# PUBLIC DISCLOSURE

March 14, 2022

# COMMUNITY REINVESTMENT ACT PERFORMANCE EVALUATION

The Murray Bank Charter Number 715834

405 South 12<sup>th</sup> Street Murray, Kentucky 42071

Office of the Comptroller of the Currency

10200 Forest Green Boulevard Suite 501 Louisville, Kentucky 40223

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

## Charter Number: 715834

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# **Overall CRA Rating**

#### Institution's CRA Rating: This institution is rated Satisfactory.

#### The lending test is rated: Satisfactory.

The major factors that support this rating include:

- The loan-to-deposit ratio is reasonable given The Murray Bank's (TMB or Bank) size, financial condition, and the credit needs of the Bank's assessment area (AA).
- A substantial majority of the Bank's loans are originated within its AA.
- The overall geographical distribution of loans reflects reasonable dispersion.
- The Bank's distribution of loans to borrowers of different income levels and to small businesses is reasonable.

#### Loan-to-Deposit Ratio

Considering the Bank's size, financial condition, and the credit needs of the AA, the Bank's loan-todeposit (LTD) ratio is reasonable. TMB's LTD ratio averaged 72.2 percent across the nine quarters since the prior CRA evaluation, with a quarterly high of 81.4 percent and a quarterly low of 59.8 percent. The average LTD ratio is on par with findings at the Bank's prior CRA evaluation.

TMB's deposits grew 44.3 percent since the prior CRA evaluation. In part, this growth was due to an influx of federal stimulus payments to individuals in response to the COVID-19 global pandemic. Despite strong local competition, TMB's loan portfolio increased by approximately 6.4 percent, not inclusive of the Bank's participation in the Small Business Administration's Payroll Protection Program (PPP). The Bank originated 1,291 PPP loans totaling \$32.8 million during the evaluation period, which have all been fully forgiven and are no longer reflected in the Bank's LTD ratio.

#### Lending in Assessment Area

A substantial majority of the Bank's loans are inside its AA. Management originated or purchased 91.8 percent of its total loans inside the Bank's AA during the evaluation period.

| Lending Inside and Ou | tside of the | e Assess | ment Area | L    |       |          |          |               |       |          |
|-----------------------|--------------|----------|-----------|------|-------|----------|----------|---------------|-------|----------|
|                       | N            | lumber o | of Loans  |      |       | Dollar A | Amount c | of Loans \$(( | 000s) |          |
| Loan Category         | Inside       |          | Outsi     | de   | Total | Insid    | e        | Outsic        | Total |          |
|                       | #            | %        | #         | %    | #     | \$       | %        | \$            | %     | \$(000s) |
| Home Mortgage         | 9            | 90.0     | 1         | 10.0 | 10    | 974      | 94.0     | 62            | 6.0   | 1,035    |
| Small Business        | 8            | 80.0     | 2         | 20.0 | 10    | 2,431    | 90.9     | 243           | 9.1   | 2,674    |
| Total                 | 17           | 85.0     | 3         | 15.0 | 20    | 3,405    | 91.8     | 305           | 8.2   | 3,710    |

Source: Random sample of home mortgage and business loans from Bank records that were originated between January 1, 2019, and December 31, 2021. Totals may reflect negligible variances due to rounding.

# **Description of Institution**

TMB is a full-service, intrastate financial institution headquartered in Murray, Kentucky. TMB is wholly owned by BancKentucky, Inc., a one-bank holding company also headquartered in Murray, Kentucky. TMB operates three full-service branches in Calloway County, all of which are equipped with fullservice automated teller machines. The Bank also operates five stand-alone cash machines located in businesses throughout Calloway County. TMB has not opened or closed any branches or made any significant changes to its corporate structure since the prior CRA evaluation.

TMB serves Calloway County through an offering of traditional banking products and services. TMB offers a variety of home mortgage, consumer, and business loans. Primary business loan products include those secured by commercial real estate, commercial and industrial loans, and agricultural-related loans. Retail loan products include loans secured by residential real estate, including home equity lines of credit, and other consumer purpose credit. TMB also offers deposit products for individuals and businesses including checking accounts, a variety of savings accounts, and certificates of deposit. Many of the Bank's services can be accessed through mobile and online banking platforms.

