Goochland	VA	Middle
	4935 Richmond Tappahannock Hwy.	Aylett	VA	Middle
	100 Broad Street Road	Manakin Sabot	VA	Upper
	6315 Mechanicsville Turnpike	Mechanicsville	VA	Middle
	12640 Stone Village Way	Midlothian	VA	Upper
	9951 Brook Road	Glen Allen	VA	Middle
	12254 W Broad St	Henrico	VA	Upper
	1600 Main Street	West Point	VA	Middle
	3740 Winterfield Road	Midlothian	VA	Upper
	1835 West Street	Annapolis	MD	Middle
Washington-Baltimore-Arlington,	6143 High Bridge Road	Bowie	MD	Upper
DC-MD-VA-WV CSA	2120 Baldwin Avenue	Crofton	MD	Upper
	1230 Race Road	Rosedale	MD	Middle

#### CRA APPENDIX G 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 metropolitan statistical areas. 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 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 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, Office of the Comptroller of the Currency, and the Federal Deposit Insurance Corporation 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, Federal Deposit Insurance Corporation, and Office of the Comptroller of the Currency, 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.

**Distressed nonmetropolitan middle-income census tract:** A middle-income, nonmetropolitan census tract will be designated as distressed if it is in a county that meets one or more of the following triggers: (1) an unemployment rate of at least 1.5 times the national average, (2) a poverty rate of 20.0% or more, or (3) a population loss of 10.0% or more between the previous and most recent decennial census or a net migration loss of 5.0% or more over the 5-year period preceding the most recent census.

**Family:** Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, 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).

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

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan statistical area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of 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 multifamily (five or more families) dwelling loans, loans for the purchase of manufactured homes and refinancing 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 metropolitan statistical area (MSA) or a metropolitan division (MD) as defined by the Office of Management and Budget. A 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. A MD is a division of a MSA based on specific criteria including commuting patterns. Only a 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.

**Multifamily:** 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.

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

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) 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 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.

**Underserved middle-income census tract:** A middle-income, nonmetropolitan census tract will be designated as underserved if it meets criteria for population size, density, and dispersion that indicate the area's population is sufficiently small, thin, and distant from a population center that the tract is likely to have difficulty financing the fixed costs of meeting essential community needs.

**Upper income:** Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.