As of December 31, 2021, TMB reported \$443.9 million in total assets, \$403.7 million in deposits, \$241.5 million in net loans and leases, and \$36.2 million in tier 1 capital. Net loans and leases represented 57.1 percent of average assets. Loans secured by 1-4 family residential real estate comprised the largest percentage of TMB's loan portfolio at 38.6 percent. This included home equity lines of credit. Commercial real estate loans accounted for 28.0 percent of the Bank's loan portfolio as of December 31, 2021. The remainder of the Bank's portfolio consisted of agricultural loans (13.4 percent), commercial and industrial loans (11.8 percent), construction and development loans (5.2 percent), consumer loans (3.8 percent), and other loans (0.8 percent).

TMB has designated one AA for CRA purposes. The AA includes all of Calloway County, Kentucky, which is not part of a metropolitan statistical area (MSA). The AA includes nine complete census tracts (CT). TMB's AA does not arbitrarily exclude any low- or moderate-income CTs, nor does it reflect illegal discrimination.

TMB faces strong competition for banking services within its AA. Nine Federal Deposit Insurance Corporation (FDIC)-insured institutions operate one or more branches in Calloway County. According to the June 30, 2021, FDIC Market Share Report, TMB ranked first holding 30.7 percent of deposits in the AA, followed by Community Financial Services Bank (24.5 percent), and Trust Bank (11.0 percent). The remaining six institutions each held 10 percent or less of AA deposits.

There are no legal or financial impediments affecting TMB's ability to meet the credit needs of its AA. The last CRA evaluation was performed by the Office of the Comptroller of the Currency (OCC) on July 29, 2019. The Bank received a Satisfactory rating.

# **Scope of the Evaluation**

## **Evaluation Period/Products Evaluated**

We conducted an evaluation of the Bank's CRA performance using the OCC's Small Bank CRA examination procedures. These procedures assess an institution's record of meeting credit needs through

its lending activities. Conclusions regarding the Bank's lending performance were based on a random sample of the Bank's primary lending products originated between January 1, 2019, and December 31, 2021. Our determination of primary products was based on dollar volume rather than number of loans originated during the evaluation period. Business and home mortgage loans accounted for 67.1 and 17.0 percent of originations by dollar volume, respectively.

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

TMB has a single AA, the entirety of Calloway County, Kentucky, which received a full-scope review. Refer to appendix A, *Scope of Examination*, for more information.

## Ratings

The Bank's overall rating is based on the State of Kentucky rating. The State rating is based on the fullscope review of TMB's single AA. In assessing performance, we placed more weight on borrower income distribution and business size as there are no low- and only two moderate income CTs in the AA.

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

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

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

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

# **State Rating**

## State of Kentucky

## CRA rating for the State of Kentucky: Satisfactory

## The Lending Test is rated: Satisfactory

The major factors that support this rating include:

• TMB's LTD ratio is reasonable given the institution's size, financial condition, and credit needs of the AA.

- A substantial majority of the Bank's loans are within its AA.
- TMB's dispersion of home mortgage and small business loans across geographies of different income levels is reasonable
- The Bank's distribution of loans among borrowers of different income levels and businesses of different sizes is reasonable.

# **Description of Institution's Operations in Kentucky**

As previously noted, the Bank operates three branch locations within its sole AA, Calloway County, Kentucky. The AA includes two moderate-, five middle-, and two upper-income CTs. There are no low-income CTs in the Bank's AA. A description of TMB and its operations in Kentucky can be found in the *Description of the Institution* section of this evaluation.

Table A below provides demographic information of TMB's AA. The AA's median family income is slightly below the \$52,600 median figure for the State of Kentucky. According to the Bureau of Labor Statistics, the annual unemployment rates for Calloway County in 2019, 2020, and 2021 were 4.0, 6.2, and 4.3 (preliminary) percent, respectively. These numbers were slightly better in relation to statewide figures across the same period.

One community contact, who heads an agency that provides social services for seniors and low- and moderate-income families in the area, identified housing and job creation as both immediate and long-term needs for the area. As previously noted, TMB was an active PPP lender during the height of the COVID-19 global pandemic, facilitating loans for customers and noncustomers to support job retention for businesses of all sizes. In addition, the Bank's two primary products reflect an ongoing dedication to helping individuals achieve home ownership and to provide financing to local businesses.

| Table A – Der                          | nographic I | nformation    | of the Assessn     | nent Area        |                 |               |
|--|-------------|---------------|--------------------|------------------|-----------------|---------------|
| Ass                                    | sessment Ar | ea: Callow    | ay County          |                  |                 |               |
| Demographic Characteristics            | #           | Low<br>% of # | Moderate<br>% of # | Middle<br>% of # | Upper<br>% of # | NA*<br>% of # |
| Geographies (Census Tracts)            | 9           | 0.0           | 22.2               | 55.6             | 22.2            | 0.0           |
| Population by Geography                | 38,106      | 0.0           | 23.9               | 46.1             | 30.0            | 0.0           |
| Housing Units by Geography             | 18,237      | 0.0           | 27.7               | 44.2             | 28.0            | 0.0           |
| Owner-Occupied Units by Geography      | 9,355       | 0.0           | 11.4               | 50.2             | 38.4            | 0.0           |
| Occupied Rental Units by Geography     | 5,479       | 0.0           | 56.8               | 28.4             | 14.8            | 0.0           |
| Vacant Units by Geography              | 3,403       | 0.0           | 25.6               | 53.4             | 21.0            | 0.0           |
| Businesses by Geography                | 2,915       | 0.0           | 29.5               | 44.3             | 26.1            | 0.0           |
| Farms by Geography                     | 278         | 0.0           | 7.9                | 62.9             | 29.1            | 0.0           |
| Family Distribution by Income Level    | 8,561       | 18.4          | 14.7               | 17.1             | 49.7            | 0.0           |
| Household Distribution by Income Level | 14,834      | 28.7          | 12.1               | 15.4             | 43.8            | 0.0           |

# **Calloway County**

| Median Family Income Non-MSAs - KY   | \$45,986         | Median Housing Value         | \$123,238 |
|--|------------------|------------------------------|-----------|
|  |                  | Median Gross Rent            | \$586     |
|  |                  | Families Below Poverty Level | 13.7%     |
| Source: 2015 ACS Census and 2021 D&B Data<br>Due to rounding, totals may not equal 100.0%<br>(*) The NA category consists of geographies that have not been assigned | ed an income cla | ussification.                |           |

# Scope of Evaluation in Kentucky

The Bank's overall rating is based on a full-scope review of its performance in the Calloway County AA. Please refer to appendix A, *Scope of Examination*, for a description of the AA and the loan products reviewed. In assessing TMB's performance at meeting the credit needs of its sole AA, equal weight was placed on small business and home mortgage loans. Slightly more consideration was given to the Bank's distribution of loans to borrowers of different income levels and businesses of different sizes than to geographical distribution performance. This is due to the AA having no low- and only two-moderate income CTs.

# LENDING TEST

The Bank's performance under the Lending Test in Kentucky is rated Satisfactory.

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

Based on a full-scope review, the Bank's performance in Calloway County is good.

## Distribution of Loans by Income Level of the Geography

The Bank exhibits reasonable geographic distribution of loans in the State.

## Home Mortgage Loans

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

TMB's lending reflected a reasonable dispersion of home mortgage loans across geographies in the Bank's AA. There are no low-income CTs in the AA. The Bank originated 12.2 percent of home mortgage loans to borrowers in moderate-income CTs during the evaluation period. This was on par with both the percentage of owner-occupied housing units in moderate-income CTs (11.4 percent) and the aggregate (14.6 percent) distribution of home mortgage loans.

## Small Loans to Businesses

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

TMB's lending reflected reasonable dispersion of loans to small businesses across geographies in the

Bank's AA. The Bank originated 33.1 percent of small business loans in moderate-income CTs. This figure includes consideration of the PPP loans originated by the Bank across the evaluation period. This is above both percentage of small businesses (29.5 percent) located in moderate-income tracts and the aggregate (30.8 percent) distribution of loans to small businesses.

## Distribution of Loans by Income Level of the Borrower

The Bank exhibits a reasonable distribution of loans to individuals of different income levels and businesses of different sizes, given the product lines offered by the Bank.

## Home Mortgage Loans

Refer to Table P in appendix D for the facts and data used to evaluate the borrower distribution of the Bank's home mortgage loan originations and purchases.

TMB's lending to low- and moderate-income families in its AA is reasonable. The Bank originated 4.1 and 13.2 percent of its home mortgage loans to low- and moderate-income families, respectively. The Bank's percentage of loans to low-income borrowers is considerably lower than the percentage of low-income families in the AA (18.4 percent) but above the aggregate (2.3 percent) comparator. The Bank's percentage of loans to moderate-income borrowers is on par with both the percentage of moderate-income families in the AA (14.7 percent) and the aggregate (11.5 percent) comparator.

#### Small Loans to Businesses

Refer to Table R in appendix D for the facts and data used to evaluate the borrower distribution of the Bank's originations and purchases of small loans to businesses.

TMB's lending reflected a reasonable distribution of loans to businesses of different sizes. Management originated 65.0 percent of loans to businesses with annual revenues of \$1.0 million or less. This was moderately less than the percentage of small businesses (86.6 percent) in the AA but is moderately higher than the aggregate (50.1 percent) comparator.

#### **Responses to Complaints**

TMB did not receive any written complaints regarding its CRA performance during the evaluation period.

# **Appendix A: Scope of Examination**

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the MSAs and non-MSAs that received comprehensive examination review, designated by the term "full-scope," and those that received a less comprehensive review, designated by the term "limited-scope".

| Time Period Reviewed:             | January 1, 2019 – Decembe  | er 31, 2021                                 |  |  |  |  |  |  |  |
|-----------------------------------|----------------------------|---|--|--|--|--|--|--|--|
| <b>Bank Products Reviewed:</b>    | Small business loans and h | mall business loans and home mortgage loans |  |  |  |  |  |  |  |
|                                   |                            |   |  |  |  |  |  |  |  |
| Affiliate(s)                      | Affiliate Relationship     | Products Reviewed                           |  |  |  |  |  |  |  |
| Not applicable                    |                            |   |  |  |  |  |  |  |  |
| List of Assessment Areas and Type | of Examination             |   |  |  |  |  |  |  |  |
| Rating and Assessment Areas       | Type of Exam               | Other Information                           |  |  |  |  |  |  |  |
| Kentucky                          |                            |   |  |  |  |  |  |  |  |
| Calloway County                   | Full-Scope                 |   |  |  |  |  |  |  |  |

# Appendix B: Summary of MMSA and State Ratings

|                 | RATINGS | The Murray Bank     |
|-----------------|---------|---------------------|
| Overall Bank:   |         | Lending Test Rating |
| The Murray Bank |         | Satisfactory        |
| State:          |         |                     |
| Kentucky        |         | Satisfactory        |

# **Appendix C: Definitions and Common Abbreviations**

The following terms and abbreviations are used in this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. For example, a bank subsidiary is controlled by the bank and is, therefore, an affiliate.

**Aggregate Lending (Aggt.):** The number of loans originated and purchased by all reporting lenders (HMDA or CRA) in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the state/assessment area.

**Census Tract (CT):** A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts nest within counties, and their boundaries normally follow visible features, but may follow legal geography boundaries and other non-visible features in some instances, Census tracts ideally contain about 4,000 people and 1,600 housing units.

**Combined Statistical Area (CSA):** A geographic entity consisting of two or more adjacent Core Based Statistical Areas with employment interchange measures of at least 15. An employment interchange measure is a measure of ties between two adjacent entities. The employment interchange measure is the sum of the percentage of workers living in the smaller entity who work in the larger entity and the percentage of employment in the smaller entity that is accounted for by workers who reside in the larger entity.

**Community Development (CD):** Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet Small Business Administration Development Company or Small Business Investment Company programs size eligibility standards or have gross annual revenues of \$1 million or less; or activities that revitalize or stabilize low- or moderate-income geographies, distressed or underserved nonmetropolitan middle-income geographies, or designated disaster areas.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

# **Content of Standardized Tables**

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

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

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

to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents aggregate peer data for the years the data is available. Because aggregate small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.

- Table T.Assessment Area Distribution of Loans to Farms by Gross Annual Revenues -<br/>Compares the percentage distribution of the number of small loans (loans less than or equal<br/>to \$500 thousand) originated and purchased by the bank to farms with revenues of \$1<br/>million or less to: 1) the percentage distribution of farms with revenues of greater than \$1<br/>million; and 2) the percentage distribution of farms for which revenues are not available.<br/>The table also presents aggregate peer small farm data for the years the data is available.
- Table U.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Geography Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the<br/>percentage distribution of households in those geographies.
- Table V.Assessment Area Distribution of Consumer Loans by Income Category of the<br/>Borrower Compares the percentage distribution of the number of loans originated and<br/>purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the<br/>percentage distribution of households by income level in each MMSA/assessment area.

| Table O:<br>Geograp               | hy |                    |               | ſ  |                    |               | I  |                    |           | I  | -                  |           | _  | -                  |           | N / A . 9                                      |                    | 9 -2021   |
|-----------------------------------|----|--------------------|---------------|--|--------------------|---------------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|--|--------------------|-----------|
|                                   | _  | otal Ho<br>tgage ] |               | Low-J  | Income [           | Tracts        | Moderat  | e-Incom            | e Tracts  | Middle   | Income             | Tracts    | Upper-Income Tracts Not Available-In           |                    | ble-Inco  | me Tracts                                      |                    |           |
|                                   | #  | \$                 | % of<br>Total | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate     | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate | % of<br>Owner-<br>Occupied<br>Housing<br>Units | %<br>Bank<br>Loans | Aggregate |
| Calloway<br>County                | 20 | 2,293              | 100.0         | 0.0  | 0.0                | 0.0           | 11.4   | 12.2               | 14.6      | 50.2   | 58.3               | 42.9      | 38.4   | 29.5               | 42.4      | 0.0  | 0.0                | 0.0       |
| Source: 2015 A<br>Due to rounding |    |                    |               |  | l Bank E           | Data, 2020 HM | IDA Aggrega                                    | te Data;           |           | •  |                    | •         | •  |                    | •         | •  |                    |           |

| Table P:<br>Borrowe                |    | sessi             | nent          | Area I           | Distri             | bution o     | of Hom           | e Mo               | rtgage    | Loans            | by In              | come C    | ategor           | y of t             | he        |                  | 2019               | ) – 2021    |
|------------------------------------|----|-------------------|---------------|------------------|--------------------|--------------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-----------|------------------|--------------------|-------------|
|                                    |    | otal H<br>tgage ] | ome<br>Loans  | Low-             | Income I           | Borrowers    | Moderate         | -Income            | Borrowers | Middle-l         | income B           | orrowers  | Upper-I          | ncome B            | orrowers  | Not Availab      | le-Incon           | e Borrowers |
|                                    | #  | \$                | % of<br>Total | % of<br>Families | %<br>Bank<br>Loans | Aggregate    | % of<br>Families | %<br>Bank<br>Loans | Aggregate | % of<br>Families | %<br>Bank<br>Loans | Aggregate | % of<br>Families | %<br>Bank<br>Loans | Aggregate | % of<br>Families | %<br>Bank<br>Loans | Aggregate   |
| Calloway<br>County                 | 20 | 2,199             | 100.0         | 18.4             | 4.1                | 2.3          | 14.7             | 13.2               | 11.5      | 17.1             | 2.6                | 19.1      | 49.7             | 80.2               | 49.9      | 0.0              | 100.0              | 17.2        |
| Source: 2015 AC<br>Due to rounding |    |                   |               |                  | 1 Bank D           | ata, 2020 HM | DA Aggrega       | te Data;           |           |                  |                    |           |                  |                    |           |                  |                    |             |

|                     | Т  | otal Lo<br>Sma |               | Low-            | Income Ti          | racts     | Moderat         | e-Income           | e Tracts  | Middle          | -Income '          | Fracts    | Upper           | -Income            | Fracts    | Not Av          | ailable- I<br>Tracts | ncome    |
|---------------------|----|----------------|---------------|-----------------|--------------------|-----------|-----------------|--------------------|-----------|-----------------|--------------------|-----------|-----------------|--------------------|-----------|-----------------|----------------------|----------|
|                     |    | Busine         |               | 2011            |                    |           |                 |                    |           |                 |                    |           |                 |                    |           |                 | Tracts               |          |
| Assessment<br>Area: | #  | \$             | % of<br>Total | %<br>Businesses | %<br>Bank<br>Loans | Aggregate | %<br>Businesses | %<br>Bank<br>Loans   | Aggregat |
| Calloway<br>County  | 20 | 4,356          | 100.0         | 0.0             | 0.0                | 0.0       | 29.5            | 33.1               | 30.8      | 44.3            | 64.4               | 43.8      | 26.1            | 2.5                | 25.3      | 0.0             | 0.0                  | 0.0      |

| Table R: Assessmer<br>Revenues  | nt Area I | Distribu       | tion of L      | oans to S         | Small Bus       | sinesses l      | by Gross  | Annual                |                    |                 | 2019 –<br>2021             |
|---|-----------|----------------|----------------|-------------------|-----------------|-----------------|-----------|-----------------------|--------------------|-----------------|----------------------------|
|   | т         | 'otal Loans to | Small Business | es                | Businesses      | with Revenues   | s <= 1MM  | Businesses wi<br>> 1M |                    |                 | th Revenues Not<br>ailable |
| Assessment Area:  | #         | \$             | % of Total     | Overall<br>Market | %<br>Businesses | % Bank<br>Loans | Aggregate | %<br>Businesses       | %<br>Bank<br>Loans | %<br>Businesses | % Bank<br>Loans            |
| Calloway County   | 20        | 4,356          | 100.0          | 509               | 86.6            | 65.0            | 50.1      | 3.3                   | 30.0               | 10.2            | 5.0                        |
| Source: 2021 D&B Data; 01/01/201<br>Due to rounding, totals may not equ |           | Bank Data;     | 1              |                   | •               |                 |           |                       | I                  | 1               |                            |